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## 6.0 OTHER ENVIRONMENTAL CONSIDERATIONS

### 6.1 Significant Unavoidable Impacts

Section 15126.2(b) of the *California Environmental Quality Act (CEQA) Guidelines* requires that an Environmental Impact Report (EIR) describe significant environmental impacts that cannot be avoided, including impacts that can be mitigated but not reduced to a less than significant level. Chapter 4 of this EIR provides detailed analyses of the environmental topics identified in the Initial Study, prepared in September 2012, as having the potential to result in significant impacts with implementation of the proposed Project. Of the seven environmental topics evaluated in this EIR, and as described below, only the topic of air quality involved an impact that could not be reduced to a less than significant level.

**Air Quality:** As analyzed in Section 4.1, *Air Quality*, even with the incorporation of feasible air quality commitments and mitigation measures, the maximum peak daily construction-related regional emissions resulting from the proposed Project would be significant for NO<sub>x</sub> during the initial and middle stages of proposed Project construction. This significant unavoidable impact would be short-term and temporary, and no additional feasible mitigation measures that would further address the impact have been identified. In addition to this Project-level impact, construction-related regional emissions of NO<sub>x</sub> would also contribute to a significant and unavoidable cumulative impact.

In addition to identifying the significant unavoidable impacts of the proposed Project, Section 15126.2(b) of the *CEQA Guidelines* also requires a description of the reasons why the Project is being proposed, notwithstanding the significant unavoidable impacts associated with the Project. As discussed in Chapter 2, *Project Description*, the proposed Project would consolidate, relocate, and modernize some of the existing aircraft maintenance facilities at the Los Angeles International Airport (LAX). The consolidation, relocation, and modernization of these facilities would allow for more efficient and effective maintenance of existing aircraft at the airport, including Airplane Design Group (ADG) VI aircraft (Airbus A380s and Boeing 747-8s). The proposed Project would also include the provision of aircraft parking positions adjacent to the new aircraft maintenance facilities and apron space for remain overnight/remain all day (RON/RAD) aircraft parking, which provides extended layover space for aircraft that cannot be accommodated at terminal area contact gates.

Without the proposed Project, there would be a serious constraint on the ability to provide adequate maintenance facilities at LAX to replace those that have been or would be removed in the future. Existing aircraft maintenance facilities at LAX are currently used on a regular basis by the tenant airlines/companies, and it is unlikely existing facilities could accommodate the aircraft maintenance needs. It is possible that remaining facilities would not be able to accommodate the increased demands completely and/or efficiently. This is especially true relative to the ability to accommodate the existing RON/RAD areas that, along with the removal of aircraft maintenance hangars, would be removed. There are already substantial demands on existing RON/RAD areas at LAX and the loss of RON/RAD spaces associated with removal of maintenance areas would exacerbate that problem. Given that the RON/RAD areas at the subject maintenance areas are used for aircraft cabin cleaning and light servicing/maintenance (i.e., "Level A checks"), the loss of those areas would mean that such aircraft servicing and light maintenance would need to be done while aircraft are at the gate, which would extend gate occupancy time and possibly delay other aircraft waiting to use the gate, or require additional stacking of aircraft at the remaining RON/RAD areas, which hinders the efficient management and movement of aircraft in those areas.

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Although the proposed Project would result in a significant short-term air quality associated with construction-related NO<sub>x</sub>, not implementing the proposed Project would result in inefficient management and movement of aircraft that would lead to greater operational air quality emissions in the long-term. Therefore, the Project is being proposed, notwithstanding the significant, unavoidable construction impact associated with construction-related regional emissions of NO<sub>x</sub>.

### 6.2 Irreversible Environmental Changes

According to the *CEQA Guidelines*, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed Project. Specifically, as stated in *CEQA Guidelines* Section 15126.2(c):

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.”

