6 ALTERNATIVES

6.1 Introduction

The State CEQA Guidelines (Section 15126.6[a]) requires that an EIR describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed project and provides an analysis of each alternative and a comparison of each alternative to the proposed Project. Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below. [1]

- The discussion of alternatives shall focus on alternatives to the project including alternative locations that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The No Project Alternative shall be evaluated along with its potential impacts. The No Project Alternative analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason." Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and, therefore, merit in-depth consideration.[2] Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet project objectives, are infeasible, or do not avoid any significant environmental effects.[3]

[1] The CEQA guidelines regarding the consideration and discussion of alternatives to a proposed project, as summarized here, are found in Section 15126.6 of the CEQA Guidelines.

[2] CEQA Guidelines, §15126.6(f)(3).
[3] CEQA Guidelines, §15126.6(c).

6.2 Project-Level Impacts

As addressed in this Draft EIR, the proposed Project would create unavoidable significant impacts related to the following environmental topics:

- Air Quality
- Noise (short-term, construction related)
- Transportation

Other potentially significant impacts have been identified; however, all of these impacts would be reduced to less-than-significant levels with implementation of the mitigation measures identified in the respective impact analysis sections of this EIR.

6.3 Project Objectives

As called for by the CEQA Guidelines, the achievement of project objectives must be balanced by the ability of an alternative to reduce the significant impacts of the project. Objectives of the proposed Project include:

Economic Development

- Enable Project site development with financially viable uses in compliance with applicable LAWA and FAA requirements.
- Ensure that Project site development achieves fair market value.
- Develop a new vibrant, sustainable center of employment, retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses.
- Revitalize the Project site by permitting a variety of uses that reflect and can adapt to current and future market demands.
- Provide space for new industries within a campus-like office environment that can accommodate a variety of users.
- Protect private investment, both existing and future, by assuring compatibility among adjacent developments and avoiding future conflicts.
- Enable the development of complementary and synergistic uses that create a critical mass to support economic vitality in the Project site and surrounding communities.

Community Compatibility, Urban Design Guidelines, and Sustainability

- Establish an appropriate scale for development.
- Provide a buffer consisting of airport-compatible uses and landscape areas between LAX operations to the south and existing residences to the north.
- Create a development program that is consistent with the LAX Plan and LAX Specific Plan.
- Create an environmentally sound development that reduces environmental impacts through a comprehensive program of sustainability guidelines consistent with existing LAWA standards.
- Establish development guidelines that are flexible yet reflect the latest best-practices in urban design and sustainability, including the promotion of native landscape strategies, and comply with established FAA airport safety regulations.
- Provide viable transportation options and connections.

- Create new development that is compatible with LAX operations and other LAWA projects.
- Reflect current community and stakeholder interests for additional open space, research and development, recreation, security, community-serving uses, and economic development.
- Ensure that new development enhances neighboring communities through additional landscaping, public facilities, open space, and pedestrian and bicycle amenities.
- Minimize parking and traffic impacts on neighboring residential communities.

Approval Process

- Establish an overall framework of land uses and development standards that can be applied within the Project area over time.
- Provide LAWA with a basis for reviewing and coordinating project development plans.
- Establish a high level of design standards and a method for reviewing projects for conformance with those standards.
- Streamline the approval process, and provide certainty and consistency for future developments.

Any evaluated alternative should meet as many of these proposed Project objectives as possible. In addition, while not specifically required under CEQA, other parameters may be used to further establish criteria for selecting alternatives such as adjustments to proposed Project phasing, conformance to all existing zoning requirements, and other "fine-tuning" that could shape feasible alternatives in a manner that may result in reducing identified environmental impacts. In some instances, when the proposed Project results in environmental impacts that are reduced to less-than-significant levels with mitigation, an alternative may reduce these less-than-significant impacts even further.

