California Environmental Quality Act Findings
Midfield Satellite Concourse

I. Project Description

The West Satellite Concourse was approved in 2004 as part of the Master Plan for Los Angeles International Airport (LAX) and was analyzed at a programmatic level in the certified Environmental Impact Report (EIR) and in the Federal Aviation Administration (FAA)-approved Environmental Impact Statement (EIS). The 2004 LAX Specific Plan required that the West Satellite Concourse be included in the LAX Specific Plan Amendment Study (SPAS). However, in the 2006 Stipulated Settlement, the relevant parties agreed to remove the West Satellite Concourse and associated Automated People Mover from the requirement to be evaluated in the LAX SPAS, allowing for a separate review and approval process. Subsequent to the release of the Final LAX Master Plan EIS/EIR, the West Satellite Concourse was renamed the Midfield Satellite Concourse (MSC).

The MSC Program approved in 2004 consists of a new multi-level concourse located within the western portion of the airfield west of the existing Tom Bradley International Terminal (TBIT) and associated passenger processing space in a proposed Central Terminal Processor (CTP) that would be located in the Central Terminal Area (CTA) of LAX. The MSC Program also includes conveyance systems connecting the MSC and CTP as well as a new taxilane, taxiway, and apron and utilities required to serve the MSC. The facility would be capable of serving both international and domestic flights, and would provide the Los Angeles World Airports (LAWA) with the flexibility to accommodate existing demand for aircraft gates while modernizing other terminals at LAX and reducing reliance on the West Remote gates. Upon completion of the MSC Program, the concourse could accommodate up to 29 aircraft gates for Aircraft Design Group (ADG) III to ADG VI aircraft. ADG III aircraft correspond to narrowbody jets (for example the Boeing 737) and ADG VI aircraft correspond to the largest jet aircraft, often referred to as new large aircraft (NLA) such as the Boeing 747-800 and the Airbus A380. The MSC Program facility, including the concourse building and associated apron areas, would encompass approximately 60 acres in the western portion of the airfield and 6 acres in the CTA for the CTP.

Due to the size and scale of the MSC Program, LAWA proposes to develop the MSC Program in phases. Phase I ("MSC North Project") of the MSC Program is the construction of the northern portion of the multi-story MSC facility and associated improvements. Project components associated with the MSC North Project include:

- A concourse for up to 11 gates and associated facilities;
- Additional taxiways and taxilanes;
- A ramp tower or FAA supplemental airport traffic control tower to control aircraft movement around the concourse facility and associated airfield;
- Tunnels for a connector/conveyance system between the MSC and the CTP;
- Utilities that support the MSC North Project; and
- The removal/relocation of existing facilities at the Project site.

Key characteristics of the proposed MSC North concourse include:

- Ability to accommodate simultaneous international and domestic passenger operations;
- Modularity of aircraft parking position layouts, boarding bridge locations, and holdroom areas to provide flexibility for a wide range of aircraft equipment at different times;
- Ability to accommodate point-to-point busing operations and future automated people mover (APM) connections with smooth transitions between the offered modes of travel; and
- Modular segmentation of the building and isolation of the building systems to allow for ongoing maintenance and incremental development of the MSC Program.

The MSC Program components that are not part of the MSC North Project have only been conceptually planned; thus, only an update of the program-level analysis of these components presented in the certified LAX Master Plan EIR is possible. For those MSC Program components receiving only programmatic environmental review in this EIR, further project-level environmental review under CEQA will be required in the future before they can be implemented. Project-level environmental documents for future phase(s) of the MSC Program will be initiated at such time as LAWA determines that they are needed.

Components associated with the future phase(s) of the MSC Program include:

- Southerly extension of MSC Program building and associated facilities;
- Extension of Taxilane C12;
- Utilities that support the future phase(s) of the MSC Program;
- A Central Terminal Processor in the CTA; and
- A connector/conveyance system between the MSC and the CTP.

II. Project Objectives

The overall objective of the MSC North Project and future phase(s) of the MSC Program is to provide LAWA with the flexibility to accommodate existing demand for aircraft gates while modernizing other terminals at LAX and reducing reliance on the West Remote Gates/Pads.

The MSC North Project would allow LAWA to modernize their existing facilities more effectively by providing gate flexibility. The new concourse facility would be designed to serve both domestic and international traffic and to accommodate all sizes of aircraft. The new gates would also reduce LAWA's reliance on the West Remote Gates/Pads.

Other specific goals and objectives for the MSC North Project and MSC Program include:

- Provide greater flexibility for modernizing existing terminals;
- Allow LAWA to close gates for renovation without reducing the number of existing gates;
- Improve terminal operations, concessions facilities, and overall passenger experience at LAX; and
- Facilitate the systematic implementation of the LAX Master Plan.

III. Procedural History

LAWA has prepared an EIR for the MSC North Project and future phase(s) of the MSC Program, pursuant to the California Environmental Quality Act (CEQA). As described above,

the MSC is a project component of the LAX Master Plan Program approved by the Los Angeles City Council in December 2004. The MSC EIR is "tiered" from, and incorporates by reference, the LAX Master Plan Final EIS/EIR.

An Initial Study (IS) and Notice of Preparation (NOP) for the MSC EIR was published on February 8, 2013 for a review period that ended on March 11, 2013. A public scoping meeting was held on February 21, 2013. On March 6, 2014, the City of Los Angeles published the Draft EIR for the proposed MSC. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period closing on April 21, 2014. A public workshop was held on March 18, 2014, during the comment period. The City of Los Angeles published the Final EIR for the MSC in June, 2014. The MSC Final EIR incorporates and responds to comments received on the Draft EIR, and includes corrections and additions to the Draft EIR. Project-specific Mitigation Measures, LAWA Mitigation Measures, and LAX Master Plan Commitments and Mitigation Measures have been included in a Project Mitigation Monitoring and Reporting Program (MMRP) for the MSC. LAWA, the Los Angeles Board of Airport Commissioners (BOAC), and other decision-makers will use the Final EIR to inform their decisions on the MSC.

The findings herein have been prepared to reflect approval of the MSC as amended in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR.

IV. Environmental Impacts and Findings

Pursuant to Public Resources Code §21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR.

BOAC has made one or more of these specific written findings regarding each significant impact associated with the MSC. Those findings are presented below, along with a presentation of facts in support of the findings. Concurrent with the adoption of these findings, BOAC adopts the Mitigation Monitoring and Reporting Program (CEQA Guidelines §15097(a)) for the MSC.

A. Findings on Significant and Unavoidable Impacts

a. Air Quality

Description of Effects: As analyzed in Section 4.1, *Air Quality*, of the Draft EIR, the MSC would generate air pollutant emissions during construction and operation of the

MSC North Project and future phase(s) of the MSC Program. As part of the LAX Master Plan, the Midfield Satellite Concourse is subject to the LAX Master Plan Commitments and Mitigation Measures contained in the LAX Master Plan Final EIS/EIR, which were adopted as project requirements in conjunction with approval of the LAX Master Plan. The LAX Master Plan Mitigation Measures that pertain to air quality and are applicable to the MSC include: *LAX-AQ-1 — General Air Quality Control Measures; LAX-AQ-2 — Construction-Related Measures; LAX-AQ-3 — Traffic-Related Measures;* and *LAX-AQ-4 — Operations-Related Control Measures.*

MSC North Project

Construction-Related Air Quality Impacts

As shown in Table 4.1-13, within Section 4.1, *Air Quality*, of the Draft EIR, construction of the MSC North Project is predicted to result in maximum daily emissions that exceed the South Coast Air Quality Management District (SCAQMD) regional construction thresholds for CO, VOC, NO_X, PM_{10}, and $PM_{2.5}$.

LAWA is committed to mitigating temporary construction-related emissions to the extent feasible and has established some of the most aggressive construction emissions reduction measures in Southern California, particularly with regard to requiring construction equipment to be equipped with emissions control devices. The air quality control measures set forth by LAWA for development projects at LAX take into account LAX Master Plan Commitments and Mitigation Measures, Community Benefits Agreement and Stipulated Settlement measures, and measures identified in EIRs for other projects at LAX. In addition, the Los Angeles Green Building Code (LAGBC) Tier 1 standards, which are applicable to all projects with a Los Angeles Department of Building and Safety (LADBS) permit-valuation over $200,000, require the proposed Project to implement a number of measures that would reduce criteria pollutant and greenhouse gas (GHG) emissions.

Based on discussions with the SCAQMD, LAWA has agreed to add the Project-specific Mitigation Measure MM-AQ (MSC)-1, which would be incorporated into bid documents for the MSC North Project specifying that contractors should use equipment on the Project that meets the most stringent emission requirements. Because it is difficult for LAWA to determine whether equipment is available that meets the most stringent emission requirements, for purposes of this analysis LAWA has kept the equipment mix specified in the Draft EIR, but will require contractors to use equipment that meets stricter standards if available. This Mitigation Measure is applicable to the analyses for Air Quality, Greenhouse Gas Emissions, and Human Health Risk.

Even with incorporation of feasible construction-related control measures, LAX Master Plan Mitigation Measures, and addition of Mitigation Measure MM-AQ (MSC)-1 as described in Section 4.1, *Air Quality*, of the Draft EIR, the maximum peak daily construction-related regional mass emissions resulting from the MSC North Project would be significant, as shown by the emissions inventory. LAWA has not identified any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance. As such, the regional air quality

impacts for CO, VOC, NO_X, PM_{10}, and $PM_{2.5}$ during construction would be significant and unavoidable.

Cumulative Construction-Related Air Quality Impacts

In accordance with SCAQMD guidance, cumulative impacts are assessed using the same significance thresholds for project-specific and cumulative impacts. For projects that exceed the project-specific significance threshold, those projects are also considered cumulatively significant. Construction of the MSC North Project would exceed the Project-specific significance thresholds for CO, VOC, NO_X, PM_{10}, and $PM_{2.5.}$ Therefore, the MSC North Project would have a cumulatively considerable contribution for construction emissions and would result in a cumulatively significant construction impact.

Findings: Even with incorporation of feasible construction-related control measures and mitigation measures, the maximum peak daily construction-related regional mass emissions for CO, VOC, NO_X, PM_{10}, and $PM_{2.5}$ resulting from the MSC North Project would be significant. There are not any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance.

Despite incorporation of these measures, the BOAC hereby finds construction-related air quality impacts related to CO, VOC, NO_X, PM_{10}, and $PM_{2.5}$ for the MSC North Project would remain significant and unavoidable and that specific economic legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measures and the MSC-Specific Mitigation Measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the Midfield Satellite Concourse, no other air quality mitigation measures are feasible that would mitigate Project-specific and cumulative impacts to air quality during the construction period.

b. Greenhouse Gas Emissions

Description of Effects: The GHG analysis provided in Section 4.2, *Greenhouse Gas Emission*s, of the Draft EIR, examines the potential GHG emissions associated with the MSC North Project and the future phase(s) of the MSC Program that may contribute to global climate change (GCC) impacts. Total GHG emissions from the MSC North Project and future phase(s) of the MSC Program were quantified to determine whether the MSC would be consistent with the Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32 (i.e., reduction of statewide GHG emissions to 1990 levels by 2020). LAX Master Plan Mitigation Measures applicable to the MSC include: *LAX-AQ-1 — General Air Quality Control Measures; LAX-AQ-2 — Construction-Related Measures; LAX-AQ-3 — Traffic-Related Measures;* and *LAX-AQ-4 — Operations-Related Control Measures.* Mitigation Measure MM-AQ (MSC)-1 would also be implemented as part of the MSC. Additionally, the MSC North Project and future phase(s) of the MSC Program would comply with the LAGBC Tier 1 standards.

MSC North Project

Construction-Related GHG Impacts

The MSC North Project-related construction sources for which GHG emissions were calculated include: (1) Off-road construction equipment; (2) On-road equipment and delivery/haul trucks; and (3) Construction worker commute vehicles. Construction of the MSC North Project is estimated to emit a total of 150,454 metric tons of CO_2e ($MTCO_2e$) during construction. When amortized over 30 years, construction GHG emissions are estimated at 5,015 $MTCO_2e$ per year. As discussed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, the significance of construction-related impacts is not determined separately for GHG emissions. Rather, the significance of construction-related and operations-related GHG emissions for the MSC North Project are evaluated together, as discussed below.

Operations-Related GHG Impacts

The analysis provided in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, addresses both direct and indirect GHG emissions. Direct operational sources of GHG emissions from the MSC North Project include: airfield operations and on-Airport stationary sources, including heating/cooling. Indirect sources of GHG emissions related to the MSC North Project include the consumption of purchased electricity, solid waste disposal, water usage, and wastewater treatment.

Operation of the proposed MSC North Project would not result in changes to air traffic patterns or an increase in Airport operations as the MSC North Project would only change the location of aircraft gates. However, this change in location of gates would result in shorter average aircraft taxi distances and thus a decrease in overall average aircraft taxi/idle times as compared to the 2019 Future Without Project scenario. The proposed MSC North Project would, however, result in additional GHG emissions from passenger busing trips and building operations of the MSC North facility when compared to existing uses of the MSC North Project site. As analyzed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, the incremental future operational GHG emissions are 5,437 metric tons CO_2e per year, which when combined with the amortized construction emissions indicated above, would contribute to a total of 10,452 $MTCO_2e$ per year. Emissions from amortized construction and operation of the MSC North Project would exceed the SCAQMD draft threshold of 10,000 $MTCO_2e$ per year. Therefore the MSC North Project would result in a significant and unavoidable impact with regard to GHG emissions.

Cumulative Construction- and Operations-Related GHG Impacts

As discussed in Section 4.2.4 (Thresholds of Significance), of the Draft EIR, the CEQA Guidelines do not include or recommend any particular threshold of significance; instead, the CEQA Guidelines leave that decision to the discretion of the lead agency (§15064.4). The California Natural Resources Agency (CNRA) noted in its Public Notice for the added sections on GHG, that the impacts of GHG emissions should be considered in the context of a cumulative impact, rather than a project impact. The Public Notice states:

> "While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CNRA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable."

It is the accumulation of GHGs in the atmosphere that may result in global climate change. Climate change impacts are cumulative in nature, and thus no typical single project would result in emissions of such a magnitude that it, in and of itself, would be significant on a project basis. A typical single project's GHG emissions will be small relative to total global or even statewide GHG emissions. Thus, the analysis of significance of potential impacts from GHG emissions related to a single project is already representative of the long-term impacts on a cumulative basis. Therefore, projects that exceed the project-specific significance thresholds are considered to be cumulatively considerable. Projects that do not exceed the project-specific thresholds for GHG emissions are not considered to be cumulatively considerable.

As discussed above, the proposed MSC North Project's combined amortized construction and operational GHG emissions would exceed the significance threshold of 10,000 $MTCO_2e$ per year. Therefore, in accordance with the discussion above, the proposed MSC North Project would cause cumulatively considerable impacts with respect to GHG emissions.

Consistency with Greenhouse Gas Reduction Plans

The MSC North Project would comply with the LAGBC Tier 1 requirements. LAWA has based its new sustainable construction standards on the mandatory and voluntary tiers defined in the LAGBC. All building projects with an LADBS permit-valuation over $200,000 shall achieve LAGBC Tier 1 conformance, to be certified by LADBS during final plan check (on the issued building permit) and validated by the LADBS inspector during final inspection (on the Certification of Occupancy). The requirements of the adopted LAGBC apply to new building construction, building renovations, and building additions within the City of Los Angeles. Specific mandatory requirements and elective measures are provided in three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. The MSC North Project would comply with the mandatory requirements for Tier 1 conformance for non-residential buildings. As a result, the MSC North Project would be consistent with plans to reduce GHG emissions.

