
LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project Statement of Overriding Considerations

The Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Los Angeles International Airport (LAX) United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project at LAX (or airport), pursuant to the California Environmental Quality Act (CEQA). On October 19, 2018, LAWA published the Final EIR for the UAL East Aircraft Maintenance and GSE Project.

The proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Currently UAL performs maintenance in two areas at LAX: West Maintenance Facility (also known as the United Airlines Maintenance Facility, and formerly known as the Continental Airlines Aircraft Maintenance Hangar) and East Maintenance Facility (also known as the United Airlines Maintenance Operations Center or MOC). The West Maintenance Facility is located in the western portion of LAX, south of World Way West approximately 0.7 mile east of Pershing Drive, and the East Maintenance Facility is located south of Century Boulevard, approximately 0.45 mile east of Sepulveda Boulevard. The distance between the two maintenance facilities is approximately 1.6 miles. Both facilities have aircraft service areas, which include enclosed hangars at the West Maintenance Facility, aircraft parking spots, GSE bays and shops, maintenance and inspection rooms and functions, and office and storage space.

UAL proposes to redevelop its existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Following project implementation, it is reasonably foreseeable that UAL's West Maintenance Facility would continue to be used for aircraft and/or GSE maintenance by another airline currently conducting such activities at LAX in constrained or reduced facilities, and would not represent a new use or an increase in such activity. Any proposed reuse of the West Maintenance Facility may be subject to its own environmental review and documentation, as appropriate under applicable law.

The proposed project would redevelop an approximately 35-acre site in the eastern portion of the airport operations area (AOA). With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. LAWA is planning to relocate the Quonset Hut. This relocation is planned as part of LAWA's ongoing management of historic resources at LAX. The relocation will occur independently of the proposed project.

Although the portion of UAL's current aircraft and GSE maintenance operations that occurs at the West Maintenance Facility would be consolidated with operations located on the east side of the airport, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. The consolidation would alter on- and off-airport vehicular movements, as well as aircraft movements on the airfield. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility, including Imperial Highway, Pershing Drive, and Westchester Parkway, would instead drive to the East Maintenance Facility, which would be accessed via Century Boulevard or a generally parallel network of side roads located south of Century Boulevard. Similarly, on the airfield, GSE and aircraft that currently travel on taxiways and taxilanes to access the West Maintenance Facility would instead travel to the East Maintenance Facility. The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and

would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways. Construction of the proposed project would be phased over approximately 22 months (one year and ten months), beginning with the demolition of existing facilities in the East Maintenance Facility lease area, projected to commence in the fourth quarter of 2018; new construction would extend to late 2020.

The UAL East Aircraft Maintenance and GSE Project EIR identified significant adverse environmental impacts that would result from the implementation of the UAL East Aircraft Maintenance and GSE Project that cannot be mitigated to a level that is less than significant by the implementation of feasible mitigation measures or alternatives. The unavoidable significant impacts from the UAL East Aircraft Maintenance and GSE Project occur with respect to air quality and cultural (historic) resources. The specific significant and unavoidable impacts of the proposed project related to air quality are as follows: construction-related regional emissions of nitrogen oxides (NO_x); construction-related localized emissions of respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}); and cumulatively considerable contribution to significant cumulative construction-related air quality impacts (NO_x, PM₁₀, and PM_{2.5}), based on significant construction-related project impacts summarized above. The proposed project would result in unavoidable significant impacts with respect to historical resources due to the demolition of two intact, surviving Intermediate Terminal Facility buildings at 6000–6016 and 6020–6024 Avion Drive (on the project site), which together represent a single historical resource. This historical resource is individually eligible for listing in the California Register of Historical Resources and for designation as a Los Angeles Historic-Cultural Monument. The demolition of the two intact, surviving Intermediate Terminal Facility buildings would be a significant and unavoidable impact and no feasible mitigation measures are available to further reduce the impact to 6000-6016 and 6020-6024 Avion Drive beyond compliance with the LAX Preservation Plan.¹ Additional information and specific findings regarding these impacts are provided in the *California Environmental Quality Act Findings - LAX UAL East Aircraft Maintenance and Ground Support Equipment Project*, as required by State CEQA Guidelines Section 15091.

State CEQA Guidelines Section 15093(b) provides that, when a public agency approves a project that will result in significant impacts that are identified in the Final EIR but are not avoided or substantially lessened to a less than significant impact, the agency must state in writing the specific reasons to support its decision based on the Final EIR and/or other information in the whole administrative record. If the specific economic, legal, social, technological or other benefits of a proposed project outweigh its unavoidable adverse environmental impacts, the adverse effects may be considered “acceptable.” LAWA, as the Lead Agency for the UAL East Aircraft Maintenance and GSE Project EIR, adopts the following Statement of Overriding Considerations.