6.4 Alternatives Considered but Dismissed

Where a potential alternative was examined but not chosen as one of the range of alternatives, the CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed. The following alternatives to the proposed Project were considered but dismissed:

- Open Space Alternative: The Open Space Alternative would prevent any future development of the Project site. All currently undeveloped areas would remain as such. This alternative was dismissed because it does not meet the project objectives of achieving fair market value for the Project site.
- Big Box Retail Alternative: The Big Box Retail Alternative changesthe allowable uses to include a conference center, hotel, and big-box retail. Although there is market demand for such uses, this alternative was dismissed because it does not meet the project objectives of additional open space, recreation, and community-serving uses. Additionally, the Big Box Retail Alternative would generally not achieve the proposed Project's objectives related to pedestrian-orientation and context-sensitive design.
- Parking Alternative: The Parking Alternative would allow the Project site to be used for paid parking lots for airport users and visitors. This alternative was dismissed because it does not meet the project objectives of additional open space, recreation, and community-serving uses.
- Alternative Locations: CEQA requires that locations that would avoid or substantially lessen any of the significant effects of the project be considered by lead agencies. LAX is currently

surrounded by developed, urban areas. LAWA cannot reasonably acquire, control or otherwise have access to alternative sites adjacent to LAX that can achieve the proposed Project objectives. This alternative was dismissed because there are no feasible alternative locations that could be acquired that would achieve the proposed Project objective of creating a compatible land use buffer between the Airport and residential communities to the north.

6.5 Alternatives to the Proposed Project

The CEQA statute, the CEQA Guidelines, and related recent court cases do not specify a precise number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice."[4] At the same time, Section 15126.6(b) of the CEQA Guidelines requires that "...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project" and Section 15126.6(f) requires, "The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project."

Accordingly, alternatives that would not address potentially significant effects are not considered herein. However, the CEQA Guidelines require that a "No Project" alternative must be included and, if appropriate, an alternative site location should be analyzed.[5] Other Project alternatives may involve a modification of the proposed land uses, density, or other Project elements at the same project location.

Alternatives should be selected on the basis of their ability to attain all or most of the basic objectives of the project while reducing the project's significant environmental effects. The CEQA Guidelines state that "...[t]he EIR should briefly describe the rationale for selecting alternatives to be discussed [and]...shall include sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project."[6]

The feasibility of the alternatives is another consideration in the selection of alternatives. The CEQA Guidelines state that "[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations [and] jurisdictional boundaries..."[7] and also that "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."[8] Alternatives that are considered remote or speculative, or whose effects cannot be reasonably predicted do not require consideration. Therefore, feasibility, the potential to mitigate significant project-related impacts, and reasonably informing the decision-maker are the primary considerations in the selection and evaluation of alternatives.

6.5.1 No Project-Existing Conditions Alternative

The No Project Alternative (Alternative 1) is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project

[4] CEQA Guidelines, § 15126.6(f).
[5] CEQA Guidelines, §§ 15126.6(e), 15126(f)(2)
[6] CEQA Guidelines, §§ 15126.6(e), 15126(f).
[7] CEQA Guidelines, § 15126.6(f)(1)
[8] CEQA Guidelines, § 15126.6(f).

Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative-Existing Conditions for the LAX Northside Plan Update includes the existing development at the site at the time of the Notice of Preparation (April 2012).

6.5.2 No Project-Planned Development Alternative

The No Project-Planned Development Alternative (Alternative 2) includes what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services. "No project" does not mean that development on the project site will be prohibited. The No Project Alternative includes "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (CEQA Section 15126.6 [e][2]). The No Project Alternative-Planned Development includes development that would be foreseeable in the future according to the adopted LAX Specific Plan. The No Project-Planned Development Alternative would permit up to 4,500,000 square feet at the Project site, and would cap vehicle trips to 3,922 in the a.m. peak hour and 4,421 in the p.m. peak hour.

6.5.3 Reduced Density Alternative

The goal of Alternative 3 is to reduce one or more of the significant quantitative-based impacts of the project (e.g., traffic, air quality, noise). For the LAX Northside Plan Update, the Reduced Density Alternative is a development program that reduces the density of the proposed Project build-out by approximately a third.

6.5.4 Reduced Retail Alternative

The goal of Alternative 4 is to reduce one or more of the significant impacts of the proposed Project, by changing the mix of allowable uses. For the LAX Northside Plan Update, the Reduced Retail Alternative would eliminate any retail uses in exchange for office uses within the Project site.