Future Phase(s) of the MSC Program

Construction-Related GHG Impacts

The impacts discussed in Section 4.2, *Greenhouse Gas Emissions*, for the future phase(s) of the MSC Program provide a program-level GHG analysis of conceptually

planned components of the future phase(s) of the MSC Program. Construction of the future phase(s) of the MSC Program was analyzed as part of the LAX Master Plan Final EIS/EIR, but for the purpose of this analysis, has been estimated to be the same as the MSC North Project. Therefore, it is estimated that the amortized construction GHG emissions for the future phase(s) of the MSC Program, including the construction GHG emissions for the MSC North Project, will be approximately 10,030 $MTCO_2e$ per year. As discussed above, the significance of construction-related impacts is not determined separately for GHG emissions. Rather, the significance of construction-related and operations-related GHG emissions for the future phase(s) of the MSC Program are evaluated together, as discussed below.

Operations-Related GHG Impacts

Like the MSC North Project, the future phase(s) of the MSC Program would not result in changes to air traffic patterns or an increase in Airport operations (beyond the operations approved in the LAX Master Plan) as the full MSC Program would only change the location of aircraft gates. Operational GHG emissions, including both direct and indirect emissions for the MSC Program, were calculated for the full MSC building, the CTP, and APM Maintenance Facility. Direct emissions from aircraft and GSE operations with the future phase(s) of the MSC Program were assumed equal to the 2025 SPAS Alternative 3 (LAX Master Plan Alternative D), as this represents the future condition with the full MSC Program, including the CTP. The analysis also accounted for public traffic circulation through the CTA. Indirect emissions include the consumption of purchased electricity, disposal of solid waste, and water consumption. As analyzed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, the incremental future operational GHG emissions for the future phase(s) of the MSC Program, combined with the amortized construction emissions indicated above, would contribute a total of 24,750 $MTCO_2e$ per year. These emissions would exceed the SCAQMD draft threshold of 10,000 $MTCO_2e$ per year; therefore, the future phase(s) of the MSC Program would result in a significant and unavoidable impact with regard to GHG emissions.

Cumulative Construction- and Operations-Related GHG Impacts

As discussed above, it is the accumulation of GHGs in the atmosphere that may result in global climate change: a typical single project's GHG emissions will be small relative to total global or even statewide GHG emissions. As such, projects that exceed the project-specific significance thresholds are considered to be cumulatively considerable, while projects that do not exceed the project-specific thresholds for GHG emissions are not considered to be cumulatively considerable.

Similar to the MSC North Project, the combined amortized construction and operational GHG emissions for the future phase(s) of the MSC Program would exceed the significance threshold of 10,000 MTCO2e per year. Therefore, in accordance with the discussion above, the future phase(s) of the MSC Program would cause cumulatively considerable impacts with respect to GHG emissions.

Consistency with Greenhouse Gas Reduction Plans

Like the MSC North Project, the future phase(s) of the MSC Program would comply with the LAGBC Tier 1 requirements. The future phase(s) of the MSC Program would comply with the mandatory requirements for Tier 1 conformance, and therefore, would be consistent with plans to reduce GHG emissions.

Findings: Even with incorporation of feasible construction- and operations-related control measures, and mitigation measures, the incremental future operational GHG emissions for the MSC North Project and future phase(s) of the MSC Program, combined with the amortized construction emissions, would be significant. There are not any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance.

Despite incorporation of these measures, the BOAC hereby finds the greenhouse gas impacts for the MSC North Project and future phase(s) of the MSC Program would remain significant and unavoidable and that specific economic legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measures and the MSC-Specific Mitigation Measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the Midfield Satellite Concourse, no other greenhouse gas mitigation measures are feasible that would mitigate the anticipated impacts from the MSC North Project and future phase(s) of the MSC Program to global climate change.

c. Human Health Risk Assessment

Description of Effects: As analyzed in Section 4.3, *Human Health Risk Assessment*, of the Draft EIR, human health risk from the inhalation exposure to toxic air contaminants (TACs) released during construction and operation of the Midfield Satellite Concourse could occur. Environmental consequences considered are cancer risks and non-cancer chronic and acute health hazards. Possible human health effects are discussed as they relate to on-site Project workers, non-Project workers (off- and on-airport), off-airport resident adults, off-airport resident children, and off-airport school children. LAX Master Plan Mitigation Measures applicable to the MSC North Project and future phase(s) of the MSC Program include: *LAX-AQ-1 — General Air Quality Control Measures; LAX-AQ-2 — Construction-Related Measures; LAX-AQ-3 — Traffic-Related Measures; and LAX-AQ-4 — Operations-Related Control Measures*. Mitigation Measure MM-AQ (MSC)-1 would also be implemented as part of the MSC. These measures were incorporated into the health risk analysis presented in Section 4.3 of the Draft EIR.

MSC North Project

Acute Non-Cancer Health Hazards

Operations of the proposed MSC North Project would not result in changes to air traffic patterns or an increase in Airport operations (beyond the operations approved as part of the LAX Master Plan) as the MSC North Project would only change the location of aircraft gates. However, this change in location of gates, along with the

construction of crossfield Taxiway C14, would result in a slight change in aircraft taxi routes. The main TAC of concern associated with aircraft taxiing is acrolein. The provision of Taxiway C14 and Taxilane C12 would cause more crossfield taxi operations to occur, which would reduce acrolein concentrations around most of the airport, but would increase peak concentrations at some receptor locations to the north and south of Taxiway C14 (see Figure 4.3-2 in Chapter 4.3, *Human Health Risk Assessment*). Acute exposures to acrolein may result in mild irritation of eyes and mucous membranes. Maximum acute non-cancer health hazards associated with exposure to acrolein are summarized in Table 4.3-10 in the Draft EIR. Acute non-cancer health hazards for TAC other than acrolein are orders of magnitude below the significance threshold of 1, and below the acute non-cancer health hazards estimated for short-term exposure to acrolein.

Operations-related incremental maximum acute hazard quotients for acrolein for operations of the proposed MSC North Project as compared to the Without Project scenario are estimated to be 1.9 for residents living at the peak hazard location, 0.5 for school children, 0.3 for recreational users, and 1.4 for off-Airport adult workers. These grid nodes are located along the fenceline directly north and south of Taxiway C14. However, 321 of 326 off-Airport grid point locations have incremental acute hazard quotients for acrolein of less than 1; 191 of these grid point locations show a negative hazard quotient (mostly along the western and southern boundaries of the airport), meaning the impacts at these locations actually improve with the proposed MSC North Project. Of the five grid point locations with incremental acute hazard quotients for acrolein greater than 1, none of the grid point locations are greater than 2.

The acute Reference Exposure Level (REL) for acrolein has an uncertainty factor of 60. This factor indicates a moderate uncertainty in the REL based on specific sources of variability not addressed in the toxicological studies, such as individual variation and interspecies differences. Although the maximum acute hazard quotient for acrolein for the MSC North Project is greater than 1, it should be noted that the acute REL is set at or below a level at which no adverse health impacts are expected for a majority of the population. Hence, it represents the tail-end of a distribution and not a specific “bright-line” beyond which adverse effects are certain; instead any adverse acute non-cancer health effects (mucous membrane irritation) would be part of a complex probabilistic process. Although the maximum acute hazard quotient estimated as 1.9 is above the threshold of significance of 1, the value is still close to the threshold for acute effects, given the uncertainty of the toxicity factor, and may represent minimal actual acute non-cancer health hazards. Thus, an acute hazard quotient of 1.9 does not mean that adverse effects would definitely occur in the receptor population; rather, it indicates that such effects cannot be ruled out on the basis of current knowledge.

Even with the incorporation of LAX Master Plan Mitigation Measures and Project-specific mitigation, acute hazard quotients for acrolein for receptors representing residents and off-Airport adult workers would be above the threshold of significance of 1. Therefore, acute non-cancer health hazard impacts during operations of the proposed MSC North Project would be significant.

Cumulative Impacts Related to Acute Non-Cancer Health Hazards

As described above, predicted concentrations of TAC released from operational activities for the MSC North Project suggest that slight impacts to human health may occur associated with acute non-cancer health hazards. The assessment of cumulative acute non-cancer health hazards follows the methods used to evaluate cumulative acute non-cancer health hazards presented in the LAX Master Plan Final EIR (Section 4.24.1.7 and Technical Report S-9a, Section 6.3), incorporating updated National-Scale Air Toxics Assessment tables from 2005. USEPA-modeled emission estimates by census tract were used to estimate annual average ambient air concentrations. These census tract emission estimates are subject to high uncertainty, and USEPA warns against using them to predict local concentrations. Thus, for the analysis of cumulative acute non-cancer health hazards, estimates for each census tract within Los Angeles County were identified, and the range of concentrations was used as an estimate of the possible range of annual average concentrations in the general vicinity of the Airport. This range of concentrations was used to estimate a range of acute non-cancer hazard indices using the same methods described in the LAX Master Plan Final EIR (Section 4.24.1.7 and Technical Report S-9a, Section 6.1). This range of hazard indices was then used as a basis for comparison with estimated maximum acute non-cancer health hazards for the MSC North Project. The relative magnitude of acute non-cancer health hazards calculated on the basis of the USEPA estimates and maximum hazards estimated for the proposed MSC North Project were taken as a general measure of relative cumulative impacts. Uncertainties in the analysis preclude estimation of absolute impacts.

When USEPA annual average estimates are converted to possible maximum 1-hour average concentrations, acrolein acute hazard indices are estimated to range from 0.03 to 1.5, with an average of 0.4 for locations within the HHRA study area. The predicted overall maximum incremental acute non-cancer health hazards for the proposed MSC North Project associated with acrolein is 1.9. Results suggest that the proposed MSC North Project would add to total 1-hour maximum acrolein concentrations at some locations in the HHRA study area and, therefore, to cumulative acute non-cancer health hazards associated with exposure to acrolein. Hence, the MSC North Project would have a cumulatively significant acrolein impact.

Future Phase(s) of the MSC Program

Acute Non-Cancer Health Hazards

Like the MSC North Project, the future phase(s) of the MSC Program would not result in changes to air traffic patterns or an increase in Airport operations (beyond the operations approved in the LAX Master Plan) as the MSC Program would only change the location of aircraft gates. However, like the MSC North Project, the future phase(s) of the MSC Program would reduce the use of the West Remote Pads/Gates, thereby increasing aircraft movements in the center of the airfield. This increase causes incremental exceedances of 1-hour acrolein acute hazard indices at receptors on the north and south fence-lines of LAX for the MSC North Project; similar results are expected for the future phase(s) of the MSC Program. Even with

the incorporation of LAX Master Plan Mitigation Measures and Project-specific mitigation, it is expected that the future phase(s) of the MSC Program would have significant impacts to acute non-cancer health hazard impacts.

Cumulative Impacts Related to Acute Non-Cancer Health Hazards

As discussed above, results suggest that the proposed MSC North Project would add to total 1-hour maximum acrolein concentrations at some locations in the HHRA study area and, therefore, to cumulative acute non-cancer health hazards associated with exposure to acrolein. Similar results are expected for the future phase(s) of the MSC Program. Therefore, the future phase(s) of the MSC Program would have a cumulatively significant acrolein impact.

Findings: The incorporation of LAX Master Plan Mitigation Measures *LAX-AQ-1, LAX-AQ-2, LAX-AQ-3* and *LAX-AQ-4*, along with Project-specific mitigation measure MM-AQ (MSC)-1, will reduce TAC emissions associated with the MSC North Project and the future phase(s) of the MSC Program. However, even with the implementation of these measures, the acute non-cancer health hazards for acrolein at some fenceline receptors will exceed the threshold of significance for the MSC North Project and future phase(s) of the MSC Program, and therefore the impact would be significant and unavoidable, and may also result in a cumulatively considerable contribution to cumulative impacts related to acute non-cancer health hazards. There are not any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance.

Despite incorporation of these measures, the BOAC hereby finds the acute non-cancer health hazard impacts, including cumulative impacts, for the MSC North Project and future phase(s) of the MSC Program would remain significant and unavoidable and that specific economic legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measures and MSC-Specific Mitigation Measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the Midfield Satellite Concourse, no other human health risk mitigation measures are feasible that would mitigate impacts to a less than significant level.

d. Construction Surface Transportation

Description of Effects: As analyzed in Section 4.7, *Construction Surface Transportation*, of the Draft EIR, construction of the MSC North Project would generate vehicle trips on the local roadway system, I-405, and I-105 in the vicinity of LAX during construction, resulting from workers traveling to and from the Project area and from trucks transporting materials and equipment. As part of the LAX Master Plan, the Midfield Satellite Concourse is subject to the LAX Master Plan Commitments and Mitigation Measures contained in the LAX Master Plan Final EIS/EIR. The nine LAX Master Plan Commitments that pertain to construction surface transportation, and are applicable to the MSC, include:

- *C-1. Establishment of a Ground Transportation/Construction Coordination Office*

- *C-2. Construction Personnel Airport Orientation*
- *ST-9. Construction Deliveries*
- *ST-12. Designated Truck Delivery Hours*
- *ST-14. Construction Employee Shift Hours*
- *ST-16. Designated Haul Routes*
- *ST-17. Maintenance of Haul Routes*
- *ST-18. Construction Traffic Management Plan*
- *ST-22. Designated Truck Routes*

MSC North Project

Construction Surface Transportation Impacts

The future cumulative traffic condition takes into consideration past, present, and reasonably foreseeable projects and includes growth in ambient background traffic and both airport and non-airport developments in the vicinity of the Airport. Twelve LAX-related construction projects are expected to occur during the five-year duration of the MSC North Project construction. Projects that were considered in the cumulative construction surface transportation analysis include the Runway Safety Area Improvements – South Airfield; Runway Safety Area Improvements – North Airfield; LAX Bradley West Project – Remaining Work; Terminal 3 Connector (Part of Bradley West Project); North Terminals Improvements; South Terminals Improvements; Central Utility Plant Replacement Project – Remaining Work; Miscellaneous Projects and Improvements; West Aircraft Maintenance Area Project; LAX Northside Area Development; LAX Master Plan Alt. D/SPAS Development; and the Metro Crenshaw/LAX Transit Corridor and Station. As analyzed in Section 4.7, *Construction Surface Transportation*, of the Draft EIR, the peak cumulative construction traffic period considering the aforementioned twelve projects, along with the MSC North Project, is anticipated to occur in December 2018.

Based on the regional and local area distribution patterns, it is anticipated that three intersections would see an increase in the volume to capacity ratio that would result in a cumulatively considerable contribution, as follows:

- Imperial Highway and Main Street (Intersection #10).
- Sepulveda Boulevard and Manchester Avenue (Intersection #23).
- Sepulveda Boulevard and Westchester Parkway (Intersection #25).

Intersection improvements to Intersections #10 and #25 were determined infeasible due to physical constraints, impacts to existing structures, pedestrian right-of-way, cost, and the temporary nature of the impacts. However, mitigation measure MM-ST (MSC)-1 will be implemented to mitigate the construction-related impacts at Intersection #23. The westbound approach of Manchester Avenue would be restriped to provide a right-turn lane and one additional left-turn lane. The resulting westbound lane configuration would be comprised of two left-turn lanes, two through lanes, and one right-turn lane. Implementation of this mitigation measure would

reduce the impact at Intersection #23 to a less-than-significant level. However, the impacts to Intersections #10 and #25 would be significant and unavoidable.

Findings: The incorporation of feasible construction-related control measures, and mitigation measure MM-ST (MSC)-1, would reduce cumulative construction-related surface transportation impacts. However, even with the implementation of these measures, impacts to two intersections would remain significant and unavoidable. There are not any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance.

Despite incorporation of these measures, the BOAC hereby finds the cumulative construction surface transportation impacts for the MSC North Project would remain significant and unavoidable and that specific economic legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measures and MSC-Specific Mitigation Measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the Midfield Satellite Concourse, no other mitigation measures are feasible that would mitigate impacts to a less than significant level.

