Los Angeles World Airports

RECOMMENDATION OF THE EXECUTIVE DIRECTOR

LAX PLAN COMPLIANCE REVIEW

Date: **November 1, 2018**

Project Name: **LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project**

Case No.: **001-018LAXSP**

Location: **Los Angeles International Airport (LAX)**

Council District: **11th**

Project Description: **See Attachment 1**

Plan Area: **LAX Plan**

Plan Land Use: **Airport Airside Subarea**

Zone: **LAX Zone**

CEQA: **Environmental Impact Report (EIR)**
State Clearinghouse Number: **2017121019**
City Clerk Number: **EIR-18-012-AD**

SUBJECT: **LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project Compliance Review**

LAX Specific Plan Section, 7 (Ordinance No. 176,345 as amended by Ordinance No. 179,148, Ordinance No. 182,542, Ordinance No. 184,348, and Ordinance No. 185,164) mandates that the Executive Director make a recommendation regarding LAX Specific Plan Compliance for all projects (as defined in the LAX Specific Plan) to the Board of Airport Commissioners (BOAC) prior to construction and issuance of any grading permit, building permit, use of land permit, or initiation of construction of any project. The Executive Director has the authority to recommend approval, approval with conditions, modification, or denial of a request for an LAX Specific Plan Compliance determination. This report addresses the proposed LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project (hereafter referred to as the Proposed Project), including a background and proposed project description, objectives, findings of fact, the requisite reports received, a recommendation of approval.

The Executive Director transmitted a copy of the written description of the Proposed Project and appropriate documents to Council District 11, the Neighborhood Council of Westchester/Playa del Rey, and posted a notice on the LAWA website on June 28th, 2018.

The Executive Director has reviewed the Proposed Project for LAX Plan Compliance as provided in the LAX Specific Plan based on: (a) a written description of the Proposed Project; (b) the Environmental Impact Report (EIR) prepared for the Proposed Project, including a traffic study; (c) the mitigation measures identified in the EIR; (d) the most recent annual traffic generation report; and (e) the most recent annual aviation activity analysis.

I. BACKGROUND AND PROPOSED PROJECT DESCRIPTION

***Background*:**

The Proposed Project would consolidate and modernize existing United Airlines (UAL) aircraft maintenance and Ground Support Equipment (GSE) facilities at LAX. This would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Currently, UAL performs maintenance in two areas at LAX: West Maintenance Facility and East Maintenance Facility. Both facilities have aircraft service areas, which include enclosed hangars at the West Maintenance Facility, aircraft parking spots, GSE bays and shops, maintenance and inspection rooms and functions, and office and storage space. Consolidation of the maintenance facilities on the Proposed Project site would eliminate duplicate maintenance facilities and operations and would place all of UAL's maintenance activities in closer proximity to its gates in terminals 7 and 8. The Proposed Project would reduce the total distance that UAL aircraft currently travel between the gates and the maintenance facilities, and would eliminate vehicle trips between the two maintenance facilities.

With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. LAWA is planning to relocate the Quonset Hut. This relocation is planned as part of LAWA's ongoing management of historic resources at LAX. The relocation would occur independently of the Proposed Project.

Project Summary:

The Proposed Project includes:

- Demolish the existing buildings associated with the East Maintenance Facility (including Hangars 1 and 2), with the exception of the Quonset Hut, which is planned for relocation by LAWA independent of the proposed project.

- Construct and operate a new aircraft and GSE maintenance facility, totaling approximately 411,000 square feet, and consisting of the following elements:

  - Two wide body aircraft hangar bays with approximately 160,000 square feet of floor area and a height of approximately 110 feet, able to serve both narrow-body and wide-body aircraft

  - Aircraft maintenance shops with approximately 74,000 square feet of floor area

  - Aircraft parts/supplies stores with approximately 60,000 to 75,000 square feet of floor area, and an associated storage yard
  - A GSE maintenance facility with approximately 45,000 to 50,500 square feet of floor area, 15 GSE bays, 2 paint bays, 1 wash bay, eGSE charging stations, and an associated storage yard
  - Facility maintenance area with approximately 2,000 square feet of floor area
  - Approximately 10,000 square feet of dock and skywalk support areas
  - Approximately 40,000 to 60,000 square feet of building circulation and support

- Replace/resurface a portion of the apron area and restripe aircraft parking positions.
- Reconfigure the apron and include aircraft parking positions in the hangar for a total of 22 aircraft parking positions on the leasehold, including 6 in the hangar, 6 on the south side of the project site, and 10 within the western portion of the leasehold.
- Provide an aircraft wash pad in a contained area for conducting dry washes of aircraft.
- Construct a jet blast deflector, also referred to as a blast fence, on the eastern portion of the project site for the purpose of conducting aircraft engine run-ups. With this blast fence, the proposed project would accommodate aircraft engine run-up activities that would be conducted at the East Aircraft Maintenance Facility approximately 90 percent of the time; the remaining run-ups would occur at other facilities within the airfield).
- Relocate and/or remove utilities, including water and wastewater pipelines, storm drain facilities, clarifiers, fuel lines, and an onsite triturator.
- Replace existing paint booths with a new spray booth that would be required to meet Best Available Control Technology (BACT).
- Install a diesel-powered backup generator to provide emergency power and transformer equipment on a small portion of the adjacent UAL cargo yard.
- Vacate the east-west portion of Avion Drive that abuts Parking Lot H to the north, and relocate Avion Drive south of Parking Garage F, which is located north of the existing shared-ride van lot on the south side of Century Boulevard, as a one-way street with travel from east to west.
- Relocate employee parking from Parking Lot H to Parking Garage F.

A detailed project description is provided in **Attachment 1**.

An Environmental Impact Report (EIR) was prepared in compliance with the California Environmental Quality Act (CEQA).

