1. INITIAL STUDY CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
Los Angeles World Airports (LAWA)	Council District 11	September 14, 2012
RESPONSIBLE AGENCIES		

U.S. Department of Transportation Federal Aviation Administration (FAA);U.S. Fish and Wildlife Service; South Coast Air Quality Management District (SCAQMD); California Department of Fish and Game; SWRCB and/or RWQCB; Los Angeles Bureau of Sanitation; Los Angeles Fire Department; Los Angeles Bureau of Engineering; Los Angeles Department of Building and Safety; Los Angeles Department of Public Works and other agencies as applicable.

PROJECT TITLE/NO.	CASE NO. 12-002-AD
LAX West Aircraft Maintenance Area Project	
PREVIOUS ACTIONS CASE NO.	DOES have significant changes from previous actions.
Los Angeles International Airport Master Plan	☑ DOES NOT have significant changes from previous actions.
Case No. CF-00-1774-S4 and CPC 2003-4647 GPA/ZC/CA/MPR	
LAX Master Plan EIR/EIS (SCH#1997061047)	

PROJECT DESCRIPTION:

The intent of the proposed West Aircraft Maintenance Area Project ("proposed Project") is to consolidate, relocate, and modernize existing aircraft maintenance facilities at LAX, particularly those that need to be replaced in conjunction with LAX Master Plan improvements. The consolidation, relocation and modernization of these facilities would allow for more efficient and effective maintenance of existing aircraft at the airport, including Aircraft Design Group (ADG) VI aircraft (Airbus A380s and Boeing 747-8s). The proposed Project would be developed on an approximately 75-acre site in the southwestern portion of the Los Angeles International Airport (LAX) property and would include aircraft parking and maintenance facilities, a ground run-up enclosure, employee parking areas, and related storage, equipment and facilities. The proposed Project would be able to accommodate up to 8 ADG VI aircraft simultaneously or 18 ADG III aircraft (aircraft similar in size to and including Boeing 737's). Specifically, the proposed Project would include: (1) approximately 50 acres of aircraft apron for ADG VI aircraft as well as smaller airline aircraft that may require Remain Over Night (RON) and Remain All-Day (RAD) parking, or those aircraft being serviced at the current aircraft maintenance hangars; (2) a ground run-up enclosure (GRE) that would provide a three-sided unroofed facility for ground run-up testing of aircraft engines required for jet engine maintenance testing and analysis, with the ingress/egress facing the prevailing winds of the site; (3) aircraft maintenance hangar(s), capable of accommodating a wide range of existing aircraft up to and including existing ADG VI aircraft, as well as a maintenance shop and supporting office space within the hangar; (4) approximately 300 employee parking spaces; (5) ancillary facilities (e.g., ground service equipment (GSE) storage and maintenance areas/facilities, aircraft wash racks, RON kits providing ground power, potable water, and preconditioned air, necessary utilities and infrastructure and possibly water storage tank(s) for fire protection); (6) a storm drainage filter and/or infiltration basin and connections to existing adjacent utility lines and storm drains; (7) a concrete batch plant would be installed on the site for construction of the proposed Project with removal planned after the final phase of construction (concrete batch plants are permitted on and have been operating on the site in recent years); and, (8) extension of Taxiway B westward to the western limits of the site (designated on-site as Taxilane AA1) to provide primary egress from the Project area, with access to the site via Taxiway AA from a point approximately 830 feet north of Taxiway C (designated on-site as Taxilane AA2). It should be noted that the proposed Project would not increase passenger or gate capacity and would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions.

In addition, as part of the proposed Project, existing contractor staging yards and associated equipment on the Project site would be relocated to existing LAX staging areas located to the south of Westchester Parkway and west of Lincoln Boulevard. Stockpiled materials (consisting of uncharacterized soil and construction rubble) currently existing within and immediately adjacent to the Project site, would be re-used on-site as backfill material and/or exported off-site to permitted landfills.

ENVIRONMENTAL SETTING:

The 75-acre Project site is located in the southwest portion of LAX, immediately south of World Way West between Taxiway AA and Pershing Drive. Existing adjacent uses include: World Way West, 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 Continental Airlines maintenance hangars to the east; and Pershing Drive followed by the Los Angeles/El Segundo Dunes and El Segundo Blue Butterfly Habitat Restoration Area to the west. The site is currently used as a construction staging area for airport construction projects. Existing on-site uses include a rock crushing station, debris and soil stockpiles, modular construction trailers/offices and an associated surface parking lot, an airfield access security post, several paved roads, a small LAWA Police Department/Transportation Security Administration (LAWA Police Department/Transportation Security Administration) canine "walk" area, and several paved and unpaved outdoor storage areas.

PROJECT LOCATION

The Project site is located in the southwest portion of LAX, immediately south of World Way West, between Taxiway AA and Pershing Drive.

PLANNING DISTRICT		STATUS:
Los Angeles International Airport Plan (L	AX Plan)	 □ PRELIMINARY □ PROPOSED □ ADOPTED □ December 14, 2004
EXISTING ZONING LAX - A Zone: Airport Airside Subarea	MAX. DENSITY ZONING N/A	DOES CONFORM TO PLAN Proposed use permitted under existing zoning.
PLANNED LAND USE & ZONE Airport-aircraft parking and maintenance	MAX. DENSITY PLAN N/A	DOES NOT CONFORM TO PLAN
SURROUNDING LAND USES North - Road (World Way West) East - Airfield (Taxiway AA) South – Parking lot, vacant West – Road (Pershing Drive)	PROJECT DENSITY N/A	

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

SIGNATURE

Chief Of Airport Planning I Los Angeles World Airports

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standard.
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a 4) mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe mitigation measures.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects.
- 9) The explanation of each issue should identify: (1) the significance criteria or threshold, if any, used to evaluate each question; and (2) the mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	Hazards & Hazardous Materials	Public Services
Agricultural Resources	Hydrology/Water Quality	Recreation
☑ Air Quality	☐ Land Use/Planning	Transportation/Traffic
☐ Biological Resources	Mineral Resources	Utilities/Service Systems
Cultural Resources	🖾 Noise	Mandatory Findings of Significance
Geology/Soils	□ Population/Housing	
☑ Greenhouse Gas Emissions		

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

C BACKGROUND	
PROPONENT NAME	PHONE NUMBER
Los Angeles World Airports	424-646-5180
PROPONENT ADDRESS	
1 World Way, Room 218B, Los Angeles, CA 90045	
AGENCY REQUIRING CHECKLIST	DATE SUBMITTED
Los Angeles World Airports	September 14, 2012
PROPOSAL NAME (If Applicable)	
Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project	

C ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:			·	
a. Have a substantial adverse effect on a scenic vista?	\square	<u> </u>		
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?				
c. Substantially degrade the existing visual character or quality of the site and its surroundings?			\boxtimes	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				
II. AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?				\boxtimes
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				
d. Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				

	Potentially Significant Unless			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the South Coast Air Quality Management Plan?	\boxtimes			
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	\boxtimes			
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, PM10, and PM2.5) under an applicable federal or state ambient air quality standard?				
d. Expose sensitive receptors to substantial pollutant concentrations?	\boxtimes			
e. Create objectionable odors affecting a substantial number of people?				
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?				\boxtimes
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?		\boxtimes		
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		\boxtimes		
d. Disturb any human remains, including those interred outside of formal cemeteries?				
VI. GEOLOGY AND SOILS. Would the project:				
a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii. Strong seismic ground shaking?				
iii. Seismic-related ground failure, including liquefaction?			\square	
iv. Landslides?				\boxtimes
b. Result in substantial soil erosion or the loss of topsoil?				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				
d. Be located on expansive soil, as defined in Table 18-1-B of the Los Angeles Building Code (2002), creating substantial risks to life or property?			\boxtimes	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or	\square		·	
indirectly, that may have a significant impact on the environment?				
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	\boxtimes			

	Potentially			
	Potentially Significant Impact	Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				\boxtimes
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?				\boxtimes
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				\boxtimes
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	\boxtimes			
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
f. Otherwise substantially degrade water quality?	\square			
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?				\boxtimes
i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?				
j. Inundation by seiche, tsunami, or mudflow?				\boxtimes
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?				\boxtimes
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?			\square	
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				\boxtimes
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	\square			
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	\boxtimes			
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	\boxtimes			

		Potentially Significant Unless		
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?				
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?				\boxtimes
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?				
b. Police protection?				
c. Schools? d. Parks?				
e. Other governmental services (including roads)?				
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

	Potentially Significant Unless			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/CIRCULATION . Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				\boxtimes
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				\boxtimes
e. Result in inadequate emergency access?				\boxtimes
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				
XVII. UTILITIES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, or exceed wastewater conveyance capacity?			\square	
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?			\boxtimes	
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			\boxtimes	

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Comply with federal, state, and local statutes and regulations related to solid waste?				
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b. Does the project have impacts which are individually limited, but cumulatively considerable?("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).				
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?				

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary) (See Section 3: Explanation of Initial Study Checklist Determinations)

2. PROJECT DESCRIPTION

2.1 INTRODUCTION

The Los Angeles World Airports (LAWA) proposes the Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project (referred to hereafter as the proposed Project).

The intent of the proposed Project is to consolidate, relocate, and modernize existing aircraft maintenance facilities at LAX, particularly those that need to be replaced in conjunction with LAX Master Plan improvements. The consolidation, relocation and modernization of these facilities would allow for more efficient and effective maintenance of existing aircraft at the airport, including Aircraft Design Group (ADG) VI aircraft (Airbus A380s and Boeing 747-8s). Routine aircraft maintenance and remain overnight (RON) and remain all day (RAD) aircraft parking are regular functions at a major airport such as LAX. Currently these functions occur in multiple areas of the airport on both the east and west side. At each of these areas routine aircraft maintenance is performed, including engine run-up testing, when required. In addition, the maintenance areas contain apron space for RON/RAD aircraft parking, which provides extended layover space for aircraft that cannot be accommodated at terminal area contact gates.

The proposed Project would be developed on an approximately 75-acre site in the southwestern portion of the airfield. The proposed Project includes aircraft parking apron areas, maintenance hangar(s), a ground run-up enclosure, employee parking areas, and related storage, equipment and facilities. The proposed Project would be able to accommodate up to 8 ADG VI aircraft simultaneously or 18 ADG III aircraft (aircraft similar in size to and including Boeing 737's). The proposed Project would not increase passenger or gate capacity and would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions.

2.2 ENVIRONMENTAL SETTING

2.2.1 Project Location

LAX encompasses approximately 3,660 acres and is situated at the western edge of the City of Los Angeles, as shown in **Figure 1**, *Regional Map*. The 75-acre Project site is located within the southwest portion of LAX immediately south of World Way West between Taxiway AA and Pershing Drive. (**Figure 2**, *Aerial Photograph*). Existing adjacent uses include: World Way West, 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 Continental Airlines maintenance hangars to the east; and Pershing Drive followed by the Los Angeles/El Segundo Dunes to the west. The Los Angeles/El Segundo Dunes is a former residential area that consists of open space/coastal dunes, with navigational aids, minor ancillary airport and utility improvements, abandoned residential streets, and the El Segundo Blue Butterfly Habitat Restoration Area. To the north of LAX is the community of Westchester (part of the City of Los Angeles), to the south is the City of El Segundo, to the east is the City of Inglewood, and to the west is the Pacific Ocean.

2.3 LAND USE AND ZONING DESIGNATION

The Project site is located entirely within the City of Los Angeles LAX Plan area, as well as the LAX Specific Plan area, and is designated in the LAX Plan as "Airport Airside." Permitted uses include, but are not limited to, runways,

taxiways, aircraft gates, maintenance areas, airfield operation areas, air cargo areas, passenger handling facilities, fire protection facilities, and other ancillary airport facilities. The LAX Specific Plan establishes the zoning and development regulations and standards consistent with the LAX Plan for the airport. Existing zoning within the LAX Specific Plan is Airport Airside (LAX-A Zone). Permitted uses in LAX-A Zone include, but are not limited to: surface and structured parking lots; aircraft under power; airline maintenance and support; air cargo facilities; commercial passenger vehicle staging and holding area; helicopter operations; navigational aids; runways, taxiways, aircraft parking aprons, and service roads; passenger handling facilities; run-up enclosures; and other ancillary airport facilities.

2.4 EXISTING PROJECT SITE CONDITIONS

The Project site is currently used as a staging area for airport construction projects, and includes: soil stockpiles, modular construction trailers/offices and an associated surface parking area, an airfield access security post (Guard Post 21), a small LAWA Police Department/Transportation Security Administration (LAWAPD/TSA) canine "walk" area, several paved roads, and several paved and unpaved outdoor loading and storage areas. The Project site is permitted to accommodate and has at various times supported a batch plant, although a batch plant is not currently located on the Project site.

2.5 LAX MASTER PLAN

The 2004 LAX Master Plan is the comprehensive development program for LAX properties, including runway and taxiway system modernization, redevelopment of terminal areas, airport maintenance areas, airport access improvement and passenger safety, security, and convenience enhancements. The proposed Project responds to the development framework set forth for LAX in the Master Plan with incorporation of certain refinements reflected in the engineering, design, and construction specifications for the project. The LAX Master Plan allowed for the replacement of existing hangars in the midfield area through the construction of three hangar/maintenance facilities dispersed in the western portion of the airport. The proposed Project is a refinement of certain projects contemplated in the LAX Master Plan. Specifically, the proposed Project would transpose an area identified for aircraft apron and maintenance on the east side of Taxiway AA with an area identified for employee parking (West Employee Parking) on the west side of Taxiway AA. Both facilities would remain in the southwest portion of the airport, south of World Way West as proposed under the LAX Master Plan, with access routes to and from each facility remaining essentially unchanged Neither these refinements nor construction of the proposed Project as a whole, would affect the number of operations at LAX, which is determined by market demand and supply considerations. The proposed Project would however, allow for more efficient and effective maintenance of aircraft while at LAX.

The Final EIR for the LAX Master Plan (California State Clearinghouse Project No. 1997061047) included analysis of the environmental impacts of future development at LAX, including aircraft maintenance areas at LAX. The LAX Master Plan Final EIR contains Master Plan commitments and mitigation measures that apply to the LAX property, including the Project site.



Regional Map

5 Miles

Initial Study

0

West Aircraft Maintenance Area Project Source: ESRI Street Map, 2009; PCR Services Corporation, 2012. 1



Aerial Photograph	350 Feet	Ď - □	-(
West Aircraft Maintenance Area Project	Initial Study		
Source: Google Earth, 2011; PCR Services Corporation, 2012.			