6.5.5 Cargo Alternative

The goal of Alternative 5 is to reduce one or more of the significant impacts of the proposed Project, by limiting allowable uses. Alternative 5 changes the allowable uses to include warehousing and cargo storage only.

The following table compares the allowable development under the proposed Project and the Project Alternatives:

Table 6-1

Proposed Project and Project Alternatives

Project	Description	Allowable Development Square Footage	
Proposed Project	A vibrant, sustainable center of employment, retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses that support the needs of surrounding communities and of Los Angeles World Airports (LAWA). The proposed Project would cap vehicle trips to a maximum of 2,009 during the a.m. peak hour, 2,543 in the p.m. peak hour, and 23,635 daily.	Office, Research and Development	1,275,000
		Mixed Use-Commercial	220,000
		Community and Civic	215,000
		Open Space and Recreation	10,000
		Airport Support	600,000
		Total:	**2,320,000**
Alternative 1: No Project Alternative-Existing Conditions	The majority of the site contains no major structures, except for the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center.	Jet Pets	No Change
		Airport Support	No Change
		Fire Station	No Change
		Golf Course	No Change
		Child Care Center	No Change
		Total:	No Change
Alternative 2: No Project Alternative-Planned Development	Development that would be allowed according to the adopted LAX Specific Plan. The No Project-Planned Development Alternative would permit up to 4,500,000 square feet at the Project site, and would cap vehicle trips to 3,922 in the a.m. peak hour and 4,421 in the p.m. peak hour.	Office-Low and Mid-Rise	1,360,000
		Office-Low-Rise	220,000
		Research Park	1,170,000
		Airport Support	750,000
		Restaurant and Retail	130,000
		Hotel	870,000
		Total:	**4,500,000**
Alternative 3: Reduced Density Alternative	A development program that reduces the density of the proposed Project at build-out by approximately a third.	Airport Support	400,000
		Community and Civic	150,000
		Office, Research and Development (Office)	441,667
		Office, Research and Development (Research and Development	275,000
		Office, Research and	133,333

Table 6-1

Proposed Project and Project Alternatives

Project	Description	Allowable Development Square Footage	
		Development (Higher Education)	
		Mixed Use-Commercial (Restaurant)	33,333
		Mixed Use-Commercial (Retail)	93,333
		Mixed Use-Commercial (Services)	20,000
		Total:	**1,546,667**
Alternative 4: Reduced Retail Alternative	Eliminates retail uses within the Project site and increases office uses accordingly. This alternative does not change the design guidelines.	Airport Support	600,000
		Community and Civic	225,000
		Office, Research and Development (Office)	802,500
		Office, Research and Development (Research and Development)	412,500
		Office, Research and Development (Higher Education)	200,000
		Mixed Use-Commercial (Restaurant)	50,000
		Mixed Use-Commercial (Services)	30,000
		Total:	**2,320,000**
Alternative 5: Cargo Alternative	Changes allowable uses to include warehousing and cargo storage only.	Warehousing	1,160,000
		Cargo Storage	1,160,000
		Total:	**2,320,000**

Source: LAWA, 2014.

6.6 Analysis Format

Section 15126.6(d) of the State CEQA Guidelines requires that each alternative be evaluated in sufficient detail to determine whether overall environmental impacts would be less, similar, or greater than the impacts of the proposed Project. Additionally, each alternative is evaluated to determine whether it would substantially attain the proposed Project objectives, as identified in Section 2, Project Description. Potential environmental impacts of each alternative are evaluated following the sequence of environmental topics in Section 4, Environmental Impact Analysis.

The potential impacts of each alternative is evaluated and compared to the impacts of the proposed Project for each environmental topic. Additionally, each analysis includes a summary table and summary statement of conclusions.

This section concludes with an overview and comparative table for all the alternatives analyzed, as well as identification of the environmentally superior alternative per the requirements of Section 15126.6(e)(2) of the State CEQA Guidelines.