Project Location:

The Proposed Project is comprised of approximately 35 acres (the "Project Site") and is situated within the eastern portion of LAX, parallel to and south of Century Boulevard and east of Sepulveda Boulevard. The Proposed Project is located entirely within the LAX Plan area of the City of Los Angeles. The Proposed Project is located at 6020-6024 Avion Drive and 6000-6016 Avion Drive. The specific project area is shown on the Project Site Plan in **Attachment 2**.

Existing and Proposed Use:

Land use designations and development regulations applicable to LAX which includes the Proposed Project, are set forth in the LAX Plan and the LAX Specific Plan. The LAX Plan, part of the Land Use Element of the City of Los Angeles General Plan, is the City's Community Plan for the LAX area. The LAX Plan was adopted concurrently with the LAX Master Plan Program in 2004 and amended in 2007, 2013, 2016 and 2017.

The Proposed Project was reviewed for consistency with the LAX Plan. The LAX Plan is intended to promote an arrangement of airport uses that encourages and contributes to the modernization of LAX in an orderly and flexible manner within the context of the City and the region. It provides goals, objectives, policies, and programs that establish a framework for the development of facilities promoting the movement and processing of passengers and cargo within a safe and secure environment. The LAX Plan is intended to allow the Airport to respond to emerging technologies, economic trends, and functional needs.

The LAX Specific Plan was adopted at the same time as the LAX Plan in 2004 and has been amended four times: 2007, 2013, 2016 and 2017. The LAX Specific Plan establishes the development standards consistent with the LAX Plan for the airport. It is a principal mechanism by which the goals and objectives of the LAX Plan are achieved and the policies and principals and implemented. Proposed facilities associated with the Proposed Project are consistent with the goals and policies of both the LAX Plan and Specific Plan.

The land use setting around the project site is generally characterized by LAX airside uses, such as aircraft maintenance facilities, cargo facilities, runways, taxiways, and aircraft apron areas to the east, west, and south; with a surface parking lots and a parking structure to the north.

The LAX Plan, the City of Los Angeles General Plan Land Use Element that governs uses on LAX, designates the project site as Airport Airside. The corresponding LAX Specific Plan also designates this area as LAX Zone: Airport Airside Subarea. The Proposed Project improvements are consistent with the LAX Plan land use designation and with the allowable uses under the LAX Specific Plan.

II. PROJECT OBJECTIVES

The specific objectives of the Proposed Project are to:

- Consolidate/relocate UAL's existing aircraft and GSE maintenance facilities at LAX in a single location to provide for more efficient and effective maintenance of UAL aircraft and equipment at the airport that eliminates duplicate facilities;

- Locate UAL's aircraft and GSE maintenance facilities closer to UAL's gates to increase efficiency by reducing the distance between the gates and maintenance area, consistent with the mission of LAX Airfield Operations of providing a safe and efficient airport operating environment;

- Modernize UAL's maintenance facilities, which were constructed between the mid-1940s and early 1970s when aircraft and GSE equipment were much smaller than they are today, in a manner that is consistent with LAWA's Sustainable Design and Construction Policy and that fulfills LAWA's strategic goal of innovating to enhance efficiency and effectiveness;

- Provide sufficient enclosed aircraft maintenance space and RON/RAD aircraft parking spaces on UAL's leasehold to support routine servicing and maintenance of aircraft and meet overnight parking requirements;

- Provide facilities to support the maintenance requirements of UAL's operations at LAX; and

- Fulfill LAWA's strategic goal of sustaining a strong business that recognizes the fiscal impact the airport makes on the regional economy.

III. FINDINGS OF FACT

The following findings support the recommendation to grant LAX Plan Compliance:

(1) THE PROPOSED PROJECT COMPLIES WITH THE LAX PLAN, ANY DESIGN GUIDELINES AND STANDARDS REQUIRED BY THE LAX SPECIFIC PLAN, AND ALL APPLICABLE PROVISIONS OF THE LAX SPECIFIC PLAN.

Applicable LAX Plan Goals and Objectives:

Compliance with Purpose of the LAX Plan: The Proposed Project complies with the proposed use and vision of the LAX Plan, as set forth in Section 1 of that Plan. The Proposed Project contributes to the modernization of the airport in an orderly and flexible manner within the context of the established framework for the development of hangar/maintenance facilities in the eastern portion of the airport property. Within the context of the regional framework, the Proposed Project is in accordance with the vision to evolve LAX into a modern, safe and secure airport.

Compliance with Goals, Objectives and Policies of the LAX Plan: The LAX Plan identifies six goals and 21 supporting objectives to expand on the intent of the LAX Plan vision and provide further direction for the development of the airport. It also identifies specific policies and programs that would be used to implement these goals and objectives. The goals and objectives of the LAX Plan are outlined in Table 1. The Proposed Project complies with the following goals and objectives of the LAX Plan, as explained below:

