Statement of Overriding Considerations

Los Angeles World Airports (LAWA) published the program-level Final Environmental Impact Report (EIR) on the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS) on January 25, 2013. Section 7.H of the LAX Specific Plan requires that, prior to implementation, certain elements of the LAX Master Plan designated as "Yellow Light Projects" be re-evaluated to determine whether alternative means are available to solve the problems that those projects were designed to address. The "Yellow Light Projects" include:

- The Ground Transportation Center (GTC), including the baggage tunnel, associated structures, and equipment;
- Automated People Mover (APM) 2 from the GTC to the Central Terminal Area (CTA), including its stations and related facilities and equipment;
- Demolition of Central Terminal Area Terminals 1, 2, and 3;
- North Runway re-configuration as contemplated in the LAX Master Plan, including center taxiways; and
- On-site road improvements associated with development of the GTC and construction of APM2.

As required by the LAX Master Plan Stipulated Settlement, the SPAS, consistent with previous local and federal approvals, identifies Specific Plan Amendments that plan for modernizing and improving LAX in a manner that is designed for a practical capacity of 78.9 Million Annual Passengers (MAP) while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA. The SPAS focuses on:

1. Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems the Yellow Light Projects were designed to address, consistent with a practical capacity of LAX at 78.9 MAP.
2. Security, traffic, and aviation activity of such designs, technologies, and configurations for the Alternative projects.
3. Potential environmental impacts that could result by replacing the Yellow Light Projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR.

The LAX SPAS Final EIR (State Clearinghouse No. 1997061047) addresses the environmental impacts associated with improvements studied under the LAX SPAS and, at a program level, focuses on significant environmental effects of the studied alternatives. Chapter 2 in Part II of the LAX SPAS FEIR identifies each of the significant adverse environmental impacts associated with the Staff-Recommended Alternative. However, as indicated in the LAX SPAS Draft EIR, most of the significant and unavoidable impacts are caused by the anticipated growth in passenger activity and non-airport-related regional development, which would occur even if none of the SPAS Alternatives, including the LAWA Staff-Recommended Alternative, were implemented. In fact, the implementation of the existing LAX Master Plan Yellow Light Projects[1] would be the most impactful development because of the extraordinary construction-related impacts and the resulting inefficiencies introduced by the resulting imbalance in airfield use. While the EIR identifies mitigations to avoid or reduce many of the significant impacts to below the level of significance, numerous significant impacts cannot be reduced below the level of significance, despite implementation of all feasible mitigations.

[1] Studied as Alternative 3 in the SPAS EIR.

CEQA Guidelines Section 15093(b) provides that when a public agency approves a project that will result in significant impacts that are identified in the Final EIR and are unable to be avoided or substantially lessened, the agency must state in writing the specific reasons to support its decision based on the Final EIR and/or other information in the administrative record. If the specific economic, legal, social, technological or other benefits of a proposed project outweigh its unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." (CEQA Guidelines Section 15093(a).) LAWA, as the Lead Agency for the LAX SPAS EIR, adopts the following Statement of Overriding Considerations.

Based on substantial evidence in the administrative record for the LAX SPAS, the Board of Airport Commissioners (BOAC) hereby finds, concludes, and determines that the unavoidable significant adverse environmental impacts of the LAWA Staff-Recommended Alternative are acceptable in light of the following specific safety, environmental, economic, legal, social, technological, or other project benefits.

Each benefit described below contains an overriding consideration warranting approval of the LAX SPAS Staff-Recommended Alternative independent of other benefits, despite each and every significant unavoidable impact.

A. Enhanced Airfield Safety and Efficiency Associated with the Reconfiguration of the North Airfield

The existing runways and taxiways on the north airfield at LAX were designed and constructed in the 1960s, when the commercial aircraft fleet was substantially smaller and lighter than the fleet serving the airport today and anticipated in the future. As a result, the existing north airfield has a number of deficiencies that impact the safety and operational efficiency of the airfield, which include, but are not limited to:

- The north airfield does not meet FAA design standards for the largest aircraft types currently in service, including Aircraft Design Group (ADG) V and VI aircraft.
- Managing aircraft activity on the north airfield requires non-standard operating procedures, which require special handling by both FAA Air Traffic Control and LAX Operations that are not optimal for safety and increase aircraft delay.
- The primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g. fully-loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, yielding less efficient operations, additional airlines costs, and disproportionate environmental impacts.
- The outdated design creates a situation where aircraft are at an increased risk for airfield hazards. Those hazards include potential collisions with other aircraft, such as when a landing aircraft might move in the path of a departing aircraft (incursion). Other potential hazards include, but are not limited to, insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways. Such hazards contribute to potential conflicts between taxiing aircraft and ground vehicles on runways, taxiways, and nearby service roads.
- Three of the four runway ends on the north airfield configuration do not comply with FAA Runway Safety Area (RSA) requirements leaving insufficient space to mitigate the dangers of aircraft excursions (i.e. overruns).
- The north airfield high-speed taxiways are not in compliance with FAA Engineering Brief No. 75 which requires high-speed taxiways to be in the last one-third of the runway length.
- The north airfield does not provide sufficient areas at the end of the runways to hold arriving flights and efficiently sequence departing aircraft.