6.7 Analysis of the No Project Alternative-Existing Conditions

6.7.1 Description of Alternative

The No Project Alternative is required by Section 15126.6 (e)(2) of the CEQA Guidelines and assumes that the proposed project would not be implemented. The No Project Alternative allows decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Alternative 1-includes the existing development at the site at the time of the Notice of Preparation (April 2012). No construction activities would occur under Alternative 1. The table below further describes Alternative 1 (**Table 6-2**).

Table 6-2

Alternative 1: No Project Alternative-Existing Conditions

Project	Description	Existing Square Footage	
Alternative 1	The majority of the site contains no major structures, except for the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center.	Jet Pets	17,521
		Airport Support	273,500
		Fire Station	23,750
		Golf Course	6,199
		Child Care Center	125,700
		Total:	**446,670**

Source: LAWA, 2014.

6.7.2 Environmental Impacts

6.7.2.1 Aesthetics

Visual Character

Aesthetics

Alternative 1 would not include grading of the site, installation of new uses and landscaping, or removal of existing buildings. Aesthetic impacts would not occur as Alternative 1 would not change the visual character of the site. However, Alternative 1 would also not include the proposed Project elements that will enhance the visual character of the site. For example, Alternative 1 would not include introduction of new open space, new landscaping, the Paseo, and building design standards that will enhance the existing character of the Project site. Alternative 1 would avoid the proposed Project's less than significant impacts on aesthetics. Therefore, no operations related aesthetics impacts would occur.

View Impacts

Alternative 1 would not introduce new buildings, nor would it remove or change any existing buildings on the Project site. The proposed Project's less than significant impacts on views would be avoided. Therefore, no operations related views impacts would occur.

Light and Glare

Ambient Illumination Levels

Alternative 1 would not introduce any new sources of illumination on the Project site. Existing lighting would remain. The proposed Project's less than significant impacts on ambient illumination levels would be avoided. Therefore, no operations related ambient illumination level impacts would occur.

Light Spillover

Alternative 1 would not introduce any new sources of light on the Project site. Existing lighting would remain. The proposed Project's less than significant impacts on light spillover would be avoided. Therefore, no operations related light spillover impacts would occur.

Shading

Alternative 1 would not introduce new buildings, nor would it remove or change any existing buildings on the Project site. No new or changed shading impacts would occur. The proposed Project's less than significant impacts on shading would be avoided. Therefore, no operations related shading impacts would occur.

6.7.2.2 Air Quality

Alternative 1 assumes that the proposed project would not be implemented. This alternative would include the existing development on the Project site. There will be no change in the criteria pollutant emissions from the existing site conditions.

6.7.2.3 Biological Resources

Loss or Reduction of Federal, State, and Local Designated Habitats

Alternative 1 would not change the existing physical condition of the Project site. The Project site is not part of a federal-, state-, or local-designated habitat. Under Alternative 1, existing vegetation would continue to grow; including non-native grassland, ornamental, unvegetated channel, and disturbed/developed land cover types. Vegetation on the Project site would continue to be regularly maintained by LAX, including regular mowing and disking of vegetation. The proposed Project's less than significant impacts on federal, state, or local designated habitats would be avoided. Therefore, no impacts to federal, state, or local designated habitats would occur.

Interference with Wildlife Movement/Migration Corridors

Alternative 1 would not change the existing physical condition of the Project site. No removal of mature trees or other vegetation that supports wildlife movement/migration would occur. Vegetation on the Project site would continue to be regularly maintained by LAX, including regular mowing and disking of vegetation. The proposed Project's less than significant impacts on wildlife movement/migration corridors would be avoided. Therefore, no impacts to wildlife movement/migration corridors would occur.

Alteration of an Existing Wetland Habitat

Alternative 1 would not change the existing physical condition of the Project site. The only potential wetland habitat in the Project site, the Argo Drainage Channel, runs along the southern boundary and partially within the Project site. Alternative 1 would not include any construction activities or changes to operational activities that would impact the potential wetland habitat. However, the proposed Project's Project Design Features to protect wetland habitat, including Best Management Practices and prohibiting grading within 50 feet of the Argo Drainage Channel would also not occur under Alternative 1. The proposed Project's less than significant impacts to wetlands would be avoided. Therefore, no impacts to wetlands would occur.