TABLE 1: LAX PLAN – GOALS AND OBJECTIVES

GOAL/ OBJECTIVE	DESCRIPTION	APPLICABLE TO PROPOSED PROJECT
Goal 1	**Strengthen LAX's unique role within the regional airport network as the international gateway to the Southern California region**	**Yes**
Objective 1	Provide superior facilities, services, and operations needed to support the role of LAX as the principal airport and international gateway to the region.	Yes
Objective 2	Improve airport facilities and operations in order to provide world-class service for travelers and other airport users (*i.e.*, employees, public service personnel, *etc.*).	Yes
Objective 3	Provide and upgrade needed facilities to accommodate current and next-generation larger aircraft associated with international and long-haul domestic travel.	Yes
Objective 4	Encourage other airports in the region to absorb growth in commercial service that is not essential to LAX's international gateway role.	No
Objective 5	Lead the effort to regionalize air service in Southern California by forging strategic partnerships that connect LAX and other regional airports.	No
Goal 2	**Develop and maintain the highest standards of air traffic safety and passenger security through design and the latest innovations.**	**No**
Goal 3	**Optimize LAX's critical role in supporting the economy as a major generator of economic activity.**	**No**
Goal 4	**Recognize the responsibility to minimize intrusions on the physical environment.**	**Yes**
Objective 1	Minimize negative impacts to the Los Angeles Airport/El Segundo Dunes and protect plant and animal species, to the extent practical for safe airport operation.	No
Objective 2	Where feasible, implement measures to improve air quality or limit the extent to which air quality is degraded by auto, aircraft, and construction equipment emissions.	Yes
Objective 3	Incorporate applicable mitigation measures and master plan commitments from environmental analyses into project design and operation.	Yes
Objective 4	Become a global leader in airport sustainability by integrating and reflecting sustainable practices into all aspects of airport operations and airport projects.	Yes
Goal 5	**Acknowledge neighborhood context and promote compatibility between LAX and the surrounding neighborhoods.**	**Yes**
Objective 1	Minimize negative impacts to surrounding residential land uses.	No
Objective 2	Maximize the public benefits of airport development, particularly to adjacent land uses.	Yes
Objective 3	Provide opportunities for community participation in Master Plan Program decisions that could affect stakeholders by consultation with an LAX Master Plan Stakeholder Liaison who will communicate with stakeholders, including: adjacent residential and business communities; airline representatives; airport concessionaires; cargo and freight forwarders; labor representatives; business organizations and neighborhood councils.	Yes
Goal 6	**Improve ground access to LAX.**	**No**

LAX Plan – Goals and Objectives

Goal #1: Strengthen LAX's unique role within the regional airport network as the international gateway to the Southern California region.

- Objective #1: Provide the superior facilities, services, and operations needed to support the role of LAX as the principal airport and international gateway to the region.
- Objective #2: Improve airport facilities and operations in order to provide world-class service for travelers and other airport users (i.e., employees, public service personnel, etc.).
- Objective #3: Provide and upgrade needed facilities to accommodate current and next-generation larger aircraft associated with international and long-haul domestic travel.

The Proposed Project would be consistent with this goal and would meet the corresponding objectives by providing an upgraded facility designed to consolidate maintenance operations at LAX. The Proposed Project would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport.

Consolidations of the maintenance facilities on the Proposed Project site would eliminate duplicate maintenance facilities and operations and would place all of UAL's maintenance activities in closer proximity to its gates in terminals 7 and 8. The Proposed Project would reduce the total distance that UAL aircraft currently travel between the gates and the maintenance facilities and would eliminate vehicle trips between the two maintenance facilities. The aircraft hangar at the East Maintenance Facility is not tall enough to accommodate modern aircraft; all aircraft maintenance at the East Maintenance Facility is conducted out-of-doors on the apron area. The equipment bays at the GSE hangar are similarly unable to accommodate large GSE equipment (the doors are not wide enough). Some of the equipment storage areas are located in building spaces that are too small, making it difficult to stack equipment or accommodate forklift. The East Maintenance Facility lacks sufficient GSE yard space, and the West Maintenance Facility lacks adequate RON/RAD aircraft parking spaces.

The Proposed Project would enhance and support the efficient operation of aircraft at LAX and ensure that LAX remains competitive as a world class airport, particularly with respect to the maintenance and accommodation of modern airplane types.

Goal #4: Recognize the responsibility to minimize intrusions on the physical environment.

- Objective #2: Where feasible, implement measures to improve air quality or limit the extent to which air quality is degraded by auto, aircraft, and construction equipment emissions.
- Objective #3: Incorporate applicable mitigation measures and master plan commitments from environmental analyses into project design and operation.

Objective #4: Become a global leader in airport sustainability by integrating and reflecting sustainable practices into all aspects of airport operations and airport projects.

The Proposed Project would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy, which requires that the new building be designed to achieve the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Silver certification. LEED Silver certification requires a project to be designed in a manner to save energy, water, and other resources, and to generate less waste and support human health. In addition, the Proposed Project would be required to be constructed in accordance with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code (CALGreen).

In addition to the measures required to obtain LEED Silver certification, LAWA has implemented a wide range of actions designed to reduce temporary, construction-related air pollutant and greenhouse gas emissions from its ongoing construction program and has established aggressive construction emissions reduction measures, including having contractors use newer model construction equipment and heavy duty trucks with low-emission engines or emissions control devices. With respect to the Proposed Project, mitigation measures have been included in the EIR to address the project's air quality impacts. See EIR MMRP.

Goal #5: Acknowledge neighborhood context and promote compatibility between LAX and the surrounding neighborhoods.

Objective #2: Maximize the public benefits of airport development, particularly to adjacent land uses.

Objective #3: Provide opportunities for community participation in Master Plan Program decisions that could affect stakeholders by consultation with an LAX Master Plan Stakeholder Liaison who will communicate with stakeholders, including: adjacent residential and business communities; airline representatives; airport concessionaires; cargo and freight forwarders; labor representatives; business organizations and neighborhood councils.

The Proposed Project is consistent with the land use designations within applicable on-Airport Land Use Plans including the LAX Plan, LAX Specific Plan, and Airport Layout Plan. The land use setting around the project site is generally characterized by LAX airside uses, such as aircraft maintenance facilities, cargo facilities, runways, taxiways, and aircraft apron areas to the east, west, and south; with a surface parking lots and a parking structure to the north. The Proposed Project would be compatible with the surrounding area.

