
Statement of Overriding Considerations Midfield Satellite Concourse

The Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Midfield Satellite Concourse (MSC) North Project (MSC North Project) and future phase(s) of the MSC Program at Los Angeles International Airport (LAX), pursuant to the California Environmental Quality Act (CEQA). In June 2014, LAWA published the Final EIR for the Midfield Satellite Concourse.

The Midfield Satellite Concourse Program consists of a new multi-level concourse located within the western portion of the airfield west of the existing Tom Bradley International Terminal (TBIT) and associated passenger processing space in a proposed Central Terminal Processor (CTP) that would be located in the Central Terminal Area (CTA) of LAX. The full MSC Program also includes conveyance systems connecting the MSC and CTP as well as a new taxiway, taxiway, and apron and utilities required to serve the MSC. The facility would be capable of serving both international and domestic flights, and would provide LAWA with the flexibility to accommodate existing demand for aircraft gates while modernizing other terminals at LAX and reducing reliance on the West Remote gates. Upon completion of the MSC Program, the concourse could accommodate up to 29 aircraft gates for Aircraft Design Group (ADG) III to ADG VI aircraft. Due to the size and scale of the MSC Program, LAWA proposes to develop the MSC Program in phases. Phase I ("MSC North Project") of the MSC Program is the construction of the northern portion of the multi-story MSC facility and associated improvements. The MSC North Project is intended to improve the terminal operations, concessions facilities, and overall passenger experience at LAX. The facility would be designed to serve both domestic and international traffic. The MSC North Project would provide LAWA with the flexibility to accommodate demand for aircraft gates while modernizing other terminals at LAX and reduce reliance on the West Remote gates. Later phase(s) would involve the development of the remaining components of the MSC Program described above and are referred to as the future phase(s) of the MSC Program.

The Midfield Satellite Concourse was evaluated in the LAX Master Plan that was approved by the Los Angeles City Council in December 2004. Concurrent with the approval of the LAX Master Plan was the certification of the LAX Master Plan Final EIS/EIR, which addressed the environmental impacts associated with the LAX Master Plan improvements, including the MSC. The Midfield Satellite Concourse EIR consists of a project-level environmental review of the MSC North Project, and a programmatic-level environmental review of the future phase(s) of the MSC Program. More specifically, the MSC EIR focused on significant environmental effects of the MSC North Project that may not have been fully addressed in the LAX Master Plan Final EIS/EIR, as well as any updates to the MSC Program from that assessed in the LAX Master Plan Final EIS/EIR. The Midfield Satellite Concourse EIR identified significant adverse environmental impacts that would result from the implementation of the MSC North Project and future phase(s) of the MSC Program that cannot be mitigated to less than significant by the implementation of feasible mitigation measures or alternatives. The unavoidable significant impacts from the Midfield Satellite Concourse occur with respect to cumulative construction-related surface transportation, construction-related air pollutant emissions, operations-related acute non-chronic hazard index for acrolein, and greenhouse gas emissions.

Statement of Overriding Considerations – Midfield Satellite Concourse

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 Midfield Satellite Concourse EIR, adopts the following Statement of Overriding Considerations.

The improvements proposed under the MSC North Project and future phase(s) of the MSC Program are included within the LAX Master Plan. The implementation of the overall LAX Master Plan will bring substantial benefits to the City of Los Angeles, including: air service benefits, economic benefits, employment benefits, environmental justice benefits, and conformance with regional plans. These benefits are described in the LAX Master Plan Final EIS/EIR and the associated CEQA Findings adopted in conjunction with the approval of the LAX Master Plan.

Based on the substantial evidence in the whole of the administrative record for the MSC North Project and future phase(s) of the MSC Program, the Board of Airport Commissioners hereby finds, concludes, and determines that the unavoidable significant adverse environmental impact associated with the construction and operation of the MSC North Project and future phase(s) of the MSC 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 Midfield Satellite Concourse, independent of other benefits, despite each and every significant unavoidable impact. Some benefits are unique to the Midfield Satellite Concourse and others represent contributions to the overall benefits of implementing the LAX Master Plan. The Midfield Satellite Concourse is an integral component of the LAX Master Plan and by implementing the Midfield Satellite Concourse, LAX Master Plan benefits will continue to be realized.

A. Economic, Operational, and Environmental Benefits Associated with Additional Gates in the Center Portion of the Airfield

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. 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 premier airports, thereby limiting the region’s future economic vitality. Construction of the Midfield Satellite Concourse will allow for modernization of existing terminals without sacrificing gates needed to maintain daily operations at LAX, and thereby helping maintain the Airport’s economic contribution in southern California (see Section 2.3, *Project Objectives*, and Appendix G, *Aircraft Gate Closures at LAX*, of the EIR).

The Midfield Satellite Concourse will also contribute to reducing operational air quality impacts. Based on airfield simulation modeling conducted for the 2019 conditions, it is projected that overall taxi/idle times for aircraft utilizing the Midfield Satellite Concourse would be reduced compared to conditions without the Project, where aircraft would have to use the West Remote Gates/Pads. The reduced taxi/idle times would result in a

Statement of Overriding Considerations – Midfield Satellite Concourse

reduction of aircraft fuel consumption, thereby decreasing fuel costs and air pollutant emissions (see Section 4.1, *Air Quality*, of the EIR). As indicated in Table 4.1-22 of the Midfield Satellite Concourse EIR, annual emissions of air pollutants from aircraft during taxi and idle modes would be slightly reduced compared to conditions without the Project for carbon monoxide, volatile organic compounds, nitrogen oxides, sulfur dioxide, respirable particulate matter, and fine particulate matter.