B. Findings on Less-than-Significant Impacts and Impacts that Will be Reduced to Below the Level of Significance with Mitigation

a. Air Quality

Description of Effects: As analyzed in Section 4.1, *Air Quality*, of the Draft EIR, the MSC would generate air pollutant emissions during construction and operations of the MSC North Project. Regional and localized construction and operational air quality impacts were assessed based on the incremental increase in emissions for the MSC North Project. Construction emissions for the future phase(s) of the MSC Program were accounted for in the LAX Master Plan Final EIS/EIR, and therefore were not analyzed in the EIR. Regional operational emissions for the future phase(s) of the MSC Program were analyzed in the Draft EIR at a programmatic level. Additionally, the Draft EIR analyzed the potential for odors during the construction and/or operation of the MSC North Project and the future phase(s) of the MSC Program. LAX Master Plan Mitigation Measures applicable to the MSC North Project and future phase(s) of the MSC Program include: *LAX-AQ-1 — General Air Quality Control Measures; LAX-AQ-2 — Construction-Related Measures; LAX-AQ-3 — Traffic-Related Measures;* and *LAX-AQ-4 — Operations-Related Control Measures*. Mitigation Measure MM-AQ (MSC)-1 would also be implemented as part of the MSC. These measures were incorporated into the air quality analysis presented in Section 4.1 of the Draft EIR.

MSC North Project

Construction-Related Air Quality Impacts

As shown in Table 4.1-13, within Section 4.1, *Air Quality*, of the Draft EIR, SO_2 emissions associated with the construction of the MSC North Project would not exceed the SCAQMD regional construction thresholds.

In addition to regional construction impacts, localized construction impacts were also evaluated at nearby sensitive receptor locations potentially impacted by the MSC North Project, consistent with SCAQMD methodologies. As shown in Table 4.1-14, within Section 4.1, *Air Quality*, of the Draft EIR, emissions from construction activities would not result in exceedances of the localized concentration-based thresholds for any criteria pollutants at nearby sensitive receptors.

Operations-Related Air Quality Impacts

As discussed in Section 4.1, *Air Quality*, of the Draft EIR, operations of the MSC North Project would not result in changes to air traffic patterns or an increase in Airport operations (beyond those approved in the LAX Master plan) as the MSC North Project would only change the location of aircraft gates. However, this change in location of gates would result in shorter average aircraft taxi distances and thus a decrease in overall average aircraft taxi/idle times as compared to the Without Project scenario. The proposed MSC North Project would, however, result in additional criteria pollutant emissions from ground service equipment (GSE), auxiliary power units (APUs), busing operations, and stationary sources.

As presented in Table 4.1-28, within Section 4.1, *Air Quality*, of the Draft EIR, regional emissions resulting from operation of the MSC North Project are substantially below applicable thresholds for CO, VOC, NO_X, SO_2, PM_{10} and $PM_{2.5}$. As a result, impacts related to regional emissions from operations of the MSC North Project would be less than significant.

Analysis of localized impacts shows that the incremental peak concentrations of CO, NO_2, SO_2, $PM_{10,}$ and $PM_{2.5}$ would also be below the SCAQMD CEQA significance thresholds for operations, and therefore result in a less than significant impact.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents and from diesel emissions. SCAQMD limits the amount of VOCs from architectural coatings and solvents. Due to mandatory compliance with SCAQMD Rules and compliance with the DPM reduction strategies, no construction activities or materials are proposed which would create objectionable odors affecting a substantial number of people. The nearest sensitive receptors are located beyond the LAX property line and would be further buffered by the dissipation of odors with distance and prevailing winds. Therefore, no impact would occur and no mitigation measures would be required.

Operations-Related Odor Impacts

According to the SCAQMD, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The MSC North Project does not include any uses identified by the SCAQMD as being associated with odors. As the MSC North Project activities would not be a source of odors, potential odor impacts would be less than significant.

Future Phase(s) of the MSC Program

Operations-Related Air Quality Impacts

As previously mentioned, the future phase(s) of the MSC Program would not alter the airspace traffic, runway operational characteristics, or the practical capacity of the Airport. Emissions analyzed as part of the future phase(s) of the MSC Program include those from aircraft, GSE, APUs, and natural gas consumption for space heating. As the LAX Master Plan Final EIS/EIR did not account for public traffic circulation within the CTA, emissions estimates for the 2025 scenarios also included traffic within the CTA. Although any future phase(s) of the MSC Program may include an APM, it is expected to be an electric system, and therefore would not contribute to operational criteria pollutant emissions.

As presented in Table 4.1-43, within Section 4.1, *Air Quality*, of the Draft EIR, regional emissions resulting from operation of the future phase(s) of the MSC Program are substantially below applicable thresholds for CO, VOC, NO_X, SO_2, PM_{10} and $PM_{2.5}$. As a result, impacts related to regional emissions from operations of the future phase(s) of the MSC Program would be less than significant.

Operations-Related Odor Impacts

Like the MSC North Project, the future phase(s) of the MSC Program would not be associated with land uses for agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding. Therefore, activities associated with the future phase(s) of the MSC Program would not be a source of odors, and potential odor impacts would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that the MSC North Project would not have Project-specific significant regional SO_2 construction impacts, localized construction impacts, regional and localized operational impacts, or odor impacts. Similarly, the future phase(s) of the MSC Program would have less than significant operational air quality impacts and odor impacts. Beyond the LAX Master Plan Mitigation Measures and MSC-Specific Mitigation Measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the Midfield Satellite Concourse, no other air quality mitigation measures would be required for these air quality impacts as they will be less than significant.

b. Human Health Risk Assessment

Description of Effects: As analyzed in Section 4.3, *Human Health Risk Assessment*, of the Draft EIR, human health risk from the inhalation exposure to TACs released during construction and operation of the Midfield Satellite Concourse could occur. Environmental consequences considered are cancer risks and non-cancer chronic and acute health hazards. Possible human health effects are discussed as they relate to on-site Project workers, non-Project workers (off- and on-airport), off-airport resident adults, off-airport resident children, and off-airport school children. LAX

Master Plan Mitigation Measures applicable to the MSC North Project and future phase(s) of the MSC Program include: *LAX-AQ-1 — General Air Quality Control Measures; LAX-AQ-2 — Construction-Related Measures; LAX-AQ-3 — Traffic-Related Measures;* and *LAX-AQ-4 — Operations-Related Control Measures*. Mitigation Measure MM-AQ (MSC)-1 would also be implemented as part of the MSC. These measures were incorporated into the health risk analysis presented in Section 4.3 of the Draft EIR.

MSC North Project

Health Risks to On-Airport Workers

Effects on on-Airport workers were evaluated by comparing estimated maximum 8-hour average TAC concentration to the CalOSHA 8-hour Time-Weighted Average Permissible Exposure Levels (PEL-TWA). As shown in Table 4.3-7, within Section 4.3, *Human Health Risk Assessment*, of the Draft EIR, the estimated maximum 8-hour average TAC concentrations for on-Airport locations for both construction and operational scenarios for the MSC North Project are several orders of magnitude below the PEL-TWA and, thus would not exceed those considered acceptable by CalOSHA standards. Therefore, impacts related to health risks to on-Airport workers would be less than significant for the MSC North Project.

Cancer Risks and Chronic Non-Cancer Hazards

Several factors contribute to cancer risks and non-cancer health hazards associated with the MSC North Project. Construction of the MSC North Project would result in temporary emissions of various TACs from construction equipment, vehicles used by workers commuting to the job site, trucks used for haul/delivery trips, and demolition (material crushing and grading). Emissions of DPM are expected to contribute the majority of total incremental cancer risks for construction sources. Operations of the MSC North Project would result in emissions of various TACs from aircraft ground operations (taxi and idle), passenger busing, and utility changes to meet increases in demand for heating and cooling.

Consistent with the results for the LAX Master Plan Final EIS/EIR, modeling results for the MSC North Project indicate that diesel particulates from trucks and construction equipment are responsible for nearly all potential health risks posed by the MSC North Project construction activities. Specifically, diesel particulates account for over 83 percent of cancer risks from construction sources, while fugitive dust contributes the greatest to non-cancer chronic health hazards from construction sources. From operational sources, aircraft emissions contribute the greatest to non-cancer chronic health hazards.

As presented in Table 4.3-8, within Section 4.3, *Human Health Risk Assessment*, of the Draft EIR, Project-related cancer risks and non-cancer chronic health hazards were predicted to be below the thresholds of significance. Given the conservative approach used to estimate the magnitude of potential impacts to human health, the MSC EIR found that no significant risks or hazards are anticipated to occur.

Cumulative Impacts Related to Cancer Risks and Non-Cancer Health Hazards

Although no defined thresholds for cumulative health risk impacts are available, it is the policy of the SCAQMD to use the same significance thresholds for cumulative impacts as for the project-specific impacts analyzed in the EIR. If cumulative health risks are evaluated following this SCAQMD policy, the project's contribution to the cumulative cancer risk would not be cumulatively considerable since the incremental cancer risk impacts of the proposed MSC North Project are all below the individual cancer risk significance thresholds of 10 in one million.

In contrast to cancer risk, the SCAQMD policy does have different significance thresholds for project-specific and cumulative impacts for hazard indices for TAC emissions. A project-specific significance threshold is one (1.0) while the cumulative threshold is 3.0. Based on this SCAQMD policy, chronic non-cancer hazard indices associated with airport emissions under the proposed MSC North Project would not be cumulatively significant.

Future Phase(s) of the MSC Program

Health Risks to On-Airport Workers

As documented in Section 4.3.6.2 of the Draft EIR, the estimated maximum 8-hour average TAC concentrations for on-Airport locations for operational sources associated with the future phase(s) of the MSC Program are expected to be similar to those of the MSC North Project. As the proposed MSC North Project TAC concentrations are several orders of magnitude below the PEL-TWA, and thus would not exceed those considered acceptable by CalOSHA standards, it is expected that the future phase(s) of the MSC Program would have similar results and would result in less than significant impacts to on-Airport workers.

Cancer Risks and Chronic Non-Cancer Hazards

Cancer risks for operational sources for the MSC North Project as compared to the Future Without Project scenario were all below the threshold of significance of 10 in 1 million. Any future phase(s) of the MSC Program, when compared against the future Without Program scenario, is expected to have similar results.

Chronic non-cancer hazard indices were evaluated for operational impacts associated with the MSC North Project; estimates for all receptors indicate that operations-related chronic non-cancer hazards would be less than the hazard index threshold of 1. It is expected that the future phase(s) of the MSC Program would have similar results.

Cumulative Impacts Related to Cancer Risks and Non-Cancer Health Hazards

As described above, it is the policy of the SCAQMD to use the same significance thresholds for cumulative impacts for hazard indices for TAC emissions as for the project-specific impacts analyzed in the EIR. Since the incremental cancer risk impacts of the proposed future phase(s) of the MSC Program are all below the individual cancer risk significance thresholds of 10 in 1 million, the project's contribution to the cumulative cancer risk would not be cumulatively considerable. It

is expected that the contribution to the cumulative cancer risk from the future phase(s) of the MSC Program would also not be cumulatively considerable. Also, based on the SCAQMD policy discussed above, chronic non-cancer hazard indices associated with airport emissions under the future phase(s) of the MSC Program would not be cumulatively significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.3, *Human Health Risk Assessment*, of the Draft EIR, the BOAC hereby finds and determines that cancer, non-cancer chronic, and on-site worker TAC concentrations would be less than significant for all receptor types, for both the MSC North Project and the future phase(s) of the MSC Program. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures in Section 4.3, *Human Health Risk Assessment*, of the Draft EIR, is not required to address the less than significant human health risk impacts. Applicable LAX Master Plan Mitigation Measures and MSC-Specific Mitigation Measure identified above will be included in the Mitigation Measure Reporting Program for the Midfield Satellite Concourse and would ensure that human health risk impacts would be less than significant. No further mitigation measures are required.

c. Noise

Description of Effects: The Initial Study found that for all six noise-related thresholds, the proposed MSC North Project would result in a "less than significant impact" and that no further analysis of that topic in an EIR was required. However, during the EIR Notice of Preparation (NOP) public comment period, LAWA received a request to analyze the potential impacts of aircraft noise from changes to taxi routes that would occur as a result of the proposed MSC North Project; therefore, Section 4.4, *Noise*, of the Draft EIR, analyzes potential taxi-noise impacts that would result from the development of the proposed MSC North Project.

MSC North Project

Taxi Operation Noise

As analyzed in Section 4.4, *Noise*, of the Draft EIR, the MSC North Project-related CNEL values would increase the existing CNEL in Westchester by approximately 0.10 dB and increase the existing CNEL in El Segundo by approximately 0.05 dB. In both cases, the increase would not substantially increase average hourly ambient nighttime noise levels and would be substantially less than the threshold of significance of a 1.5 dB CNEL increase at or above 65 dB CNEL; hence, the increase in Project-related taxiing noise is a less than significant impact. The average hourly ambient daytime and nighttime noise levels from aircraft taxiing was also calculated. The MSC North Project-related aircraft taxiing noise would be substantially less than existing ambient noise levels, and when added to existing ambient noise levels, would increase the existing ambient noise levels in Westchester by approximately 0.09 dB in the daytime and 0.08 dB at night, and in El Segundo by approximately 0.25 dB in the daytime and 0.03 dB at night. Therefore, impacts would be less than significant.

Cumulative Taxiway Noise

As indicated in the impacts analysis above, operations-related increases in existing CNEL levels, estimated at nearby noise-sensitive receptors, resulting from implementation of the MSC North Project would include a maximum 0.10 dBA increase associated with aircraft taxiing. This increase would be substantially less than the threshold of significance (i.e., 1.5 dBA CNEL increase). Of the related projects in the immediate MSC North Project area, including LAX Master Plan projects as well as other capital improvement projects undertaken by LAWA and other local agencies, there are two projects with the most potential to result in operations related changes to existing CNEL levels at the nearest sensitive noise-receptors: the Runway 7L/25R Runway Safety Area (RSA) and Associated Improvements Project, and the West Aircraft Maintenance Area Project. Other related projects that may result in changes in operational noise are located much farther away from the nearest noise-sensitive receptors affected by the proposed MSC North Project and are not expected to have a notable contribution to cumulative operational noise impacts. As indicated in Figure 4.6-7 of the Runway 7L/25R Runway Safety Area (RSA) and Associated Improvements Project Draft EIR, it is anticipated that CNEL levels in the northwest portion of El Segundo for Future With Project Conditions would increase by approximately 0.3 dB compared to Baseline Conditions.[1] As indicated in Section 4.5.6 of the West Aircraft Maintenance Area Project Draft EIR[2], it is anticipated that Project-related CNEL levels in the northwest portion of El Segundo would increase by approximately 0.07 dB. These increases in combination with the increases described above for the proposed MSC North Project would not result in a 1.5 dB increase in the existing ambient noise level (i.e., CNEL) for the affected area; hence, cumulative impacts associated with operational noise would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.4, *Noise*, of the Draft EIR, the BOAC hereby finds and determines that MSC North Project-related and cumulative noise impacts would be less than significant. None of the LAX Master Plan Commitments or Mitigation Measures are applicable to taxiway noise, therefore, they have not been included in the noise analysis. No further mitigation measures are required.

d. Public Services – Fire Protection

Description of Effects: As analyzed in Section 4.5, *Public Services – Fire Protection Services*, of the Draft EIR, the MSC has the potential to impact fire protection services at LAX. As part of the LAX Master Plan, the Midfield Satellite Concourse is subject to the LAX Master Plan Commitments and Mitigation Measures contained in the LAX Master Plan Final EIS/EIR. The twelve LAX Master Plan Commitments that

[1] City of Los Angeles, Los Angeles World Airports, Draft Environmental Impact Report for Los Angeles International Airport (LAX) Runway 7L/25R Runway Safety Area (RSA) and Associated Improvements Project, September 2013.