- The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

The SPAS LAWA Staff-Recommended Alternative includes a series of modifications to the north airfield complex, including the runways, the taxiway system, navigational aids, and service roads to address each of the problems identified above. Those modifications include:

- Increasing the distance of separation between runways and taxiways, including a shift of Runway 6L/24R 260 feet north. These distances largely determine the types of aircraft that can freely operate on the system without operational restrictions and special handling.
- Installing a center taxiway between the runways and modifying exit taxiways in order to increase pilot situational awareness and reduce incursion risk.
- Extending Runway 6R/24L by 1,250 feet east to better accommodate fully loaded aircraft that would otherwise have to taxi to the south airfield to depart.
- Displacing the threshold on Runway 6L/24R 604 feet to the west to relocate the Runway Protection Zone away from residential uses.
- Implementing a combination of runway extensions, declared distances, and displaced thresholds in order to meet federal RSA requirements.
- Demolishing or relocating current terminal and airport-support facilities, and modifying and lengthening taxiways to the full length of Runway 6R/24L.

Once implemented, the LAWA Staff-Recommended Alternative would accomplish the following:

- Be consistent with FAA design standards for all aircraft currently serving LAX, with the exception of ADG VI aircraft when visibility is less than ½ mile;
- Significantly reduce existing operational restrictions required on the north airfield, resulting in an improvement in airfield efficiency and level of service;
- Reduce the potential for airfield hazards and enhance overall safety, through modifications in the location and geometry of runways, taxiways, taxilanes, and service roads;
- Accommodate a larger percentage of departing aircraft by extending the primary departure runway (6R/24L), thereby increasing airfield efficiency at LAX;
- Provide a runway-length taxiway and taxilane, to provide additional areas to hold and sequence arriving and departing aircraft; and
- Eliminate the Runway Protection Zone overlay on residential uses.

The SPAS Staff-Recommended Alternative addresses key planning objectives related to airfield safety and efficiency. Critically for LAX, the combination of improvements provided would result in a north airfield configuration that would permit 99.87% of all aircraft operations forecasted to serve LAX in 2025[2] to be managed in a standard manner, free of restrictions and workarounds that complicate efforts to provide a safe and efficient airfield.

The LAWA Staff-Recommended Alternative also provides a key safety enhancement not present on today's airfield, a centerline taxiway that provides additional distance and geometry that is designed to reduce the chances of pilots blundering into an active runway. As documented in Section 4.7.2 of the SPAS Draft EIR, this centerline taxiway has been acknowledged in each safety study of the north airfield, and by the FAA, as enhancing airfield safety. In addition, the LAWA Staff-Recommended Alternative includes exit taxiways with improved geometry, giving almost all arriving pilots line of sight to the end of Runway 6R/24L when positioned to cross that runway. This direct line of sight provides an improvement to situational awareness to pilots not

[2] See Appendix F-1 of the LAX SPAS Report.

reliant on developing technology. Further discussion of the safety features present in the LAWA Staff-Recommended Alternative can be found on Chapter 4.7.2.10 and Table 4.7.2-16 of the SPAS Draft EIR.

The efficiency improvements outlined above actually reduce aircraft-related operational emissions compared to those emissions that would occur if the north airfield remained as it is today[3] or if the north airfield were reconfigured as proposed in the LAX Master Plan[4]. As stated in Chapter 1.4 of the SPAS Draft EIR, all SPAS airfield and terminal alternatives are associated with significant and unavoidable operational-related SOx, PM10, and PM2.5 emissions. However, implementing the LAWA Staff-Recommended Alternative would result in a 1.1% decrease in SOx, and a .6% decrease in both PM10 and PM2.5 when compared to a scenario without airfield reconfiguration[5], and even greater reductions when compared to implementing the airfield configuration included in the LAX Master Plan[6].