Based on the substantial evidence in the whole of the administrative record for the UAL East Aircraft Maintenance and GSE Project, the Board of Airport Commissioners hereby finds, concludes, and determines that the unavoidable significant adverse environmental impacts associated with the construction of the UAL East Aircraft Maintenance and GSE Project are acceptable in light of the following specific economic, operational, legal, technological or other project benefits. Each project benefit

¹ LAWA developed the LAX Preservation Plan, which identifies all historic resources on LAX property; identifies historic resources that LAWA commits to preserving; provides guidance on the rehabilitation of historic buildings, structures, objects, and sites located on LAX property; and creates a process for review of future projects with respect to historic resources. The buildings located at 6000-6016 and 6020-6024 Avion Drive are not identified for preservation in the LAX Preservation Plan. However, the LAX Preservation Plan specifies the procedures to be followed in the event of demolition of a historical resource on LAX property. Specifically, demolition of a historic resource requires notification to the City of Los Angeles Department of City Planning’s Office of Historic Resources (OHR), including submittal of a documentation plan that fully documents the historic resource prior to demolition. OHR is required to submit any written comments on the documentation plan within 15 working days from the date the documents are received. LAWA will comply with the procedures outlined in the adopted LAX Preservation Plan related to the demolition of 6000-6016 and 6020-6024 Avion Drive. Even with compliance with these procedures, the impact of the proposed project on historical resources would remain significant.

described below constitutes an overriding consideration warranting approval of the UAL East Aircraft Maintenance and GSE Project, independent of other benefits, despite the proposed project's significant unavoidable impacts.

A. Economic Benefits Associated with the UAL East Aircraft Maintenance and GSE Project at LAX

Construction of the UAL East Aircraft Maintenance and GSE Project at LAX would allow for the continued safe daily operations at LAX, and thereby help maintain the airport's economic contribution in Southern California. As an international port for passengers, cargo, and freight, LAX provides a foundation for businesses that depend on passenger and cargo operations and logistics. In this regard, LAX is a vital component of the local, regional, and state economy. As the international gateway to the western United States, LAX has long been a major supporter of the Southern California economy through employment and generation of taxes and other revenue, and by facilitating the efficient movement of people, goods, and services. Also, construction activity associated with the UAL East Aircraft Maintenance and GSE Project would promote economic growth over the approximately 22-month construction period in terms of spending by workers and the provision of goods and services in support of construction.

B. Operational Efficiency Benefits Associated with the UAL East Aircraft Maintenance and GSE Project

Consolidation/relocation of UAL's existing aircraft and GSE maintenance facilities at LAX in a single location would provide for more efficient and effective maintenance of UAL aircraft and equipment at the airport and would eliminate duplicate facilities and maintenance operations. In addition, consolidation of UAL's maintenance activities into a single facility would eliminate vehicle trips between the two maintenance facilities that occur under existing conditions. Further, locating UAL's aircraft and GSE maintenance facilities closer to UAL's passenger gates (located at Terminals 7 and 8) would increase efficiency by reducing the distance that UAL aircraft currently travel between the gates and the maintenance facilities, consistent with the mission of LAX Airfield Operations of providing a safe and efficient airport operating environment. Finally, UAL's maintenance facilities were constructed between the mid-1940s and early 1970s, when aircraft and GSE equipment were much smaller than they are today. As such, the existing facilities include aging infrastructure and inaptly sized and located facilities. Replacing the existing facilities with a modern facility designed for current aircraft and equipment would increase operational efficiency and would "right-size" the space to match the business operations.

C. Sustainability and Environmental Benefits Associated with the UAL East Aircraft Maintenance and GSE Project

As noted above, UAL's maintenance facilities were constructed between the mid-1940s and early 1970s. As such, existing deficiencies of UAL maintenance facilities include aging infrastructure and inaptly sized and located facilities. The proposed project would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy, which requires that the new building be designed to achieve the United States Green Building Council's Leadership in Energy and Environmental Design (LEED®) Silver certification. LEED® Silver certification requires a project to be designed in a manner to save energy, water, and other resources, and to generate less waste and support human health. In addition, the proposed project would be required to be constructed in accordance with the Los Angeles Green Building Code, which is based on the California Green Building Code (CALGreen). Further, the consolidation of UAL's maintenance facilities would result in an overall reduction in building square footage requiring heating, cooling, or lighting. Finally, as part of the proposed project, UAL would consolidate its stationary source equipment at the East

Maintenance Facility, and would upgrade its current equipment with new, cleaner technologies. Stationary equipment to be installed would include natural gas boilers and water heaters, a diesel-operated emergency generator, and a maintenance-related spray booth (which would replace the existing spray booths at both the east and west facilities). Where required, the project equipment would meet Best Available Control Technology (BACT).

During project operations, all employees would be located at the East Maintenance Facility. This would involve relocation of employees who currently work at the West Maintenance Facility. The majority of employees at LAX live in areas that are located east of the airport. Therefore, the consolidation of maintenance activities on the east side of the airport would reduce vehicle miles traveled (VMT) by maintenance employees from their places of residence to the worksite. In addition, consolidation of UAL's maintenance activities into a single facility would eliminate vehicle trips between the two maintenance facilities that occur under existing conditions. These reductions in VMT would result in reduced greenhouse gas (GHG) emissions compared to GHG emissions from existing maintenance employee commutes. Further, aircraft and ground vehicle movements would decrease due to the decreased distance between the UAL gates in the Central Terminal Area and the East Maintenance Facility, reducing energy use and air pollutant emissions. In addition to the decreased travel distance, because of the proximity to the gates, more aircraft would be towed between the gates and the maintenance facility with implementation of the proposed project than under baseline conditions, although the total number of daily aircraft movements would be the same. As compared to taxiing, towing results in fewer air pollutant and GHG emissions.