[2] City of Los Angeles, Los Angeles World Airports, Draft Environmental Impact Report for Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project, October 2013.

pertain to public services – fire protection services, and are applicable to the MSC, include:

- *C-1. Establishment of a Ground Transportation/Construction Coordination Office*
- *ST-9. Construction Deliveries*
- *ST-12. Designated Truck Delivery Hours*
- *ST-14. Construction Employee Shift Hours*
- *ST-17. Maintenance of Haul Routes*
- *ST-18. Construction Traffic Management Plan*
- *ST-19. Closure Restrictions of Existing Roadways*
- *ST-21. Construction Employee Parking Locations*
- *ST-22. Designated Truck Routes*
- *FP-1. LAFD Design Recommendations*
- *PS-1. Fire and Police Facility Relocation Plan*
- *PS-2. Fire and Police Facility Space and Siting Requirements*

MSC North Project

Construction

Traffic congestion associated with the construction of the MSC North Project would have the potential to hamper or delay emergency response. However, these impacts would be reduced or avoided through LAX Master Plan Commitment *C-1, Establishment of a Ground Transportation/Construction Coordination Office*. The Ground Transportation/Construction Coordination Office, which is now in place, would ensure, among other things, proper coordination and planning with fire protection agencies to reduce effects from construction on traffic, emergency access, and response times. In addition, LAX Master Plan Commitments *ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-21,* and *ST-22* would serve to further reduce potential traffic impacts during construction. In the event construction activities were to result in deterioration of traffic conditions, use of emergency sirens, alternate response routes, and multiple station responses when necessary would help facilitate emergency access and response as occurs under current congested conditions. No new or expanded fire stations would be required during construction of the MSC North Project. Therefore, impacts to emergency response times related to construction of the MSC North Project would be less than significant.

Operations

MSC North Project components, including the new Taxilane C12 and Taxiway C14, would enhance safety and efficiency compared to baseline conditions, thereby decreasing demand on fire protection services and personnel associated with airfield accidents. With the construction of the MSC North building and provisions for the passenger conveyance tunnel, the LAFD will have additional building areas to protect. However, implementation of relevant sections of the NAFP Code and

California Building Code related to the construction and operation of the concourse and tunnel would address fire, emergency access, and passenger safety issues.

LAX Master Plan Commitment *FP-1, LAFD Design Recommendations*, and *PS-2, Fire and Police Facility Space and Siting Requirements*, as well as enforcement of FAR and fire code requirements, would ensure maintenance of adequate response times, staffing, equipment, facilities, and emergency access for all MSC North Project components. The implementation of the MSC North Project would not affect the ability of Fire Station 80 to respond to emergencies at LAX and would not affect response times to other locations at LAX. Additionally, the MSC North Project would not require any new or expanded fire stations. Therefore, impacts to fire protection services for the operation of MSC North Project would be less than significant.

Cumulative Impacts

The following projects would cumulatively contribute to fire protection service demands at the Airport:

- Within the Central Terminal Area, the LAX Bradley West Project – Remaining Work, North Terminals Improvements, Central Utility Plant Replacement Project – Remaining Work, and South Terminals Improvements; and
- Within the airfield area, the West Aircraft Maintenance Area Project, Runway Safety Area Improvements – South Airfield, and Runway Safety Area Improvements – North Airfield.

When cumulatively examined with future proposed projects at the Airport, the MSC North Project would contribute to cumulative increases in fire-related public service demands. However, the LAX Master Plan Commitments would be sufficient to offset the associated increases in fire protection service demands. The implementation of these improvements would not cause emergency vehicles to change their existing emergency access routes, impact existing fire stations, or require new fire stations at LAX. Thus, these improvements would not affect the ability of the LAX Fire Stations to respond to emergencies at LAX and would not affect response times to other locations at LAX. Therefore, cumulative public service demands associated with the MSC North Project would result in a less than significant impact with mitigation.

Future Phase(s) of the MSC Program

Construction

Similar to the MSC North Project, the construction of the future phase(s) of the MSC Program may cause traffic congestion that could have the potential to hamper or delay emergency response. However, with the implementation of LAX Master Plan Commitments described above, impacts would be mitigated to a less than significant level.

Operations

The southerly extension of the MSC building, along with the CTP, would result in additional building area that the LAFD would have to protect. However, the future

phase(s) of the MSC Program would not require any new or expanded fire stations. Any roadway modifications under the future phase(s) of the MSC Program could reduce the potential for automobile collisions, automobile/pedestrian conflicts, and emergency response incidents at the airport compared to existing conditions. Improved traffic flow associated with new ground access facilities would also be expected to improve response times for fire protection services. Therefore, impacts to fire protection services associated with operation of the future phase(s) of the MSC Program would be less than significant.

Cumulative Impacts

Like the MSC North Project, the future phase(s) of the MSC Program would contribute to cumulative increases in fire-related public service demands. However, the LAX Master Plan Commitments would be sufficient to offset the associated increases in fire protection service demands. Thus, these improvements would not affect the ability of the LAX Fire Stations to respond to emergencies at LAX and would not affect response times to other locations at LAX. Therefore, cumulative public service demands associated with the future phase(s) of the MSC Program would result in a less than significant impact with mitigation.

Findings: Based on substantial evidence in the administrative record, including Section 4.5, *Public Services – Fire Protection Services*, of the Draft EIR, the BOAC hereby finds and determines that fire protection services as related to the MSC North Project and the future phase(s) of the MSC would be less than significant with implementation of the twelve LAX Master Plan Commitments discussed above. No further mitigation measures are required.

e. On-Airport Transportation

Description of Effects: The MSC North Project would have minimal effect on operational traffic within the CTA as it would not lead to increased passenger activity levels or a change in passenger processing. Passenger processing operations would be distributed throughout the existing terminals; therefore, no significant change in surface traffic is anticipated to occur under the MSC North Project. Thus, operational traffic for the MSC North Project was not further analyzed in this EIR, as identified in the Initial Study.

As analyzed in Section 4.6, *On-Airport Transportation*, of the Draft EIR, the future phase(s) of the MSC Program would result in changes to traffic flow and activity within the CTA. The LAX Master Plan Final EIS/EIR assumed that no private vehicles would circulate through the CTA. However, the future phase(s) of the MSC Program assumes that circulation by private vehicles through the CTA could remain and that passengers would access the CTP via private vehicle or commercial vehicle. Thus, trips associated with operation of the future phase(s) of the MSC Program were analyzed at a program level in the Draft EIR.

Future Phase(s) of the MSC Program

On-Airport Traffic Impacts

Changes to traffic through the CTA under the future phase(s) of the MSC Program would be minimal as compared to the Without Program scenario. Dependent on passenger activity levels in 2025, the future phase(s) of the MSC Program may be subject to LAX Mitigation Measures included in the Bradley West Project (BWP) EIR and the Specific Plan Amendment Study (SPAS) EIR, including: *MM-ST (BWP)-2 – Improve the Intersection of Center Way and World Way South*; *MM-ST (BWP)-3 – Widen World Way Across from the TBIT*; and *MM-ST (SPAS)-2 – Change Departures and Arrivals Level Commercial Vehicle Curbside Operations Under Future (2025) Conditions*. With implementation of these mitigation measures, future phase(s) of the MSC Program would not result in significant curbside, roadway, or intersection impacts. Therefore, impacts to on-airport transportation associated with the future phase(s) of the MSC Program would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.6, *On-Airport Transportation*, of the Draft EIR, the BOAC hereby finds and determines that the future phase(s) of the MSC Program would not have significant on-airport transportation impacts. The BOAC hereby adopts the conclusions regarding less than significant surface transportation impacts. Applicable LAX Mitigation Measures identified above and in Section 4.6, *On-Airport Transportation*, of the Draft EIR, will be included in the Mitigation Monitoring and Reporting Program for the Midfield Satellite Concourse and would ensure that on-airport transportation impacts would be less than significant. No further mitigation measures are required.

f. Construction Surface Transportation

Description of Effects: As analyzed in Section 4.7, *Construction Surface Transportation*, of the Draft EIR, construction of the MSC North Project would generate vehicle trips on the local roadway system, I-405, and I-105 in the vicinity of LAX during construction, resulting from workers traveling to and from the project area and from trucks transporting materials and equipment. As part of the LAX Master Plan, the Midfield Satellite Concourse is subject to the LAX Master Plan Commitments and Mitigation Measures contained in the LAX Master Plan Final EIS/EIR. The nine LAX Master Plan Commitments that pertain to construction surface transportation, and are applicable to the MSC, include:

- *C-1. Establishment of a Ground Transportation/Construction Coordination Office*
- *C-2. Construction Personnel Airport Orientation*
- *ST-9. Construction Deliveries*
- *ST-12. Designated Truck Delivery Hours*
- *ST-14. Construction Employee Shift Hours*
- *ST-16. Designated Haul Routes*
- *ST-17. Maintenance of Haul Routes*
- *ST-18. Construction Traffic Management Plan*

- *ST-22. Designated Truck Routes*

MSC North Project

Construction Surface Transportation Impacts

Potential traffic-related impacts for the Baseline Plus Project condition for the MSC North Project were analyzed based on a comparison between the Project-specific traffic generated during the peak construction period (December 2018) and the baseline traffic volumes. The resulting levels of service were compared to the levels of service associated with the baseline condition. A significant impact would be realized if/when the thresholds of significance are met or exceeded. As described in Section 4.7, *Construction Surface Transportation*, no significant construction-related traffic impacts would occur under the Baseline Plus Project condition for the MSC North Project. Therefore, no Project-specific mitigation measures were required.

Findings: Based on substantial evidence in the administrative record, including Section 4.7, *Construction Surface Transportation*, of the Draft EIR, the BOAC hereby finds and determines that the MSC North Project would not have Project-specific significant construction surface transportation impacts. The BOAC hereby adopts the conclusions regarding less than significant surface transportation impacts. Applicable LAX Master Plan Commitments identified in Section 4.7, *Construction Surface Transportation*, of the Draft EIR, will be included in the Mitigation Monitoring and Reporting Program for the Midfield Satellite Concourse and would ensure that surface transportation impacts would be less than significant. No further mitigation measures are required.

C. Less than Significant Impacts Identified in the Initial Study

The Initial Study prepared for the Midfield Satellite Concourse (Appendix A of the Draft EIR) evaluated the potential impacts on a range of subjects as listed in Appendix G of the CEQA Guidelines. The analysis conducted for the Initial Study determined that no impact would occur relative to Agricultural and Forestry Resources, Mineral Resources, and Recreation. The Initial Study also determined that the impact of the MSC North Project and the future phase(s) of the MSC Program with respect to Biological Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Noise[3], Population and Housing, and Utilities and Service Systems would be less than significant.

The Initial Study determined that potentially significant impacts with respect to aesthetics would be reduced to a less than significant level with the implementation of the following LAX Master Plan Commitments and Mitigation Measures:

[3] The Initial Study found that for all six noise-related thresholds, the proposed MSC North Project would result in a "less than significant impact" and that no further analysis of that topic in an EIR was required. However, during the EIR NOP public comment period, LAWA received a request to analyze the potential impacts of aircraft noise from changes to taxi routes that would occur as a result of the proposed MSC North Project; therefore, taxi-noise was analyzed in Section 4.4 of the EIR.

Mitigation Measure DA-1. Provide and Maintain Airport Buffer Areas. Along the northerly and southerly boundary areas of the airport, LAWA will provide and maintain landscaped buffer areas that will include setbacks, landscaping, screening or other appropriate view-sensitive improvements with the goals of avoiding land use conflicts, shielding lighting, enhancing privacy, and better screening views of Airport facilities from adjacent residential uses. Use of existing facilities in buffer areas may continue as required until LAWA can develop alternative facilities.

Mitigation Measure MM-DA-1. Construction Fencing. Construction fencing and pedestrian canopies shall be installed by LAWA to the degree feasible to ensure maximum screening of areas under construction along major public approach and perimeter roadways, including Sepulveda Boulevard, Century Boulevard, Westchester Parkway, Pershing Drive, and Imperial Highway west of Sepulveda Boulevard. Along Century Boulevard, Sepulveda Boulevard, and in other areas where the quality of public views are a high priority, provisions shall be made by LAWA for treatment of the fencing to reduce temporary visual impacts.

The Initial Study also determined that potentially significant impacts with respect to the discovery of unknown archaeological and paleontological resources, and human remains, during construction of the MSC North Project and future phase(s) of the MSC Program would be reduced to a less than significant level with the implementation of the following LAX Master Plan Mitigation Measures and Project-specific Mitigation Measures:

Mitigation Measure MM-HA-5. Archaeological Monitoring. Any grading and excavation activities within LAX proper or the acquisition areas that have not been identified as containing redeposited fill material or having been previously disturbed shall be monitored by a qualified archaeologist. The archaeologist shall be retained by LAWA and shall meet the Secretary of the Interior's Professional Qualifications Standards. The project archaeologist shall be empowered to halt construction activities in the immediate area if potentially significant resources are identified. Test excavations may be necessary to reveal whether such findings are significant or insignificant. In the event of notification by the project archaeologist that a potentially significant or unique archaeological/cultural find has been unearthed, LAWA shall be notified and grading operations shall cease immediately in the affected area until the geographic extent and scientific value of the resource can be reasonably verified. Upon discovery of an archaeological resource or Native American remains, LAWA shall retain a Native American monitor from a list of suitable candidates obtained from the Native American Heritage Commission.

Mitigation Measure MM-HA-6. Excavation and Recovery. Any excavation and recovery of identified resources (features) shall be performed using standard archaeological techniques and the requirements stipulated in the Archaeological Treatment Plan (ATP). Any excavations, testing, and/or recovery of resources shall be conducted by a qualified archaeologist selected by LAWA.

Mitigation Measure MM-HA-7. Administration. Where known resources are present, all grading and construction plans shall be clearly imprinted with all of the archaeological/cultural mitigation measures. All site workers shall be informed in

writing by the on-site archaeologist of the restrictions regarding disturbance and removal as well as procedures to follow should a resource deposit be detected.

Mitigation Measure MM-HA-8. Archaeological/Cultural Monitor Report. Upon completion of grading and excavation activities in the vicinity of known archaeological resources, the Archaeological/Cultural monitor shall prepare a written report. The report shall include the results of the fieldwork and all appropriate laboratory and analytical studies that were performed in conjunction with the excavation. The report shall be submitted in draft form to the FAA, LAWA, and City of Los Angeles-Cultural Affairs Department. City representatives shall have 30 days to comment on the report. All comments and concerns shall be addressed in a final report issued within 30 days of receipt of city comments.

Mitigation Measure MM-HA-9. Artifact Curation. All artifacts, notes, photographs, and other project-related materials recovered during the monitoring program shall be curated at a facility meeting federal and state requirements.

Mitigation Measure MM-HA-10. **Archaeological Notification**. If human remains are found, all grading and excavation activities in the vicinity shall cease immediately and the appropriate LAWA authority shall be notified; compliance with those procedures outlined in Section 7050.5(b) and (c) of the State Health and Safety Code, Section 5097.94(k) and (i) and Section 5097.98(a) and (b) of the Public Resources Code shall be required. In addition, those steps outlined in Section 15064.5(e) of the CEQA Guidelines shall be implemented.

Mitigation Measure MM-HA (MSC)-1. Conformance with LAX Master Plan Archaeological Treatment Plan. Prior to initiating grading and construction activities, LAWA will retain an on-site Cultural Resource Monitor (CRM), as defined in the LAX Master Plan Mitigation Monitoring and Reporting Program Archaeological Treatment Plan (ATP), who will determine if the proposed project area is subject to archaeological monitoring. As defined in the ATP, areas are not subject to archaeological monitoring if they contain redeposited fill or have previously been disturbed. The CRM will compare the known depth of redeposited fill or disturbance to the depth of planned grading activities, based on a review of construction plans. If the CRM determines that the project site is subject to archaeological monitoring, a qualified archaeologist (an archaeologist who satisfies the Secretary of the Interior's Professional Qualifications Standards [36 CFR 61]) shall be retained by LAWA to inspect excavation and grading activities that occur within native material. The extent and frequency of inspection shall be defined based on consultation with the archaeologist. Following initial inspection of excavation materials, the archaeologist may adjust inspection protocols as work proceeds.

Mitigation Measure MM-PA-2. Paleontological Authorization. The paleontologist shall be authorized by LAWA to halt, temporarily divert, or redirect grading in the area of an exposed fossil to facilitate evaluation and, if necessary, salvage. No known or discovered fossils shall be destroyed without the written consent of the project paleontologist.

Mitigation Measure MM-PA-3. Paleontological Monitoring Specifications. Specifications for paleontological monitoring shall be included in construction contracts for all LAX projects involving excavation activities deeper than six feet.