FIGURE

2.6 WEST AIRCRAFT MAINTENANCE AREA EIR

Consistent with the California Environmental Quality Act (Public Resources Code §21000 et seq., "CEQA") and the CEQA Guidelines (California Code of Regulations title 14, §15000 et seq.), LAWA is preparing a project-level Environmental Impact Report (EIR) to evaluate the environmental impacts of the proposed Project.¹ The West Aircraft Maintenance Area EIR will evaluate the environmental impacts of the proposed Project. This Initial Study Checklist has been prepared for the proposed Project to focus the issues that will be studied in further detail in the EIR by identifying the resource areas that could be subject to significant impacts from the proposed Project, and that would require incorporation of mitigation measures where feasible. The Initial Study also identifies resource areas where the environmental effects of the proposed Project and associated activities, LAWA has determined that potentially significant effects may occur in the following areas: Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation/Circulation, and Mandatory Findings of Significance. These issues will be evaluated further in the EIR.

LAWA has determined that no significant impacts would occur for the following resource areas: Aesthetics, Agricultural and Forest Resources, Biological Resources, Cultural Resources, Geology and Soils, Mineral Resources, Population and Housing, Public Services, Recreation, and Utilities and Service Systems. These topics will not be evaluated further in the EIR unless new information affecting these determinations arises during the 30-day scoping period associated with circulation of the Notice of Preparation for the EIR.

2.7 **PROJECT CHARACTERISTICS**

2.7.1 Overview

The proposed Project would consolidate, relocate, and modernize existing aircraft maintenance facilities allowing for more efficient and effective maintenance of aircraft while at LAX. The proposed Project would provide facilities and areas for aircraft maintenance and maintenance hangar(s), as well as parking areas for existing aircraft and employees. The proposed Project would be able to accommodate up to eight (8) Airplane Design Group (ADG) VI aircraft (such as the Airbus A380 and Boeing 747-8) simultaneously, or 18 ADG III aircraft (aircraft similar in size to and including Boeing 737's). Proposed facilities would include: (1) approximately 50 acres of aircraft apron for ADG VI aircraft as well as smaller airline aircraft that may require Remain Over Night (RON) and Remain All-Day (RAD) parking, or those aircraft being serviced at the current aircraft maintenance hangars; (2) a ground run-up enclosure (GRE) that would provide a three-sided unroofed facility for ground run-up testing of aircraft engines required for jet engine maintenance testing and analysis, with the ingress/egress facing the prevailing winds of the site; (3) aircraft maintenance hangar(s), capable of accommodating a wide range of existing aircraft up to and including existing ADG VI aircraft, as well as a maintenance shop and supporting office space within the hangar; (4) approximately 300 employee parking spaces; (5) ancillary facilities (e.g., ground service equipment (GSE) storage and maintenance

¹ A portion of the currently proposed Project, specifically 18 acres of new apron area in the eastern portion of the site, was previously planned to accommodate four parking positions for existing ADG-VI aircraft, along with other related improvements, which were collectively referred to as the "Southwest RON Apron Project". A Draft Initial Study/Mitigated Negative Declaration for the Southwest RON Apron Project was completed and distributed for public review in February 2011, but never completed. The current proposed Project incorporates, supersedes and replaces the improvements previously proposed for the Southwest RON Apron Project.

areas/facilities, aircraft wash racks, RON kits providing ground power, potable water, and pre-conditioned air, necessary utilities and infrastructure and possibly water storage tank(s) for fire protection); (6) a storm drainage filter and/or infiltration basin and connections to existing adjacent utility lines and storm drains; (7) a concrete batch plant would be installed on the site for construction of the proposed Project with removal planned after the final phase of construction (concrete batch plants are permitted on and have been operating on the site in recent years); and, (8) extension of Taxiway B westward to the western limits of the site (designated on-site as Taxilane AA1) to provide primary egress from the Project area, with access to the site via Taxiway AA from a point approximately 830 feet north of Taxiway C (designated on-site as Taxilane AA2). **Figure 3**, *Conceptual Site Plan*, presents the proposed layout of the proposed Project.

2.7.2 Aircraft Parking Apron

The proposed Project includes the construction of an aircraft parking apron on approximately 50 acres of the Project site. An aircraft parking apron is a large flat concrete surface remote from the terminal area where aircraft that RON/RAD are towed to can either be maintained or parked until their next scheduled flight at which time they would be towed to their appropriate terminal area gate. The footprint of aircraft hangars and employee parking are not included in the 50 acres, and represent additional area to be developed as part of the proposed Project. Unlike certain existing maintenance areas that do not fully accommodate all aircraft at LAX, the proposed Project would fully accommodate ADG VI aircraft, as well as smaller commercial aircraft that may require RON/RAD parking, or aircraft being serviced at the aircraft maintenance hangars.

Primary access to the apron would be via Taxiway AA, with the exact points of access and aircraft routing pattern to be determined in coordination with the FAA. It is anticipated that Taxiway B would be extended westward to the western limits of the site (designated on-site as Taxilane AA-1) to provide primary airfield access to the Project area. The apron would also serve as a location for a ground run-up enclosure, storage and support area for Ground Service Equipment (GSE), and supporting structures or facilities. Supporting facilities include aircraft wash racks that would include RON/RAD kits that provide 400 Hz ground power, pre-conditioned air and potable water to parked aircraft, allowing full aircraft functionality without running auxiliary power units. A portion of the Runway 7L Runway Protection Zone (RPZ) overlies a part of the apron. The FAA recommends clearing of incompatible objects and activities within the RPZ. It is not intended to park aircraft within the RPZ and this area would be used for circulation of aircraft, GSE storage and other non-permanent staging of ground equipment. Construction of the apron area and other infrastructure would occur during the initial phase of the proposed Project.

2.7.3 Aircraft Maintenance Hangars

The proposed Project includes construction of aircraft maintenance hangar(s), capable of accommodating a wide range of existing aircraft up to and including ADG VI aircraft. The proposed hangar area, including employee parking and other associated paved areas, in addition to aircraft apron areas described previously that may overlap, is estimated to encompass approximately 15 acres of the Project site. The purpose of the aircraft hangar(s) would be to provide area for routine aircraft maintenance while the aircraft is not at a contact terminal gate, scheduled line maintenance, and other higher levels of scheduled and unscheduled aircraft maintenance. Unlike the former TWA Hangar of approximately 268,000 square feet and the American Airlines High Bay Hangar of approximately 255,000 square feet,



This page is intentionally blank.

the new hangar(s) would be fully capable of servicing the largest aircraft that currently serve LAX and would contain state of the art features to enable the effective servicing of existing aircraft.

Approximately 400,000 square feet of hangar bay space (floor area) with a maximum estimated height of approximately 150 feet can be accommodated on the Project site. Hangar(s) would typically have a sliding hangar door to fully enclose aircraft within the hangar. Typical equipment (subject to user requirements of the eventual tenant) may include an internal crane to hoist aircraft or parts, 400 Hz power and pre-conditioned air, a compressed air system to include drop down reels and/or floor mounted receptacles that are retractable, explosion proof outlets and/or plugs installed in drop down reels and/or floor mounted that are retractable, foundation able to handle point loading for jacks, trench drain to include oil/water separators and grease traps, foam fire protection system, water sprinkler or deluge system, test bed for testing equipment and parts, ground water storage tank, phone, intercom, and internet installed throughout the entire hangar, lighting in both (hangar and office) to include 3-phase power, auxiliary back-up power, office support space for administrative functions, conference rooms, kitchen, break and restrooms, warehouse shipping/receiving, vehicle service bays, tool storage, welding shop, and flammable/hazardous materials storage. Typically, hangar(s) also include a maintenance shop and supporting office space.

The initial phase of the proposed Project would involve construction of a portion of the proposed hangar area along with an employee parking lot. The remainder of the hangar(s) and additional employee parking would be constructed in one or more later phases of the proposed Project. It is possible that during the phasing of the proposed Project a relocatable structure(s) may be constructed to provide covered maintenance space until such time as permanent hangar(s) are developed. Relocatable structures would typically feature a high strength PVC coated polyester membrane cladding that is tensioned over an engineered structural steel frame system which provides the airport the ability to cost effectively relocate the structure as operational needs change.

2.7.4 Ground Run-up Enclosure (GRE)

Unlike the current maintenance areas at LAX where engine testing is performed in the open, the proposed Project includes a state of the art ground run-up enclosure (GRE) intended to mitigate noise from these engine tests. The GRE will be approximately 330 feet wide and 355 feet long, encompassing approximately 120,000 square feet, which would accommodate all commercial aircraft including A380 and B747-8. The height of the GRE is anticipated to be between 50 and 60 feet. The most common GRE configuration is a three-sided unroofed facility. The GRE is constructed with noise absorbing panels lining the side and rear walls. The panels are specifically designed to provide sound absorption at the lower frequencies, characteristic of engine test procedures. Typical insertion loss characteristics of a standard 3-sided GRE are a loss of 15 dBA at directions from 60 degrees to 300 degrees (0 degrees equating to the noise of the aircraft) at a distance of 400 feet from the source. The GRE may also be used as a wash rack location to provide a location for the high pressure washing of aircraft and the capture of the associated run-off. The GRE would be located outside of, but adjacent to, the Runway 7L Runway Protection Zone (RPZ) restricted development area. The GRE would be constructed during the initial phase of the proposed Project.

2.7.5 Employee Parking Lot

The proposed Project includes construction of employee parking areas to accommodate aircraft maintenance technicians and management staff. Such parking is planned to occur immediately north and west of the hangar area and is anticipated to provide approximately 300 parking spaces. The size of the employee parking lot would be based on tenant requirements, but is not expected to exceed 300 spaces. Access to and from the parking lot would be via

World Way West. The employee parking area would include area illumination, paint/stripes for vehicle stalls, and an Air Operations Area (AOA) security fence to separate airside and landside activities. During the initial phase of the proposed Project, parking would be provided to support the first phase of hangar development and the support requirements for the RON/RAD apron.

2.7.6. Ancillary Facilities and Features

Ground service equipment (GSE) storage and maintenance areas/facilities are proposed as part of the Project, including electrical charging stations. RON kits are also proposed, as well as wash racks that would include a recycling system to minimize flows to the sewer system. The hangar(s) described above would require provisions for fire protection, including possibly water storage for a deluge system.

2.7.7 Relocation and Demolition of Existing On-site Uses

Development of the Project site would include removal or relocation of existing on-site uses. Existing construction staging yards and associated equipment would be relocated to other existing staging areas located to the south of Westchester Parkway and west of Lincoln Boulevard, however, staging for the proposed Project would occur on-site. The existing small fenced area used by LAWAPD and TSA as a canine "walk" area would be relocated in an area in the southern area of the airport, west of Runway 7R. Guard Post 21 would be demolished. Existing utility lines serving the site would either be preserved, adjusted/strengthened, or removed. The Project site is permitted to accommodate a batch plant. The concrete batch plant would be installed on the site and utilized for construction of the proposed Project. During the various phases of the Project's development, the concrete batch plant would likely be relocated to several locations within the limits of the Project site. While the concrete batch plant would be utilized during the Project's development period, it would be removed prior to full buildout of the site. Stockpiled soil and construction rubble stockpiles existing within and immediately adjacent to the site would be re-used on-site as backfill material and/or exported off-site to permitted landfills.

2.7.8 Utilities

The proposed Project would connect to existing water, sanitary sewer, storm drain, electricity, gas and communications lines located within the World Way West and Pershing Drive right-of-ways (ROWs). Multiple existing utility lines also bisect the Project site, and would either be preserved, adjusted/strengthened, or abandoned/removed. The proposed Project would connect to existing adjacent utility lines and drainage lines in World Way West and Pershing Drive. In addition, to safely convey runoff from the Project site under the proposed Project, the following drainage improvements would be constructed: (1) an on-site storm drainage system; (2) connection of this system to the existing storm drains in World Way West and Pershing Drive; (3) development of a detention/infiltration basin in the southwest corner of the Project site (within an existing LAX employee surface parking lot); and (4) the development of on-site water quality improvements (e.g., wash rack recycling system, oil-water separator, use of porous pavement or media filters, etc.) to reduce urban pollutants in Project stormwater runoff.

Construction Schedule/Phasing

It is anticipated that the proposed Project would be completed over the next eight to ten years.

2.8 REQUIRED APPROVALS/CONSULTATIONS

Implementation of the proposed Project would require approvals from and consultation with Federal, State, and regional/local agencies. The EIR will be used by the following agencies in connection with permits and approvals necessary for the construction and operation of the proposed Project. Federal, State, and regional/local agency actions required for the construction and operation of the proposed Project may include, but are not limited to, those described below. This EIR may also be used in connection with other Federal, State, or regional/local approvals, permits, or actions that may be deemed necessary for the proposed Project, but which are not specifically identified below.

2.8.1 Federal

- U.S. Department of Transportation Federal Aviation Administration (FAA) approval of an FAA Notice of Construction or Alteration, to ensure safe and efficient use of navigable airspace with consideration of the project and during the construction of the West Aircraft Maintenance Area Project. LAWA and its selected contractor would submit a FAA Form 7460-1 "Notice of Proposed Construction or Alteration".
- Consultation with the U.S. Fish and Wildlife Service.

2.8.2 State

- South Coast Air Quality Management District (SCAQMD) review of any permits required under the Clean Air Act for stationary sources;
- Consultation with the California Department of Fish and Game.
- The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) administer regulations regarding water quality in the State. Permits or approvals required from the SWRCB and/or RWQCB may include but are not be limited to: (1) General Construction Storm Water Permit; (2) Standard Urban Stormwater Mitigation Plan; and (3) Submittal of a Recycled Water Report to the RWQCB for the use of recycled water as a dust control measure for construction.

2.8.3 Regional/Local

- LAX Certification of the Final EIR for the LAX West Aircraft Maintenance Area Project;
- LAX Specific Plan Compliance Review in accordance with Section 7 of the Specific Plan;
- Preparation of a Project-Specific Storm Water Management Plan or Standard Urban Storm Water Mitigation Plan for approval by the Bureau of Sanitation, Watershed Protection Division;
- Los Angeles Fire Department approval;
- Los Angeles Bureau of Engineering (BOE) "B" Permit for the GRE to be located within the North Central Outfall Sewer (NCOS) easement;
- Grading permits, building permits, and other permits issued by the Department of Building and Safety for the Project and any associated Department of Public Works permits for infrastructure improvements;

3. EXPLANATION OF INITIAL STUDY CHECKLIST DETERMINATIONS

The following analysis provides supporting documentation for the determinations presented in the Initial Study Checklist presented in Section 2 of this document. Each response provided below evaluates how the West Aircraft Maintenance Area Project (proposed Project) as defined in the Project Description may affect existing environmental conditions at the Project site and in the surrounding area. The Environmental Impact Report (EIR) will further evaluate topics where the potential for a significant impact has been identified. The EIR will analyze the identified potentially significant impacts and, where appropriate, identify mitigation measures, and explain how such measures would reduce significant impacts.