Interference with Habitat/Species Behavior

Alternative 1 would not change the existing physical condition of the Project site or in the Project site vicinity. The Los Angeles Airport/El Segundo Dunes habitat preserve located across Pershing Drive to the west of the Project site supports El Segundo Blue Butterfly. California gnatcatcher and California legless lizards have been observed approximately 0.8 miles south, and 1,000 feet west, respectively, of the proposed Project's Biological Resources Study Area within the Los Angeles Airport/El Segundo Dunes habitat preserve. Alternative 1 would not involve construction or operational activities that would impact this habitat or species behavior within the habitat. The proposed Project's less than significant impacts to habitat/species behavior would be avoided. Therefore, no impacts to habitat/species behavior would occur.

6.7.2.4 Cultural Resources

Paleontological Resources

Alternative 1 would not include any grading, excavation, fill, or other activities that would disturb the ground, and thus, impacts to paleontological resources would not occur under Alternative 1.

The proposed Project's less than significant impacts to paleontological resources would be avoided. Therefore, no impacts to paleontological resources would occur.

Archaeological Resources

Alternative 1 would not include any grading, excavation, fill, or other activities that would disturb the ground, and thus, impacts to archaeological resources, including disturbing, destroying, or removing resources, would not occur under Alternative 1. The proposed Project's less than significant impacts to archaeological resources would be avoided. Therefore, no impacts to archaeological resources would occur.

Historic Architectural Resources

Alternative 1 would not include any demolition of existing buildings or introduction of new structures. Furthermore, the Project site does not include any historic architectural resources. Alternative 1 would not result in the demolition of any individually historic building, or impair any historic district. The proposed Project's less than significant impacts to historic architectural resources would be avoided. Therefore, no impacts to historic architectural resources would occur.

6.7.2.5 Geology and Soils

Geologic Hazards

Fault Rupture

No known active or potentially active faults underlie the Project site. In addition, the Project site is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. Accordingly, the potential for surface fault rupture at the Project site is considered to be low. Alternative 1 would not introduce any new uses or construction activities that could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. The proposed Project's less than significant impacts to fault rupture would be avoided under Alternative 1. Therefore, no impacts related to fault rupture would occur.

Seismic Ground Shaking

The Project site is located in the seismically active Los Angeles Basin, and, therefore, has the potential to be subjected to strong seismic ground shaking. However, the Project site is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. Alternative 1 would not cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury impacts from strong seismic ground shaking. The proposed Project's less than significant impacts to seismic ground shaking would be avoided under Alternative 1. Therefore, no impacts related to seismic ground shaking would occur under Alternative 1.

Liquefaction

Borings conducted at the Project site at depths of 50.5 to 55.5 feet did not encounter groundwater and the Project site is not mapped as being within a liquefaction hazard zone by the State of California. However, the City of Los Angeles General Plan Safety Element (1996)

shows a limited portion of the east side of the Project site as being within a liquefaction zone. Alternative 1 would not introduce any new uses or structures to the Project site that would be located in a City of Los Angeles-designated liquefaction zone. The proposed Project's less than significant impacts to liquefaction would be avoided. Therefore, no impacts to liquefaction would occur.

Landslides

The Project site and surrounding area has an average slope of less than 30 percent, and thus is not susceptible to potential hazards from slope stability. Furthermore, the Project site is not located within a State of California-designated seismic hazard zone for landslide potential or a City of Los Angeles-designated landslide inventory area. Alternative 1 would not include grading or otherwise change slopes on the Project site, and would not result in substantial damage to structures or infrastructure, or expose people to substantial risk or injury due to landslides. The proposed Project's less than significant impacts to landslides would be avoided under Alternative 1. Therefore, no impacts to landslides would occur.

Inundation

Based on a review of the California Geologic Survey (CGS) Tsunami Inundation Map for the Venice 7.5-minute quadrangle, the Project site is not located within a tsunami inundation-hazard area (CGS 2009). As such, no impacts associated with tsunamis would occur for Alternative 1.