Mitigation Measure MM-PA-4. Paleontological Resources Collection. Because some fossils are small, it will be necessary to collect sediment samples of promising horizons discovered during grading or excavation monitoring for processing through fine mesh screens. Once the samples have been screened, they shall be examined microscopically for small fossils.

Mitigation Measure MM-PA-5. Fossil Preparation. Fossils shall be prepared to the point of identification and catalogued before they are donated to their final repository.

Mitigation Measure MM-PA-6. Fossil Donation. All fossils collected shall be donated to a public, nonprofit institution with a research interest in the materials, such as the Los Angeles County Museum of Natural History.

Mitigation Measure MM-PA-7. Paleontological Reporting. A report detailing the results of these efforts, listing the fossils collected, and naming the repository shall be submitted to the lead agency at the completion of the project.

Mitigation Measure MM-PA (MSC)-1. Conformance with LAX Master Plan Paleontological Management Treatment Plan. Prior to the initiation of grading and construction activities, LAWA will retain a professional paleontologist, as defined in the LAX Master Plan Mitigation Monitoring and Reporting Program Paleontological Management Treatment Plan (PMTP), who will determine if the project site exhibits a high or low potential for subsurface resources. If the project site is determined to exhibit a high potential for subsurface resources, paleontological monitoring will be conducted in accordance with the procedures stipulated in the PMTP. If the project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP. In the event that paleontological resources are discovered, the procedures outlined in the PMTP for the identification of resources will be followed.

Mitigation Measure MM-PA (MSC)-2. Construction Personnel Briefing. In accordance with the PMTP, construction personnel will be briefed by the consulting paleontologist in the identification of fossils or fossiliferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur.

Additionally, the Initial Study also determined that potentially significant impacts with respect to hazards and hazardous materials during construction and operations of the MSC North Project and future phase(s) of the MSC Program would be reduced to a less than significant level with the implementation of the following LAX Master Plan Mitigation Measures and Project-specific Mitigation Measures:

Mitigation Measure MM-HM-2. Handling of Hazardous Materials Encountered During Construction. Prior to the initiation of construction, LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials encountered during construction. The intent of this program will be to ensure that all contaminated soils and/or groundwater encountered during construction are handled in accordance with all applicable regulations.

Mitigation Measure MM-HM (MSC)-1. Asbestos-Containing Materials and Lead Based Paint. Prior to construction activities, LAWA, or its contractors, will conduct an evaluation of all buildings (built prior to 1980) to be demolished to evaluate the

presence of asbestos-containing materials and lead-based paint. Remediation will be implemented in accordance with the recommendation of these evaluations.

Mitigation Measure MM-HM (MSC)-2. Hazardous Materials Contingency Plan. LAWA or its contractors will prepare a hazardous materials contingency plan addressing the potential for discovery of unidentified USTs, hazardous materials, petroleum hydrocarbons, or hazardous or solid wastes encountered during construction. The contingency plan will address UST decommissioning, field screening and materials testing methods, mitigation and contaminant management requirements, and health and safety requirements.

Mitigation Measure MM-HM (MSC)-3. Hazardous and Solid Waste Disposal. Construction contractors will dispose of all hazardous or solid wastes and debris encountered or generated during construction and demolition activities in accordance with all federal, state, and local laws and regulations.

Findings: Based on substantial evidence in the administrative record, including the Initial Study, provided as Appendix A of the Draft EIR, the BOAC hereby finds and determines that construction and operation of the MSC North Project and future phase(s) of the MSC Program would be less than significant with respect to Aesthetics, Agricultural and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials (except for acute non-cancer health hazards for acrolein), Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, and Utilities and Service Systems. The Initial Study requires no further action or mitigation measures with respect to these resources or the findings of the Initial Study. Although archaeological, paleontological and human remains are not expected to be found during construction, LAX Master Plan Mitigation Measures associated with discovery of unknown archaeological and paleontological resources will be included in the Mitigation Monitoring and Reporting Program to further ensure a less than significant impact (as described in the Initial Study). The BOAC hereby adopts the conclusions regarding less-than-significant construction- and operation-related impacts on these environmental subject areas.

D. Findings on Project Alternatives

a. Alternatives Considered and Rejected

Redevelop Existing Terminal(s) to Add New Gates

As an alternative to construction of the MSC, LAWA considered whether the existing terminals within the CTA could be redeveloped to add new gates. A number of different terminal configurations were examined as part of the LAX Master Plan and as part of SPAS, some of which would add gates within the CTA. However, redevelopment of any of the existing terminals would close gates for an extended period of time. There are no spare gates at LAX to accommodate the passenger airline operations that would be displaced to allow redevelopment of an existing terminal; all gates are currently utilized. During peak periods, the West Remote Gates/Pads are also near capacity. Thus, LAWA cannot undertake redevelopment

of a terminal to add new gates without displacing current tenants and their passenger operations. Because the objectives of the MSC North Project include giving LAWA the flexibility to redevelop existing terminals without negatively affecting passenger operations and the ability to close gates for renovation without reducing the number of existing gates, this alternative was determined infeasible and was not carried forward for full evaluation.

Alternate Site – West Remote Gates/Pads Site Alternative

The West Remote Pads/Gates site is located west of the proposed Project Site and is bounded to the south by World Way West, to the north by Taxiway E, to the west by Pershing Drive, and to the east by Taxiway AA. The approximately 71-acre West Remote Gates/Pads site is currently utilized as an apron/gate area for on-loading and off-loading of international and domestic flights that cannot be handled in the CTA. Passengers are ferried to and from the site by buses. The apron area is also utilized for RON and RAD parking of aircraft when the gates are not in use.

The West Remote Gates/Pads site can accommodate 11 aircraft at apron gates having jet loading bridges and another 7 hardstand (pads) without loading bridges, for a total of 18 positions. Additional aircraft are double- and sometimes triple-parked at some of these positions during overnight and early morning hours. In April, May, and June of 2013 the West Remote Gates/Pads were utilized to park 1,592 aircraft, with 634 using contact gates and an additional 958 operations parked on "hardstand" or RON positions. An August 2012 peak month survey of West Remote Gates/Pads usage found that peak use of the area was in the early morning, and included 16 aircraft parked simultaneously. On that same day, a total of 34 aircraft were positioned on the West Remote Gates/Pads site during various times of the day.

A large maneuvering area is located in the southwest quadrant of this alternative site. This maneuvering area also serves as an operational readiness area for "super-jumbo" aircraft such as the Antonov AN-124 cargo carrier, which has called on LAX in the past. Additionally, this space is utilized for RON/RAD for highly secure visits by public and government officials that at times require staging of military cargo and other large aircraft.

Although the West Remote Gates/Pads site was investigated in whole and in part as an alternative location for the proposed Project, it was not carried forward for further analysis because the site is already highly utilized for passenger gate facilities and for aircraft parking (i.e., RON/RAD), including special-purpose use (i.e., super-jumbo aircraft parking and high-security areas) and would not be able to accommodate additional apron gates or hardstand positions. The West Remote Gates/Pads have no concessions for passengers and are inefficient due to their distance from the CTA, providing a poor level of passenger service. Because objectives of the MSC North Project include giving LAWA the flexibility to redevelop existing terminals without negatively affecting passenger operations; the ability to close gates for renovation without reducing the number of existing gates; and to improve terminal operations, concessions facilities, and overall passenger experience at LAX, this alternative was determined infeasible and was not carried forward for full evaluation.

Alternative Construction Approach

Consideration was given to modifying the overall construction approach in an effort to avoid or substantially lessen the significant construction-related surface transportation, air quality, and greenhouse gas emission impacts identified in Chapter 4. It should be noted that the construction approach currently proposed for the MSC North Project already includes a number of features that reduce potential impacts in those areas. These features include, but are not limited to: scheduling construction employee shift hours and truck delivery hours to avoid the peak commuter periods; recycling/reuse of demolition debris associated with the removal of existing apron, roadways, and other surfaces through the use of an on-site rock-crusher; preparation of concrete using an on-site batch plant; establishment of limits on construction equipment idling time; and requirements to use low-emission equipment.

An alternative construction approach that could be considered relative to avoiding or substantially reducing the surface transportation and air quality impacts associated with the MSC North Project would be to extend the overall construction period to reduce the amount of daily activity. With respect to air quality impacts, the amount of reduction in daily activity that would be required in order for the daily air pollutant emissions to fall below the SCAQMD CEQA thresholds of significance would be between 44 percent and 91 percent.

The largest reduction required to avoid a significant impact would be needed with respect to NOx emissions. Daily activities would need to be reduced by approximately 91 percent, which would limit daily construction activities to approximately 30 minutes within what would otherwise be a 10-hour work day or 1.2 hours within what would otherwise be a 24-hour work day. Even if the size of the equipment crews were reduced in half, based on a lower intensity of daily construction activity and an extended overall duration of construction, activity within a 10-hour work day could only occur for about an hour in order for the construction-related NOx emissions to remain less than significant. Based on such limitations, it would conceivably take approximately 100 years to complete project construction. While such an alternative would reduce daily emissions to a level that is less than significant and would also reduce the daily construction-related trip generation, it would simply increase the overall duration of air pollutant emissions and construction traffic on local roadways. Therefore, this alternative was determined to be infeasible and was not carried forward for full evaluation.

Findings: For reasons described above, the BOAC hereby rejects the Redevelop Existing Terminal(s) to Add New Gates Alternative; the Alternate Site – West Remote Gates/Pads Alternative; and the Alternative Construction Approach Alternative, as they do not meet the proposed Project's objectives:

- The Existing Terminal(s) to Add New Gates Alternative and the Alternate Site – West Remote Gates/Pads Alternative would not meet the proposed Project's objectives because it would not provide LAWA the flexibility to redevelop existing terminals without negatively affecting passenger operations. Nor would it allow LAWA the ability to close gates for renovation without reducing the number of existing gates.

- The Alternative Construction Approach Alternative would not meet the proposed Project's objectives because it would conceivably take approximately 100 years to complete project construction. While such an alternative would reduce daily emissions to a level that is less than significant and would also reduce the daily construction-related trip generation, it would increase the overall duration of air pollutant emissions and construction traffic on local roadways.

b. Alternatives Carried Forward for Full Evaluation

MSC North Project

Alternative 1: No Project

Under the "No Project" alternative, none of the improvements and activities proposed for the MSC North Project would occur. The proposed Project site would continue to be used for aircraft maintenance, RON/RAD aircraft parking, the U.S. Coast Guard facility, electrical substations, and the various other existing uses at the site. LAWA would forego the opportunity to develop new gates that would allow them the flexibility to renovate and redevelop the existing terminals without negatively affecting existing airline passenger operations. LAWA would continue to rely on the West Remote Gates/Pads to provide remote contact gates and/or parking positions when contact gates at the terminals within the CTA are unavailable.

While impacts for the No Project Alternative would be less than the proposed Project, as described below, the No Project Alternative would not meet the Project's objectives of giving LAWA the flexibility to redevelop existing terminals without negatively affecting passenger operations; the ability to close gates for renovation without reducing the number of existing gates; and to improve terminal operations, concessions facilities, and overall passenger experience at LAX.

Air Quality. As the No Project Alternative would not involve any construction, it would not have the significant unavoidable impact that would occur under the proposed Project with respect to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions. With respect to regional operational emissions, the No Project Alternative would be similar to the proposed Project; impacts would be less than significant.

Greenhouse Gas Emissions. This Alternative would result in no net increase in short-term and temporary emissions of GHGs since construction would not occur. On a long-term basis, the existing site facilities would continue to be used and would not be relocated. Maintenance and other activities would continue to occur at the existing facilities located on the Project site, which were built prior to LAX's adoption of the Los Angeles Green Building Code Tier 1 standards and thus were not designed to meet the current energy efficiency standards. However, the MSC North Project would generate more greenhouse gas emissions than the existing facilities due to its size and function and the greater electrical, heating, and cooling requirements. Thus, the operational emissions under the No Project Alternative would be less than the proposed Project, and would be less than significant.

Human Health Risk. The No Project Alternative would have no health risk impact associated with construction since no construction would occur. Operational health impacts of this Alternative would be less than significant as there would be no change in operations at the airport compared to existing conditions. Therefore, there would be no change in localized emissions at the Project site, impacts would be less than significant, and this alternative would avoid the significant and unavoidable impact of the proposed Project in regards to the acute non-cancer hazard index for acrolein.

Noise. Under the proposed Project, operational noise sources would include aircraft taxiing to the MSC North site, which would have less than significant noise impacts. The No Project Alternative would not introduce any new sources of noise on the Project site or within the surrounding vicinity; ambient noise levels at the site would remain as they are under existing conditions, consistent with typical noise levels from aircraft taxiing in the midfield area of the airport. Under the No Project alternative, more aircraft would taxi to and utilize the West Remote Gates/Pads than under the proposed Project. However, noise impacts from aircraft operations would be similar under both alternatives and would remain less than significant.

Public Services – Fire Protection Services. Under the No Project Alternative, the provision of new aircraft gates in the midfield area and a tunnel connecting the MSC North building to the CTA under the proposed Project would not occur. As discussed in Chapter 4.5, *Public Services – Fire Protection Services*, the proposed Project would have a less than significant impact. However, as the No Project Alternative entirely avoids the proposed Project's fire protection services impacts, it would have less impact than the proposed Project on existing fire protection services in the area.

Construction Surface Transportation. As the No Project Alternative would not involve any of the construction activities associated with the development of the proposed Project, construction traffic associated with demolition, construction of new facilities, delivery of materials and hauling, and employee trips would not occur. As discussed in Chapter 4.7, *Construction Surface Transportation*, the proposed Project would have a significant and unavoidable cumulative impact on two intersections during the Project's construction phase. As the No Project Alternative entirely avoids the proposed Project's construction traffic impacts, it would have less impact than the proposed Project on existing traffic conditions in the area.

Findings: For reasons discussed above, the BOAC hereby rejects the No Project Alternative. While significant impacts would be reduced for air quality, greenhouse gas emissions, human health risk, and construction surface transportation, this Alternative would not meet any of the objectives of the proposed Project, including: providing LAWA the flexibility to modernize existing terminals; allowing LAWA to close gates for renovations without reducing the number of existing gates; improving the overall passenger experience at LAX; reducing reliance on the West Remote Gates/Pads; and facilitating the implementation of the LAX Master Plan.

Alternative 2: Reduced Project

A reduced project alternative was identified that would involve the construction of 7-8 gates rather than the 11 gates proposed as part of the MSC North Project. The

footprint of this facility was assumed to be approximately 100,000 square feet. The concourse would stop just north of World Way West and would avoid impacting the FAA navigational aids, one of the electrical industrial stations, 3 RON parking spaces, the natural gas regulator, and the American Airlines Private Post. In addition to a reduced concourse facility, this alternative would also eliminate the tunnel for a future conveyance system, as well as Taxiway C14 and associated enabling projects, including: demolition of the U.S. Coast Guard facility; demolition of the U.S. Airways Maintenance facility; relocation of Electrical Vault #2; the removal of 5 RON aircraft parking spaces; and the relocation of the water deluge tank and pump station. All other project components would be included.

Air Quality. The Reduced Project Alternative would result in construction emissions, but due to the reduced size of the project would be less than the proposed Project. As discussed in Chapter 4.1, *Air Quality*, the proposed Project would result in a net increase in short-term and temporary emissions of criteria air pollutants associated with construction-related activities with a significant and unavoidable impact with respect to regional emissions of CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X. The Reduced Project Alternative would have less construction impacts than the proposed Project. Implementation of the Reduced Project Alternative would avoid significant impacts related to short-term and temporary emissions of VOC, PM_{10}, and $PM_{2.5}$, that would otherwise occur under the proposed Project. However, as shown in Table 5-2 of Section 5.5.1.2 of the Draft EIR, while impacts to construction-related regional CO and NO_X emissions would be reduced, impacts would still be significant and unavoidable.