The Proposed Project is not a LAX Master Plan Project and LAX no longer has a LAX Master Plan Stakeholder Liaison. However, LAWA still provided outreach efforts. The Proposed Project's Initial Study (IS) and Draft EIR were made available on the LAWA website providing opportunity for review and comment. Agencies, organizations and other interested parties in proximity to the project were notified of the Proposed Project through mailings along with notification in the local and regional newspapers. Comments and suggestions could be submitted via the LAWA website: http://www.lawa.org/ourLAX/Comments.aspx. Comments

were received by the public during the comment period. The Notice of Preparation (NOP) and IS, included as Appendix A of the Draft EIR, was circulated for public review from December 7, 2017 to January 8, 2018. Federal, state, regional, and local agencies, as well as the public, were afforded the opportunity to comment on the findings of the IS through the 30-day scoping period associated with circulation of the NOP for the EIR.

CEQA requires that all state and local agencies consider the environmental consequences of projects over which they have discretionary authority. Implementation of the Proposed Project requires approvals from and consultation with federal, state, and regional/local agencies. The EIR would be used by agencies in connection with permits and approvals necessary for the construction and operation of the proposed project. The EIR is used primarily to (1) inform decision-makers and the public about the potentially significant environmental effects of the proposed project and the ways to avoid or reduce the significant environmental effects to the extent feasible; (2) demonstrate to the public that the environment is being protected; and (3) ensure that the planning and decision-making processes reflect an understanding of the environmental effects of the proposed project.

Applicable LAX Plan Policies and Programs: The following policies and programs have been developed to implement the LAX Plan goals and objectives to guide airport development and are applicable to the Proposed Project. These policies and programs are organized into topics that address functional and operational aspects of the airport and potential impacts to adjacent land uses. Applicable topics to the Proposed Project are identified in Table 2 for the adopted LAX Plan.

TABLE 2: LAX PLAN – POLICIES AND PROGRAMS

POLICIES AND PROGRAMS	DESCRIPTION	APPLICABLE TO PROPOSED PROJECT
3.1.1	**Safety and Security**	**Yes**
3.1.1	**Safety**	**Yes**
P1	Study and address runway realignment and taxiway separation to provide for larger aircraft maneuvering areas and clearances.	No
P2	Provide for adequate aircraft queue space at departure ends of the runways.	No
P3	Evaluate center taxiways to reduce the possibility of runway incursions.	No
P4	Provide parallel taxiways between all new structures for improved aircraft maneuvering and reduced taxi times.	No
P5	Improve taxiway spacing into gate locations to reduce gate congestion and improve taxi times and efficiency.	No
P6	Consult with the Los Angeles Fire Department during the design phase of facilities to review plans and incorporate recommendations that enhance airport safety.	Yes
P7	Establish runway protection zones contiguous to the ends of each runway. These runway protection zones shall be identical to the FAA's runway protection zone.	No
P8	Prohibit uses within FAA designated runway safety areas, including, but not limited to, Runway Safety Areas (RSA) and Runway Protection Zones (RPZ) that create safety hazards.	No

POLICIES AND PROGRAMS	DESCRIPTION	APPLICABLE TO PROPOSED PROJECT
P9	Prohibit uses that would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation.	Yes
P10	Prohibit uses that would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.	Yes
3.1.2	**Security**	**Yes**
P1	Evaluate, develop, and improve both physical and operational security measures at LAX, as necessary, in the Central Terminal Area and at other passenger processing facilities.	No
P2	Design and construct facilities that provide for security of passengers by providing multiple levels of security screening procedures while maintaining ease of use.	No
P3	Consult with the Los Angeles Police Department, the Los Angeles World Airports Police Department, other law enforcement agencies, and security experts, as appropriate, during the facility planning, design, and review phase so that potential environmental contributors to criminal activity are reduced and to ensure the security of the airport, airline passengers, and the surrounding community.	Yes
P4	Provide law enforcement and fire facilities to enhance the ability to respond to emergency situations and facilitate coordination with other emergency response agencies.	Yes
P5	Provide flexibility in facility design to allow for the incorporation of new technologies in security.	Yes
3.2	**Land Use**	**Yes**
3.2.1	**Land Use – Airport Airside**	Yes
P1	Develop a balanced airfield to provide for more efficient and effective use of airport facilities.	Yes
P2	Expand and improve employee parking.	No
P3	Locate airport uses and activities with the potential to adversely affect nearby residential land uses through noise, light spillover, odor, vibration, and other consequences of airport operations and development, as far from them as feasible.	Yes
P4	Provide and maintain landscape buffer areas along the southern boundary of Airport Airside that include setbacks, landscaping, screening, or other appropriate view sensitive uses with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy, and better screening view of airport facilities from adjacent residential uses.	No
P5	No aircraft under power shall enter the Imperial Terminal Area located on the south side of the airport generally used for cargo and fixed-base operations. Continue the use of tug and tow procedures in this area.	No
3.2.2	**Land Use – Airport Landside**	No
3.2.3	**Land Use – Airport Landside Support**	No
3.2.4	**Land Use – LAX Northside**	No
3.2.4	**Land Use – Open Space**	No
3.3	**Conservation**	**Yes**
3.3.1	**Conservation – Biotic Communities**	No
3.3.2	**Sustainability**	Yes
P1	Design and provide new facilities to meet or exceed energy prescriptive standards required under Title 24.	Yes
P2	Reduce energy usage and increase usage of green power at all airport facilities and in all operations.	Yes
P3	Increase recycling and source reduction efforts at all facilities and for all operations.	Yes
P4	Increase water conservation in all airport facilities and for all operations.	Yes

