
Statement of Overriding Considerations Runway 6L-24R and Runway 6R-24L Runway Safety Area and Associated Improvements Project

The Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project (Project) at Los Angeles International Airport (LAX), pursuant to the California Environmental Quality Act (CEQA). In June 27, 2014, LAWA published the Final EIR for the proposed Project.

The proposed Project would involve improvements to the RSAs in the northern airfield, as well as pavement rehabilitation on Runway 6L-24R and Taxiway AA, and the realignment of taxiway hold bars. The proposed Project would not increase passenger or gate capacity, and would not increase flights and/or aircraft operations at LAX. The main objective of the proposed Project is to comply with the *Transportation, Treasury, Housing and Urban Development, the Judiciary, The District of Columbia, and Independent Agencies Appropriations Act* (Public Law 109-115)¹, which states that all RSAs at 14 CFR Part 139 airports must meet FAA design standards to the extent practicable by December 31, 2015. LAWA has identified improvements that can be implemented by December 31, 2015 to bring the Runway 6L-24R RSA into compliance with FAA design criteria and to make improvements to the Runway 6R-24L RSA. Other objectives of the proposed Project are:

- Maintain safe operations;
- Minimize effects to existing aircraft operations; and
- Extend the life of Runway 6L-24R and associated Taxiway AA.

Additionally, the taxiway hold bars on Taxiways Y, Z, and AA need to be realigned to meet FAA standards. The hold bars on these taxiways mark where aircraft exiting from Runway 6L-24R need to hold and wait for air traffic control clearance before crossing Runway 6L-24R. Realigning the hold bars will bring them into compliance with current FAA standards.

The proposed Project EIR identified temporary, significant adverse environmental impacts that would result during construction of the proposed Project that cannot be mitigated to a level of insignificance by the implementation of feasible mitigation measures or alternatives. Although LAX Master Plan Mitigation Measures *LAX-AQ-1 — General Air Quality Control Measures* and *LAX-AQ-2 — Construction-Related Measures*, as well as Project-specific Mitigation Measure *MM-AQ (RSA-N)-1* would be implemented as part of the proposed Project, unavoidable significant impacts would still occur from construction-related air pollutant emissions and construction-related emissions of acrolein, a toxic air contaminant (TAC).

CEQA Guidelines Section 15093(b) provides that when a public agency approves a project that will result in significant impacts that are identified in the Final EIR but are not avoided or substantially lessened, the agency must state in writing the specific reasons to support its

¹ *The Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law [P.L.] 109-115), November 30, 2005.

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decision based on the Final EIR and/or other information in the whole administrative record. If the specific economic, legal, social, technological or other benefits of a proposed project outweigh its unavoidable adverse environmental impacts, the adverse effects may be considered “acceptable.” LAWA, as the Lead Agency for the proposed Project EIR, adopts the following Statement of Overriding Considerations.

Based on the substantial evidence in the whole of the administrative record for the proposed Project, the Board of Airport Commissioners (BOAC) hereby finds, concludes, and determines that the unavoidable significant adverse environmental impact associated with the construction and operation of the proposed Project are acceptable in light of the following specific economic, operational, legal, technological or other project benefits. Each Project benefit described below constitutes an overriding consideration warranting approval of the proposed Project, independent of other benefits, despite each and every significant unavoidable impact.

A. Enhanced Airfield Safety

Currently, the existing RSAs for Runway 6L-24R and Runway 6R-24L are not in compliance with FAA’s airport design standards. Therefore, the proposed Project would modify the existing RSAs in order to comply with the requirements of the *Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law [P.L.] 109-115). This Act requires completion of RSA improvements by airport sponsors that hold a certificate under Title 14, Code of Federal Regulations (CFR), Part 139, *Certification and Operations: Land Airports Serving Certain Air Carriers*, to comply with FAA design standards by December 31, 2015. Implementation of the proposed Project will provide RSAs for Runway 6L-24R and Runway 6R-24L to reduce the risk of damage to airplanes in the event of undershoot, overshoot, or excursion from the runway. An additional safety-related function of the RSA is to provide greater accessibility for firefighting and emergency rescue vehicles during such incidents.

Improved RSAs that meet FAA design standards will ultimately reduce the frequency and severity of aviation-related events that pose a risk to human life, aircraft, equipment and infrastructure, which provide benefits to passengers, airline and airport employees, and the residents, businesses, and employees that reside within the vicinity of the airport.

B. Maintain and Extend Utility of Airfield Pavement

The rehabilitation of Runway 6L-24R and Taxiway AA will repair and extend the utility of these portions of the LAX airfield. This action is needed to address poor pavement conditions and extend the useful life of Runway 6L-24R pavement and maintain its usage as the primary arrivals runway for the north airfield. Due to heavy usage over the years, sections of the pavement have deteriorated and need reconstruction. LAWA is responsible for providing suitable infrastructure and maintaining safe facilities at LAX for aircraft operations.

The proposed Project would protect society’s investment in the existing airfield infrastructure at LAX, and extend the utility of LAX which has economic and social benefits to the residents, businesses, and employees that depend on the airport and air transportation system.

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C. Promote Job Creation

Operating and continuing to develop LAX will provide increased employment benefits to the Los Angeles region. According to a 2012 Report by the Los Angeles Economic Development Corporation (LAEDC)² that examined the economic contributions of LAX in 2011, the economic activity at LAX, including both capital spending and visitor spending, can be credited with generating 294,400 jobs in Los Angeles County with a labor income of \$13.6 billion.

The construction of the Runway 6L-24R and Runway 6R-24L RSA and Associated Improvements Project will provide employment benefits to the Los Angeles region. It is estimated that the proposed Project would provide construction-related employment for over 135 workers during the peak week of the approximately 8-month construction period (see Section 4.7.5.1 in Volume I of the EIR). The proposed Project is estimated to cost approximately \$38.9 million to construct, which would generate approximately 170,700 construction employee hours. Additional revenue in the form of fees associated with grading, sewer and storm drain, and storm water permits is expected to be approximately \$25,000.

² Los Angeles Economic Development Corporation, "Los Angeles International Airport in 2011: Economic Impact Analysis," August 2012. Available: http://cdn.laedc.org/wp-content/uploads/2012/04/LAX_2011_FINAL1.pdf