The proposed Project is located within the LAX property, and is subject to the requirements and mitigation measures of several LAX plans and CEQA documents, including but not limited to: (1) the 2005 LAX Street Frontage & Landscape Development Plan Update; (2) the 2004 Los Angeles International Airport Proposed Master Plan Improvements (LAX Master Plan); and (3) the 2004 Final EIS/EIR for the Los Angeles International Airport Master Plan Proposed Improvements (SCH #1997061047). Where necessary to support the conclusions made in this Initial Study, the information, requirements and mitigation measures from these documents are referenced in the Initial Study responses, as is information from other relevant CEQA documents and technical studies associated with other LAWA projects at LAX.

I. AESTHETICS.

Would the Project:

a. Have a substantial adverse effect on a scenic vista?

a. Less Than Significant Impact. The Project site is located within the western portion of the Los Angeles Basin, and broad scenic vistas of the Santa Monica Mountains in the distance are available across the Project site and other areas of LAX from the El Segundo residential neighborhood located 0.41 miles to the south. Most of the north-facing residences at lower elevations within the neighborhood have their northerly views blocked or obstructed by a landscaped and treed berm located along the south side of Imperial Highway. However, north-facing residences at higher elevations within the neighborhood where intervening residences are not present, enjoy views of the Santa Monica Mountains on clear days. The proposed Project would include hangars which could reach up to 150 feet in height that would be visible from some of these north-facing, upper elevations of these residences relative to the Project site, and the small portion of the total field of view which would be occupied by the proposed hangars as seen from the residences, the hangars would not have a substantial adverse effect on scenic vistas of the Santa Monica Mountains. A less than significant impact would occur, and no mitigation measures are required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

b. No Impact. The Transportation Element, an element of the City of Los Angeles General Plan adopted in 1999, includes Scenic Highways policies which supersede the City's 1978 Scenic Highways Plan. According to Chapter VI,

Section D and Figure E of the Element, Vista del Mar between Culver Avenue and the City Boundary, south of Grand Avenue, is the closest Scenic Highway to the Project site, and thus affords the closest scenic vistas.² The Vista del Mar corridor is valued for beach, sand dune, and ocean views, and while a corridor plan has not yet been developed for Vista del Mar, Section D of the Element outlines aesthetics-related interim guidelines for development within the corridor.³ However, the Project site is not located within or visible from the corridor as it is blocked from view by the intervening Los Angeles /El Segundo Dunes. The Project site also does not contain scenic resources, such as trees, rock outcroppings, historic buildings, or other locally recognized desirable aesthetic features. Therefore, no impact would occur to scenic vistas or to scenic resources within a city-designed scenic highway, and no mitigation is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. Under the proposed Project, the existing construction staging operations at the Project site would be relocated to Los Angeles World Airports (LAWA) Construction Staging Area A, with the exception of Guard Post 21 which would be demolished at some point after completion of the initial phase of the proposed Project. Construction Staging Area A is located in the northwestern portion of the airport property, immediately south of Westchester Parkway between Pershing Drive and Lincoln Boulevard, and accommodates construction staging for several on-going Los Angeles International Airport (LAX) Master Plan projects including the Bradley West Terminal project. The western half of Construction Staging Area A currently contains construction trailers, storage areas, loading areas, etc., and over 30-pole mounted lights in the interior. The eastern half of the staging area has been graded and a portion of it is currently being used as a stockpile area. It has over 40 pole-mounted perimeter fence lights running along the entire northern boundary with intervening features between the staging area and the residential and school uses located between approximately 250 and 650 feet to the north, including semi-opaque construction fencing, several berms, Westchester Parkway and associated lighting, trees, and vacant airport property. Relocating existing on-site construction staging operations to Construction Staging Area A would be less than significant for the following reasons: (1) Construction Staging Area A is already the site of existing construction staging activities and does not contain features that contribute to valued aesthetic character; (2) the intervening features between Construction Staging Area A and the residential and school uses to the north block many of the views of the construction staging area from the north; and (3) the relocated construction staging activities would be subject to LAX Master Plan Mitigation Measure DA-1, which requires construction fencing to block most views of construction activities from adjacent properties, in this case, most views of Construction Staging Area A from the residences within the Westchester neighborhood to the north. No additional mitigation measures to address relocation of staging activities are required.

The 75-acre Project site is highly disturbed and surrounded on three sides by airport uses and on the fourth by Pershing Drive. Most of the Project site is currently being used as a construction staging area and contains a rock crushing station, debris and soil stockpiles, construction trailers/offices, an airfield access security post, several paved roads, and several paved and unpaved outdoor storage areas. While the Project site has several small patches of ruderal weedy vegetation, mostly occurring as strips between the other uses and along both Pershing Drive and Taxiway AA, the site has no landscaping or other features of aesthetic value, nor is it located adjacent to or within the viewshed of a designated scenic highway or scenic vista (see response above). Adjacent uses include the West Remote Pads/Gates

² City of Los Angeles Planning Department, <u>Transportation Element of the Los Angeles City General Plan</u>, adopted September 1999.

³ Ibid.

and aircraft aprons to the north, across World Way West, an airport employee parking lot and vacant airport land to the south, Taxiway AA, American Airlines employee parking and the Continental Airlines maintenance hangars to the east, and the Los Angeles/El Segundo Dunes across Pershing Drive to the west.

Construction and operation of the proposed Project at the Project site would be consistent in visual character with existing airport-related uses to the north, south and east, and would be an aesthetic improvement over the existing uses at the Project site which include large stockpiles, portable trailers, construction equipment and storage areas. Furthermore, the proposed Project would be required to comply with applicable LAX Street Frontage & Landscape Development Plan Update⁴ requirements and LAX Master Plan⁵ commitments and mitigation measures which have been designed to ensure aesthetic and visual compatibility with adjacent development and public streets. Applicable aesthetics and visual Master Plan commitments and mitigation measures are listed below. Compliance with these would ensure that Project construction activities and the operation of the proposed improvements incorporate the necessary screening, buffering, landscaping, and other design measures to avoid significant adverse aesthetics impacts on the Westchester neighborhood to the north, the El Segundo neighborhood to the south, or to travelers on Pershing Drive.

- LAX Street Frontage & Landscape Development Plan Update Policy 1.3: Parking areas should be landscaped in accordance with LAWA standards and shall comply with the requirements of Airport Security. Areas should be screened from streets by 3-to 8-foot high decorative walls, berms, landscaping, or other appropriate screening mechanisms, as feasible and practical.
- LAX Street Frontage & Landscape Development Plan Update Policy 1.4: Storage and industrial uses such as fueling, loading, and maintenance at cargo areas shall comply with the requirements of Airport Security, and should be screened from streets by decorative walls, berms, and/or appropriate landscaping, as feasible and practical.
- LAX Street Frontage & Landscape Development Plan Update Policy 1.5: Open areas not used for buildings, driveways, or parking lots should be planted, irrigated, and/or maintained on a regular basis.
- LAX Street Frontage & Landscape Development Plan Update Policy 1.7: Vegetation should be used to soften solid screening walls as feasible and practical, and shall comply with the requirements of Airport Security.
- LAX Street Frontage & Landscape Development Plan Update Policy 6.1: Master Plan Projects shall be subject to LAX Plan Compliance Review for LAWA approval.
- LAX Street Frontage & Landscape Development Plan Update Policy 6.2: Perimeter landscape areas shall comply with the City of Los Angeles Landscape Ordinance as outlined by the LAX Specific Plan and all other applicable local codes and regulations, as feasible and practical.
- LAX Street Frontage & Landscape Development Plan Update Landscape Profile 4.8.3: This land use classification includes facilities such as aircraft maintenance hangars, Central Utility Plant, Compressed Natural Gas and/or Liquid Natural Gas facility, fuel farm, ground handling services, ground run-up enclosures,

⁴ City of Los Angeles, Los Angeles World Airports (LAWA), LAX Street Frontage & Landscape Development Plan Update, March 2005.

⁵ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, April 2004.

and the Automated People Mover (APM) maintenance facility. These areas are located between the two runway complexes west of the passenger terminals, on the south side of Century Boulevard and east of Sepulveda Boulevard, on the north side of Imperial Highway and on the west side of Aviation Boulevard. These uses are sometimes considered unsightly and require visual screening from public view to maintain neighborhood compatibility. When they are located on the airport perimeter or are visible from public roads or private property the perimeter treatment shall include solid walls or opaque planting to screen views into the facilities as permitted by Airport Security requirements. Landscape setback areas shall be 15 to 20 feet in typical areas, and 50 feet wide where steep slopes exist. Landscape setback areas shall include solid walls, with earth berms or shrub planting to soften the appearance of the walls. Walls may be vine covered or have hedges or other shrubs and trees planted along the entire face. Ground planes/areas shall be planted and maintained with ground covers, shrubs and trees. Where facilities are located on the airport interior, fencing will be allowed in place of solid walls.

- LAX Street Frontage & Landscape Development Plan Update Landscape Profile 4.9.3: Facilities within this classification include a surface parking lot at La Cienega Boulevard, rental car parking, employee parking lots, parking structures at the and Ground Transportation Center and Intermodal Transportation Center, and parking lots in service, maintenance and other ancillary facilities. Surface parking lots and the first level of parking structures may require visual screening from public view to maintain neighborhood compatibility. When they are located on the airport perimeter or are visible from public roads or private property, landscape areas shall be planted with shrub masses, hedges or groves of low branching trees, to the extent feasible and practical to screen views into the facilities. Landscape setback areas shall be 15 to 20 feet in typical areas. Parking facilities may be secured through the use of 8-foot height fencing and planting along public streets. Where parking facilities are adjacent to public parks or located across from residences, solid walls shall be constructed for effective screening. Setback areas shall include earth berms or shrub planting to soften the appearance of walls. Walls may be vine covered or have hedges or other shrubs and trees planted along the entire face. All areas not used for vehicular parking and circulation in surface parking lots shall be planted and maintained with ground covers, shrubs and trees. Where facilities are located on the airport interior, fencing will be allowed in place of solid walls.
- LAX Street Frontage & Landscape Development Plan Update Section 6.1.7 (Surface Parking Areas and Parking Structures Standards): Landscape setbacks surrounding surface parking areas and parking structures require planting, irrigation and security fencing or walls. The minimum setback for all parking facilities shall be 15 feet from the street right of way line unless otherwise specified. These areas shall be screened from adjacent streets or highways by solid walls in residential areas and berms, fencing with planting or walls in commercial, open space or other uses. At least 4 percent of the parking lot interior (not including setback areas) shall be permanently landscaped. Tree species shall be selected to create shade, reduce glare and heat. Care shall be taken to assure that trees do not drop sticky flowers or fruits onto paved surfaces or vehicles. Trees shall not be weak wooded or prone to wind damage. Trees shall have a minimum planted area of 50-square feet when surrounded by paving or walls. Long term parking areas shall be fenced or walled on all perimeters to maintain security as required by the Airport Security requirements. Employee parking areas may be unfenced. In cases where parking facilities adjoin the AOA, the perimeter security barrier fence shall be required. Parking lots shall conform to the applicable sections of the City of Los Angeles Landscape Ordinance as authorized by the LAX Specific Plan. This ordinance establishes standards to reduce glare, ambient temperatures and water use in parking lot and landscape areas.
- LAX Master Plan Mitigation Measure MM-DA-1. Construction Fencing: Construction fencing and pedestrian canopies shall be installed by LAWA to the degree feasible to ensure maximum screening of areas

under construction along major public approach and perimeter roadways, including Sepulveda Boulevard, Century Boulevard, Westchester Parkway, Pershing Drive, and Imperial Highway west of Sepulveda Boulevard. Along Century Boulevard, Sepulveda Boulevard, and in other areas where the quality of public views are a high priority, provisions shall be made by LAWA for treatment of the fencing to reduce temporary visual impacts.

Finally, the Project would include some landscaping (xeriscaping or drought-tolerant plantings). Thus, the proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings, impacts on visual character would be less than significant, and no mitigation measures are required.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. As indicated in Response I.c above, Construction Staging Area A is already a lit construction staging area which is partially buffered from view by the residential and school uses to the north due to topography and other intervening features. The proposed relocation of construction staging operations from the Project site to Construction Staging Area A could potentially result in a small incremental increase in lighting in that staging area, depending on the timing of construction activities occurring in construction Staging Area A related to other airport projects. However, any incremental increase in lighting would be small given the high light levels already existing in the area, and little of any such increase in lighting. Furthermore, the relocated construction staging activities would be subject to LAX Master Plan Mitigation Measure DA-1 (full text provided in Response I.c) requiring construction staging operations would not create new sources of substantial light or glare which would adversely affect day or nighttime views in the area, and the impact would be less than significant. No additional mitigation measures are required.

The Project site is located within an urban area with existing sources of ambient light and glare, including street lights along World Way West and Pershing Drive to the north and west, aircraft apron lighting to the north, American Airlines employee parking lot and airport facility lighting to the east, and aviation beacon lighting within the Los Angeles/El Segundo Dunes to the west. Outdoor lighting is also currently present at the Project site itself, primarily in the northern and western portions of the sites at the rock crushing station, truck staging areas, Guard Post 21, and near the construction trailers/offices.

As a part of the proposed Project, eight new 70-foot tall high-mast pole light assemblies consisting of six to eight 1,000-watt metal halide lamps each would be installed to illuminate each of the proposed aircraft parking positions, taxiway edge lighting would be installed from Taxiways AA and B, parking lot lighting would be installed per City standards at the employee parking lot, lights would be mounted at the exterior entrances to the ground run-up enclosure (GRE) and proposed aircraft hangars, security and foot perimeter/parapet lights would be installed, and light would likely emanate from the interiors of the proposed GRE and aircraft maintenance hangars (when open). However, such lighting would be directed downward toward the immediate area of the Project site and would not

result in light spillover⁶ at the nearest sensitive receptors (i.e., the El Segundo Blue Butterfly Habitat Restoration Area within the Los Angeles/El Segundo Dunes located approximately 170 feet west of the Project site along the west side of Pershing Drive, the residential uses located approximately 0.41 miles to the south along the south side of West Imperial Avenue, and the residential uses located approximately 0.97 miles to the north, north of the airport property). The proposed lighting would also be consistent with the type of lighting already present at the Project site and found elsewhere in the western portion of the airport (i.e., at the West Remote Pads/Gates, American Airlines employee parking lot, etc.). Project lighting would be in compliance with applicable Federal Aviation Administration (FAA) standards and in conformance with relevant LAWA light and glare guidelines. Furthermore, Project compliance with Master Plan Commitments LI-2 and LI-3 would ensure that no light sources or building materials would be introduced which interfere with nighttime views in the area.