Operation of the Reduced Project Alternative would result in emissions consistent with current levels and with future aircraft activity projections, which would be about the same as the emissions under the proposed Project on a long-term basis. However, additional bus trips and GSE trips would occur under the proposed Project to transport passengers and their luggage between the MSC North and terminals within the CTA. Thus, the operational emissions under the Reduced Project Alternative would have similar emissions related to aircraft operations, slightly lower emissions related to on-airport bus and GSE trips, but slightly greater emissions from aircraft taxiing.

In summary, the Reduced Project Alternative would avoid the significant impact that would occur under the proposed Project with respect to construction-related regional PM_{10}, $PM_{2.5}$, and VOC emissions. While impacts for construction-related regional CO and NO_X emissions would be reduced, impacts would still be significant and unavoidable for these air pollutants. With respect to regional operational emissions, the Reduced Project Alternative would be similar to the proposed Project; impacts would be less than significant.

Greenhouse Gas Emissions. The Reduced Project Alternative would result in a net increase in emissions of GHGs, but total emissions would be less than the proposed Project due to the reduced size of the Project. The Reduced Project Alternative would be required to comply with the CALGreen and LAGBC Tier 1 standards for nonresidential buildings, which would reduce energy consumption, waste generation, and GHG emissions compared to similar buildings that do not meet the standards. The Reduced Project Alternative would result in operational

greenhouse gas emissions associated with the MSC North building; however, total emissions would be less than the proposed Project due to the reduced size of the building. Additionally, GHG emissions from current uses of the MSC North Project site that would remain under the Reduced Project Alternative were quantified as well. The Reduced Project Alternative would result in fewer total greenhouse gas emissions, when compared to the proposed Project Alternative; it is anticipated that the Reduced Project Alternative would avoid the significant impact that would occur under the proposed Project with respect to greenhouse gas emissions.

Human Health Risk. The Reduced Project Alternative would result in changes to aircraft taxi patterns similar to the proposed Project, although with fewer gates, fewer aircraft operations would occur at the MSC North building. Although this Alternative does not include the construction of Taxiway C14, it is still anticipated that the acute non-cancer hazard index for acrolein would be similar to that anticipated under the proposed Project due to the shift of aircraft taxi operations from the CTA to the midfield area. Thus, operational health impacts of this Alternative would be similar to the proposed Project. Implementation of the Reduced Project Alternative would not avoid or substantially reduce the significant unavoidable impact that would occur under the proposed Project with respect to the acute non-cancer hazard index for acrolein.

Noise. Under the proposed Project, operational noise sources would include aircraft taxiing to the MSC North site, which would have less than significant noise impacts. The Reduced Project Alternative would include the same changes to aircraft taxi paths (with the exception of Taxiway C14), although with fewer gates at the MSC North, there would be fewer aircraft operations in this area of the airfield. As with the proposed Project, no significant noise impacts from aircraft operations at LAX is expected to occur under the Reduced Project Alternative.

Public Services – Fire Protection Services. Under the Reduced Project Alternative, the MSC North building would be smaller than the proposed Project with 3-4 fewer aircraft gates. Additionally, the Reduced Project Alternative would avoid impacting World Way West, the FAA navigational aids, an electrical industrial station, 3 RON parking spaces, the natural gas regulator, and the American Airlines Private Post. In addition to a reduced concourse facility, this alternative would also eliminate the tunnel for a future conveyance system, as well as Taxiway C14 and associated enabling projects. With elimination of the tunnels and the reduction in size of the MSC North building, this alternative would have reduced impacts to fire protection services when compared to the proposed Project. As with the proposed Project, no significant impacts to fire protection services at LAX is expected to occur under the Reduced Project Alternative.

Construction Surface Transportation. With a reduced Project as discussed above, this Alternative would have reduced impacts to surface transportation from construction activities when compared to the proposed Project. As discussed in Chapter 4.7, *Construction Surface Transportation*, the proposed Project would have a significant and unavoidable cumulative impact on two intersections during the peak cumulative period of the Project's construction phase. Because the peak cumulative period of the construction phase is primarily related to construction of the MSC North building, it is anticipated that implementation of the Reduced Project Alternative

would still result in significant and unavoidable impacts with respect to construction surface transportation. However, the impact would be reduced when compared to the proposed Project.

Findings: Although the Reduced Project Alternative would reduce emissions of VOCs, PM_{10}, and $PM_{2.5}$, as well as GHG emissions, to a less than significant impact, this Alternative would not fully avoid the significant impacts or satisfy all of the objectives of the Project. The Reduced Project Alternative would allow LAWA to close fewer gates for renovations without reducing the number of existing gates, provide less flexibility for LAWA to modernize existing terminals, would require LAWA to rely on the West Remote Gates/Pads more when compared to the proposed Project, and extend the phased implementation of the approved LAX Master Plan. In light of the above analysis, the BOAC hereby rejects the Reduced Project Alternative evaluated in the MSC EIR and finds that it will not avoid the significant and unavoidable impacts of the Project related to construction-related regional CO and NO_X emissions, acute non-cancer health hazards for acrolein, and cumulative impact on two intersections during the peak cumulative period of construction, and would not satisfy all of the Project's objectives.

Alternative 3: MSC South

Alternative 3 would involve construction of the southern portion of the MSC rather than the northern portion as proposed. This alternative would impact the American Airlines High Bay Hangar, but would stop just south of World Way West. This alternative would avoid impacting the FAA navigational aids, one of the electrical industrial stations, the American Airlines Maintenance (Non-Power) shop, the American Airlines leasehold parking, and the natural gas regulator. This alternative would also result in a reduced project alternative with 2 fewer aircraft gates than the proposed MSC North Project.

Air Quality. The MSC South Alternative would result in construction emissions, but due to the reduced size of the project would be less than the proposed Project. Although the MSC South Alternative would have less construction impacts than the proposed Project Alternative, the main elements contributing to the exceedance of regional emissions of CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X would still occur; including construction of the MSC South building and apron, Taxiway C14, and passenger and conveyance tunnels. Implementation of the MSC South Alternative would not avoid or substantially reduce significant impacts related to short-term and temporary emissions of criteria air pollutants that would otherwise occur under the proposed Project, as shown in Table 5.4 of Section 5.5.1.3 of the Draft EIR.

Operation of the MSC South Alternative would result in emissions generally about the same as the emissions under the proposed Project on a long-term basis. Taxiing distances of some aircraft would decrease under the proposed Project when compared to the MSC South Alternative, as fewer operations would occur at the West Remote Gates/Pads. However, additional bus trips and GSE trips would occur under the proposed Project to transport passengers and their luggage between the MSC North building and terminals within the CTA. Thus, the operational emissions under the MSC South Alternative would have similar emissions related to aircraft operations, slightly lower emissions related to on-airport bus and GSE trips, but

slightly greater emissions from aircraft taxiing, when compared to the proposed Project.

In summary, the MSC South Alternative would not avoid or substantially reduce the significant unavoidable impact that would occur under the proposed Project with respect to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions. With respect to regional operational emissions, the MSC South Alternative would be similar to the proposed Project; impacts would be less than significant.

Greenhouse Gas Emissions. The MSC South Alternative would also result in a net increase in emissions of GHGs, but total emissions would be slightly less due to the reduced size of the project. The MSC South Alternative would be required to comply with the CALGreen and LAGBC Tier 1 standards for nonresidential buildings, which would reduce energy consumption, waste generation, and GHG emissions compared to similar buildings that do not meet the standards. The MSC South Alternative would result in operational greenhouse gas emissions associated with the MSC building; total emissions would be slightly less than the proposed Project due to the reduced size of the building but would not be substantially different since the electrical, heating, and cooling requirements of the MSC South building would still be substantial. While the MSC South Alternative would result in fewer total greenhouse gas emissions, when compared to the proposed Project, it is not anticipated that the MSC South Alternative would avoid or substantially reduce the significant unavoidable impact that would occur under the proposed Project with respect to greenhouse gas emissions.

Human Health Risk. The MSC South Alternative would result in changes to aircraft taxi patterns similar to the proposed Project; although with fewer gates, fewer aircraft operations would occur at the MSC South. However, because this Alternative also includes the construction of Taxiway C14, it is anticipated that the acute non-cancer hazard index for acrolein would be similar to that anticipated under the proposed Project. The provision of Taxiway C14 and Taxilane C12 would cause more crossfield taxi operations to occur, which would reduce acrolein concentrations around most of the airport, but would increase peak concentrations at some receptor locations to the north and south (see Figure 4.3-2 in Chapter 4.3, *Human Health Risk Assessment*). Thus, operational health impacts of this Alternative would be similar to the proposed Project. Implementation of the MSC South Alternative would not avoid or substantially reduce the significant unavoidable impact that would occur under the proposed Project with respect to the acute non-cancer hazard index for acrolein.

Noise. Under the proposed Project, operational noise sources would include aircraft taxiing to the MSC North site, which would have less than significant noise impacts. The MSC South Alternative would include similar changes to aircraft taxi paths, although with fewer gates and at a location south of the proposed MSC North building. Thus, there would be slightly fewer aircraft operations in this area of the airfield. However, as with the proposed Project, no significant noise impacts from aircraft operations at LAX is expected to occur under the MSC South Alternative.

Public Services – Fire Protection Services. Under the MSC South Alternative, the MSC South building would be smaller than the proposed Project with 2 fewer aircraft gates. However, the MSC South Alternative would include new aircraft gates in the

midfield area, tunnel(s) connecting the MSC South building to the CTA, and Taxiway C14. Thus, this Alternative would have similar impacts to fire protection services when compared to the proposed Project. As with the proposed Project, no significant impacts to fire protection services at LAX are expected to occur under the MSC South Alternative.

Construction Surface Transportation. The MSC South Alternative includes nearly all of the components of the proposed Project, as discussed above. Thus, this Alternative would have similar impacts to construction surface transportation when compared to the Proposed Project. As discussed in Chapter 4.7, *Construction Surface Transportation*, a significant and unavoidable impact on two intersections would occur during the Project's construction phase. Therefore, it is anticipated that implementation of the MSC South Alternative would not avoid or substantially reduce the significant unavoidable impact that would occur under the proposed Project with respect to construction surface transportation.

Findings: Although the MSC South Alternative would reduce emissions associated with construction, this Alternative would not avoid the significant impacts or satisfy all of the objectives of the Project. The MSC South Alternative would provide gates for LAWA to utilize during renovations of existing terminals, but it would permit LAWA to close fewer gates for renovations without reducing the number of existing gates, provide less flexibility for LAWA to modernize existing terminals, would require LAWA to rely on the West Remote Gates/Pads more when compared to the proposed Project, and extend the phased implementation of the approved LAX Master Plan. In light of the above analysis, the BOAC hereby rejects the MSC South Alternative evaluated in the MSC EIR and finds that it will not effectively reduce or avoid the significant and unavoidable impacts of the Project related to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions, greenhouse gas emissions, acute non-cancer health hazards for acrolein, and cumulative impact on two intersections during the peak cumulative period of construction, and will not satisfy all of the Project's objectives.

Alternative 4: Terminal/Concourse 0

Alternative 4 would involve the construction of "Terminal/Concourse 0" north of World Way and east of Terminal 1. Terminal/Concourse 0 could be constructed with up to 7 gates in the western portion of the area currently occupied by Park One. This alternative would require the relocation of Sky Way (upper and lower roadways) eastward to allow development of the terminal and would also provide additional roadway and curbfront in the CTA. This alternative would eliminate the impacts to the existing facilities at the Project site (aside from the Taxiway C14 enabling projects), which would remain as they exist today, and would also eliminate the need for an underground conveyance system from the MSC to connect to the CTA.

Air Quality. The Terminal/Concourse 0 Alternative would result in construction emissions, but due to the reduced size of the project would be less than the proposed Project for all pollutants except for NO_X. As discussed in Chapter 4.1, *Air Quality*, the proposed Project would result in a net increase in short-term and temporary emissions of criteria air pollutants associated with construction-related activities with a significant and unavoidable impact with respect to regional emissions

of CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X. Although the Terminal/Concourse 0 Alternative would have less construction impacts than the proposed Project Alternative (for all criteria pollutants except NO_X), major construction elements contributing to the exceedance of regional emissions would still occur. This includes construction of the Terminal/Concourse 0 building and apron, Taxiway C14, and relocation of Sky Way. Implementation of the Terminal/Concourse 0 Alternative would not avoid or substantially reduce significant impacts related to short-term and temporary emissions of criteria air pollutants that would otherwise occur under the proposed Project, as shown in Table 5-6 of Section 5.5.1.4 of the Draft EIR.

Operation of the Terminal/Concourse 0 Alternative would result in emissions which would be about the same as the emissions under the proposed Project on a long-term basis. Taxiing distances of some aircraft would decrease under the proposed Project when compared to the Terminal/Concourse 0 Alternative, as fewer operations would occur at the West Remote Gates/Pads and aircraft would taxi to the midfield area, not the northeast corner of LAX. However, additional bus trips and GSE trips would occur under the proposed Project to transport passengers and their luggage between the MSC North and terminals within the CTA, which would not occur under the Terminal/Concourse 0 Alternative. Thus, the operational emissions under the Terminal/Concourse 0 Alternative would have similar emissions related to aircraft operations, lower emissions related to on-airport bus and GSE trips, but greater emissions from aircraft taxiing when compared to the proposed Project.

In summary, the Terminal/Concourse 0 Alternative would not avoid or substantially reduce the significant unavoidable impact that would occur under the proposed Project with respect to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions. With respect to regional operational emissions, the Terminal/Concourse 0 Alternative would be similar to the proposed Project; impacts would be less than significant.

Greenhouse Gas Emissions. The Terminal/Concourse 0 Alternative would also result in a net increase in short-term and temporary emissions of GHGs, but total emissions would be slightly less due to the reduced size of the project. The Terminal/Concourse 0 Alternative would be required to comply with the CALGreen and LAGBC Tier 1 standards for nonresidential buildings, which would reduce energy consumption, waste generation, and GHG emissions compared to similar buildings that do not meet the standards. The Terminal/Concourse 0 Alternative would result in operational greenhouse gas emissions associated with the terminal building; however, total emissions would be less than the proposed Project due to the reduced size of the building, but would not be substantially different since the electrical, heating, and cooling requirements of the terminal building would still be substantial. The Terminal/Concourse 0 Alternative would result in fewer total greenhouse gas emissions, when compared to the proposed Project Alternative; it is anticipated that the Terminal/Concourse 0 Alternative would avoid the significant impact that would occur under the proposed Project with respect to greenhouse gas emissions.

Human Health Risk. The Terminal/Concourse 0 Alternative would result in changes to aircraft taxi patterns with more aircraft traveling to the northeast corner of LAX than they do today. However, because this Alternative also includes the construction

of Taxiway C14, it is anticipated that the acute non-cancer hazard index for acrolein impacts to receptors north and south of the airport would be similar to that anticipated under the proposed Project, and would probably impact receptors located just east of the CTA due to the proximity of the airport property line to the Terminal/Concourse 0 site. Thus, operational health impacts of this Alternative would be similar to the proposed Project. Implementation of the Terminal/Concourse 0 Alternative would not avoid or substantially reduce the significant unavoidable impact that would occur under the proposed Project with respect to the acute non-cancer hazard index for acrolein.

Noise. Under the proposed Project, operational noise sources would include aircraft taxiing to the MSC North site, which would have less than significant noise impacts. The Terminal/Concourse 0 Alternative would include similar changes to aircraft taxi paths due to construction of Taxiway C14, but would also include introduction of aircraft taxi noise further east in the CTA adjacent to the Terminal/Concourse 0 site. However, as with the proposed Project, no significant noise impacts from aircraft operations at LAX is expected to occur under the Terminal/Concourse 0 Alternative.