The proposed Project would necessarily consume slowly renewable and non-renewable resources. Construction of the proposed Project would require a commitment of resources that would include: (1) building materials, (2) fuel for construction equipment and machinery, (3) fuel for the transportation of construction workers and vendors to and from the Project site; and (4) fuel for the transportation of stockpiled materials from the Project site. Construction would require the consumption of resources that are non-replenishable or may renew so slowly that they are considered non-renewable. These resources would include: raw materials in steel; metals such as copper and lead; aggregate materials such as sand and stone used in concrete and asphalt; petrochemical construction materials such as plastics; and water.

Operation of the proposed Project is not expected to result in additional consumption of non-renewable resources associated with aircraft maintenance because the proposed Project simply redirects and consolidates existing aircraft maintenance operations.

The proposed Project would comply with the City of Los Angeles Green Building Code (LAGBC) Tier 1 requirements. Certain measures of note that would reduce the use of non-renewable resources include: compliance with enhanced construction waste reduction goals; exceeding the California Energy Code requirements by 15 percent; use of plumbing fixtures and fixture fittings to reduce the overall use of potable water within the building by 20 percent; and providing readily accessible areas for the depositing, storage, and collection of non-hazardous materials for recycling. The proposed Project would also comply with the Los Angeles World Airports (LAWA) policies and programs related to sustainability, which would reduce the use of non-renewable resources and are implemented on a project-specific and on an airport-wide basis.

Operational activities associated with the proposed Project are not expected to increase the number of run-ups from aircraft engine testing; generate additional vehicle traffic; increase passenger, gate capacity, flights and/or aircraft operations at LAX; or increase existing maintenance activities at LAX. Furthermore, the proposed Project would also implement energy

and water conservation measures, recycling of non-hazardous materials, and other sustainable strategies to the extent feasible. Therefore, the use of non-renewable resources would not result in significant irreversible changes to the environment.

### **6.3 Growth Inducing Impacts**

Section 15126.2(d) of the *CEQA Guidelines* requires an EIR to discuss the ways the proposed Project could foster economic or population growth, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

#### **6.3.1 Project Characteristics**

The proposed Project would consolidate, relocate, and modernize some of the existing aircraft maintenance facilities at LAX. The consolidation, relocation, and modernization of these facilities would allow for more efficient and effective maintenance of existing aircraft at the airport, including ADG VI aircraft. The proposed Project would not increase passenger or gate capacity and would not increase flights and/or aircraft operations at LAX. Similarly, the proposed Project would provide functions and services that already occur elsewhere at the airport at existing facilities that are anticipated to be removed in the future. The consolidation and relocation of existing RON/RAD and aircraft maintenance activities is not anticipated to result in an increase in such activities at LAX nor is it expected to result in an increase in the number of employees associated with such activities, with the exception of temporary construction jobs.

#### **6.3.2 Economic Growth**

An important function of LAX is to sustain and support economic growth in the region. Although the proposed Project would not directly generate economic growth, would not increase passenger or gate capacity, would not increase flights and/or aircraft operations, or increase the number of permanent employees, it would generate short-term construction jobs and improve and modernize aircraft maintenance facilities at the airport to better accommodate newer generation aircraft, including ADG VI aircraft. The proposed Project would also combine aircraft maintenance hangars and aircraft parking areas within close proximity on the same site, thereby supporting more efficient and effective use of airport facilities. As such, the proposed Project would indirectly foster economic growth in the region, through short-term construction jobs and more efficient maintenance and airfield activities.

#### **6.3.3 Removal of an Impediment to Growth**

The proposed Project would not increase passenger or gate capacity, flights and/or aircraft operations, maintenance activities, or the number of permanent employees and would not cause LAX to grow beyond what has been evaluated and anticipated under the LAX Master Plan. In addition, the proposed Project would not provide new access to an area that is undeveloped since the site is located within an area of the airport that is in active use, including use as a staging area for airport construction projects. Furthermore, the Project is located within an area of the airport contemplated for maintenance uses pursuant to the LAX Master Plan.