B. Operational Benefits Associated with the Improvement and Modernization of Terminal Facilities at LAX, including, but not limited to Accommodation of ADG VI Aircraft

As aviation activity levels continue to increase at LAX, particularly as related to long-distance international flights, there is an increasing presence of new large aircraft, including Airplane Design Group (ADG) VI, operating at the Airport. Commencement of ADG VI aircraft service at LAX initiated in October 2008, and has created a need for several enhancement projects to ensure the Airport suitably accommodates large aircraft, including, but not limited to, the Airbus A380 and Boeing 747-800. Based on the operational activity characteristics of large aircraft (ADG V and VI) over the past several years, there is now greater awareness of the need to provide facilities for these aircraft at LAX. Design and operation requirements for the ADG VI aircraft are greater, for both landside and airside facilities, than those for smaller ADG categories. On the airside, the clearance requirements for aircraft taxi routes and parking/gate areas, as well as the pavement load design, are greater than those of smaller aircraft sizes. On the landside, ADG VI aircraft require larger holdrooms to accommodate their greater carrying capacity and terminals that can accommodate a greater “surge” of arriving passengers. The Midfield Satellite Concourse includes a number of improvements specifically designed to accommodate ADG VI aircraft, including: four contact gates designed for ADG VI aircraft (i.e. gates with multiple jetways to help facilitate the deplaning of a large number of passengers on arriving flights), larger holdrooms, additional concession areas, and additional restrooms (see Section 2.5, *Project Characteristics*, of the EIR).

As part of the MSC North Project, construction of Taxiway C14 would result in a new crossfield taxiway designed to ADG VI standards. This would provide air traffic control tower staff with additional options for routing new large aircraft between the north and south airfield complexes and, as such, the Midfield Satellite Concourse would maintain and improve existing aircraft ground access between the north airfield complex and the south airfield complex (see Section 2.5, *Project Characteristics*, of the EIR).

Implementation of the MSC North Project would provide a logical development pattern to facilitate the systematic implementation of the LAX Master Plan. The MSC North project would also be consistent with the zoning uses in the LAX Plan and the LAX Specific Plan, as well as LAWA’s *Sustainable Airport Planning, Design and Construction Guidelines Version 6* (see Section X.B of the Initial Study, Appendix A, Volume 2 of the EIR). Design and construction of the MSC North Project would demonstrate LAWA’s commitment to sustainability and energy efficiency.

C. Improved Passenger Experience at LAX

LAX is well recognized as one of the world’s leading commercial airports and is an integral part of southern California. In 2013, LAX was the nation’s third busiest airport in terms of both total annual passengers and total annual aircraft operations: over 66.7

Statement of Overriding Considerations – Midfield Satellite Concourse

million passengers traveled through LAX in 2013. Although it has functioned as an airport since 1928, the main terminal complex at LAX was constructed in 1961 and its facilities are in need of modernization. As discussed in Chapter 2, *Description of the Proposed Project*, of the Draft EIR, the main objective of the MSC North Project and future phase(s) of the MSC Program is to provide LAWA with the flexibility to accommodate existing demand for aircraft gates while modernizing other terminals at LAX, and reducing reliance on the West Remote Gates/Pads, ultimately improving passenger experience at LAX.

As described in Appendix G, *Aircraft Gate Closures*, of the Draft EIR, existing terminal renovations occur frequently at LAX. The Midfield Satellite Concourse will ensure continued operations during these intermittent closures, thereby allowing for much needed renovations to older Airport infrastructure. Both the MSC and terminal modernization will provide passengers with more contemporary terminal facilities.

The Midfield Satellite Concourse will also reduce reliance on the remote gates located in the western portion of the airfield, known as the West Remote Gates/Pads, which lack amenities, such as restrooms, concessions, and holdrooms. The proposed MSC North Project and future phase(s) of the MSC Program would deliver world class terminal facilities with concessions, holdrooms, and passenger services. The Midfield Satellite Concourse will be able to accommodate both domestic and international air traffic, which are both important to the region's economic sustainability and success.

D. Promote Job Creation

Operating and continuing to develop LAX will provide increased employment benefits to the Los Angeles region. According to an economic impact analysis of LAX completed by the Los Angeles County Economic Development Corporation (LAEDC), LAX created 294,400 direct and indirect jobs, with a labor income of \$13.6 billion in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties. This resulted in an economic output of more than \$39.7 billion.¹

The operations of the Midfield Satellite Concourse would provide employment benefits to the Los Angeles region. As indicated in Chapter 6, *Other Environmental Considerations*, of the Draft EIR, the Midfield Satellite Concourse may result in a modest increase in long-term employment opportunities for airline personnel, maintenance and janitorial staff, concessionaires, and bus operators, as well as security screening, and baggage claim or ticketing/check-in agents.

Construction activity associated with the MSC North Project would also provide construction-related employment for an estimated 536 workers during the peak week of the approximately 5-year construction period (see Table 4.7-4 of the Draft EIR). Considering the multiplier effect to account for the indirect effects on other industries, the total impact within the County during the construction period would be even higher. The multiplier effect for employment refers to additional non-construction jobs that may result in industries, such as the service industries, to support the construction activity. The

¹ Los Angeles Economic Development Corporation, "Los Angeles International Airport in 2011: Economic Impact Analysis," August 2012. Available: http://cdn.laedc.org/wp-content/uploads/2012/04/LAX_2011_FINAL1.pdf

Statement of Overriding Considerations – Midfield Satellite Concourse

MSC North Project is estimated to cost approximately \$1.079 billion to construct,² which would generate approximately 3.9 million construction employee hours. Additional revenue in the form of fees associated with grading, building, sewer and storm drain, and storm drain water permits is expected to be over \$25,000.

² \$1.079 billion represents the estimated un-escalated cost for the MSC North Project.

Statement of Overriding Considerations – Midfield Satellite Concourse

This page intentionally left blank.