In addition, the light and glare analysis in the 2004 Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) prepared for the LAX Proposed Master Plan Improvements included a quantitative analysis of the increase in ambient light levels in adjacent sensitive areas associated with the development of urban uses at the Project site, and determined that light from such development would increase by well below the 2.0 footcandle LAMC threshold at the nearest light sensitive uses.⁷ The 2004 Final /EIS/EIR determined that lighting in the western portion of the airport property under the Master Plan, similar to the type of lighting currently proposed, would have a less than significant impact on the El Segundo Blue Butterfly within the El Segundo Blue Butterfly Habitat Restoration Area.⁸ Finally, Project lighting and building facade materials would be designed and selected in accordance with LAWA guidelines and requirements (e.g., LAX Street Frontage and Landscape Development Plan, LAX Master Plan commitments and mitigation measures, etc.) adopted to avoid light spillover and the generation of substantial light and glare. These Master Plan commitments and mitigation measures are listed below. Compliance with these would ensure that the proposed Project incorporates landscaping, walls and/or other buffering and non-glare building materials, and that lighting is shielded/focused downward, in such a way as it does not spill over onto, interfere with the views of, or otherwise adversely impact light-sensitive uses including the El Segundo Blue Butterfly Habitat Restoration area to the west, the Westchester neighborhood to the north, or the El Segundo neighborhood to the south. Please see Response *IV.a-b,e* for additional discussion of the potential for lighting related impacts on the El Segundo Blue Butterfly.

- LAX Street Frontage & Landscape Development Plan Update Landscape Profile 4.8.3: See Response I.c. for text.
- LAX Street Frontage & Landscape Development Plan Update Landscape Profile 4.9.3: See Response I.c for text.
- LAX Master Plan Commitment LI-2. Use of Non-Glare Generating Building Materials: Prior to approval of final plans, LAWA will ensure that proposed LAX facilities will be constructed to maximize use of non-reflective materials and minimize use of undifferentiated expanses of glass.

⁶ Light spillover refers to direct illumination of the ground surface whereby a distinct boundary between the illuminated and nonilluminated ground surface can be distinguished. This is a separate issue from ambient light levels which refers to light levels at a particular location measured in footcandles.

⁷ City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Statement / Environmental Impact Report for the Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, April 2004.

⁸ Ibid.

• LAX Master Plan Commitment LI-3. Lighting Controls: Prior to final approval of plans for new lighting, LAWA will conduct reviews of lighting type and placement to ensure that lighting will not interfere with aeronautical lights or otherwise impair Airport Traffic Control Tower or pilot operations. Plan reviews will also ensure, where feasible, that lighting is shielded and focused to avoid glare or unnecessary light spillover. In addition, LAWA or its designee will undertake consultation in selection of appropriate lighting type and placement, where feasible, to ensure that new lights or changes in lighting will not have an adverse effect on the natural behavior of sensitive flora and fauna within the Habitat Restoration Area.

For all the reasons stated above, the proposed Project would not create a new source of substantial light or glare at the Project site which would adversely affect day or nighttime views in the area and the light and glare impacts of the Project would be less than significant. No mitigation measures are required.

II. AGRICULTURAL AND FOREST RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California agricultural land evaluation and site assessment model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the Project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?
- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- d. Result in the loss of forest land or conversion of forest land to non-forest use?
- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

a-e. No Impact. The Project site is located within a developed airport and is surrounded by airport uses, urbanized areas, and the Los Angeles/El Segundo Dunes. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no forest resources exist at the Project site or surrounding areas. Further, there are no Williamson Act contracts in effect for the Project site or surrounding areas.⁹ The proposed Project would replace existing temporary construction staging uses at the Project site with airport uses, and would neither convert farmland to non-agricultural use or result in conflicts with existing zoning for agricultural use or a Williamson Act contract. Similarly, it would not result in the conversion of forest land to non-forest use. Therefore, no impacts to agricultural or forest resources would occur, and no mitigation measures are required.

⁹ City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.16, April 2004.

III. AIR QUALITY.

The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the Project result in:

- a. Conflict with or obstruct implementation of the South Coast Air Quality Management Plan?
- **b.** Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, PM₁₀, and PM_{2.5}) under an applicable federal or state ambient air quality standard?
- d. Expose sensitive receptors to substantial pollutant concentrations?
- e. Create objectionable odors affecting a substantial number of people?

a-e. Potentially Significant Impact. The project site is located within the South Coast Air Basin (Basin) which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). At the federal level, the Basin is designated as a nonattainment area for ozone (O_3) , respirable particulate matter (PM_{10}) , fine particulate matter $(PM_{2.5})$, and lead (Pb). At the state level, the Basin is designated as nonattainment for O_3 , PM_{10} , $PM_{2.5}$, Pb, and nitrogen dioxide (NO_2) . The nearest existing sensitive receptors are the residential uses located along the south side of Imperial Highway in the City of El Segundo, 0.41 miles to the south.

The proposed Project would convert an existing, largely unpaved, 75-acre construction staging area into paved RON/RAD apron areas, a GRE, aircraft hangars, and employee parking. These activities would generate both construction air emissions associated with Project development, and operational air emissions from aircraft maintenance, aircraft engine run-up activities, and employee motor vehicles. While the proposed Project would primarily relocate activities that already generate operational air emissions from other areas of the airport to the Project site (and in the case of construction staging emissions, from the Project site to other existing airport construction staging areas), the EIR will evaluate whether the Project construction or operation could potentially: (1) conflict with or obstruct implementation of the South Coast Air Quality Management Plan; (2) violate air quality standards or contribute to an existing or Project air quality violation; (3) result in a cumulatively considerable adverse net increase in air pollutants; (4) expose sensitive receptors to substantial pollutant concentrations; and/or (455) create objectionable odors (aircraft engine exhaust, diesel emissions, etc.) that could affect a substantial number of people. Project air emissions will be modeled and compared to applicable quantified air quality thresholds.

IV. BIOLOGICAL RESOURCES.

Would the Project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

a-b, e. Less Than Significant. The Project site is located within an area that has been used for construction trailers/offices and construction storage and staging for several years. It is graded, highly disturbed, and largely devoid of vegetation other than some small ruderal weedy areas; the loss of which would be considered a less-than-significant impact. Based on a review of biological surveys previously performed for the LAX Master Plan, a biological field survey of the unpaved/undeveloped portions of the LAX property conducted for the LAX Specific Plan Amendment Study,¹⁰ a review of the California Natural Diversity Database (CNDDB)¹¹, and a review of the California Native Plant Society Inventory of Rare and Endangered Plans of California,¹² there are no known riparian areas, wetland areas, or trees on or immediately adjacent to the Project site,¹³ and sensitive plant, wildlife and fish species are not known to occur on or otherwise utilize the Project site. Also, while five ephemerally wetted areas on the Project site were found in 2001 to contain embedded cysts of the Riverside Fairy Shrimp, a federally-listed endangered species: (1) field surveys of these areas in 2003 concluded that these areas did not represent either federally protected wetlands or wetted areas subject to California Department of Fish and Game (CDFG) jurisdiction;¹⁴ and (2) the cysts were subsequently removed from the site, and the top layer of soil from occupied ponds was removed to prevent future formation of shrimp habitat, in July and August 2005 pursuant to Master Plan Mitigation Measure LU-8 and 2004 and 2005 Biological Opinions from the United States Fish and Wildlife Service (USFWS).¹⁵ Also, habitat assessments conducted in fall 2011 of the airport property, including the Project site, detected no new ephemerally ponded areas on the airport property (including on the Project site) that could support fairy shrimp.¹⁶ Therefore, the Project would not directly impact sensitive species or their habitat, riparian habitat, other sensitive natural communities, federally protected wetlands, or wetted areas subject to CDFG jurisdiction, and no mitigation measures are required.

The Project site is located across Pershing Drive from the El Segundo Blue Butterfly Habitat Restoration Area (Habitat Restoration Area) which is habitat for the El Segundo Blue Butterfly, a federally-listed endangered species. Project construction and/or operational activities would generate dust, light/glare, and noise which could be perceptible from the Habitat Restoration Area. However, the Project site is the location of existing construction staging activities which already generate dust, light/ glare and noise, and the proposed Project would replace these uses with other uses that generate dust, light/glare and noise. Also, the Project site and adjacent area is already subject to high ambient noise

¹⁰ Glen Lukos & Associates, Biological Resources Technical Report for the LAX Specific Plan Amendment Study, May, 2012.

¹¹ California Department of Fish and Game, California Natural Diversity Database, Rarefind 3, Sacramento, 2011.

¹² California Native Plant Society, Online Inventory of Rare and Endangered Plans of California, 8th Edition, Available: http://www.cnps.org/cnps/rareplants/inventory/, accessed November 2011.

¹³ There are no jurisdictional wetlands on the Project site per a formal jurisdictional wetlands delineation completed in 2009 for the western portion of LAX (Los Angeles World Airports, Final Environmental Impact Report for LAX Bradley West Project, SCH #2008121080, September 2009).

¹⁴ Los Angeles World Airports, Draft Environmental Impact Report for LAX Bradley West Project, SCH #2008121080, page 5-60, May 2009.

¹⁵ Sapphos Environmental, Inc. Documentation of Salvage and Storage of Riverside Fairy Shrimp Cyst-Bearing Soil in Support of the April 20, 2004 Biological Opinion for Alternative D and the April 8, 2005 Biological Opinion for Operations and Maintenance. 2005

¹⁶ Glen Lukos & Associates, Biological Resources Technical Report for the LAX Specific Plan Amendment Study, May, 2012.

levels from aircraft noise and from vehicular noise along surrounding roadways, particularly Pershing Drive and Vista del Mar. Furthermore, the LAX Master Plan contains Master Plan commitments and mitigation measures a number of which are applicable to the proposed Project that would minimize dust, light/glare and noise effects, including effects in the Habitat Restoration Area, including:

• LAX Master Plan Mitigation Measure MM-AQ-2. Mitigation Plan for Air Quality - Construction-Related Mitigation Measures. This measure describes numerous specific actions to reduce fugitive dust emissions and exhaust emissions from on-road and off-road mobile and stationary sources used in construction. These actions are listed in the table below.

Measure	Type of Measure
Post a publically visible sign with the telephone number and person to contact regarding dust complaints; this person shall respond and take corrective action within 24 hours.	Fugitive Dust
Prior to final occupancy, the applicable demonstrates that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.	Fugitive Dust
All roadways, driveways, sidewalks, etc., being installed as part of the project should be completed as soon as possible; in addition, building pads should be laid as soon as possible after grading.	Fugitive Dust
Pave all construction access roads at least 100 feet on to the site from the main road.	Fugitive Dust
To the extent feasible, have construction employees' work/commute during off-peak hours.	On-Road Mobile
Make available on-site lunch trucks during construction to minimize off-site worker vehicle trips.	On-Road Mobile
Prohibit staging and parking of construction vehicles (including workers' vehicles) on streets adjacent to sensitive receptors such as schools, daycare centers, and hospitals.	Nonroad Mobile
Prohibit construction vehicle idling in excess of ten minutes.	Nonroad Mobile
Utilize on-site rock crushing facility, where feasible, during construction to reuse rock/concrete and minimize off-site truck haul trips.	Nonroad Mobile
Specify combination of electricity from power poles and portable diesel- or gasoline-fuel generators using "clan burning diesel" fuel and exhaust emission controls.	Stationary Point Source Controls
Suspend use of all construction equipment during a second-stage smog alert in the immediate vicinity of LAX.	Mobile and Stationary
Utilize construction equipment having the minimum practical engine size (i.e., lowest appropriate horsepower rating for intended job).	Mobile and Stationary
Require that all construction equipment working on-site is properly maintained (including engine tuning) at all times in accordance with manufacturers' specifications and schedules.	Mobile and Stationary
Prohibit tampering with construction equipment to increase horsepower or to defeat emission control devices.	Mobile and Stationary
The contractor or builder shall designate a person or persons to ensure the implementation of all components of the construction-related measure through direct inspections, record reviews, and investigations of complaints.	Administrative

- LAX Mitigation Measure MM-ET-3. El Segundo Blue Butterfly Conservation Dust Control. To reduce the transport of fugitive dust particles related to construction activities, soil stabilization, watering or other dust control measures, as feasible and appropriate, shall be implemented with a goal to reduce fugitive dust emissions by 90 to 95 percent during construction activities within 2,000 feet of the El Segundo Blue Butterfly Habitat Restoration Area. In addition, to the extent feasible, no grading or stockpiling for construction activities should take place within 100 feet of occupied habitat of the El Segundo blue butterfly.
- LAX Mitigation Measure MM-DA-1. Construction Fencing. Construction fencing and pedestrian canopies shall be installed by LAWA to the degree feasible to ensure maximum screening of areas under construction along major public approach and perimeter roadways, including Sepulveda Boulevard, Century Boulevard, Westchester Parkway, Pershing Drive, and Imperial Highway west of Sepulveda Boulevard. Along Century Boulevard, Sepulveda Boulevard, and in other areas where the quality of public views are a high priority, provisions shall be made by LAWA for treatment of the fencing to reduce temporary visual impacts.
- LAX Mitigation Measure LI-3. Light Controls. Prior to final approval of plans for new lighting, LAWA will conduct reviews of lighting type and placement to ensure that lighting will not interfere with aeronautical lights or otherwise impair Airport Traffic Control Tower or pilot operations. Plan reviews will also ensure, where feasible, that lighting is shielded and focused to avoid glare or unnecessary light spillover. In addition, LAWA or its designee will undertake consultation in selection of appropriate lighting type and placement, where feasible, to ensure that new lights or changes in lighting will not have an adverse effect on the natural behavior of sensitive flora and fauna within the Habitat Restoration Area.
- LAX Master Plan Mitigation Measure MM-N-10. Construction Scheduling: The timing and/or sequence of the noisiest on-site construction activities shall avoid sensitive times of the day, as feasible (9 p.m. to 7 a.m. Monday Friday; 8 p.m. to 6 a.m. Saturday; anytime on Sunday or Holidays).
- LAX Master Plan Commitment N-1. Maintenance of Applicable Elements of Existing Aircraft Noise Abatement Program: All components of the current airport noise abatement program that pertain to aircraft noise will be maintained.

Concerning project dust emissions, adherence to LAX Master Plan Mitigation Measures AQ-2 and ET-3 would require the implementation of fugitive dust control measures which would reduce Project construction-related fugitive dust emissions by 90 to 95 percent. Hence, proposed Project construction-related fugitive dust emissions would be minimized, and would potentially be below the levels currently generated by the existing on-site construction staging activities.

Concerning project light/glare, the light analysis in the LAX Master Plan EIR found that increased light levels associated with Master Plan development would have a less than significant impact on the El Segundo blue butterfly as the butterfly is a diurnal species, does not exhibit flight-to-light behavior, and remains perched at night. Furthermore, adherence to LAX Master Plan Mitigation Measures DA-1 and LI-3 which require construction fencing to visually shield construction activities/lighting from adjacent properties and the shielding and focusing of light downward, combined with the 135 foot distance between the Project site and the Habitat Restoration Area, together would avoid Project light spillover into the Habitat Restoration Area.