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### 6.3.4 Development or Encroachment into an Isolated Open Space

Development can be considered growth inducing when it is not contiguous to existing urban development and introduces development into open space areas. The proposed project site is situated within the southwest portion of LAX immediately south of World Way West between Taxiway AA and Pershing Drive. The Project site is currently used primarily as a staging area for airport construction projects, and includes: modular construction trailers/offices and an associated surface parking area, several paved roads, and several paved and unpaved outdoor loading and storage areas. In addition, stockpiled material consisting of soil and construction rubble is located within and immediately adjacent to the Project site. Adjacent uses include the West Remote Pads/Gates and aircraft aprons to the north; an airport employee parking lot and vacant airport property to the south; Taxiway AA, an American Airlines employee parking lot and the United-Continental maintenance hangars to the east; and Pershing Drive followed by the Los Angeles/El Segundo Dunes to the west. Therefore, development of the proposed Project would occur in an existing developed area and would not introduce new development into an undeveloped or open space area.

### 6.3.5 Precedent Setting Action

The proposed Project would consolidate, relocate, and modernize some of the existing aircraft maintenance facilities at LAX. The proposed Project would not encourage or facilitate new activities that do not already occur at the airport, or that have not been anticipated and accounted for under the LAX Master Plan. Therefore, it would not establish a precedent for unanticipated growth.

## 6.4 Potential Secondary Effects

Section 15126.4(a)(1)(D) of the *CEQA Guidelines* requires mitigation measures to be discussed if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the project as proposed. One Project-specific mitigation measure to address impacts associated with Hazards and Hazardous Materials was identified. Potential secondary effects would not occur as a result of the implementation of this mitigation measure as discussed below.

**Hazards and Hazardous Materials:** Mitigation Measure MM-HAZ (WAMA)-1 requires research to determine the exact location of abandoned/plugged oil wells and if these wells were abandoned in conformance with current regulations. Implementation of this mitigation measure would require conformance with the Division of Oil, Gas, and Geothermal Resources (DOGGR) and City of Los Angeles Fire Department regulations prior to construction.

Specific DOGGR regulations and requirements for the inspection, testing, plugging, and abandonment of oil wells are contained within Chapter 4, Development, Regulation, and Conservation of Oil and Gas Resources, Article 3 of the *State of California Code of Regulations*. These regulations require a specific set of actions be taken, dependent on the found state of the abandoned oil wells (e.g. for open holes, a cement plug must extend from the total depth of the well or from at least 100 feet below the bottom of each oil or gas zone to at least 100 feet above the top of each oil or gas zone, for cased holes, all perforations are to be plugged with cement, with the plug extending at least 100 feet above the top of a landed liner, the uppermost perforations, the casing cementing point, the water shut-off holes, or the oil or gas zone,

whichever is highest). Chapter V, Article 7, (Fire Code) (57.90.01-45) of the Los Angeles City Municipal Code further regulates the location, drilling safeguards, and abandonment of oil wells in the City. In the event oil wells are found that have not been properly abandoned, the procedures and agency oversight prescribed in these regulations would serve as performance standards to ensure that significant impacts associated with the potential migration of fluids and groundwater contamination would be avoided during construction of the proposed Project. Construction will comply with all applicable requirements of DOGGR and the City of Los Angeles Fire Department for the investigation and/or re-abandonment of the well(s).

Should contaminated soils be encountered, they would be handled in accordance with LAX Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction. Therefore, no potential secondary effects would result.

### 6.5 Less Than Significant Effects

This EIR concludes that construction-related air quality impacts associated with localized emissions, toxic air contaminants, and odors and operational air quality impacts would be less than significant. In addition, construction and operational impacts on greenhouse gas emissions, hazards and hazardous materials (after mitigation), hydrology and water quality, noise, land use and planning, and construction surface transportation would be less than significant, as documented in Chapter 4, *Environmental Impact Analysis*.

In addition, an Initial Study (IS) was prepared for the proposed Project. Based on the analysis contained in the IS, LAWA determined that the proposed Project would result in “not significant” or “less than significant” environmental impacts in the following subject areas:

- Aesthetics;
- Agricultural Resources;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation;
- Public Services;
- Traffic and Circulation (during operation); and
- Utilities.