Alternative 1 would not include any construction or introduce new uses; therefore, no impacts would occur relative to compliance with applicable emergency plans.

The Project site is over 100 feet above Marina Del Rey and the Ballona Creek and over 50 feet above the Argo Drainage Channel making wave oscillation topographically improbable. Because there is no threat to the Project site, seiches are not a hazard for Alternative 1. Additionally, no dams or dikes are located within or near the Project site.

Alternative 1 would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury due to inundation by a dam or a seiche. The proposed Project's less than significant impacts to inundation would be avoided under Alternative 1. Therefore, no impacts to inundation would occur.

Soil Conditions

Near-surface soil encountered within borings conducted for the proposed Project were observed to be sand soils estimated to have a very low to low expansion potential. Project site soils are anticipated to have negligible soluble sulfate levels. Additionally, the Project site soils are anticipated to have low to moderate levels of soluble chloride and relatively low electrical resistivity.

Previously developed areas of the Project site may have deep fill. Alternative 1 would not include construction or excavation that may impact soil conditions. Alternative 1 would not cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury impacts from soil conditions. The proposed Project's less than significant impacts to soil conditions would be avoided under Alternative 1. Therefore, no impacts to soil conditions would occur.

Sedimentation and Erosion

Erosion

Alternative 1 would not include any grading, excavation, fill, or other activities that would disturb the ground. The proposed Project's less than significant impacts to erosion would be avoided. Therefore, no impacts to erosion would occur.

Sedimentation

Alternative 1 would not include any grading, excavation, fill, or other activities that would disturb the ground. The proposed Project's less than significant impacts to sedimentation would be avoided. Therefore, no impacts to sedimentation would occur.

Landform Alteration

Alternative 1 would not include any grading, excavation, fill, or other activities that would disturb the ground. There would be no impacts, as with the proposed Project. Therefore, no impacts to landform alteration would occur.

6.7.2.6 Greenhouse Gases

Alternative 1 assumes that the proposed Project would not be implemented. This alternative would include the existing development on the site. There will be no change in the greenhouse gas (GHG) emissions from the existing site conditions. In this alternative, the emissions per service population would be "undefined" as there is no service population to estimate a value.

6.7.2.7 Hazards and Hazardous Materials

Transportation, Use, or Disposal of Hazardous Materials

Alternative 1 would not change existing uses or activities on the Project site. Hazardous materials would continue to be used on the Project site as they are under existing conditions, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. All hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Alternative 1 would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. Therefore, no impacts to transportation, use, or disposal of hazardous materials would occur.

Accidental Release of Hazardous Materials

Alternative 1 would not include any grading, excavation, fill, or other activities that would disturb the ground, nor would it include demolition of existing structures on the Project site. Portions of the Project site are located in the City of Los Angeles Methane Hazard and Methane Hazard Buffer zone. The Project site does not contain any known soil or groundwater contamination sites. Alternative 1 would not include any subterranean elements that would result in accidental release of hazardous materials, including methane and contaminated soil, groundwater, or other hazardous materials. The proposed Project's less than significant impacts to accidental release of hazardous materials would be avoided. Therefore, no impacts to accidental release of hazardous materials would occur.

Contaminated Soils, Groundwater, and Other Hazardous Materials

Alternative 1 would not include grading, excavation, fill, or other activities and would not introduce new uses. The Project site does not contain any known soil or groundwater contamination sites. The proposed Project's less than significant impacts to contaminated soils, groundwater, and other hazardous materials would be avoided. Therefore, no impacts to contaminated soils, groundwater, and other hazardous materials would occur.

Hazardous Emissions and Materials within a Quarter Mile of Existing or Proposed Schools

Alternative 1 would not change existing uses or activities on the Project site. Hazardous materials would continue to be used on the Project site as they are under existing conditions, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. Although hazardous materials would continue to be used and transported within ¼ mile of existing and proposed schools in the Project site vicinity, Alternative 1 would not increase the use of hazardous materials and emissions and these materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Alternative 1 would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. The proposed Project's less than significant impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be avoided. Therefore, no impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would occur.