Concerning proposed Project construction noise, as indicated previously, existing construction staging activities at the Project site already generate noise, and it is not expected that Project construction activities would result in a

substantial increase in this existing construction-related noise. Also, adherence to LAX Master Plan Mitigation Measure N-10 would limit proposed Project construction activities during nighttime hours when low ambient noise levels would otherwise make proposed Project construction noise more noticeable in the Habitat Restoration Area. Finally, noise levels from the noisiest outdoor construction activities (e.g., excavation and grading) are typically 86 dBA Leq at 50 feet from the noise source, and since this noise would attenuate to approximately 81.5 dBA at a distance of 100 feet and as discussed in the LAX Master Plan EIR, the level at which a noise event becomes a disturbance to sensitive species such as the El Segundo blue butterfly is generally 95 dBA Lmax.

Concerning proposed Project operational noise, aircraft taxiing already occurs in the vicinity of the Project site on Taxiway AA, and the Project site and Habitat Restoration Area are both located at the western edge of the south airfield runways, and thus the Habitat Restoration Area already experiences substantial aircraft noise, including noise from overflights. Furthermore, the proposed Project would be required to adhere to LAX Master Plan commitment N-1 which requires compliance with the LAX Aircraft Noise Abatement Program which has been formulated to minimize aircraft noise impacts on adjacent uses. In addition, the proposed GRE would not include operations during nighttime hours when low ambient noise levels would otherwise make GRE noise more noticeable in the Habitat Restoration Area. Finally, while it is estimated that the 80 dBA Lmax noise contour from the GRE would extend into the Habitat Restoration Area, as discussed in the paragraph above, noise generally only becomes a disturbance to sensitive species such as the El Segundo blue butterfly when it approaches 95 dBA Lmax.

Based on the above, the indirect biological resources impacts of the proposed Project on the El Segundo blue butterfly and associated habitat would be less than significant, and no mitigation measures are required.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

c. No Impact. As indicated in *Response IV.a-b, e* above, the Project site does not contain federally protected wetlands. No federally protected wetlands occur in the area to be potentially impacted, and even if wetlands did occur in the area, the Project would not include construction activities within the Los Angeles/El Segundo Dunes. Therefore, no impact would occur, and no mitigation measures are required.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

d, *f*. No Impact. The Project site is surrounded by existing airport uses, streets and fencing. It is a highly disturbed area and subject to daily construction staging activities. It is not bisected by waterways, riparian threads, or forest habitat which could be used as movement corridors by wildlife. Furthermore, the previous biological studies discussed under *Response IV.a-c*, *e* above, have not identified the Project site as being within an area used for movement by native or migratory fish or wildlife species. Therefore, the proposed Project would not interfere substantially with native resident or migratory fish or wildlife species movement or impede the use of native wildlife nursery sites. Similarly, the Project site is not located within an area subject to a Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, no impacts would occur in terms of these issues, and no mitigation is required.

V. CULTURAL RESOURCES.

Would the Project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

No Impact. The LAX Master Plan EIR/EIS included historical resources surveys, and none of the identified resources are located on or near the Project site.¹⁷ Therefore, no impacts to historic resources would occur, and no mitigation is required.

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

d. Disturb any human remains, including those interred outside of formal cemeteries?

b,d. Less Than Significant Impact with Mitigation Incorporated. PCR Services Corporation (PCR) conducted a cultural resources assessment in 2011 for a Project that was previously proposed on 18 acres in the eastern portion of the Project site named the Southwest Remain Overnight Apron (RON) Project.¹⁸ The cultural assessment identified a 78-acre Area of Potential Effect (APE) around the previously proposed Southwest RON Project which included the 75-acre Project site, and evaluated both the potential for the APE to contain cultural resources and the potential for the previously proposed Southwest RON Project to impact any such resources. The scope of work for the assessment included a cultural resources records search through the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search through the California Native American Heritage Commission (NAHC), review of historic topographic maps and aerials, review of a recent paleontological records search from the Natural History Museum of Los Angeles County (LACM), and a pedestrian survey of the APE. Because the assessment covered the Project site, and because the depth of excavations under the previously proposed Southwest RON Project would be similar to those under the proposed Project, the findings of the 2011 cultural resources assessment, as set forth below, are applicable to the proposed Project.

No historical resources, archaeological resources, or human remains have been previously recorded within the Project site, and no new such resources were identified by PCR during the pedestrian survey. There are no historic buildings or structures presently located within the Project site, and the proposed Project would not cause an adverse effect to a listed historic property or archaeological site. The negative results of the archaeological survey were a direct result of the poor surface visibility within the majority of the Project site that may have obstructed the identification of resources on the surface. However, historic period resources and prehistoric archaeological resources have been recorded within a half-mile radius of the Project site, which confirms historic and prehistoric occupation in the surrounding vicinity.

¹⁷ City of Los Angeles, Los Angeles World Airports (LAWA), LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.9.1, April 2004.

¹⁸ PCR Services Corporation, Cultural Resources Assessment for Southwest Remain Overnight Apron Project at Los Angeles International Airport; City of Los Angeles, California. Prepared for the Federal Aviation Administration and Camp Dresser and McKee, Inc., August 2011.
According to LAWA engineers, there is approximately 11 feet of artificial fill that underlies the Project site. Given the limited potential to encounter buried historical and/or archaeological resources in fill soils, the majority of the excavations associated with the proposed Project would likely not encounter any buried historic or archaeological resources that may be present. However, the Project includes a proposal for hangars, a GRE, and eight high mast apron lights, and the excavations for these elements could extend into previously undisturbed native soils and therefore would have a potential to encounter buried historic or archaeological resources at depth. Any such impact would be less than significant with implementation of the mitigation measure listed below which outlines the archaeological monitoring, notification, and treatment requirements for development at LAX. Compliance with this mitigation measure would ensure that Project construction activities are monitored for the potential to uncover buried archaeological resources and human remains, and that if such resources/human remains are uncovered, they are studied and treated in accordance with applicable regulations.

Mitigation Measure ARCHAEO-1: Prior to initiation and construction activities, LAWA will retain an onsite Cultural Resources Monitor (CRM), as defined in the LAX Master Plan MMRP Archaeological Treatment Plan (ATP), who will determine if the project site is subject to archaeological monitoring. As defined in the ATP, areas are not subject to archaeological monitoring if they contain redeposited fill or have previously been disturbed. LAWA shall retain an archaeologist to monitor excavation activities in native or virgin soils in accordance with the detailed monitoring procedures and other procedures outlined in the ATP regarding treatment for archaeological resources that are accidentally encountered during construction. In accordance with the methods and guidelines provided in the ATP, the CRM will compare the known depth of redeposited fill or disturbance to the depth of planned grading activities, based on a review of construction plans. If the CRM determines that the Project site is subject to archaeological monitoring, a qualified archaeologist (an archaeologist who satisfies the Secretary of the Interior's Professional Qualifications Standards [36 CFR 61]) shall be retained by LAWA to inspect excavation and grading activities that occur within native material. The extent and frequency of inspection shall be defined based on consultation with the archaeologist. Following initial inspection of excavation materials, the archaeologist may adjust inspection protocols as work proceeds. Identification, evaluation, and recovery of cultural resources shall be conducted in accordance with the methods, guidelines, and measures established in the ATP. If Native American cultural resources are encountered, LAWA shall comply with guidance established in the ATP for retaining a Native American monitor. If human remains are found, LAWA shall comply with the State Health and Safety Code regarding the appropriate treatment of those remains as outlined in the ATP. Reporting shall be completed in conformance with the requirements established in the ATP to document the archaeological monitoring effort and guidance as to the proper curation and archiving of artifacts in accordance with industry and federal standards.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. Per the cultural resources assessment, several fossil localities have been identified in the region from 13 to 40 feet below the ground surface in deposits that currently exist at the surface and at depth within the Project site. No paleontological resources were identified by PCR during the pedestrian survey, although this is a direct result of the poor surface visibility within the majority of the site. According to the LACM, deep excavations associated with the proposed Project would likely encounter paleontological resources (vertebrate fossils). As discussed above, excavations for the high mast poles would extend into previously undisturbed native soils, and therefore would have a potential to encounter buried paleontological resources at depth, including potentially unique paleontological resources. Any such impact would be less than

significant with implementation of the mitigation measures listed below which outline the paleontological monitoring and treatment requirements for the proposed Project. Compliance with the following mitigation measures would ensure that Project construction activities are monitored for the potential to uncover buried paleontological resources, and that if such resources are uncovered, they are studied and treated in accordance with applicable regulations.

- Mitigation Measure PALEO-1. Conformance with LAX Master Plan Paleontological Management Treatment Plan: (PMTP): Prior to the initiation of grading and construction activities, LAWA will retain a professional paleontologist, as defined in the Final LAX Master Plan MMRP PMTP, who will determine if the Project site exhibits a high or low potential for subsurface resources. If the Project site is determined to exhibit a high potential for subsurface resources, paleontological monitoring will be conducted in accordance with the procedures stipulated in the PMTP. If the Project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP. In the event that paleontological resources are discovered, the procedures outlined in the PMTP for the identification of resources will be followed to ensure that unique paleontological resources are studied and treated in accordance with applicable regulations and procedures such that significant impacts are avoided.
- Mitigation Measure PALEO 2. Construction Personnel Briefing: In accordance with the PMTP, construction personnel will be briefed by the consulting paleontologist in the identification of fossils or fossilferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur.

VI. GEOLOGY AND SOILS.

Would the Project:

- a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture is the surface displacement that occurs along the surface of a fault during an earthquake. As indicated in the LAX Master Plan Final EIR, while the Project site is located within the seismically active southern California region, it is not located within an Alquist-Priolo Special Study Zone.¹⁹ Geotechnical literature indicates that the Charnock Fault, a potentially active fault, may be located near or through the eastern portions of LAX property (although the Project site is located approximately 1.8 miles further west). However, as stated in the LAX Master Plan EIR/EIS, the Charnock Fault is considered to have low potential for surface rupture independently or in conjunction with movement on the Newport-Inglewood Fault Zone, which is located approximately three miles east of LAX (approximately 4.8 miles from the Project site).²⁰ Therefore, impacts to people

¹⁹ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.22, April 2004.

²⁰ Ibid.

or structures resulting from rupture of a known earthquake fault are considered less than significant, and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. As indicated in the LAX Master Plan Final EIR, the Project site is located in the seismically active southern California region; however, there is no evidence of faulting on the site, and the site is not located within an Alquist-Priolo Special Study Zone.²¹ Further, all construction would be designed in accordance with the provisions of the Los Angeles Building Code (LABC), the requirements of which are more stringent than California's Uniform Building Code (UBC) and have been formulated to allow structures to withstand the seismic ground shaking levels expected in the region. Therefore, potential impacts associated with strong seismic ground shaking would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a seismic hazard that occurs when strong ground shaking causes saturated granular soil (such as sand) to liquefy and lose strength. The susceptibility of soil to liquefy tends to decrease as the density of the soil increases and the intensity of ground shaking decreases. As indicated in the LAX Master Plan EIR/EIS, the depth to groundwater at LAX is generally greater than 90 feet, which would indicate that the site has a very low susceptibility to liquefaction. While perched groundwater has been documented at a depth of approximately 40 feet below the surface of the Project site, the overall potential for liquefaction at LAX is considered low.²²

Strong ground shaking will also tend to densify loose to medium dense deposits of partially saturated granular soils and could result in seismic settlement of foundations and the ground surface at LAX. Due to variations in material type, seismic settlements would tend to vary considerably across LAX, but are generally estimated to be between negligible and 0.5 inches, which is a low level of settlement; hence, the overall potential for damaging seismically-induced settlement is considered to be low.²³

Seismically-induced ground shaking can also cause slope-related hazards through various processes including slope failure, lateral spreading,²⁴ flow liquefaction, and ground lurching.²⁵ Because the Project site is relatively flat (except for the debris and soil stockpiles which will be removed and/or reused as backfill material on-site) and existing slopes

²¹ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.22, April 2004

²² Ibid.

²³ Ibid.

²⁴ Lateral Spreading: Deformation of very gently sloping ground (or virtually flat ground adjacent to an open body of water) that occurs when cyclic shear stresses caused by an earthquake induce liquefaction, reducing the shear strength of the soil and causing failure and "spreading" of the slope.

²⁵ Ground Lurching: Ground lurching (and related lateral extension) is the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of earthquake-induced ground shaking. Damage includes lateral movement of the slope in the direction of the slope face, ground cracks, slope bulging, and other deformations.

in the LAX vicinity are relatively small in area and of low angle and height (less than 15 feet), the overall potential for such failures is considered to be low.²⁶

The California Department of Conservation (CDC) is mandated by the Seismic Hazards Act of 1990²⁷ to identify and map the state's most prominent earthquake hazards in order to help avoid damage resulting from earthquakes. The CDC's Seismic Hazard Zone Mapping Program charts areas prone to liquefaction and earthquake-induced landslides throughout California's principal urban and major growth areas. According to the Seismic Hazard Map for the Inglewood Quadrangle, no potential liquefaction zones are located within the LAX area. Isolated zones of potential seismic slope instability are identified within the Los Angeles/El Segundo Dunes, but the Los Angeles/El Segundo Dunes are located west of the Project site, across Pershing Drive.²⁸ Given the Project site's flat topography (after proposed removal of the debris and soil stockpiles), it would not be subject to slope instability, and the potential instability within the Los Angeles/El Segundo Dunes to the west would not pose a risk to the Project site.

In summary, the potential for seismic-related ground failure at the Project site is considered low, and the proposed Project would be designed in accordance with the provisions of the LABC, both of which have been formulated to avoid substantial seismic-related ground failure. Therefore, potential impacts associated with seismic-related ground failure would be less than significant, and no mitigation measures are required.

iv. Landslides?

No Impact. The Project site is flat (except for the gravel and soil stockpiles which will be removed and/or used as backfill material on-site), and the City of Los Angeles Landslide Inventory and Hillside Areas map does not identify any areas in the vicinity of the Project site as representing unstable slopes which may be prone to landslides.²⁹ Implementation of the proposed Project would not result in the exposure of people or structures to the risk of landslides. Therefore, no impacts resulting from landslides would occur, and no mitigation measures are required.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The proposed Project would require grading of the 75-acre Project site, the reuse/relocation/disposal of stockpiled soil and debris, and trenching for utility and storm drain lines. As indicated in the 2004 LAX Master Plan Final EIS/EIR, the potential for soil erosion is low at LAX due to the flat topography of the LAX property (including the Project site).³⁰ Conformance with LABC 7000 Sections 91.7001 – 91.7016, which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. In addition, the LABC requires an erosion control plan that is reviewed by the Department of

²⁶ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.22, April 2004.

²⁷ California Public Resources Code, §2690-2699.6 (Seismic Hazards Mapping Act).

²⁸ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.22, April 2004.

²⁹ City of Los Angeles Planning Department, Safety Element of the City of Los Angeles General Plan, Exhibit C, Landslide Inventory & Hillside Areas In the City of Los Angeles, June 1994.