Public Services – Fire Protection Services. Under the Terminal/Concourse 0 Alternative, the proposed terminal building would be smaller than the proposed Project with 4 fewer aircraft gates. Additionally, the Project site would continue to be used for aircraft maintenance, RON/RAD aircraft parking, the U.S. Coast Guard facility, electrical substations, and the various other existing uses at the site. Under the Terminal/Concourse 0 Alternative, the provision of new aircraft gates in the midfield area at LAX that would be constructed under the proposed Project would not occur. Rather, Terminal/Concourse 0 would be constructed with up to 7 gates east of Terminal 1. Thus, this Alternative would have less gates and is anticipated to have less impact to fire protection services than the proposed Project. As with the proposed Project, no significant impacts to fire protection services at LAX is expected to occur under the Terminal/Concourse 0 Alternative.

Construction Surface Transportation. Under the Terminal/Concourse 0 Alternative, the proposed terminal building would be smaller than the proposed Project with 4 fewer aircraft gates. Additionally, the Project site would continue under its current use. Under the Terminal/Concourse 0 Alternative, the provision of new aircraft gates in the midfield area at LAX that would be constructed under the proposed Project would not occur. Rather, Terminal/Concourse 0 would be constructed with up to 7 gates in the western portion of the area currently occupied by Park One, east of Terminal 1. Because there is limited open space available in this part of the airport, construction staging would have to occur in other areas of the airport, most likely north of the runway complex or in the Continental City area in the southeast corner of the airport.

As discussed in Chapter 4.7, *Construction Surface Transportation*, a significant and unavoidable impact on two intersections would occur during the Project's construction phase (Imperial Highway and Main Street, and Sepulveda Boulevard and Westchester Parkway). The Sepulveda Boulevard and Westchester Parkway intersection would be impacted if construction staging occurred north of the runway complex; however, the Imperial Highway and Main Street intersection would most likely not be impacted under the Terminal/Concourse 0 Alternative. Thus, the

Terminal/Concourse 0 Alternative would lessen but not entirely avoid the significant unavoidable impact that would occur under the proposed Project with respect to construction surface transportation.

Hazards and Hazardous Materials. The Park One site was previously used for various manufacturing operations by Garrett AiResearch, which was subsequently purchased by AlliedSignal (now known as Honeywell). AlliedSignal sold the property in 1991, at which time it was converted into an asphalt-covered commercial parking lot that is currently operated under the name of Park One, also known as "Park 'N Fly." Several investigation and remediation programs have been implemented at this site since 1989. The principal chemicals of concern (COCs) in soil and groundwater at the site include 1,1-dichloroethene (1,1-DCE), 1,1,1-trichloroethane (1,1,1-TCA), and 1,4-dioxane. VOCs and 1,4-dioxane have been detected in soil, soil gas, perched groundwater, and groundwater at the site. Soil vapor extraction at the site is estimated to have removed more than 100,000 pounds of VOCs between 1990 and 2011. Soil closure has been obtained for all portions of the site except the northwest quadrant.

Ongoing remediation at this site consists of soil vapor extraction to remove VOCs using a granular activated carbon system and monitoring wells. Due to the extent of the VOC contamination associated with the Park One site, it is possible that remediation would still be underway when construction of Terminal/Concourse 0 would be initiated. Due to the extent of excavation needed for the Terminal/Concourse 0 improvements, it is likely that part, or all, of the remediation system would have to be removed during construction, if it was still operational. This would entail destruction of the extraction wells and removal of underground piping and aboveground vessels. Removing the active remediation system at Park One for an extended period would interfere with existing cleanup efforts. However, temporary cessation of remediation would not have any impacts on human health as groundwater beneath the site is not used for municipal purposes and contaminated soils lie beneath asphalt and would not be exposed.

The Terminal/Concourse 0 Alternative would have a greater impact on hazards and hazardous materials than the proposed Project, but with a commitment to continue remediation of the site, impacts to ongoing remediation efforts would be less than significant.

Findings: Although the Terminal/Concourse 0 Alternative would reduce GHG emissions to a less than significant impact, as well as reduce the impact of construction surface transportation, this Alternative would not fully avoid the significant impacts or satisfy all of the objectives of the Project. The Terminal/Concourse 0 Alternative would provide gates for LAWA to utilize during renovations of existing terminals, but it would permit LAWA to close fewer gates for renovations without reducing the number of existing gates, provide less flexibility for LAWA to modernize existing terminals, would require LAWA to rely on the West Remote Gates/Pads more when compared to the proposed Project, and extend the phased implementation of the approved LAX Master Plan. In light of the above analysis, the BOAC hereby rejects the Alternate Site – Terminal/Concourse 0 Alternative evaluated in the MSC EIR and finds that it will not entirely avoid the significant and unavoidable impacts of the Project related to construction-related

regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions, acute non-cancer health hazards for acrolein, and cumulative impact on one intersection during the peak cumulative period of construction, and will not satisfy all of the Project's objectives.

Future Phase(s) of the MSC Program

Alternative 1: No Future Phase(s) of the MSC Program

As required by CEQA, a "no project" alternative was considered for the future phase(s) of the MSC Program. In this case, the "no project" alternative would mean that after the MSC North Project is constructed, no additional development of the MSC Program would occur. The MSC would remain an 11-gate facility with the Project components identified; no other proposed components would be implemented.

Air Quality. The No Future Phase(s) of the MSC Program Alternative would result in emissions which would be about the same as the emissions under the proposed future phase(s) of the MSC Program on a long-term basis. As discussed in Chapter 4.1, *Air Quality*, operation of the future phase(s) of the MSC Program is not expected to generate new emissions associated with aircraft operations because the future phase(s) of the MSC Program would not increase or change the type of aircraft operations at LAX. Taxiing distances of some aircraft would decrease under the future phase(s) of the MSC Program when compared to the No Future Phase(s) of the MSC Program Alternative, as the West Remote Gates/Pads would be closed. The future phase(s) of the MSC Program would also include operation of an APM, eliminating busing of passengers between the MSC and the CTA. Thus, the operational emissions under the No Future Phase(s) of the MSC Program Alternative would have similar emissions related to aircraft operations, but greater emissions related to aircraft taxiing and on-airport bus and GSE trips.

Nonetheless, as the No Future Phase(s) of the MSC Program Alternative would not involve any construction, it would not have the likely significant unavoidable impact that would occur under the future phase(s) of the MSC Program with respect to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions. With respect to regional operational emissions, the No Future Phase(s) of the MSC Program Alternative would have higher emissions than the future phase(s) of the MSC Program, but impacts would likely be less than significant.

Greenhouse Gas Emissions. Under the No Future Phase(s) of the MSC Program Alternative, the MSC North building would not be expanded and the uses on the southern portion of the MSC site would continue for aircraft maintenance, RON/RAD aircraft parking, and the various other existing uses at the site. This Alternative would result in no net increase in short-term and temporary emissions of GHGs since additional construction would not occur. On a long-term basis, the existing site facilities would continue to be used and would not be relocated. Maintenance and other activities would continue to occur at the existing facilities located on the southern portion of the MSC site, which were built prior to LAX's adoption of the Los Angeles Green Building Code Tier 1 standards and thus were not designed to meet the current energy efficiency standards. However, under the No Future Phase(s) of the MSC Program Alternative, the MSC North building would generate more

greenhouse gas emissions than the existing facilities due to its size and function (see Section 4.2.6). While the operational emissions under No Future Phase(s) of the MSC Program Alternative would be less than the future phase(s) of the MSC Program, the operational emissions associated with the No Future Phase(s) of the MSC Program Alternative would still be significant.

Human Health Risk. The No Future Phase(s) of the MSC Program Alternative would have no health risk impact associated with construction since no additional construction would occur. Therefore, impacts would be less than the future phase(s) of the MSC Program. Health hazards during operation of the MSC North building (under the No Future Phase(s) of the MSC Program Alternative) would be the same as described in Section 4.3.6. This alternative would have less health impacts when compared to the future phase(s) of the MSC Program in regards to the acute non-cancer hazard index for acrolein, but would have impacts similar to the MSC North Project.

Noise. Under the No Future Phase(s) of the MSC Program Alternative, operational noise sources would include aircraft taxiing to the MSC North site, which would have less than significant noise impacts. The No Future Phase(s) of the MSC Program Alternative would not introduce any new sources of noise on the southern portion of the MSC site or within the surrounding vicinity; ambient noise levels at the site would remain similar to noise levels under the MSC North Project, consistent with typical noise levels from aircraft taxiing in the midfield area of the airport. Under the No Future Phase(s) of the MSC Program Alternative, more aircraft would taxi to and utilize the West Remote Gates/Pads than under the future phase(s) of the MSC Program. However, noise impacts from aircraft operations would be similar under both alternatives and would remain less than significant.

Public Services – Fire Protection Services. Under the No Future Phase(s) of the MSC Program Alternative, the future phase(s) of the MSC Program site would continue to be used for aircraft maintenance, RON/RAD aircraft parking, and the various other existing uses at the site. Under the No Future Phase(s) of the MSC Program Alternative, the provision of additional aircraft gates in the midfield area and a CTP in the CTA would not occur. As discussed in Chapter 4.5, *Public Services – Fire Protection Services*, the future phase(s) of the MSC Program would have a less than significant impact. As the No Future Phase(s) of the MSC Program Alternative would be the same as the MSC North Project, it would have similar impacts on existing fire protection services in the area; therefore, no significant impacts to fire protection services at LAX are expected to occur under the No Future Phase(s) of the MSC Program.

Findings: For reasons discussed above, the BOAC hereby rejects the No Project Alternative. While significant impacts would be avoided for air quality emissions during construction and construction surface transportation impacts, this Alternative would not fully avoid the significant impacts or satisfy all of the objectives of the MSC Program. In light of the above analysis, the BOAC hereby rejects the No Future Phase(s) of the MSC Program Alternative evaluated in the MSC EIR and finds that it will not entirely avoid the significant and unavoidable impacts of the Project related to greenhouse gas emissions and acute non-cancer health hazards for acrolein, and will not satisfy all of the MSC Program's objectives including: providing LAWA the

flexibility to modernize existing terminals; allowing LAWA to close gates for renovations without reducing the number of existing gates; improving the overall passenger experience at LAX; reducing reliance on the West Remote Gates/Pads, and facilitating the implementation of the LAX Master Plan.

Alternative 2: Reduced Program – Fewer Gates

The future phase(s) of the MSC Program includes up to an additional 18 gates, which when added to the gates proposed for the MSC North Project would provide a concourse with up to 29 gates. An alternative to the future phase(s) of the MSC Program would be a smaller concourse with fewer gates. For purposes of identifying alternatives that may avoid or substantially lessen the significant impacts of the future phase(s) of the MSC Program, a reduced Program alternative of a concourse with a total of 20 gates was considered.

Air Quality. The Reduced Program Alternative would result in construction emissions, but due to the reduced size of the project could be less than the future phase(s) of the MSC Program. As discussed in Chapter 4.1, *Air Quality*, the proposed MSC North Project would result in a net increase in short-term and temporary emissions of criteria air pollutants associated with construction-related activities with a significant and unavoidable impact with respect to regional emissions of CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X. It is assumed for purposes of this analysis that the future phase(s) of the MSC Program would have similar construction-related impacts as would the Reduced Program Alternative, albeit less than the future phase(s) of the MSC Program.

Operation of the Reduced Program Alternative would result in emissions which would be about the same as the emissions under the future phase(s) of the MSC Program on a long-term basis. Taxiing distances of some aircraft would decrease under the future phase(s) of the MSC Program when compared to the Reduced Program Alternative, as no operations would occur at the West Remote Gates/Pads. The future phase(s) of the MSC Program would also eliminate bus trips to transport passengers and some GSE trips to transport their luggage between the MSC and terminals within the CTA; however, the Reduced Program Alternative may continue usage of the West Remote Gates/Pads, which would necessitate continued busing of passengers and luggage between the West Remote Gates/Pads and the CTA. Thus, the operational emissions under the Reduced Program Alternative would have similar emissions related to aircraft operations, but slightly greater emissions related to on-airport bus and GSE trips, and aircraft taxiing, when compared to the future phase(s) of the MSC Program.

In summary, the Reduced Program Alternative would not avoid or substantially reduce the likely significant unavoidable impact that would occur under the proposed Project with respect to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions. With respect to regional operational emissions, the Reduced Program Alternative would have similar but slightly higher impacts than the future phase(s) of the MSC Program.

Greenhouse Gas Emissions. Under the Reduced Program Alternative, the MSC building would be smaller than the proposed future phase(s) of the MSC Program by

at least 9 fewer aircraft gates. The Reduced Program Alternative would result in a net increase in short-term and temporary emissions of GHGs due to construction activities, but total emissions would be slightly less than the future phase(s) of the MSC Program due to the reduced size of the program. The Reduced Program Alternative would be required to comply with the CALGreen and LAGBC Tier 1 standards for nonresidential buildings, which would reduce energy consumption, waste generation, and GHG emissions compared to similar buildings that do not meet the standards. The Reduced Program Alternative could result in operational greenhouse gas emissions associated with the MSC building; total emissions would be slightly less than the future phase(s) of the MSC Program due to the reduced size of the building but would not be substantially different since the electrical, heating, and cooling requirements of the MSC building would still be substantial. While the Reduced Program Alternative would result in fewer total greenhouse gas emissions, when compared to the future phase(s) of the MSC Program, it is not anticipated that the Reduced Program Alternative would avoid or substantially reduce the significant unavoidable impact that would occur under the future phase(s) of the MSC Program with respect to greenhouse gas emissions.

Human Health Risk. The Reduced Program Alternative would result in changes to aircraft taxi patterns similar to the future phase(s) of the MSC Program, although with fewer gates, fewer aircraft operations would occur at the MSC and operations may continue to occur at the West Remote Gates/Pads. Similar to the future phase(s) of the MSC Program, it is anticipated that the acute non-cancer hazard index for acrolein would exceed the significance threshold at some receptors. Thus, operational health impacts of this Alternative would be similar to the future phase(s) of the MSC Program. Implementation of the Reduced Program Alternative would not avoid or substantially reduce the significant unavoidable impact that would occur under the future phase(s) of the MSC Program with respect to the acute non-cancer hazard index for acrolein.

Noise. Under the future phase(s) of the MSC Program, operational noise sources would include aircraft taxiing to the MSC site, which would have less than significant noise impacts. The Reduced Program Alternative would include the same changes to aircraft taxi paths, although with fewer gates at the MSC, there would be fewer aircraft operations in this area of the airfield but continued aircraft operations at the West Remote Gates/Pads. As with the future phase(s) of the MSC Program, no significant noise impacts from aircraft operations at LAX is expected to occur under the Reduced Program Alternative.

Public Services – Fire Protection Services. Under the Reduced Program Alternative, the MSC building would be smaller than the future phase(s) of the MSC Program with at least 9 fewer aircraft gates. However, the Reduced Program Alternative would include additional aircraft gates in the midfield area, operation of the APM connecting the MSC building to the CTA, and the CTP. Thus, this Alternative would have similar impacts to fire protection services when compared to the future phase(s) of the MSC Program. As with the future phase(s) of the MSC Program, no significant impacts to fire protection services at LAX are expected to occur under the Reduced Program Alternative.

Findings: Although the Reduced Program – Fewer Gates Alternative would reduce emissions associated with construction, this Alternative would not avoid the significant impacts or satisfy all of the objectives of the MSC Program. The Reduced Program – Fewer Gates Alternative would provide gates for LAWA to utilize during renovations of existing terminals, but it would permit LAWA to close fewer gates for renovations without reducing the number of existing gates, provide less flexibility for LAWA to modernize existing terminals, would require LAWA to continue to rely on the West Remote Gates/Pads, and extend the phased implementation of the approved LAX Master Plan. In light of the above analysis, the BOAC hereby rejects the Reduced Program – Fewer Gates Alternative evaluated in the MSC EIR and finds that it will not effectively reduce or avoid the significant unavoidable impacts of the future phase(s) of the MSC Program related to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions, greenhouse gas emissions, and acute non-cancer health hazards for acrolein, and will not satisfy all of the Program's objectives.

Alternative 3: No Central Terminal Processor/APM to Existing Terminal

Another alternative considered to the future phase(s) of the MSC Program was an alternative that eliminates the CTP. Instead of the APM going to an CTP, the APM would instead go to one of the existing terminals within the CTA. For purposes of this analysis, it was assumed that the APM would run between Terminal 3 and the MSC.