POLICIES AND PROGRAMS	DESCRIPTION	APPLICABLE TO PROPOSED PROJECT
P5	Increase use of environmentally and socially responsible products.	Yes
P6	Incorporate sustainable planning, design, and construction practices into all airport projects.	Yes
P7	Integrate sustainable practices into internal policies, business processes, and written agreements.	Yes
P8	Promote sustainability awareness to airport employees and the greater community.	Yes
3.4	**Circulation and Access**	**Yes**
P1	Develop direct links from each major Airport Airside and Airport Landside facility to other Airport Landside and Airport Airside facilities, as appropriate.	No
P2	Connect airport facilities to, and to the extent feasible, improve the safety, operation, and mobility of, the regional ground transportation network.	No
P3	Provide facilities that encourage transit ridership.	No
P4	Consolidate rental car facilities.	No
P5	Develop safe and efficient curbside check-in facilities.	No
P6	Provide convenient short- and long-term parking facilities.	No
P7	Provide dedicated employee parking facilities.	Yes
P8	Develop a connection point between the airport and MTA facilities.	No
P9	Relieve traffic congestion in the CTA and on area surface streets and roads.	Yes
P10	Continue transformation of LAX into a world-class destination airport and enhance the passenger experience.	No
P11	Connect to transit, encouraging transit ridership to LAX.	No
P12	Create new mobility options for passengers including pick-up and drop-off areas outside of the CTA.	No
P13	Provide passengers a fast and reliable new way to get to their flights.	No
P14	Reduce vehicle emissions and improve air quality.	No
3.5	**Economic Benefit**	**Yes**
P1	Sustain jobs and economic output provided to the local, regional, and state economies.	Yes
P2	Modernize, upgrade, and improve LAX in order to sustain the airport's economic benefits.	Yes
P3	Provide for an efficient arrangement of on-airport cargo facilities.	No
P4	Locate those on-airport uses that are dependent on secondary, ancillary commercial uses, adjacent to such uses.	No
3.6	**Noise**	**Yes**
P1	Maintain and enhance applicable elements of the current Aircraft Noise Abatement Program that pertain to aircraft noise.	No
P2	Update facilities, gates, and runways, to accommodate the New Large Aircraft (NLA) and the next generation of quieter jets.	Yes
P3	Minimize the impacts of aircraft and airport noise through runway orientation.	No
P4	Move nighttime noise-creating activities to the interior of the airfield and away from noise-sensitive areas situated north and south of the airport.	Yes
P5	Continue use of tug and tow procedures in the Imperial Terminal Area.	No
P6	Use over-ocean procedures during nighttime, when weather permits.	No
P7	Conduct departures to the west along the runway heading until reaching the coastline.	No

POLICIES AND PROGRAMS	DESCRIPTION	APPLICABLE TO PROPOSED PROJECT
P8	Continue to implement LAX's Airport Noise Mitigation Program to mitigate noise impacts to incompatible land uses (residences, schools, hospitals, churches, and libraries).	No
P9	Locate airport uses and activities with the potential for noise impacts as far from adjacent residential neighborhoods as feasible.	Yes
P10	Require new uses to adhere to applicable state airport land use compatibility regulations.	No
P11	Encourage the conversion of incompatible land uses to uses that are compatible with the airport.	No
P12	Support the construction and use of a ground run-up enclosure (GRE) to minimize aircraft engine testing noise.	No
3.7	**Air Quality**	**Yes**
P1	Modify runways and taxiways to reduce airfield delays and congestion in order to lessen air emissions through reduced idle time.	No
P2	Expand and revise the Air Quality Mitigation Program in order to implement and coordinate methods to reduce air pollutant emissions.	No
P3	Establish and implement source controls to reduce construction-related air emissions for on-road and non-road mobile sources and stationary engines.	Yes
P4	Provide facilities that encourage transit ridership of other FlyAway services for other airports in the region.	No
P5	Establish land use and traffic circulation patterns that reduce traffic and congestion, thereby reducing automobile idle times and subsequent motor vehicle emissions.	No
P6	Encourage and facilitate the conversion of ground support equipment to extremely low emission technology, such as electric power or fuel cells.	Yes
P7	Develop Intelligent Transportation Systems applications for highway and roadway improvements to minimize traffic and parking congestion and to provide passengers with information that allows them to make informed choices regarding ground access options to and from LAX and other regional airports.	No
P8	Reduce emissions from all operations including stationary and mobile sources.	Yes
3.8	**Hazardous Waste**	**Yes**
P1	Implement a program for handling of contaminated materials encountered during construction.	Yes
3.9	**Design**	**Yes**
P1	Appropriately relate those airport facilities that are adjacent to community land uses to the scale and level of activity of those uses.	Yes
P2	Relate Airport Landside facilities to the existing airport infrastructure in a clear, well-organized, functional, and compatible manner.	No
P3	Update and/or integrate existing design plans into a comprehensive set of design guidelines for airport facilities.	Yes
P4	Develop and incorporate signage guidelines that provide guidance and establish controls for signage that are appropriate to an airport.	Yes

LAX Plan – Policies and Programs

3.1.1 Safety

Policy and Program #6:	Consult with the Los Angeles Fire Department during the design phase of facilities to review plans and incorporate recommendations that enhance airport safety.
Policy and Program #9:	Prohibit uses that would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation.
Policy and Program #10:	Prohibit uses that would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

The City of Los Angeles Fire Department (LAFD) provides fire protection services to the project site. Four LAFD fire stations are located on airport property (Fire Station Nos. 80, 51, 5, and 95). The Project Site is currently developed and used for airport uses, and the boundary of the Proposed Project would not extend beyond the current airport boundary. The Proposed Project would comply with all applicable city, state, and federal codes and ordinances, including LAFD and Los Angeles Building and Safety requirements.

The Proposed Project would be required to comply with the fire and building code requirements, such as the inclusion of safety features including fire hydrants, fire sprinklers, and fire extinguishers. Incorporation of these required fire safety features would reduce demand on fire protection and emergency services. Implementation of the improvements would not restrict emergency access, increase response times, or extend station responses distances. In accordance with LAWA practice, access routes in the vicinity of the project site would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal and Los Angeles Fire code regulations and therefore would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

Additionally, the Proposed Project would be clear of FAA designated runway safety areas designed in a manner that would not be an attractant to wildlife that pose a hazard to aircraft operations. The electrical and operating system associated with the Proposed Project would be required to not interfere with aircraft systems or FAA navigation systems.