Additionally, implementing the Staff-Recommended Alternative would reduce the number of people and dwellings that would be newly exposed to significant levels of aircraft noise compared to those that would be exposed if the north airfield remains as it is today[7]. Chapter 4.10.1 of the SPAS Draft EIR analyzes and identifies significant aviation noise impacts for each of the SPAS Alternatives, and Section 2.3.10.1 of the SPAS Final EIR specifically identifies the significant aviation noise impacts of the LAWA Staff-Recommended Alternative. While these impacts are primarily related to the expected increase in aircraft operations that would occur regardless of airfield reconfiguration, in accordance with federal regulation and state law, the EIR quantified these impacts by projecting $\geq$65CNEL noise contours on existing surrounding land uses and populations. The projected contours for the LAWA Staff-Recommended Alternative identify the number of newly impacted dwellings to be reduced by 233, and the number of newly impacted people reduced by 1244 compared to a scenario in 2025 that does not include a reconfigured airfield. In fact, leaving the north airfield in its existing operational configuration would result in the highest number of people being newly exposed to significant levels of aircraft noise of all of the SPAS Alternatives[8].

B. Improved Accommodation of Airport-Related Traffic, Especially as it Relates to the Central Terminal Area (CTA)

Because the majority of LAX passengers are origin and destination passengers, i.e., their journey begins and/or ends at LAX, an efficient ground transportation system remains an important part of the airport environment. Today, travelers, visitors, employees, vendors, and others seeking access to passenger terminals in the CTA generally gain access using the existing roadway and curbside system. Currently, a system of existing roadways provides access to the airport, where, upon arrival into the CTA, traffic is split into either the upper roadway system (for departures) or the lower roadway system (for arrivals). Certain commercial vehicles that serve the airport, including most LAX shuttles, circulate on both levels and travel in mixed flow on surface streets to provide access to airport-serving facilities outside of the CTA.

The existing system poses a number of concerns relative to traffic flows, including, but not limited to:

[3] Studied as Alternative 4 in the LAX SPAS EIR.
[4] Studied as Alternative 3 in the LAX SPAS EIR.
[5] Studied as Alternative 4 in the LAX SPAS EIR.
[6] Studied as Alternative 3 in the LAX SPAS EIR.
[7] Studied as Alternative 4 in the LAX SPAS EIR.
[8] See Table 4.10.1-55 of the LAX SPAS Draft EIR.

- The CTA roadway system design currently creates queuing, weaving, and conflict points at various locations that impede traffic flow;
- During peak travel times, inbound airport traffic currently extends out of the CTA roadways onto public streets and may worsen as airport activity returns and grows;
- Curbside demand is unevenly distributed, especially during peak periods, creating concentrations of passengers who are not accommodated by the existing curbside system;
- As cumulative regional traffic increases, there will be less time certainty for airport users without easy access to the airport from the regional transit system; and
- The roadway system is not designed to efficiently accommodate security screening of vehicles entering the CTA.

The LAX SPAS LAWA Staff-Recommended Alternative seeks to address these problems through changes in the roadway network, curbside, and by modifying existing facilities and implementing new airport facilities outside of the CTA. In summary, these changes include:

- Modifying Sky Way, a primary entry point into the CTA, for traffic coming from the north of the airport designed to disperse an existing conflict point in the vicinity of Terminal 1;
- Constructing an Intermodal Transportation Facility (ITF) in the vicinity of Lot C, designed to serve as a new remote access point to LAX, by providing remote passenger pick-up and drop-off capability, and access to other intermodal uses including public and private transit;
- Relocating long-term passenger and employee parking in the Vicinity of Lot C and Manchester Square;
- Developing a Consolidated Rental Car Facility (CONRAC) in Manchester Square; and
- Developing an Automated People Mover (APM) that would circulate passengers between the CTA, transit facilities, and the aforementioned airport facilities outside of the CTA.

The LAX SPAS Staff-Recommended Alternative is expected to provide LAWA with additional flexibility as it seeks to improve the performance of the ground transportation system. In particular, the LAX SPAS Staff-Recommended Alternative would accomplish:

- Improved roadway segments that reduce bottlenecks and eliminate weaving near the entryway to the CTA;
- A reduction in the volume of vehicles accessing the CTA by providing alternative facilities outside of the CTA for passenger pick-up and drop-off and access to commercial vehicles;
- A reliable, grade-separated APM that connects the CTA, transit facilities, and airport facilities outside of the CTA; and
- The integration of the airport facilities with the nearby public transit facilities, including the recently approved Metro Crenshaw/LAX Corridor Metrorail system.

With the construction of new facilities and associated operational changes included in the LAX SPAS Staff-Recommended Alternative, the total number of vehicles entering the CTA and using the CTA roadway network and curbside would decrease by over 340 vehicles in the peak hour, a reduction of over 5% of total vehicle trips entering the CTA when compared to the "no development" Alternative[9]. At the same time, the eventual placement of rental car users on the APM system will allow LAWA to reassign over 1000 feet of dedicated curb in the CTA to other uses, thereby diffusing some of the curbside demand that can reduce the level of service on the roadway and curb systems. Together, these changes should improve the overall performance and passenger level of service of the CTA, especially in peak hours.