Since the impacts of the proposed Project with respect to these subject areas were determined to be either “not significant” or “less than significant,” these environmental topics were not evaluated further in this EIR. This methodology is consistent with *CEQA Guidelines* Section 15063(c)(3). Pursuant to *CEQA Guidelines* Section 15128, the various possible Project effects found not to be significant are discussed in the Initial Study, attached to this EIR as Appendix A. No additional potentially significant impacts were identified during the circulation of the Notice of Preparation (NOP) for public and agency comments.

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Refinements have been made to the proposed Project to reflect additional information and coordination with the public and the FAA. The refinements do not represent a material change to the proposed Project that was described in the IS/NOP and do not change any of the conclusions in the IS.

Subsequent to the preparation of the IS and NOP, the following additional information related to biological resources was identified, including information associated with a biological survey conducted in April and May of 2013.

In March 2013, four California gnatcatchers (*Polioptila californica californica*) were observed within the El Segundo Blue Butterfly Preserve located at the El Segundo dunes west of the LAX airfield operations area. To further ascertain the full extent of California gnatcatcher activity at the site, LAWA retained Glenn Lukos Associates, Inc., a biological resources consulting firm with biologists permitted by the U.S. Fish and Wildlife Service (USFWS) to conduct specific (i.e., "protocol-level") surveys for the species at the site.

The Survey Area included the coastal sand dune habitat that is located west of Pershing Drive, north of Imperial Highway, south of Waterview Street, and east of Vista del Mar. Focused surveys for the coastal California gnatcatcher were conducted from April 16 through May 22, 2013 in areas of potentially suitable habitat in accordance with USFWS guidelines. No gnatcatchers were observed in the north one-third of the Survey Area, which encompasses the dunes area directly west of the north airfield runways. Based on gnatcatcher behaviors observed during survey visits to this location, habitat in the immediate vicinity of the navigational aids in the portions of the dunes does not support breeding activity by gnatcatchers due to a lack of suitable vegetation and/or the vegetative structure typically utilized by breeding gnatcatchers. Within the central portion of the Survey Area, generally to the northwest, west, and southwest of the World Way West/Pershing Drive interchange, one coastal California gnatcatcher family group (two adults and three fledglings) and two individual males were detected within the Survey Area. Activity associated with the family group was generally centered around a nest located in vegetation on an east-facing slope, south of the aforementioned interchange. Activity associated with the two individual males generally occurred to the northwest of the nest area for one male and to the southwest of the nest area for the other male.

The Project site located east of Pershing Drive, south of World Way West and west of Taxiways AA, B, and C is largely unvegetated and does not contain vegetation suitable for the California gnatcatcher. The area is currently utilized as a construction staging area that includes a large materials stockpile. As discussed earlier, the area is subject to frequent and significant disturbance as a result of its current land use. Due to the lack of native scrub vegetation and the high level of disturbance and activity at the Project site, it does not support habitat suitable for the California gnatcatcher. Therefore, no direct impacts to California gnatcatcher would occur from implementation of the proposed Project.

Although California gnatcatcher occur within the dunes area west of the Project site, across Pershing Drive, no indirect impacts are anticipated to occur from implementation of the proposed Project. Given that California gnatcatcher have come to, and currently occupy, the El Segundo dunes area, which is subject to high noise levels from departing aircraft, it is not anticipated that construction and operational noise associated with development and use of the Project site would adversely affect the species. No indirect impacts from dust generated during construction activities are anticipated to occur given that dust control measures are included in the air quality control measures for the proposed Project adopted in the Alternative D MMRP

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(i.e., MM-AQ-2. LAX Master Plan - Mitigation Plan for Air Quality; Construction-Related Measures). No indirect impacts from nighttime lighting at the Project site are anticipated to occur given that high-intensity lighting already occurs in the areas to the north of the Project site (i.e., at the West Remote Pads apron area) and to the east and southeast of the site (i.e., American Airlines employee parking lot along the east side of Taxiway AA and the United-Continental Airlines aircraft maintenance complex east of Taxiway AA and north of Taxiway C).

Therefore, while this new information has been considered, there are no changes to the conclusions in the IS which state that the proposed Project would not have a significant impact on biological resources.

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