³⁰ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, p. 4-1246, April 2004.

Building and Safety prior to construction should grading exceed 200 cubic yards and occur during the rainy season (between November 1 and April 15). LAWA would be required to prepare an erosion control plan to avoid substantial soil erosion. Therefore, proposed Project impacts related to soil erosion would be less than significant, and no mitigation measures are required.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. Settlement of foundation soils beneath engineered structures or fills typically results from the consolidation and/or compaction of the foundation soils in response to the increased load induced by the structure or fill. As indicated in the 2004 LAX Master Plan Final EIS/EIR, the presence of undocumented and typically weak artificial fill at LAX creates the potential for settlement.³¹ LAX is also underline by some silt and clay layers prone to settlement.³² However, design features and construction methods can reduce the potential for excessive settlement at LAX, and the overall potential for damaging settlement is considered low. Also, the proposed Project would be subject to the LABC requirements which have been formulated to avoid issues related to unstable soils including landslides, lateral spreading, subsidence, liquefaction and collapse. Furthermore, Project design and construction would be required to adhere to engineering and design recommendations of a geological and/or soils report required by LAMC Section 91.7006.2. Therefore, issues related to unstable soils would be less than significant, and no mitigation measures are required.

d. Be located on expansive soil, as defined in Table 18-1-B of the Los Angeles Building Code (2002), creating substantial risks to life or property?

Less Than Significant Impact. Expansive soils are typically composed of certain types of silts and clays that have the capacity to shrink or swell in response to changes in soil moisture content. Shrinking or swelling of foundation soils can lead to damage to engineered structures including tilting and cracking. As indicated in the LAX Master Plan Final EIS/EIR, fill materials located in some portions of the LAX area could be prone to expansion.³³ However, all construction would occur in accordance with the LAMC Sections 91.7001 through 91.7016 and with the Los Angeles Department of Building and Safety requirements, which include construction requirements for grading, excavation, and foundation work, and the requirement to prepare a geological and/or soils report and adhere to all the engineering and design recommendations made in the report). Therefore, proposed Project implementation would occur, and no mitigation measures are required.

³¹ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, p. 4-1246, April 2004.

³² Ibid.

³³ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.22, April 2004.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project site is located in an urbanized area where wastewater infrastructure is currently in place. The proposed Project would not use septic tanks or alternative wastewater disposal systems. Therefore, the ability of onsite soils to support septic tanks or alternative wastewater systems would not be relevant to the proposed Project, and thus no impact would occur and no mitigation measures are required.

VII. GREENHOUSE GAS EMISSIONS.

Would the Project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- **b.** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

a-b. Potentially Significant Impact. The proposed Project would convert an existing, largely unpaved, 75-acre construction staging area into an area with an aircraft parking apron for RON/RAD use, a GRE, aircraft maintenance hangar(s), an employee parking lot, and other facilities for the parking, maintenance, and washing of aircraft. These activities/uses would not be expected to result in a large net increase in air emissions (including GHG emissions) as they would largely represent a consolidation of existing aircraft washing and maintenance operations from other areas of the airport. However, in order to provide a conservative analysis, the EIR will evaluate whether the proposed Project could potentially: (1) generate greenhouse gas emissions (GHGs), either directly or indirectly, that may have a significant impact on the environment; and/or (2) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHGs. Project GHG emissions will be modeled.

VIII. HAZARDS AND HAZARDOUS MATERIALS.

Would the Project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

a -b. Potentially Significant Impact. The construction staging area on the Project site contains stockpiled materials which would be re-used on-site as fill material and/or transported off-site to a landfill permitted to accept such materials. A portion of the stockpiled materials may have petroleum hydrocarbons (TPH) associated with a pavement recycling area and fragments of asphaltic material. Further investigation will be undertaken of the stockpiled materials, and means for segregating and disposing of impacted materials will be identified as may be warranted. In addition, the Project site has a history of use, and further investigation, including the performance of a Phase 1 Environmental Site Assessment, will be undertaken to determine whether the Project site contains other hazardous materials contamination. The Project site contains two groundwater monitoring wells that are part of remediation efforts at the upstream Continental site. Although the proposed Project would not effect groundwater or interfere with

these remediation efforts, should the two monitoring wells be affected by construction or site development, any impacts would be addressed in accordance with the requirements of the Los Angeles Regional Water Quality Control Board Vacuum Enhanced Free Product Recovery (VEFPR) System Monitoring Plan with Continental Airlines, dated 10 March 2006. Although the proposed Project would be subject to a substantial number of federal, state and local regulations that control hazardous materials use, storage, transport, and disposal, the potential for the Project to present a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials, or to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, will be evaluated further in an EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project site is not located within one-quarter mile of an existing or proposed school. The nearest existing school is St. Bernard High School located 0.88 miles to the north, and no schools are proposed within one-quarter mile of the Project site. Therefore, no impact would occur, and no mitigation measures are required.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. According to the California Department of Toxic Substances Control (DTSC) EnviroStor Database, groundwater contamination has occurred associated with Continental Airline maintenance activities upstream (northeast) of the Project site 34, remediation of this groundwater contamination is underway at the Continental Site, and groundwater quality monitoring is occurring downstream of the Continental site including at the Project site (although groundwater contamination does not extend to the Project site).³⁵ In addition, according to SWRCB's GeoTracker Database, several permitted underground storage tanks (USTs) occur along World Way West in the vicinity of the Project site.36 Finally, there is a stockpile (approximately 25,000-30,000 cubic yards of material) on the Project site located just south of Guard Post 21 which is partially contaminated with hydrocarbons. However, the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impact to a listed hazardous materials site would occur, and no mitigation measures are required.

e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?

No Impact. A portion of the apron area for the proposed Project lies within a portion of the Runway Protection Zone (RPZ) for Runway 7L. No aircraft parking would occur in this area, and it would be restricted from incompatible

³⁴ State Water Resources Control Board, GeoTracker System, http://geotracker.waterboards.ca.gov, accessed by PCR on May 31, 2012.

³⁵ Ibid

³⁶ Ibid.

objects and activities pursuant to FAA requirements. Therefore, no impact related to safety hazards for people residing or working in the Project area would occur and no mitigation measures are required.

f. For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for the people residing or working in the area?

No Impact. The Project site is not located within the vicinity of a private airstrip but rather within a public airport as discussed under *Response No. VIII.a-e, g* above. No impact would occur, and no mitigation measures are required.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed Project would not include the closure of existing adjacent streets during either construction or operation, would not impede access to the Project site or adjacent properties, and would not generate a substantial increase in the demand for emergency response or evacuation planning. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, no impact would occur, and no mitigation measures are required.

h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project site is located within a developed airport and is surrounded by airport uses, streets and the Los Angeles/El Segundo Dunes. It is not within a City of Los Angeles Wildfire Hazard Area, as delineated in the Safety Element of the General Plan.³⁷ Therefore, implementation of the proposed Project would not result in the exposure of people or structures to hazards associated with wildland fires, and no mitigation measures are required.

IX. HYDROLOGY AND WATER QUALITY.

Would the Project:

- a. Violate any water quality standards or waste discharge requirements?
- b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?
- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

³⁷ City of Los Angeles Planning Department, Safety Element of the City of Los Angeles General Plan, Exhibit D, Selected Wildfire Hazard Areas In the City of Los Angeles, April 1996.

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- f. Otherwise substantially degrade water quality?

a-f. Potentially Significant Impact. The 75-acre Project site is located within the western portion of the 700-acre Pershing Sub-basin which covers the southwest quarter of the airport property. Runoff from the Pershing Sub-basin flows to City of Los Angeles storm drains in World Way West and Pershing Drive, and then to a County of Los Angeles storm drain in Imperial Highway before being discharged to Santa Monica Bay via the County's Imperial Outfall. Runoff from the Project site currently sheet flows to the Pershing and World Way West drains (or to a drainage ditch along the east side of the site which flows to World Way West). Approximately 10% of the Project site is covered with impervious surfaces (primarily asphalt). The site does not contain streams or rivers, and is not located within a 100-year floodplain.³⁸

The proposed Project would generate wet- and dry-weather flows from the development of additional impervious surfaces, and include water use which could potentially: (1) violate water quality standards or waste discharge requirements; (2) substantially deplete groundwater supplies or interfere with groundwater recharge; (3) substantially alter the existing drainage pattern of the site or area, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (4) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; and/or (65) otherwise substantially degrade water quality. Therefore, these issues will be evaluated further in an EIR. A drainage report will be prepared, and pollutant loading in Project runoff will be analyzed.

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

g-h. No Impact. As indicated in the LAX Master Plan EIR/EIS, no 100-year floodplain areas are located within the LAX Master Plan boundaries (including the Project site).³⁹ Furthermore, the proposed Project would not involve the construction of housing. Therefore, no impacts resulting from the placement of housing or other structures within a 100-year floodplain would occur, and no mitigation measures are required.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. As indicated in *Response No. IX.g-h* above, the Project site is not located within a 100-year floodplain and thus is not subject to flooding. In addition, as delineated on the City of Los Angeles Inundation and Tsunami Hazard

³⁸ City of Los Angeles, West Maintenance Area Drainage Design Report, prepared for Los Angeles World Airports by Atkins, April 13, 2012.

³⁹ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.13, April 2004.

Areas map,⁴⁰ the Project site is not located within a boundary of an inundation area from a flood control basin. Further, the Project site is not located within the downstream influence of any levee or dam. Therefore, no impacts due to the exposure of people or structures to a risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam would occur, and no mitigation measures are required.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. The Project site is located approximately 0.5 mile east of the Pacific Ocean and is not delineated as a potential inundation or tsunami impacted area in the City of Los Angeles Inundation and Tsunami Hazard Areas map.⁴¹ Mudflows are not a risk as the Project site is located on, and is generally surrounded by, relatively level terrain and urban development. Therefore, no impacts resulting from inundation by seiche, tsunami, or mudflow would occur, and no mitigation measures are required.

X. LAND USE AND PLANNING.

Would the Project:

a. Physically divide an established community?

No Impact. The Project site is located entirely within the boundaries of a developed airport in an urbanized area and development of the site would not disrupt or divide the physical arrangement of an established community. Thus, the proposed Project would not divide an established community, and no mitigation measures are required.

b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. Land use designations and development regulations applicable to LAX, including the Project site, are set forth in the LAX Plan⁴² and the LAX Specific Plan.⁴³ The Project site is in an area designated in the LAX Plan as "Airport Airside." Within the LAX Specific Plan, the Project Site is in an area designated as within the Airport Airside subarea and zoned "LAX - A Zone, Airport Airside Sub-Area."

The aircraft parking and maintenance uses associated with the proposed Project are permitted uses on the Project site under the Airport Airside designation and LAX – A Zone. However, further analysis is required to assess Project consistency with the land use goals, policies, objectives and requirements of the LAX Master Plan, LAX Plan, and LAX Specific Plan. This will be evaluated further in an EIR.

⁴⁰ City of Los Angeles Planning Department, Safety Element of the City of Los Angeles General Plan, Exhibit G, Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.

⁴¹ City of Los Angeles Planning Department, Safety Element of the City of Los Angeles General Plan, Exhibit G, Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.

⁴⁵ City of Los Angeles, Los Angeles World Airports, LAX Plan, September 29, 2004.

⁴³ City of Los Angeles, Los Angeles World Airports, Los Angeles International Airport Specific Plan, September 29, 2004.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Less Than Significant Impact. The Project site is located across Pershing Drive from the Los Angeles El Segundo Dunes Specific Plan Area, a designated Los Angeles County Significant Ecological Area and City of Los Angeles Ecologically Important Area, within which is located a Dunes Habitat Preserve area for the El Segundo Blue Butterfly, a federally-listed endangered species. The proposed Project would not include construction activities within any of these areas. Furthermore, while the proposed Project would include construction and operational activities perceptible from these areas, and while these activities would generate dust, light/glare and noise, the impacts of these on the El Segundo Blue Butterfly, its habitat, and the above iconological areas would be less than significant for the same reasons discussed under *Response IV,a,b,e.* Therefore, the proposed Project would not conflict with an applicable habitat conservation plan or natural community conservation plan.

XI. MINERAL RESOURCES.

Would the Project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The State Mining and Geology Board classifies mineral resource zones (MRZs) throughout the State. As indicated in the LAX Master Plan Final EIR, the Project site is contained within a MRZ-3 zone, which represents areas with mineral deposits whose significance cannot be evaluated from available data.⁴⁴ The Project site is within the boundaries of the airport and surrounded by airport-related uses. There are no actively-mined mineral resources on the Project site, nor is the site available for mineral resource extraction given the existing airport use. Therefore, the proposed Project would not affect access to or the availability of valued mineral resources, and no mitigation measures are required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Project site is not within an area delineated on the City of Los Angeles Oil Field & Oil Drilling Areas map in the City of Los Angeles General Plan Safety Element.⁴⁵ Furthermore, the Project site is disturbed and in an area that is not available for mineral resource extraction due to the construction staging uses. Therefore, the proposed Project would not affect the availability of a locally-important mineral resource recovery site, and no mitigation measures are required.

⁴⁴ City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, SCH #1997061047, Section 4.17, April 2004.

⁴⁵ City of Los Angeles Planning Department, Safety Element of the City of Los Angeles General Plan, Exhibit E, Oil Field & Oil Drilling Areas in the City of Los Angeles, May 1994.

XII. NOISE.

Would the Project result in:

- a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- **b.** Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?
- c. A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?
- d. A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?
- e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

a-e. Potentially Significant Impact. The Project site is located within the western portion of the LAX property, within an area well removed from existing noise-sensitive uses (e.g., residential, schools, churches, etc.). The nearest noise-sensitive land uses are the El Segundo residential neighborhood located 0.41 miles to the south, and the Westchester residential neighborhood located approximately 0.97 miles to the north. The Project site and adjacent area is currently subject to high ambient noise levels resulting from a combination of noise sources, including on-site construction staging activities, aircraft taxiing along Taxiway AA and other nearby taxiways, aircraft takeoffs and landings from the south airfield runways, and motor vehicle traffic along Pershing Drive, Imperial Highway and Westchester Parkway.

The proposed Project would generate construction noise associated with both on-site construction activities and the proposed relocation of existing on-site construction staging activities associated with other projects to an existing LAX construction staging area located along the south side of Westchester Parkway, immediately east of Pershing Drive and extending to Lincoln Boulevard. The proposed Project would also generate operational noise associated with the proposed Project, particularly aircraft engine run-ups at the proposed GRE.