Air Quality. The No CTP/APM to Existing Terminal Alternative would result in construction emissions, but due to the reduced size of the project would be less than the future phase(s) of the MSC Program. As discussed in Chapter 4.1, *Air Quality*, the proposed MSC North Project would result in a net increase in short-term and temporary emissions of criteria air pollutants associated with construction-related activities with a significant and unavoidable impact with respect to regional emissions of CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X. It is assumed for purposes of this analysis that the future phase(s) of the MSC Program would have similar construction-related impacts, as would the No CTP/APM to Existing Terminal Alternative since this alternative still includes the main components of the MSC Program (concourse, apron, and APM). However, construction-related impacts are expected to be less than the future phase(s) of the MSC Program.

Operation of the No CTP/APM to Existing Terminal Alternative would result in emissions which would be about the same as the emissions under the future phase(s) of the MSC Program on a long-term basis. Taxiing distances of aircraft under the future phase(s) of the MSC Program when compared to the No CTP/APM to Existing Terminal Alternative would be the same, as no operations would occur at the West Remote Gates/Pads. The No CTP/APM to Existing Terminal Alternative would eliminate bus trips to transport passengers and some GSE trips to transport luggage between the MSC and the CTA. Additionally, because this Alternative would not include construction of the CTP, it would result in fewer operational emissions (no emissions related to heating and cooling of the CTP). Thus, the operational emissions under the No CTP/APM to Existing Terminal Alternative would have similar emissions related to aircraft operations, and aircraft taxiing, but fewer emissions related to heating and cooling.

In summary, the No CTP/APM to Existing Terminal Alternative would not avoid or substantially reduce the likely significant unavoidable impact that would occur under the future phase(s) of the MSC Program with respect to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions. With respect to regional operational emissions, the No CTP/APM to Existing Terminal Alternative would have similar but less impacts than the future phase(s) of the MSC Program.

Greenhouse Gas Emissions. Under the No CTP/APM to Existing Terminal Alternative, the future phase(s) of the MSC Program would include expansion of the MSC to up to 29 gates. However, under this Alternative, the CTP would not be constructed but the underground APM system would be installed between the MSC and an existing terminal within the CTA. The No CTP/APM to Existing Terminal Alternative would result in a net increase in short-term and temporary emissions of GHGs due to construction activities, but total emissions would be less than the future phase(s) of the MSC Program due to the reduced size of the program. The No CTP/APM to Existing Terminal Alternative would be required to comply with the CALGreen and LAGBC Tier 1 standards for nonresidential buildings, which would reduce energy consumption, waste generation, and GHG emissions compared to similar buildings that do not meet the standards. The No CTP/APM to Existing Terminal Alternative would result in operational greenhouse gas emissions associated with the MSC building and APM, but would have no greenhouse gas emissions associated with the CTP. While the No CTP/APM to Existing Terminal Alternative would result in fewer total greenhouse gas emissions related to the elimination of the CTP, when compared to the future phase(s) of the MSC Program, it is not anticipated that the No CTP/APM to Existing Terminal Alternative would avoid or substantially reduce the significant unavoidable impact that would occur under the future phase(s) of the MSC Program with respect to greenhouse gas emissions.

Human Health Risk. The No CTP/APM to Existing Terminal Alternative would result in changes to aircraft taxi patterns similar to the future phase(s) of the MSC Program. Thus, similar to the future phase(s) of the MSC Program, it is anticipated that the acute non-cancer hazard index for acrolein would exceed the significance threshold at some receptors. Thus, operational health impacts of this Alternative would be similar to the future phase(s) of the MSC Program.

Noise. Under the future phase(s) of the MSC Program, operational noise sources would include aircraft taxiing to the MSC site, which would have less than significant noise impacts. The No CTP/APM to Existing Terminal Alternative would include the same changes to aircraft taxi paths. As with the future phase(s) of the MSC Program, no significant noise impacts from aircraft operations at LAX is expected to occur under the No CTP/APM to Existing Terminal Alternative.

Public Services – Fire Protection Services. Under the No CTP/APM to Existing Terminal Alternative, the future phase(s) of the MSC Program would include expansion of the MSC to up to 29 gates. However, under this Alternative, the CTP would not be constructed, but the underground APM system would be installed between the MSC and an existing terminal within the CTA. Thus, this Alternative would have similar impacts to fire protection services when compared to the future phase(s) of the MSC Program. As with the future phase(s) of the MSC Program, no

significant impacts to fire protection services at LAX are expected to occur under the No CTP/APM to Existing Terminal Alternative.

Findings: Although the No CTP/APM to Existing Terminal Alternative would reduce emissions associated with construction, this Alternative would not avoid the significant impacts or satisfy all of the objectives of the MSC Program. The No CTP/APM to Existing Terminal Alternative would provide gates for LAWA to utilize during renovations of existing terminals, but it would extend the phased implementation of the approved LAX Master Plan and would not improve the overall passenger experience at LAX. In light of the above analysis, the BOAC hereby rejects the No Central Terminal Processor/APM to Existing Terminal Alternative evaluated in the MSC EIR and finds that it will not effectively reduce or avoid the significant and unavoidable impacts of the future phase(s) of the MSC Program related to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions, greenhouse gas emissions, and acute non-cancer health hazards for acrolein, and will not satisfy all of the Program's objectives.

Alternative 4: No Central Terminal Processor/No APM

The final alternative considered for the future phase(s) of the MSC Program was an alternative that included no CTP or APM; passengers would check-in, check their luggage, and undergo security screening within one of the existing terminals in the CTA, and then be bused to the MSC, as is assumed to occur for the MSC North Project.

Air Quality. The No CTP/No APM Alternative would result in construction emissions, but due to the reduced size of the project would be less than the future phase(s) of the MSC Program. As discussed in Chapter 4.1, *Air Quality*, the proposed MSC North Project would result in a net increase in short-term and temporary emissions of criteria air pollutants associated with construction-related activities with a significant and unavoidable impact with respect to regional emissions of CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X. It is assumed for purposes of this analysis that the future phase(s) of the MSC Program would have similar construction-related impacts associated with construction of the southern portion of the MSC, as would the No CTP/No APM Alternative, albeit less than the future phase(s) of the MSC Program.

Operation of the No CTP/No APM Alternative would result in emissions which would be about the same as the emissions under the future phase(s) of the MSC Program on a long-term basis. Taxiing distances of aircraft under the future phase(s) of the MSC Program when compared to the No CTP/No APM Alternative would be the same, as no operations would occur at the West Remote Gates/Pads. The future phase(s) of the MSC Program would also eliminate bus trips to transport passengers and some GSE trips to transport luggage between the MSC and terminals within the CTA; however, the No CTP/No APM Alternative would necessitate continued busing of passengers and luggage between the MSC and the CTA. Thus, the operational emissions under the No CTP/No APM Alternative would have similar emissions related to aircraft operations and aircraft taxiing, but much greater emissions related to on-airport bus and GSE trips. In fact, simulations of ground movements prepared for the MSC Program indicate that the number of bus trips and GSE trips required to

support a 29-gate MSC would result in lengthy queues, congestion on the vehicle service roads, and potential delay to airfield operations due to the number of vehicles and trips required to transport passengers and luggage.

In summary, the No CTP/No APM Alternative would not avoid or substantially reduce the likely significant unavoidable impact that would occur under the future phase(s) of the MSC Program with respect to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions. With respect to regional operational emissions, the No CTP/No APM Alternative would have similar but higher impacts than the future phase(s) of the MSC Program due to increased busing and number of GSE trips.

Greenhouse Gas Emissions. Under the No CTP/No APM Alternative, the future phase(s) of the MSC Program would include expansion of the MSC to up to 29 gates. However, under this Alternative, the underground APM system between the MSC and the CTP or CTA would not be installed and the CTP would not be constructed. The No CTP/No APM Alternative would result in a net increase in short-term and temporary emissions of GHGs due to construction activities, but total emissions would be less than the future phase(s) of the MSC Program due to the reduced size of the program. The No CTP/No APM Alternative would be required to comply with the CALGreen and LAGBC Tier 1 standards for nonresidential buildings, which would reduce energy consumption, waste generation, and GHG emissions compared to similar buildings that do not meet the standards. The No CTP/No APM Alternative would result in operational greenhouse gas emissions associated with the MSC building; but would have no greenhouse gas emissions associated with the APM or CTP. However, the No CTP/No APM Alternative would necessitate continued busing of passengers and luggage between the MSC and the CTA resulting in greater greenhouse emissions. While the No CTP/No APM Alternative would result in fewer total greenhouse gas emissions related to the elimination of the APM and CTP, when compared to the future phase(s) of the MSC Program, it is not anticipated that the No CTP/No APM Alternative would avoid or substantially reduce the significant unavoidable impact that would occur under the future phase(s) of the MSC Program with respect to greenhouse gas emissions.

Human Health Risk. The No CTP/No APM Alternative would result in changes to aircraft taxi patterns similar to the future phase(s) of the MSC Program. Because the No CTP/No APM Alternative would result in continued (and increased) busing of passengers and transport of luggage via GSE, increased emissions associated with these trips would occur. Simulations of ground movements prepared for the MSC Program indicate that the number of bus trips and GSE trips required to support a 29-gate MSC would result in lengthy queues, congestion on the vehicle service roads, and potential delay to airfield operations due to the number of vehicles and trips required, which would also increase emissions and potential human health risks. Thus, similar to the future phase(s) of the MSC Program, it is anticipated that the acute non-cancer hazard index for acrolein would exceed the significance threshold at some receptors. Thus, operational health impacts of this Alternative would be similar to the future phase(s) of the MSC Program.

Noise. Under the future phase(s) of the MSC Program, operational noise sources would include aircraft taxiing to the MSC site, which would have less than significant noise impacts. The No CTP/No APM Alternative would include the same changes

to aircraft taxi paths. As with the future phase(s) of the MSC Program, no significant noise impacts from aircraft operations at LAX is expected to occur under the No CTP/No APM Alternative.

Public Services – Fire Protection Services. Under the No CTP/No APM Alternative, the future phase(s) of the MSC Program would include expansion of the MSC to up to 29 gates. However, under this Alternative, the underground APM system between the MSC and the CTP would not be installed and the CTP would not be constructed. Because this Alternative would not include an operational underground APM, impacts to fire protection services would be less than those associated with the future phase(s) of the MSC Program. As with the future phase(s) of the MSC Program, no significant impacts to fire protection services at LAX are expected to occur under the this Alternative.

Findings: Although the No CTP/No APM Alternative would reduce emissions associated with construction, this Alternative would not avoid the significant impacts or satisfy all of the objectives of the MSC Program. The No CTP/No APM Alternative would provide gates for LAWA to utilize during renovations of existing terminals, but it would extend the phased implementation of the approved LAX Master Plan and would not improve the overall passenger experience at LAX. In light of the above analysis, the BOAC hereby rejects the No CTP/No APM Alternative evaluated in the MSC EIR and finds that it will not effectively reduce or avoid the significant and unavoidable impacts of the future phase(s) of the MSC Program related to construction-related regional CO, PM_{10}, $PM_{2.5}$, VOC, and NO_X emissions, greenhouse gas emissions, and acute non-cancer health hazards for acrolein, and will not satisfy all of the Program's objectives..

E. Findings on Suggestions Included in Comments on the MSC Draft EIR

a. Comment MSC-AL00002

Suggestion: The commenter suggested that LAWA consider the options listed below to mitigate the significant construction surface transportation impacts: 1) direct construction traffic away from the Sepulveda corridor to the Imperial Highway corridor; and 2) restripe the intersection at Manchester Avenue and Sepulveda Boulevard instead of widening the street.

Response: As described in Section 4.7.4.2 of the Midfield Satellite Concourse Draft EIR, construction truck traffic is limited to accessing the MSC North Project site via Imperial Highway and Pershing (i.e., avoiding the Sepulveda corridor), as described in Section 4.7.7 of the Draft EIR. The impacts at Manchester Avenue and Sepulveda Boulevard, as well as at Westchester Parkway and Sepulveda Boulevard are a result of potential construction employee traffic entering/exiting the employee parking/work site. For purposes of distributing construction employee traffic on the study area roadway network, it was assumed that employees would originate from geographic locations in proportion to the distribution of regional population and utilize specific street routing assumptions obtained from the LAX Master Plan Final EIS/EIR and the 2011 LAX Air Passenger Survey. Because construction employees typically utilize private vehicles to commute to their worksites, there is no feasible way LAWA can enforce the routes that construction employees use to commute to their worksite.

Thus, the analysis conservatively assumes that construction workers would utilize the surrounding roadway network in proportion to the regional population distribution. Thus, LAWA does not believe that they have the means to remove the impact at Manchester Avenue and Sepulveda Boulevard.

LAWA agrees that the intersection of Manchester Avenue and Sepulveda Boulevard can be restriped within the existing right-of-way to implement the mitigation required at this intersection to reduce the impact to less than significant. The Final EIR incorporates this corrected language (see Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR.

b. Comment MSC-AL00004

Suggestion: The commenter suggested that LAWA consider the options listed below to mitigate the significant construction surface transportation impacts at Imperial Highway and Main Street:

- extend the westbound double left-turn pocket (for vehicles turning south onto Main) by approximately 150 feet to obtain stacking distance for 14 vehicles;
- extend the eastbound merge lane (for vehicles turning right onto Imperial) by approximately 250 feet to ease transition into traffic before reaching the hill on the south side of Imperial;
- extend the eastbound right-turn pocket west of the bus stop on the south side of Imperial to facilitate turning onto Main.

Response: The recommendations of mitigation alternatives have been noted by LAWA; however, the cumulatively considerable significant impact calculated using the Circular 212 Planning Method would not be eliminated or reduced at this location through the lengthening of the turn bays as suggested by the commenter. A traffic model of this intersection, utilizing Synchro 7 and SimTraffic, was developed to determine whether extension of the left-turn lanes, right-turn lanes, and eastbound merge lanes would improve the intersection to a less than significant impact. The modeling indicated that vehicles queuing for the westbound left turn movement have adequate space within the existing left turn lanes for queuing and increasing the turn bays would not affect the traffic flow at this intersection.

The modeling also indicates that the eastbound right-turn lanes are adequate for the average queue lengths at this intersection. However, to provide 95 percent coverage of this movement, the right-turn lane would need to be nearly 700 feet long, which is not feasible. However, even with these improvements, the LOS impact identified in the MSC Draft EIR would still remain during the peak cumulative construction period (December 2018).

c. Comment MSC-PC00002

Suggestion: The commenter is concerned with evacuation procedures for the concourse, specifically, onto the air operations area (AOA).

Response: In accordance with LAX Master Plan Commitments *FP-1: LAFD Design Recommendations* and *PS-2: Fire and Police Facility Space and Siting*

Requirements, LAWA will coordinate with the Los Angeles Fire Department (LAFD) to develop appropriate evacuation plans for the MSC. Evacuation onto the Airport Operations Area (AOA) should be avoided whenever possible. If determined necessary, evacuations to specific designated assembly areas will be coordinated with the Operations Chief/Relief Incident Commander, the Airport Traffic Control Tower (ATCT), the Transportation Security Administration (TSA), the LAFD, the Los Angeles Police Department (LAPD), LAX Operations, and LAX Security departments. In the event that passengers are evacuated from the MSC to the ramp areas, the LAX Operations representatives will respond as soon as possible to direct passengers to the appropriate areas and provide buses for relocating them, as available. In the event of evacuation onto the AOA, LAX Operations will close movement areas, as appropriate.

F. Findings on Responses to Comments on the Draft EIR and Revisions to the Final EIR

Responses to comments made on the Draft EIR and revisions made in the final EIR merely clarify and amplify the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines Section 15088.5(b).

G. Location and Custodian of Records

The documents and other materials that constitute the administrative record for LAWA's actions related to the MSC are located at LAWA, One World Way, 2nd Floor, Los Angeles, CA 90045. The LAWA Capital Programming and Planning Division is the custodian of the administrative record for the Project.