[9] Studied as Alternative 4 in the SPAS EIR.

Additionally, the LAX SPAS Staff-Recommended Alternative will provide an improved connection for airport users seeking to access the airport through private or public transit, including those seeking to connect to shared ride vans, long distance shuttles, or Metro. The grade-separated circulator system will provide a reliable and effective service between airport and Metro facilities, removing perceived barriers to the airport for potential transit riders.

C. Maintain LAX's Position as a Premier International Gateway

LAX already serves as a fundamental underpinning in the region's economy. Central to that economic importance is LAX's position as the international gateway to the western United States. According to a study completed in 2007 by the Los Angeles Economic Development Corporation (LAEDC)[10], over the course of 2006 an average transoceanic flight traveling round-trip to LAX everyday added $623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with $156 million in wages. Given the continued growth in, and reliance on, new large aircraft, such as the Boeing 747, 777 and the Airbus A380 by major airlines operating on those long-distance international routes, LAX must be able to effectively accommodate those aircraft, both on the airfield and within the terminals, to maintain the significant regional economic benefits LAX provides and leverages.

As noted above, the LAX SPAS LAWA Staff-Recommended Alternative provides for modifications on the north airfield that will more safely and efficiently accommodate these large aircraft. These are especially important in light of the deficiencies on LAX's south airfield complex, where taxiway, taxilane, and runway separation limitations result in operational challenges to accommodating ADG V and VI aircraft. According to the SPAS projected aircraft fleet mix detailed in Appendix F-1 of the Preliminary SPAS Report, almost half of all international flight operations will be either ADG V or VI aircraft. For LAX to remain a premier international gateway, it must have the ability to safely and efficiently accommodate these critical segments of the international fleet.

In addition, by relocating the effective Airport Parking Limit Line (APLL) to the north, the LAWA Staff-Recommended Alternative provides for approximately 916,200 square feet of new or redeveloped terminal area that could be used to provide passenger processing and modern amenities expected by international passengers at premier airports. These terminal improvements are vital to ensure that LAX maintains its position as a premier international gateway.

D. Promote Job Creation

Operating and continuing to develop LAX will provide increased employment benefits to the Los Angeles region. According to a 2012 Report by the Los Angeles Economic Development Corporation (LAEDC)[11] that examined the economic contributions of LAX in 2011, the economic activity at LAX, including both capital spending and visitor spending, can be credited with generating 294,400 jobs in Los Angeles County with a labor income of $13.6 billion.

That same study also estimated if LAWA were to undertake $8.5 billion in future capital projects, such as some of the projects contemplated in SPAS, it could generate an additional 90,500 job-years in Los Angeles County with a labor income of $5.6 billion throughout the course of capital development. While there are many projects, independent of SPAS and documented as cumulative projects in the SPAS Draft EIR (such as the Midfield Satellite Concourse), that could

[10] Entitled "The Economic Activity Dependent on Overseas Flights at LAX", available online at: http://www.laedc.org/reports/LAXEconomicImpactofOverseasFlights.pdf

lead to substantial capital development, selecting and implementing the LAX SPAS LAWA Staff-Recommended Alternative would generate a sizable portion of that $8.5 billion.

According to the Rough Order of Magnitude (ROM) cost estimates provided in Chapter 8 of the LAX Preliminary SPAS Report, the LAWA Staff-Recommended Alternative, as a combination of Alternatives 1 and 9, would result in more than $4.7 billion in capital costs. That represents more than half of the future capital investment studied by the LAEDC. In addition, the ROM cost estimate does not include the permanent jobs that would be created to operate the new facilities included in the Staff-Recommended Alternative (such as Terminal 0, and the Intermodal Transportation Facility), or the substantial traffic, noise, and other mitigations that are required to implement any Alternative. Both the operational expenditures and the financing of mitigations will lead to further local investments, and therefore jobs, in the region.

In addition, through continued operation of LAX Master Plan Commitment EJ-3, Job Outreach Center, LAWA will continue to make special efforts to encourage minority, women-owned, and disadvantaged business enterprise subcontractors and historically underrepresented and at-risk local residents from areas surrounding LAX to be placed in SPAS-related projects.

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[11] Entitled "Los Angeles International Airport in 2011 – Economic Impact Analysis", available at http://www.lawa.org//uploadedFiles/LAWA/pdf/2012-LAX-LAEDC%20report.pdf.