3.1.2 Security

Policy and Program #3:	Consult with the Los Angeles Police Department, the Los Angeles World Airports Police Department, other law enforcement agencies, and security experts, as appropriate, during the facility planning, design, and review phase so that potential environmental contributors to criminal activity are reduced and to ensure the security of the airport, airline passengers, and the surrounding community.
Policy and Program #4:	Provide law enforcement and fire facilities to enhance the ability to respond to emergency situations and facilitate coordination with other emergency response agencies.
Policy and Program #5:	Provide flexibility in facility design to allow for the incorporation of new technologies in security.

Both the Los Angeles World Airport Police Division (LAWA PD) and the City of Los Angeles Police Department LAX Detail (LAPD LAX Detail) provide police protection services to LAX, including the Proposed Project site. Demand for on-Airport police protection services is typically determined by increases in aircraft activity and employees. The Proposed Project is not anticipated to substantially increase long-term employment that would result in need for additional police protection. Consultation would with the Los Angeles Police Department, other law enforcement agencies and security experts would occur during the facility planning and design phase to ensure input is provided on the security related activities associated with the Proposed Project that would affect the airport, airline passengers, and the surrounding community.

3.2.1 Land Use – Airport Airside

Policy and Program #1: Develop a balanced airfield to provide for more efficient and effective use of airport facilities.

Policy and Program #3: Locate airport uses and activities with the potential to adversely affect nearby residential land uses through noise, light spillover, odor, vibration, and other consequences of airport operations and development, as far from them as feasible.

As stated earlier, the Proposed Project seeks to locate UAL's aircraft and GSE maintenance facilities closer to UAL's gates to increase efficiency by reducing the distance between the gates and maintenance area. In addition, another project objective is to modernize UAL's maintenance facilities constructed between the mid-1940s and early 1970s in a manner that is consistent with LAWA's Sustainable Design and Construction Policy to fulfill LAWA's strategic goal of innovating to enhance efficiency and effectiveness.

The Proposed Project site is located within the eastern portion of LAX, parallel to and south of Century Boulevard. The project site is removed from communities near LAX. The LAX Plan, the City of Los Angeles General Plan Land Use Element that governs uses on LAX, designates the site as Airport Airside. The corresponding LAX Specific Plan designates this area as LAX Zone: Airport Airside Sub-Area. The Proposed Project improvements are consistent with the LAX Plan land use designation and with allowable uses under the LAX Specific Plan. The land use setting around the project site is characterized by airport operations, aircraft maintenance facilities, and cargo facilities. Existing adjacent uses include the LAWA Records Building and American Eagle commuter facility to the west; air cargo facilities and Delta Air Lines aircraft maintenance facility to the northwest; a shared-ride vehicle holding lot and an employee parking structure (referred to as Parking Garage F) to the north; the UAL Cargo building to the northeast; American Airlines Cargo and GSE facility to the east; and the LAX south airfield to the south, specifically Taxiway C, followed by Taxiway B, Runway 7L-25R, Taxiway H (centerline taxiway), Runway 7R-25L, and Taxiway A.

3.3.2 Sustainability

Policy and Program #1: Design and provide new facilities to meet or exceed energy prescriptive standards required under Title 24.

Policy and Program #2:	Reduce energy usage and increase usage of green power at all airport facilities and in all operations.
Policy and Program #3:	Increase recycling and source reduction efforts at all facilities and for all operations.
Policy and Program #4:	Increase water conservation in all airport facilities and for all operations.
Policy and Program #5:	Increase use of environmentally and socially responsible products.
Policy and Program #6:	Incorporate sustainable planning, design, and construction practices into all airport projects.
Policy and Program #7:	Integrate sustainable practices into internal policies, business processes, and written agreements.
Policy and Program #8:	Promote sustainability awareness to airport employees and the greater community.

The proposed project would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy, which requires that the new building be designed to achieve the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Silver certification. Non-hazardous construction and demolition debris generated at the site would be recycled or salvaged to the extent required to meet LEED Silver certification. The proposed improvements would include efficient lighting fixtures and controls with occupancy sensors where appropriate to reduce energy consumption during off-peak hours, and the heating, ventilation, and air conditioning controls within occupied areas would be designed to reset temperatures to maximum efficiency without sacrificing occupant comfort. Natural lighting would be provided in the hangar bays through the use of transparent or translucent panels in the sidewalls. Where possible, the facility would incorporate coated glass that minimizes heat gain as well as building materials and furnishings made of recycled content. During construction, low-emitting paints, adhesives, carpets, and sealants would be used to the extent feasible. To conserve potable water, the restrooms in the new facility would be designed with low- or ultra-low-flow systems, and recycled water would be used for construction-related dust control and construction equipment washing when feasible.

LAWA's Clean Construction Program ensures contractors follow sustainable construction practices such as using low-emission equipment, recycling construction and demolition waste, and minimizing non-essential trips through better schedule coordination. Employing sustainable construction practices also has a positive impact on other initiatives important to LAWA, including air quality, water and energy consumption, recycling and material resources reduction, and social responsibility.

LAWA completed a waste characterization study at LAX to establish a baseline for recycling and waste diversion programs and develop strategies towards meeting the City of Los Angeles' Zero Waste goal. Zero Waste LA is a new public private partnership designed to address the 3-million tons of waste disposed annually by businesses, consumers and residents. This innovative franchise system establishes a waste and recycling collection program for all commercial, industrial, and large multifamily customers in the City of Los Angeles.

LAWA has implemented a wide range of actions designed to reduce temporary, construction-related air pollutant and greenhouse gas emissions from its ongoing construction program and has established aggressive construction emissions reduction measures, particularly with regard to requiring construction equipment and heavy duty trucks to be newer models that have low-emission engines or be equipped with emissions control devices. To achieve this commitment, LAWA has developed standard control measures which would be applied to the proposed project.

