Statement of Overriding Considerations

The Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the LAX Landside Access Modernization Program at Los Angeles International Airport (LAX or Airport), pursuant to the California Environmental Quality Act (CEQA). On February 17, 2017, LAWA published the Final EIR for the LAX Landside Access Modernization Program.

The LAX Landside Access Modernization Program ("Project") seeks to improve access options and the travel experience for passengers; shift the location where different modes of traffic operate within the Central Terminal Area (CTA) and on the surrounding street network; and provide a direct connection via the proposed Automated People Mover (APM) to the Los Angeles County Metropolitan Transportation Authority (Metro) Crenshaw/LAX Line and Green Line and Metro transit system. By implementing this Project, LAWA seeks to provide more travel time certainty, reduce traffic congestion and improve air quality in and around the Airport.

The LAX Landside Access Modernization Program consists of:

- An Automated People Mover (APM) system with six APM stations connecting the CTA via an above-grade fixed guideway to new proposed ground transportation facilities;
    - Passenger walkway systems with moving walkways connecting the APM stations to passenger terminals, parking garages, and ground transportation facilities;
    - Modifications to existing passenger terminals and parking garages to support the APM walkway system connections, including vertical circulation (elevators, escalators, and stairs) cores to garage levels and to the arrival, departure, and concourse levels at the terminals;
    - An APM maintenance and storage facility (MSF);
    - APM power substations;
- A consolidated rental car facility (CONRAC) designed to meet the needs of rental car agencies serving LAX with access to the CTA via the APM;
- Two intermodal transportation facilities (ITFs) providing airport parking and pick-up and drop-off areas outside the CTA for private vehicles and commercial shuttles;

- Roadway improvements designed to improve access to the proposed facilities and the CTA and reduce traffic congestion in neighboring communities;
- Security features, including security fencing, surveillance cameras, security lighting, and emergency phones/call boxes, to meet the security needs of the Los Angeles World Airports Police Department (LAWAPD);
- Fire safety features in compliance with fire and building code requirements including fire hydrants, fire sprinklers, and fire extinguishers;
- Utilities infrastructure, both new and modified to support the proposed Project;
- Identify options for pricing, policies and procedures in regards to vehicle operations at LAX;
- Incorporation of the LAX Design Guidelines into the proposed Project;
- Land acquisition, subdivision of parcels, creation of new tract maps, and/or other reconfiguration of parcels, dedications and vacations of public rights-of-way, as well as zoning change approvals;
- Future potential related development on land owned by LAWA located adjacent to the new proposed ground transportation facilities;
- Enabling projects to allow construction of the proposed Project, including utility relocation and demolition of certain existing facilities, some of which would be reconstructed; and
- Amendments to plans regulating land use in the area, including the City of Los Angeles General Plan, the LAX Plan, and the LAX Specific Plan, zone changes, and the reconfiguration of existing parcels.

The LAX Landside Access Modernization Program EIR consists of a project-level environmental review of the LAX Landside Access Modernization Program Project, and a programmatic-level environmental review of LAX Landside Access Modernization Program Potential Future Related Development. The LAX Landside Access Modernization Program EIR identified significant adverse environmental impacts that would result from the implementation of the LAX Landside Access Modernization Program Project and the LAX Landside Access Modernization Program Potential Future Related Development that cannot be mitigated to a level that is less than significant by the implementation of feasible mitigation measures or alternatives. The unavoidable significant impacts from the LAX Landside Access Modernization Program Project occur with respect to: aesthetics (visual character) which would also be cumulatively considerable; construction-related regional air pollutant emissions for VOC and NO_X, which would also be cumulatively considerable; construction-related local concentrations for PM_{10} which would also be cumulatively considerable; operations-related local concentrations of PM_{10} which would also be cumulatively considerable; cultural resources (historic resources) which would also be cumulatively considerable; greenhouse gas emissions (plan/policy consistency); public services (schools), off-Airport operational traffic impacts at one intersection (La Cienega Boulevard and W. Arbor Vitae Street) and one freeway segment (I-405 at La Cienega Boulevard); and construction-related surface transportation (temporary traffic, access and transit). Significant unavoidable impacts from the LAX Landside Access Modernization Program Potential Future Related Development occur with respect to: operational-related regional air pollutant emissions for VOC and NO_X; cumulatively considerable operations-related emissions for CO, VOC, NO_X, PM_{10}, and $PM_{2.5}$; greenhouse gas emissions (per capita efficiency threshold and plan/policy consistency); off-Airport traffic impacts at one intersection (La Cienega Boulevard

and W. Arbor Vitae Street) and three freeway segments (I-405 at La Cienega Boulevard, I-405 at La Tijera Boulevard, and I-105 at Crenshaw Boulevard[1]); and construction-related surface transportation (temporary traffic, access and transit).

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

Based on the substantial evidence in the whole of the administrative record for the LAX Landside Access Modernization Program, the Board of Airport Commissioners hereby finds, concludes, and determines that the unavoidable significant adverse environmental impacts associated with the construction and operation of the LAX Landside Access Modernization Program 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 LAX Landside Access Modernization Program, independent of other benefits, despite each and every significant unavoidable impact.