Because the Project site is the location of existing construction staging activities, it is not anticipated that Project construction activities at the Project site would result in any substantial change in existing noise emanating from the Project site. Similarly, because the proposed Project would consolidate existing aircraft maintenance, washing, and engine testing operations at the Project site from other areas of the airport, and would not result in an increase airport employees, and because most Project employees already access the airport property from Pershing Drive and World Way West such that there would not be a major shift in airport employee traffic patterns under the proposed Project, the proposed Project noise sources (e.g., noise from relocated construction staging activities at the northerly construction staging area across the street from the Westchester neighborhood, and noise from on-site engine run-up and other maintenance activities), the proposed Project could potentially result in the: (1) exposure of persons to, or the generation of noise levels in excess of, applicable noise standards; (2) exposure of people to or generation of excessive groundborne vibration or groundborne noise levels (at the northerly construction staging area only); (3) a substantial temporary, periodic, and/or permanent increase in ambient noise levels in the Project vicinity above levels

existing without the proposed Project; and (4) exposure of people residing or working in the Project area to excessive noise levels. Therefore, these issues will be evaluated further in an EIR.

f. For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?

No Impact. As discussed under *Response No. XII.e* above, the Project site is located within an airport land use plan area and not within the vicinity of a private airstrip. Therefore, the proposed Project would not have the potential to expose people residing or working within the area of a private airstrip to excessive noise levels, and no mitigation measures are required.

XIII. POPULATION AND HOUSING.

Would the Project:

a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The proposed Project would provide an area with an aircraft parking apron for RON/RAD use, a GRE, aircraft maintenance hangar(s), an employee parking lot, and other facilities ancillary to aircraft maintenance. The proposed Project would consolidate existing aircraft washing and parking which currently occurs at other locations on the airport property. The proposed Project would not include the types of development (such as residential or business development) that often has associated with it large resident or employee populations. Also, the employees that would work at the Project site are existing airport employees that would move to the Project site from other areas of the airport property rather than represent new employees. The proposed Project would also not increase the passenger or cargo capacity of the airport as it would not include passenger or cargo gates or other passenger and cargo facilities, and would not extend roads or other infrastructure to un-served areas. Thus, the proposed Project would not induce substantial population growth in the area either directly or indirectly. Thus, the impact would be less than significant, and no mitigation measures are required.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

b-c. No Impact. The proposed Project is located within a public airport and accommodates existing construction staging activities; the proposed Project would not displace any existing housing or people, and would not necessitate the construction of replacement housing elsewhere. Thus, no impact would occur, and no mitigation measures are required.

XIV. PUBLIC SERVICES.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to

maintain acceptable service ratios, response times or other performance objectives for any of the public services?

a. Fire protection?

Less Than Significant Impact. The City of Los Angeles Fire Department (LAFD) provides fire protection services throughout LAX, including the Project site. Three LAFD fire stations are located on the LAX property (Fire Station Nos. 80, 51, and 95), with the new Fire Station No. 80 located less than one mile to the east of the Project site within the airfield. The proposed Project would consolidate aircraft parking and maintenance operations already occurring in other areas of the airport property. Also, while the proposed RON and RAD aprons and GRE would represent new facilities, they would be replacing existing structures and thus would not pose a substantial increase in fire risk or generate a substantial increase in demand for fire protection services. Furthermore, the Project includes a proposal for a fully integrated fire water pipe and hydrant system connecting to the existing LADWP 24-inch high-pressure water pipeline in Pershing Drive and meeting LAFD requirements, and LAWA has committed to developing a water storage tank on the Project would comply with all applicable LAWA, City, state, and federal fire codes and ordinances, including but not limited to the LAX Master Plan commitment identified below, which have been formulated to ensure that proper fire protection features, emergency access, fire flow, etc., are incorporated into the development:

- LAX Master Plan Commitment FP-1. LAFD Design Recommendations: During the design phase prior to initiating construction of a Master Plan component, LAWA will work with LAFD to prepare plans that contain the appropriate design features applicable to that component, such as those recommended by LAFD, and listed below:
 - Emergency Access. During Plot Plan development and the construction phase, LAWA will coordinate with LAFD to ensure that access points for off-airport LAFD personnel and apparatus are maintained and strategically located to support timely access. In addition, at least two different ingress/egress roads for each area, which will accommodate major fire apparatus and will provide for major evacuation during emergency situations, will be provided.
 - Fire Flow Requirements. Proposed Master Plan development will include improvements, as needed, to ensure that adequate fire flow is provided to all new facilities. The fire flow requirements for individual Master Plan improvements will be determined in conjunction with LAFD and will meet, or exceed, fire flow requirements in effect at the time.
 - Fire Hydrants. Adequate off-site public and on-site private fire hydrants may be required, based on determination by the LAFD upon review of proposed plot plans.
 - Street Dimensions. New development will conform to the standard street dimensions shown on the applicable City of Los Angeles Department of Public Works Standard Plan.
 - Road Turns. Standard cut-corners will be used on all proposed road turns.
 - Private Roadway Access. Private roadways that will be used for general access and fire lanes shall have at least 20 feet of vertical access. Private roadways will be built to City of Los Angeles standards to the satisfaction of the City Engineer and the LAFD.
 - Dead-End Streets. Where fire lanes or access roads are provided, dead-end streets will terminate in a cul-de-sac or other approved turning area. No fire lane shall be greater than 700 feet in length unless secondary access is provided.

- Fire Lanes. All new fire lanes will be at least 20 feet wide. Where a fire lane must accommodate a LAFD aerial ladder apparatus or where a fire hydrant is installed, the fire lane will be at least 28 feet wide.
- Building Setbacks. New buildings will be constructed no greater than 150 feet from the edge of the roadways of improved streets, access roads, or designated fire lanes.
- Building Heights. New buildings exceeding 28 feet in height may be required to provide additional LAFD access.
- Construction/Demolition Access. During demolition and construction activities, emergency access will remain unobstructed.
- Aircraft Fire Protection Systems. Effective fire protection systems will be provided to protect the areas beneath the wings and fuselage portions of large aircraft. This may be accomplished by incorporating foam-water deluge sprinkler systems with foam-producing and oscillating nozzle (per NFPA 409, aircraft hangars for design criteria).

Therefore, the proposed Project would not result in any substantial increase in demand for fire protection services that may result in the need for new or altered fire protection facilities. Accordingly, no significant impacts related to fire protection services are anticipated, and no mitigation measures are required.

b. Police protection?

Less Than Significant Impact. The Los Angeles World Airports Police Division (LAWAPD), the City of Los Angeles Police Department LAX Detail (LAPD LAX Detail), and the Los Angeles Police Department (LAPD) provide police protection services to LAX, including the Project site. The LAWAPD is located just east of the CTA and the LAPD LAX Detail station is also located on the east side of the airport. Demand for on-airport police protection services is typically determined by increases in aircraft activity and employees. As discussed in *Response No. XIII.a.* above, the proposed Project would not result in any increase in existing airport employment, and would not increase passenger or cargo capacity at LAX. Therefore, the proposed Project would not necessitate new or physically altered police protection facilities, the provision of which would result in substantial adverse physical impacts. Accordingly, no significant impacts related to police protection services are anticipated, and no mitigation measures are required.

c. Schools?

No Impact. As discussed in *Response No. XIII.a.* above, the proposed Project would not increase existing passenger or cargo capacity at the airport, would not result in an increase in existing airport employment, and would not include residential development. As a result, the proposed Project would not result in a substantial direct or indirect increase in demand for schools, the provision of which could result in substantial adverse physical impacts. Accordingly, no significant impacts related to school facilities or services are anticipated, and no mitigation measures are required.

d. Parks?

Less Than Significant Impact. As discussed in Response No. XIII.a. above, the proposed Project would not increase employment or existing passenger or cargo capacity at the airport, and would not include residential development. As a result, the proposed Project would not result in a substantial direct or indirect increase in demand for parks, the

provision of which could result in substantial adverse physical impacts. Accordingly, no significant impacts related to parks would occur, and no mitigation measures are required.

e. Other governmental services (including roads)?

Less Than Significant Impact. The proposed Project does not include residential development, and thus would not contribute to a direct increase in demand for other governmental services (e.g., libraries. or roadway capacity). Also, the proposed Project would not result in increases in passenger or cargo capacity at the airport, or result in an increase in airport employment. Therefore, the proposed Project would not induce substantial population growth in the area or indirectly result in a demand for other governmental services. No significant impacts to other governmental facilities would occur, and no mitigation measures are required.

XV. RECREATION.

- a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- **b.** Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

a-b. No Impact. As discussed in *Response No. XIII.a.* above, the proposed Project would not include residential development, increase passenger or cargo capacity, or increase employment at LAX. Therefore, the proposed Project would not result in an increase in demand for existing neighborhood and regional parks or other recreational facilities, and thus would not result in or contribute to substantial physical deterioration of park or recreational facilities. Furthermore, because the proposed Project does not include the construction of new recreational facilities or expansion of existing recreational facilities, no adverse physical effects associated with such development would occur. Based on the above, no impacts would occur, and no mitigation measures are required.

XVI. TRANSPORTATION/CIRCULATION.

Would the Project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- b. Conflict with an applicable congestion management program (CMP), including, but not limited to level of service standards (LOS) and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

a-b. Potentially Significant Impact. The Project site is located on the western side of the LAX airport property. Regional access is provided by Interstate 405 (I-405) and Interstate 105 (I-105), area access is by Pershing Drive via Imperial Highway and Westchester Parkway, and site access is from driveways along World Way West. Existing traffic on the western side of the airport is restricted largely to airport employee/delivery traffic and general traffic

between the west sides of the City of El Segundo and the community of Westchester/Playa del Rey. Airport travelers do not access LAX from the west. Existing traffic at the Project site is restricted to airport construction worker and airport construction vehicle traffic. Peak hour traffic conditions on the western side of the airport is currently uncongested (e.g., within acceptable levels of service).⁴⁶ Peak hour level of service at intersections on the eastern side of the airport is currently congested during peak hours.⁴⁷

The proposed Project would generate construction- and operations-related traffic. The proposed Project would not result in an increase in LAX flights, operations, or employees, and thus would not result in a net increase in operational airport traffic on the area's roadways and freeways. Therefore, the Project would not result in significant operational traffic, and no mitigation is required.

The proposed Project would include both on-site construction activities which would generate temporary traffic on the local roadways. In addition, the proposed relocation of existing on-site construction staging activities to an existing LAX construction staging area located in the northwest corner of the airport property would generate temporary traffic. It is thus conservatively assumed in this analysis that Project construction traffic could: (1) conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; and (2) conflict with an applicable CMP or other standards established by the county congestion management agency for designated roads or highways. Therefore, these issues will be evaluated further in an EIR, and a traffic study will be prepared.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?

No Impact. The proposed Project would provide an area for maintenance and parking of aircraft, but would not change air traffic patterns or increase air traffic levels. The Project would also include extension of Taxiway B into the Project site (designated on-site as Taxilane AA1) to provide aircraft with access to the proposed maintenance facilities, but this would not increase or change the location of air traffic patterns. Therefore, the proposed Project would not result in a change in air traffic patterns that could result in substantial safety risks, no significant impacts would occur, and no mitigation measures are required.

- d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e. Result in inadequate emergency access?
- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact: The proposed Project would not change existing road alignments or geometrics, would not include new public streets, and would not remove existing public streets. Furthermore, the proposed Project would not change existing bicycle or pedestrian facilities, and would not create new demand for bicycle, pedestrian, or transit facilities and services (given the lack of a net increase in airport employees under the Project). Therefore, the proposed project

⁴⁶ Ibid.

⁴⁷ Ibid.

would not: (1) substantially increase hazards due to a design feature; (2) result in inadequate emergency access; or (3) conflict with adopted polices, plans, programs regarding public transit, bicycle, pedestrian facilities, or otherwise decrease the performance or safety of such facilities. No impact would occur, and no mitigation measures are required.

XVII. UTILITIES.

Would the Project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB), or exceed wastewater conveyance capacity?

Less Than Significant. Sanitary wastewater generated by activities at LAX is treated at the Hyperion Treatment Plant (HTP) just to the southwest of LAX. The City of Los Angeles has an approved plan (Integrated Resources Plan or IRP) to accommodate future and cumulative wastewater treatment capacity, and is implementing the components that comprise its plan through the monitoring of triggers (i.e., population growth, regulatory changes, and other policy decisions) as part of their implementation strategy.⁴⁸ As discussed in *Response No. XIII.a.*, the proposed Project would not increase passenger or cargo capacity at LAX, would not include residential development, and would not increase airport employment. Also, while aircraft wash racks would be installed as part of the proposed Project, these racks would be largely relocated from other areas of the airport property, and water used at the racks would be collected and recycled (where not all existing LAX wash racks currently have recycling systems), both of which would serve to reduce the incremental increase in wash water entering the sewer system. Therefore, the proposed Project would not substantially increase wastewater generation, and thus would not have the potential to exceed the wastewater treatment requirements of the applicable RWQCB. Hence, no significant impacts with regard to wastewater generation and treatment would occur, and no mitigation measures are required.

The proposed Project would include bathrooms for on-site employees, and wash racks for the washing of aircraft. Flows from both of these sources would require conveyance by the local Los Angeles Bureau of Sanitation (LA BOS) sanitary sewer system. The employee bathroom would be connected to either the 8- or 10-inch sewer lines in World Way West, and the wash rack area would be connected to the existing 8-inch sewer line in Pershing Drive. The increase in wastewater flows to the existing sewer lines would be minimal given that Project employees and most of the wash racks would be relocated from other areas of the airport property, and given that the wash racks would be developed with a recycling system to minimize flows to the sewer system. Furthermore, the City's IRP would ensure the development of increased City wastewater treatment capacity, when required.⁴⁹ This is especially true of the City's regional trunk lines which feed into the HTP, including those which would be utilized by the proposed Project (Pershing main, etc.).⁵⁰ Therefore, a less than significant impact would occur, and no mitigation measures are required.

⁴⁸ City of Los Angeles, Final Environmental Impact Report for the LAX CUP Replacement Project, SCH #2009041043, Appendix A, Initial Study, page A-37, July 2009.

⁴⁹ Ibid.

⁵⁰ City of Los Angeles, Initial Study for the LAX CUP Replacement Project, SCH #2009041043, April 1, 2009.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. As discussed in *Response No. XIII.a.*, the proposed Project would not increase passenger or cargo capacity at LAX, and would not result in an increase in airport employees. Therefore, while the proposed Project would require water and sewer connections to the existing adjacent LADWP water and LA BOS sewer lines in World Way West and Pershing Drive, the proposed Project would not require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. No population-related impact to water or wastewater facilities would occur, and no mitigation measures are required.