3.4 Circulation

Policy and Program #7: Provide dedicated employee parking facilities.
Policy and Program #9: Relieve traffic congestion in the CTA and on area surface streets and roads.

Although the portion of UAL's current aircraft and GSE maintenance operations that occurs at the West Maintenance Facility would be consolidated with operations located on the east side of the airport, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. The consolidation would alter on- and off-airport vehicular movements. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility, including Imperial Highway, Pershing Drive, and Westchester Parkway, would instead drive to the East Maintenance Facility, which would be accessed via Century Boulevard or a generally parallel network of side roads located south of Century Boulevard. The Proposed Project would involve vacating a portion of Avion Drive and relocate the street south of Parking Garage F just north of the Project Site as an east-west one-way street. Employee parking would be relocated from Parking Lot H, a surface parking lot located south of Avion Drive,to Parking Garage F located to the north of the Project Site.

3.5 Economic Benefit

Policy and Program #1: Sustain jobs and economic output provided to the local, regional, and state economies.
Policy and Program #2: Modernize, upgrade, and improve LAX in order to sustain the airport's economic benefits.

As an international port for cargo and freight, LAX provides a foundation for businesses that depend on cargo operations and logistics. In this regard, LAX is a vital component of the local, regional, and state economy. Failure to modernize LAX would impede the ability to meet airport users' future needs and could threaten the airport's position as one of the nation's premiere airports, thereby limiting the region's future economic vitality.

3.6 Noise

Policy and Program #2: Update facilities, gates, and runways, to accommodate the New Large Aircraft (NLA) and the next generation of quieter jets.
Policy and Program #4: Move nighttime noise-creating activities to the interior of the airfield and away from noise-sensitive areas situated north and south of the airport.

Policy and Program #9: Locate airport uses and activities with the potential for noise impacts as far from adjacent residential neighborhoods as feasible.

Construction and operation of the proposed project would not expose persons to, or result in the generation of, noise in levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies; expose people to, or result in the generation of, excessive groundborne vibration or groundborne noise levels; create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

The Proposed Project would consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility), and provide new and improved facilities at that location. The project site is within a public airport in an urban environment that operates 24 hours a day, seven days a week, and 365 days a year, with many existing sources of noise, including aviation noise and traffic noise. The Proposed Project would occur in an area generally removed from noise-sensitive areas near LAX.

The Proposed Project would not result in an increase in activity within LAX, or an increase in aircraft operations. Moreover, operation of the proposed project would not increase the number of daily flights arriving and departing from LAX or the ambient growth in aviation activity at LAX that is projected to occur in the future. As part of regularly scheduled maintenance, FAA requires that aircraft engines be tested at various power levels while the aircraft is out of service and on the ground in a stationary position to ensure the engines' proper operation prior to the aircraft being returned to service. Such engine ground run-ups are presently conducted at the United Airline West Maintenance Facility. The relocation of aircraft engine ground run-ups from the West Maintenance Facility to the East Maintenance Facility would place such activity farther away from noise-sensitive residential uses. The distance from existing run-up activity in the West Maintenance Facility to the nearest residential uses in El Segundo to the south is approximately 2,600 feet. The distance from the run-up area proposed in the East Maintenance Facility to the nearest, unobstructed residential uses, which are also located in El Segundo, is approximately 5,900 feet. The nearest non-residential noise-sensitive land use is the Crowne Plaza Hotel located approximately 450 feet to the north. The proposed hangar and the existing UAL cargo building would lie between the run-up area and the hotel.

3.7 Air Quality

Policy and Program #3: Establish and implement source controls to reduce construction-related air emissions for on-road and non-road mobile sources and stationary engines.

Policy and Program #6: Encourage and facilitate the conversion of ground support equipment to extremely low emission technology, such as electric power or fuel cells.

Policy and Program #8: Reduce emissions from all operations including stationary and mobile sources.

In addition to the measures required to obtain LEED Silver certification, LAWA has implemented a wide range of actions designed to reduce temporary, construction-related air pollutant and greenhouse gas emissions from its ongoing construction program and has established aggressive construction emissions reduction measures, including having contractors use newer model construction equipment and heavy duty trucks with low-emission engines or emissions control devices. See EIR MMRP.

The Proposed Project would include eGSE charging stations within the GSE maintenance facility. The number of eGSE charging stations would be the same as the current number of stations. In addition, the hangar and aircraft apron would be designed as a "Pad-of-the-Future," with dual 400 hertz (Hz) electric power for all aircraft parking positions, and using stationary or portable GPUs, stationary or portable pre-conditioned air (PCA) units, and/or electrification of GSE maintenance activities. The portable GPUs and PCA units to be used at the facility would include existing diesel, gasoline, and electric-powered units.

3.8 Hazardous Waste

Policy and Program #1: Implement a program for handling of contaminated materials encountered during construction.

In accordance with LAWA standard practices for development projects at LAX and with City requirements that mandate compliance with California Health and Safety Code requirements, prior to the issuance of any permit for the demolition of the existing maintenance facility hangars, LAWA would provide a letter to the Los Angeles Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos Containing Materials (ACM) are present in the building. Appropriate protective and materials management measures would be implemented during abatement and demolition of the buildings in accordance with applicable federal, state, and local health and safety requirements. Additionally, construction work would be required to comply with LAWA's Design and Construction Handbook, which specifies that all requirements of environmental regulatory agencies be complied with, including but not limited to the federal and state Environmental Protection Agencies; the Certified Unified Program Agency; the Air Quality Management District; and the local ordinances as cited in the City's Municipal Code. Those requirements include obtaining the proper permits for any construction, demolition, and/or remediation activities.

3.9 Design

Policy and Program #1: Appropriately relate those airport facilities that are adjacent to community land uses to the scale and level of activity of those uses.