A. ECONOMIC, OPERATIONAL, AND ENVIRONMENTAL BENEFITS ASSOCIATED WITH IMPROVEMENT AND MODERNIZATION OF LANDSIDE FACILITIES AT LAX

Jobs and commerce are direct economic benefits attributable to LAX. As an international port for passengers, cargo, and freight, LAX provides a foundation for businesses that depend on passenger and cargo operations and logistics. In this regard, LAX is a vital component of the local, regional, and state economy. As the international gateway to the western United States, LAX has long been a major supporter of the Southern California economy through employment and generation of taxes and other revenue, and by facilitating the efficient movement of people, goods, and services. Construction of the LAX Landside Access Modernization Program would allow for modernization of

[1] As discussed in Section 4.12.2 of the Draft EIR, with implementation of mitigation measures, including LAWA's fair share contribution to I-405 mobility and ITS improvements and I-105 ITS improvements, impacts would be less than significant for the I-105 at Crenshaw Boulevard freeway segment; however, these improvements would not mitigate the significant impact at the I-405 segments to less than significant levels. Because implementation of mitigation to the State highway system is within the responsibility and jurisdiction of a public agency other than LAWA (i.e., Caltrans), LAWA cannot require it to be implemented. Significant impacts associated with cumulative impacts to freeway segments may not be reduced to less than significant if Caltrans does not adopt effective mitigation measures or if mitigation is infeasible. In that case, the proposed Project's indirect impacts on these freeway segments, including I-105 at Crenshaw Boulevard, would remain significant and unavoidable.

landside facilities while maintaining daily operations at LAX, and thereby helping maintain the Airport's economic contribution in Southern California.

Implementation of the LAX Landside Access Modernization Program would improve access to LAX and relieve congestion on Airport and surrounding roadways, improving the level of service at several key intersections located in the vicinity of LAX (see Section 4.12.2, *Off-Airport Transportation*, of the EIR). As such, the LAX Landside Access Modernization Program would reduce vehicle miles traveled and associated emissions of air pollutants from vehicles on the local roadways. As indicated in Tables 4.2.1-10 and 4.2.1-11 within Section 4.2.1, *Air Quality*, of the Draft EIR, regional operational emissions as a result of the LAX Landside Access Modernization Program Project would be reduced when compared to future without Project conditions for carbon monoxide, volatile organic compounds, nitrogen oxides, respirable particulate matter, and fine particulate matter. The LAX Landside Access Modernization Program Project would also result in a net decrease in greenhouse gas emissions (see Section 4.5, *Greenhouse Gas Emissions*, of the Draft EIR).

B. IMPROVED PASSENGER EXPERIENCE AT LAX

The LAX Landside Access Modernization Program would continue to advance and transform LAX's access system and ensure that LAX remains competitive as a world class airport. The LAX Landside Access Modernization Program would improve access options and the travel experience for passengers and shift the location where different modes of traffic operate within the CTA and on the surrounding street network. By implementing the LAX Landside Access Modernization Program, LAWA would provide more travel time certainty, reduce traffic congestion and improve air quality in and around the Airport. In addition, the APM system would provide a direct connection to Metro's proposed Airport Metro Connector (AMC) 96th Street Transit Station, which would enable passengers, employees, and visitors to have access to the regional public transportation system.

The LAX Landside Access Modernization Program would improve ground access to and from LAX, which would improve traffic movement and reduce congestion for all vehicles in the vicinity. The Project includes roadway improvements that are designed to provide better access to new landside facilities and minimize conflicts between users. Additionally, the APM will be grade-separated along its entire alignment which will eliminate pedestrian and vehicular conflicts. The proposed roadway improvements would integrate roadway, pedestrian, bicycle, transit, and landscaping improvements into an attractive, multi-modal balanced and efficient network serving LAX and its passengers. Additionally, the LAX Design Guidelines (see Appendix B of the Draft EIR, as modified in Chapter 3 of the Final EIR) prescribe elements of roadways and streetscapes to create safe roadways and promote multi-modal uses.

C. SUSTAINABILITY

The LAX Landside Access Modernization Program is to create a sustainable ground transportation infrastructure for LAX. The Project would facilitate transit connections to LAX, reducing vehicle miles traveled per capita. The Project incorporates the LAX Design Guidelines (see Appendix B of the Draft

EIR, as modified in Chapter 3 of the Final EIR) to promote sustainability and world class design at LAX. As part of the Project, LAWA will require energy efficient designs, water efficiency and conservation, construction waste reduction and recycling, numerous air quality emissions reduction measures, natural resource protection and other sustainable operational and design standards. Furthermore, 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, 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. The LAX Landside Access Modernization Program mitigation measures proposed to be implemented as part of the Project are identified in Chapter 4 of the Draft EIR and in the Mitigation Monitoring and Reporting Program. In addition, the Los Angeles Green Building Code Tier 1 standards, which are applicable to all projects with a Los Angeles Department of Building and Safety permit-valuation over $200,000, require the proposed Project to implement sustainability measures that would reduce criteria pollutant emissions.

D. JOB CREATION

LAX is a major employer on both a local level and a regional level. In addition to providing permanent positions at the Airport, LAX is also a major provider of construction jobs. The Project would foster additional employment opportunities and economic activity that would benefit the communities located around LAX and the City of Los Angeles and would include development of a Transportation Demand Management program to provide increased home-to-work transportation options for LAX employees residing in designated Disadvantaged Communities, making the LAX area more attractive for employers.

Construction and operation of the LAX Landside Access Modernization Program would be a multi-billion dollar investment to improve LAX's ground access program and associated infrastructure, and thereby helping maintain the Airport's economic contribution in Southern California. The proposed Project is estimated to cost approximately $5.5 billion to construct, which would provide up to 2,500 construction jobs. Additionally, the Project would increase the number of facilities that LAWA would be operating, thereby providing an increase in long-term employment opportunities for Airport transportation personnel, airline personnel, maintenance and janitorial staff, concessionaires, etc. As discussed in Section 4.10, *Population and Housing*, of the Draft EIR, the Project would result in a net increase of roughly 100 permanent LAX jobs, all of which support the economy and employment of the region.

Construction activity associated with the proposed Project would also support the economy over the multi-year construction period due to the number of construction workers, anticipated spending by these workers, and the provision of goods and services in support of construction.