Airport Hazards

Wildlife Hazards

Alternative 1 would not change existing uses or activities on the Project site. Existing wildlife attractants, such as trees and other vegetation would remain. Vegetation on the Project site would continue to be regularly maintained by LAX, including regular mowing and disking of vegetation. Alternative 1 would not change wildlife hazards at the Project site. However, Project Design Features such as prohibiting the casting and spraying of seed for sod, requiring that trees be planted to meet specified spacing requirements, and prohibiting trees that provide fruit would also not be implemented under Alternative 1. The proposed Project's less than significant impacts to wildlife hazards would be avoided. Therefore, no impacts to wildlife hazards would occur.

Lighting and Glare Hazards

Alternative 1 would not add new sources of lighting or glare to the Project site. Existing lighting and building materials would remain in their existing configurations. However, Project Design Features including requirements that building, street, and safety lighting be shielded to prevent glare or light spillover from reaching aviation and aircraft operations and that surfaces of buildings not include reflective materials would not be implemented under Alternative 1. The proposed Project's less than significant impacts to lighting and glare hazards would be avoided. Therefore, no impacts to lighting and glare hazards would occur.

Airport Obstruction Hazards

Alternative 1 would not introduce new buildings or structures that would interfere with aircraft operations. Existing buildings, which comply with required height limits for airport safety, would

remain in their existing locations and configurations. The proposed Project's less than significant impacts to airport obstruction hazards would be avoided. Therefore, no impacts to airport obstruction hazards would occur.

Interference with Emergency Response Plans

Alternative 1 would not change existing uses or activities on the Project site. Access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports would not change under Alternative 1. The proposed Project's less than significant impacts to interference with emergency response plans would be avoided. Therefore, no impacts to emergency response plans would occur.

6.7.2.8 Hydrology and Water Quality

Hydrology

Surface Water

Alternative 1 would not change existing uses or activities on the Project site. Existing pervious and impervious surfaces would remain as they are under existing conditions and no changes to drainage patterns or increases in runoff from the Project site would occur. Pervious areas would be greater than under the proposed Project. The proposed Project's less than significant impacts to surface water hydrology would be avoided. Therefore, no impacts to surface water hydrology would occur.

Groundwater

Alternative 1 would not change existing uses or activities on the Project site. Existing pervious and impervious surfaces would remain as they are under existing conditions and no changes to infiltration or dewatering would occur. Pervious areas would be greater than under the proposed Project, resulting in more recharge to groundwater than under the proposed Project. The proposed Project's less than significant impacts to groundwater hydrology would be avoided. Therefore, no impacts to groundwater hydrology would occur.

Water Quality

Surface Water

Alternative 1 would not change existing uses or activities on the Project site. Existing surface water pollutants such as pesticides, fertilizers, vehicle fuel, or oil would continue to be generated on the Project site. However, additional pollutants related to new land uses in the proposed Project would be avoided. The proposed Project's less than significant impacts to surface water quality would be avoided. Therefore, no impacts to surface water quality would occur.

Groundwater

Alternative 1 would not change existing uses or activities on the Project site. Existing pervious and impervious surfaces would remain as they are under existing conditions and no changes to infiltration or dewatering would occur. Pervious areas would be greater than under the proposed Project, resulting in more recharge to groundwater than under the proposed Project. Additionally, the proposed Project's new land uses and associated new pollutants would not be

introduced under Alternative 1, resulting in relatively less pollutants infiltrating into groundwater. The proposed Project's less than significant impacts to groundwater quality would be avoided. Therefore, no impacts to groundwater quality would occur.

6.7.2.9 Land Use and Planning

Land Use Plan Consistency

Alternative 1 would not change existing uses or activities on the Project site. Uses on the Project site under existing conditions include disturbed, vacant areas as well as an animal quarantine facility, airport support uses, fire station, golf course, and child development center. These uses would continue to operate and no changes to the LAX Specific Plan or LAX Northside Design Guidelines and Standards would occur. No land use approval permits would be required. The proposed Project's less than significant impacts to land use plan consistency would be avoided. Therefore, no impacts to land use plan consistency would occur.