The proposed Project would include wash racks for the washing of aircraft. While the washing of aircraft and associated water use already occurs on the airport property, some incremental increase in aircraft washing activities and associated water use could occur. However, because Project washing operations would represent a small incremental increase in airport-wide washing activities, if any, and would utilize recycled water, they would not create a substantial increase in demand for new or expanded domestic water treatment facilities. Therefore, no impacts would occur, and no mitigation measures are required.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Impact. The proposed Project would replace approximately 10 acres of impervious surfaces existing at the Project site with approximately 75 acres of impervious surfaces. This would increase the quantity of stormwater runoff generated within the Project site. To safely convey runoff from the Project site under the proposed Project, the following drainage improvements are proposed: (1) an on-site storm drainage system; (2) connection of this system to the existing storm drains in World Way West and Pershing Drive; (3) development of a small detention/infiltration basin in the southwest corner of the Project site (within an existing airport employee parking lot); and (4) the development of on-site water quality improvements (e.g., wash rack recycling system, oil-water separator, use of porous pavement or media filters, etc.) to reduce urban pollutants in Project stormwater runoff. As this Initial Study assumes and evaluates 100 percent development of the Project site, the environmental effects associated with the development of these improvements are already evaluated throughout this Initial Study, and no additional significant impacts would occur.

d. Have sufficient water supplies available to serve the Project from existing entitlements and resource, or are new or expanded entitlements needed?

Less Than Significant Impact. The LADWP is the water purveyor for LAX. LADWP is responsible for supplying, treating, and distributing water within the City. According to LADWP, it has met the immediate needs of its customers and is well positioned to continue to do so in the future.⁵¹ LAX is served by a 36-inch trunk line in Sepulveda Boulevard that distributes water to a combination of 12-inch and 16-inch transmission lines running along the airport perimeter and 8-inch and 10-inch transmission lines primarily along the perimeter of the airport terminals.

⁵¹ City of Los Angeles Department of Water and Power, Urban Water Management Plan, 2005.

The proposed Project would provide water line hook ups to airplanes parked on the proposed RON and RAD aprons, GRE and maintenance hangars, and to the proposed supporting office space within the hangars, with this water supplied via connection to the existing LADWP 12-inch high-pressure water line in Pershing Drive.

Because the majority of the proposed Project would involve the consolidation of existing LAX aircraft maintenance and washing operations at the Project site rather than represent new such uses, and because Project employees would be existing airport employees who relocate from other areas of the airport to the Project site, any incremental increase in water use associated with the proposed Project would be minimal, and would be accommodated by existing airport water entitlements. Also, the proposed wash racks would be designed to collect and re-use water, thereby reducing overall water consumption. Furthermore, the LADWP performed an evaluation of water availability for the LAX Master Plan in June 2003 (Water Supply Availability Assessment for the Los Angeles World Airport – LAX Master Plan project – Alternative D) and determined that adequate water supplies would be available to meet water demands under the Master Plan.⁵² Therefore, since the proposed Project would be generally consistent with the uses proposed within the Master Plan, it too would fall within the range of the UWMP. Therefore, no new or expanded water entitlements would be required, no significant impacts with respect to water supply would occur, and no mitigation measures are required.

e. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed in Response Nos. XVII.a. and b. above, the proposed Project would not result in a substantial increase in wastewater generation, and existing wastewater treatment facilities are adequate to serve the proposed Project. Therefore, impacts to wastewater treatment facilities would not be significant, and no mitigation measures are required.

f. Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?

g. Comply with federal, state, and local statutes and regulations related to solid waste?

f-g. Less Than Significant Impact. The proposed Project would result in the installation of paving on undeveloped land on a largely unpaved lot currently used for rock crushing and construction staging activities. The site contains apparatus, construction office trailers, construction machinery, and both debris and soil stockpiles. There are no existing structures to be demolished and a minimal amount of paving that would require removal. As such, only minimal construction waste would be generated as a result of construction activities. Existing contractor staging yards and associated equipment would be relocated to existing LAX staging areas located to the south of Westchester Parkway and west of Lincoln Boulevard. Stockpiled materials (consisting of uncharacterized soil and construction rubble) currently existing within and immediately adjacent to the Project site, would be re-used on-site as backfill material and/or exported off-site to permitted landfills. Under the proposed Project, it is anticipated the Project construction and operational waste would be disposed of at Sunshine Canyon Landfill (Class I/I, Kettleman City

⁵² City of Los Angeles, Los Angeles World Airports (LAWA), Final Environmental Impact Statement/Environmental Impact Report for the Los Angeles International Airport Proposed Master Plan Improvements, SCH # 1997061047, page 4-1503, April 2004.

174 miles from LAX). The County of Los Angeles currently has adequate inert (construction) waste capacity. The County's Annual Report on the Countywide Summary Plan and Siting Element estimated the total remaining permitted inert waste capacity in Los Angeles County to be approximately 60.2 million tons.⁵³ Therefore, there is anticipated to be no shortfall in disposal capacity for inert waste within the County. Furthermore, because the proposed Project would not increase passenger/gate capacity or increase flights/operations at the airport, it would not generate an incremental increase in solid waste generation. In addition, the LAX Master Plan EIR/EIS found that, with implementation of Master Plan Mitigation Measures HA-4 through -10 and Master Plan Commitments SW-1 through -3, the Master Plan would result in a less than significant solid waste impact. Since the activities associated with the proposed Project were anticipated in the LAX Master Plan, and would be subject to these same Master Plan mitigation measures and commitments, impacts would be less than significant. In addition, all waste disposal would occur in compliance with federal, state, City and LAWA statutes and regulations related to solid waste impacts due to new development at LAX are applicable to the proposed Project:

• LAX Master Plan Commitment SW-1. Implement an Enhanced Recycling Program: LAWA will enhance their existing recycling program, based on successful programs at other airports and similar facilities. Features of the enhanced recycling program will include: expansion of the existing terminal recycling program to all terminals, including new terminals; development of a recycling program at LAX Northside/Westchester Southside; lease provisions requiring that tenants meet specified diversion goals; and preference for recycled materials during procurement where, practical and appropriate.

Note: Subsequent to the approval of the LAX Master Plan, LAWA adopted the "LAWA Sustainable Airport Planning, Design and Construction Guidelines" for implementation on all airport projects. These Guidelines provide goals and performance standards for recycling of materials during both construction and operation of airport facilities in accordance with the provisions of Master Plan Commitment SW-1. LAWA has also implemented an enhanced recycling program at LAX as outlined in the "LAX Recycling Plan" which provides updated guidelines for recycling operations at LAX.

- LAX Master Plan Commitment SW-2. Requirements for the Use of Recycled Materials during Construction: LAWA will require, where feasible, that contractors use a specified minimum percentage of recycled materials during construction of LAX Master Plan improvements. The percentage of recycled materials required will be specified in the construction bid documents. Recycled materials may include, but are not limited to, asphalt, drywall, steel, aluminum, ceramic tile, cellulose insulation, and composite engineered wood products. The use of recycled materials in LAX Master Plan construction will help to reduce the project's reliance upon virgin materials and support the recycled materials market, decreasing the quantity of solid waste requiring disposal.
- LAX Master Plan Commitment SW-3. Requirements for the Recycling of Construction and Demolition Waste: LAWA will require that contractors recycle a specified minimum percentage of waste materials generated during demolition and construction. The percentage of waste materials required to be recycled will be specified in the construction bid documents. Waste materials to be recycled may include, but are not limited to, asphalt, concrete, drywall, steel, aluminum, ceramic tile, and architectural details.

⁵³ County of Los Angeles, Department of Public Works, Annual Report on the 2010 Countywide Integrated Waste Management Plan, October, 2011.

Given the above, the impact would be less than significant.

Under the proposed Project, an existing on-site stockpile partially contaminated with hydrocarbons may require remediation and would either be reused on-site as backfill material or exported to a landfill licensed to accept such waste. As indicated in *Response VIII.a,b,d,e,g*, this issue will be evaluated further in the Hazards/Hazardous Materials section of the EIR.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Impact. The proposed Project is located on a highly disturbed site within a developed airport. There are no listed endangered, threatened or special status species, riparian/wetland areas, trees, or wildlife movement corridors known to occur at the Project site, and fairy shrimp cysts, which were documented on the Project site and at other locations within the airport property in the past, have been removed and relocated from the Project site (see *Response Nos. IV.a-f, e*). Furthermore, the proposed Project would not result in significant indirect impacts (e.g., dust, light/glare and noise impacts) on the El Segundo Blue Butterfly given a suite of applicable LAX Master Plan mitigation measures and other factors (see *Response Nos IV.a-f, e*). Therefore, the proposed Project would not have the potential to result in significant biological resources impacts, and no mitigation measures are required.

As discussed under *Response V.a*, historical surveys previously conducted of the airport property have not identified any historic resources on the Project site, and there are no buildings on the Project site and thus no potential for the presence of historical resources on-site. Therefore, no impact would occur to historic resources, and no mitigation measures are required.

There are no known archaeological or paleontological resources located on the Project site, and the disturbed nature of the site make the site's sensitivity to such resources low. Nonetheless, as discussed under *Response Nos. V.b-d*, archaeological and paleontological resources have been found at other locations within the airport property, and the potential exists for the destruction of buried archaeological or paleontological resources at the Project site during construction, if such resources are present. Still, with the implementation of the mitigation measures identified in *Response Nos. V.b-d*, potential impacts to archaeological and paleontological resources would be less than significant.

b. Does the Project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects and the effects of probable future Projects).

Potentially Significant Impact. As indicated in the previous responses in this Initial Study, the proposed Project would have the potential to result in potentially significant impacts in the areas of air quality, GHGs, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, and transportation. In order to provide a conservative analysis, this Initial Study assumes that the proposed Project could have impacts which are individually

limited but cumulatively considerable in each of these issue areas. Therefore, the cumulative impacts in terms of each of these impact areas will be evaluated in an EIR. For the other environmental issues, the proposed Project would be located too far away from sensitive uses, and/or result in such minor impacts, that it would not have the potential to generate cumulatively considerable impacts in combination with the limited number of other past, current or probable future projects in the vicinity of the Project site.

c. Does the Project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impacts. Implementation of the proposed Project may result in adverse environmental effects in terms of the environmental issues listed under *Response No. XVIII.b* above which could potentially result in substantial adverse effects on human beings. The potential for the proposed Project to result in such impacts will be evaluated further in an EIR. For the other environmental issues, the proposed Project would be located too far away from sensitive uses, and/or result in such minor impacts, that it would not have the potential to generate environmental effects which could cause substantial adverse effects on human beings, either directly or indirectly.

4. REFERENCES

- California Department of Toxic Substances Control, EnviroStor Database, http://www.envirostor.dtsc.ca.gov, accessed by PCR on May 31, 2012.California Public Resources Code, §2690-2699.6 (Seismic Hazards Mapping Act).
- California Regional Water Quality Control Board, Los Angeles Region 4, <u>Water Quality Control Plan, Los Angeles</u> <u>Region – Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties</u>, June 13, 1994.
- City of Los Angeles Department of Water and Power, Urban Water Management Plan, 2005.
- City of Los Angeles Planning Department, <u>Safety Element of the City of Los Angeles General Plan, Exhibit C,</u> <u>Landslide Inventory & Hillside Areas In the City of Los Angeles, June 1994.</u>
- City of Los Angeles Planning Department, <u>Safety Element of the City of Los Angeles General Plan, Exhibit D,</u> <u>Selected Wildfire Hazard Areas in the City of Los Angeles</u>, April 1996.
- City of Los Angeles Planning Department, <u>Safety Element of the City of Los Angeles General Plan, Exhibit G,</u> <u>Inundation & Tsunami Hazard Areas in the City of Los Angeles</u>, March 1994.
- City of Los Angeles Planning Department, <u>Safety Element of the City of Los Angeles General Plan, Exhibit E, Oil</u> <u>Field & Oil Drilling Areas in the City of Los Angeles</u>, May 1994.
- City of Los Angeles Planning Department, <u>Transportation Element of the Los Angeles City General Plan</u>, September 1999.
- City of Los Angeles, Los Angeles World Airports (LAWA), <u>Draft Environmental Impact Report for the LAX Bradley</u> <u>West Project, SCH #2008121080</u>, May 2009.
- City of Los Angeles, Los Angeles World Airports (LAWA), <u>Final Environmental Impact Report for the LAX Bradley</u> <u>West Project, SCH #2008121080</u>, September 2009.
- City of Los Angeles, Los Angeles World Airports (LAWA), <u>Initial Study for the LAX CUP Replacement Project, SCH</u> <u>#2009041043</u>, April 1, 2009.
- City of Los Angeles, Los Angeles World Airports (LAWA), <u>Final Environmental Impact Report for the LAX CUP</u> <u>Replacement Project, SCH #2009041043</u>, July 2009.
- City of Los Angeles, Los Angeles World Airports (LAWA), <u>Final Environmental Impact Statement/Environmental</u> <u>Impact Report, Los Angeles International Airport Proposed Master Plan Improvements</u>, April 2004.

- City of Los Angeles, Los Angeles World Airports (LAWA), <u>Los Angeles International Airport (LAX) Street Frontage</u> <u>& Landscape Development Plan Update</u>, March 2005
- City of Los Angeles, <u>West Maintenance Area Drainage Design Report</u>, prepared for Los Angeles World Airports by Atkins, April 13, 2012.
- County of Los Angeles, <u>Department of Public Works</u>, <u>Annual Report on the 2010 Countywide Integrated Waste</u> <u>Management Plan</u>, October 2011. Glen Lukos & Associates, <u>Biological Resources Technical Report for the</u> <u>LAX Specific Plan Amendment Study</u>, May, 2012.
- PCR Services Corporation, <u>Cultural Resources Assessment for Southwest Remain Overnight Apron Project</u> at Los Angeles International Airport; City of Los Angeles, California. Prepared for the Federal Aviation Administration and Camp Dresser and McKee, Inc., August 2011.
- Sapphos Environmental, Inc. <u>Documentation of Salvage and Storage of Riverside Fairy Shrimp Cyst-Bearing Soil in</u> <u>Support of the April 20, 2004 Biological Opinion for Alternative D and the April 8, 2005 Biological Opinion</u> <u>for Operations and Maintenance.</u> 2005

Santa Monica Bay Restoration Commission, Santa Monica Bay Restoration Plan, 2008.

State Water Resources Control Board, GeoTracker System, http://geotracker.waterboards.ca.gov, Accessed by PCR on May 31, 2012.

5. PREPARERS AND PERSONS CONTACTED

LEAD AGENCY

City of Los Angeles Los Angeles World Airports One World Way, Room 218 Los Angeles, CA 90045

Herb Glasgow, Chief of Airport Planning (Project Manager)

Lisa Trifiletti, Assistant Project Manager

Evelyn Quintanilla, City Planner

INITIAL STUDY PREPARATION

PCR Services Corporation (Sub consultant to Tetra Tech)

233 Wilshire Boulevard, Suite 130 Santa Monica, CA 90401

Jay Ziff, Principal and Project Manager

Heidi Rous, Director/Principal, Air Quality, Climate & Acoustic Services

Jessie Barkley, Senior Planner and Assistant Project Manager

Robert Hilman, Senior Planner

Denise Kaneshiro, Graphic Designer

Tetra Tech (General Contractor)

3475 E. Foothill Blvd. Pasadena, CA 91107

Salar D. Niku, Ph.D., PE, Program Manager