Policy and Program #3: Update and/or integrate existing design plans into a comprehensive set of design guidelines for airport facilities.

The Proposed Project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX. The land use setting around the project site is generally characterized by LAX Airside land uses, such as maintenance and cargo facilities, runways, taxiways, aircraft apron areas, and parking lots and. The Proposed Project appropriately

relate to airport facilities that are to the scale and level of activity of those uses to the adjacent land uses.

Design and construction of the Proposed Project would comply with current Los Angeles Building Code and Uniform Building Code requirements to reduce potential risks associated with fault rupture or strong seismic ground shaking. Numerous safeguards are required by law to minimize the potential for, and the effects from, an accident if one were to occur. FAA's Airport Design Standards establish, among other things, land use related guidelines to protect people and property on the ground, including establishment of safety zones that keep areas near runways free of objects that could interfere with aviation activities.

In 2008, LAWA developed Sustainable Airport Planning, Design and Construction Guidelines for Implementation on All Airport Projects, which were subsequently updated in 2009 and 2010. The LAWA Guidelines were developed to provide a comprehensive set of performance standards focusing on sustainability specifically for airport projects on a project-level basis. The LAWA Guidelines incorporate a "LAWA-Sustainable Rating System" based on the number of planning and design points and construction points a project achieves, based on the criteria and performance standards defined in the LAWA Guidelines, which is similar to LEED.

In 2017, LAWA adopted the LAX Design Guidelines to provide a framework to enhance the visual quality of the environment in and around LAX in a way that is consistent with airport needs and existing area conditions. Per Section 15.B of the LAX Specific Plan, projects located in the LAX Design Guidelines area shall substantially conform to the LAX Design Guidelines. The LAX Design Guidelines encourage the development of more sustainable and user friendly spaces with a focus on unified, high quality architecture and urban design, and a seamless interaction between a variety of users such as pedestrians, cyclists, transit riders, and automobile drivers with an emphasis on the passenger experience.

(2) THAT THE ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT HAVE BEEN ASSESSED IN COMPLIANCE WITH CEQA.

> The Proposed Project has been analyzed in compliance with CEQA. The documentation of the EIR is set forth in detail in **Attachment 3**.

IV. REPORTS RECEIVED

The LAX Specific Plan requires that the Executive Director consider input from a number of sources. These include the Annual Traffic Generation Report and the Annual Aviation Activity Report.

Traffic Generation Report

The Annual Traffic Generation Report was prepared pursuant to Appendix A of the LAX Specific Plan. LAWA is required to prepare and submit an Annual Traffic Generation Report to the BOAC, the Department of City Planning, Los Angeles Department of Transportation and Los Angeles City Council.

The monitoring of the airport trips was conducted during the airport's peak weekday hour of 11 a.m. to noon and during the month of August – the peak travel month. The LAX Specific Plan Appendix A requires that the annual report be posted on our website and released 180 days after the end of the calendar year and be submitted to the Department of City Planning, the Department of Transportation (DOT), the Board of Airport Commissioners (BOAC), and to the City Council. According to the traffic forecasts in the LAX Master Plan environmental documents, at full build-out of the approved alternative (Alternative D), the total trip generation of all airport-related uses would be 26,011 during the airport peak hour of the projected build-out year. This represents a net increase of 8,236 trips when compared to baseline conditions of 1996 at 17,725. The results from the 2017 survey indicate that LAX-related uses generated 18,054 vehicle trips during the airport peak hour for August 2017. This total is below the projected LAX Master Plan build-out total of 26,011 airport peak hour trips.

The current 2017 Traffic Generation Report for LAX is provided as **Attachment 4** and can be accessed via the following link:

https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/studies-and-reports/traffic-generation-report/traffic-generation-report-2017.pdf

Aviation Activity Analysis

LAWA is required to prepare and submit an annual Aviation Activity Analysis Report to BOAC, the Department of City Planning, Los Angeles DOT, and the City Council pursuant the LAX Specific Plan appendix A. This report includes the latest analysis that identifies the current number of passengers, volume of air cargo and aircraft operations served at LAX. LAWA had an increase of 4.49% in passenger volumes and an increase of 8.20% in cargo volumes compared to the previous year. LAX remains the primary airport for the region.

The current 2017 Aviation Activity Analysis Report on aviation activity traffic comparison for LAX is provided as **Attachment 5** and can be accessed via the following link:

https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/aviation-activity-analysis/aviation-activity-analysis-2017.ashx?la=en&hash=3D8A306890D5C13C08C0B593969C62FEA0ADC449

V. RECOMMENDATION

Under the authority granted by Section 7C of the LAX Specific Plan and for the reasons set forth in this report, I recommend:

A. That the BOAC grant the LAX Plan Compliance approval for the Proposed Project based on the following findings:

   1. LAX Specific Plan Consistency
      That the Proposed Project complies with the LAX Plan, any design guidelines required by the LAX Plan, and all applicable provisions of the LAX Specific Plan; and

2. Environmental Compliance
That the environmental effects of the Proposed Project have been assessed in compliance with CEQA.

Sincerely,

Date: 10/18/2018

Deborah Flint
Chief Executive Officer

Reviewed by:

Samantha Bricker
Deputy Executive Director
Environmental Programs Group

Prepared by:

Evelyn Quintanilla
Chief of Airport Planning II

Angelica Espiritu
City Planner

Attachments

Attachment 1 – Proposed Project Description
Attachment 2 – Project Site Plan
Attachment 3 – EIR
Attachment 4 – 2017 Traffic Generation Report
https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/studies-and-reports/traffic-generation-report/traffic-generation-report-2017.pdf
Attachment 5 – 2017 Aviation Activity Analysis Report
https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/aviation-activity-analysis/aviation-activity-analysis-2017.ashx?la=en&hash=3D8A306890D5C13C08C0B593969C62FEA0ADC449

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