Existing Land Use Compatibility

Alternative 1 would not change existing uses or activities on the Project site. Uses on the Project site under existing conditions include disturbed, vacant areas as well as an animal quarantine facility, airport support uses, fire station, golf course, and child development center. These uses would continue to operate and compatibility with on-site and off-site land uses would not change. However, proposed Project uses that would enhance land use compatibility would not be introduced under Alternative 1, including mixed-use commercial uses adjacent to the existing Westchester Business District; a buffer area adjacent to residences to the north of the Project site; and airport support uses adjacent to existing airport uses to the south of the Project site. The proposed Project's less than significant impacts to existing land use compatibility would be avoided. Therefore, no impacts to existing land use compatibility would occur.

6.7.2.10 Noise

Construction

Alternative 1 would not include any construction activities. Noise related to on-site construction activities and off-site construction trucks, as well as construction related ground-borne vibration would not occur. The proposed Project's significant impacts to construction noise would be avoided. Therefore, no impacts to construction noise would occur.

Operations

Alternative 1 would not change existing uses or activities on the Project site. The existing noise environment at and around the Project site consists of noise from airport-related activities including aircraft departing, landing, and taxiing on runways and connecting taxiways; noise from vehicular traffic movements on local roadways; and noise from other community sources, such as use of lawn mowers, barking dogs, etc. Under Alternative 1 noise would remain as it is under existing conditions both on- and off-site and airport noise exposure would not change. The proposed Project's less than significant impacts to construction noise would be avoided. Therefore, no impacts to construction noise would occur.

6.7.2.11 Population, Housing, and Employment

Cause or Accelerate Growth in an Undeveloped Area

Alternative 1 would not change existing uses or activities on the Project site. No new infrastructure or other facilities would be built to cause or accelerate population, housing, or employment growth in an undeveloped area and population, housing, or employment projections would not be exceeded. The proposed Project's less than significant impacts to growth in an undeveloped area would be avoided. Therefore, no impacts to growth in an undeveloped area would occur.

Consistency with Growth Policies

Alternative 1 would not change existing uses or activities on the Project site and would not introduce new population, housing, or employment inconsistent with growth policies. However, new employment and mixed-use development consistent with applicable policies would not be introduced at the Project site. Employment and jobs that would be served by the proposed Project would likely locate at other dispersed sites within the region. The proposed Project's less than significant impacts to consistency with growth policies would be avoided. Therefore, no impacts to consistency with growth policies would occur.

6.7.2.12 Public Services

Fire

Alternative 1 would not introduce permanent residences, new structures, or new employees that would need fire protection services. On-site demand for fire services would be similar to existing conditions. No changes to the need for fire protection infrastructure, demand, or emergency access would occur. The proposed Project's less than significant impacts to fire services would be avoided. Therefore, no impacts to fire services would occur.

Police

Alternative 1 would not introduce permanent residences, new structures, or new employees that would need police protection services. On-site demand for police protection services would be similar to existing conditions. No changes to the need for police officers or equipment, demand, or emergency access would occur. The proposed Project's less than significant impacts to police services would be avoided. Therefore, no impacts to police services would occur.

Public Schools

Alternative 1 would not introduce permanent residences and would not change student generation or demand for school services. No increases in demand for schools would occur. The proposed Project's less than significant impacts to public school services would be avoided. Therefore, no impacts to public school services would occur.

Libraries

Alternative 1 would not introduce permanent residences and would not result in population growth. No increases in demand or impact on libraries would occur. The proposed Project's less

than significant impacts to library services would be avoided. Therefore, no impacts to library services would occur.

6.7.2.13 Recreation

Alternative 1 would not introduce permanent residences and would not result in increased demand or impacts to recreation facilities. However, under Alternative 1 the proposed Project's provision of new open space and recreational amenities on the Project site would not occur and the per capita open space and recreation facilities in the area would be less than under the proposed Project. The proposed Project's less than significant impacts to recreation facilities and services would be avoided. Therefore, no impacts to recreation facilities and services would occur.

6.7.2.14 Traffic and Transportation

Alternative 1 assumes that the proposed Project would not be implemented and there would be no change to the existing use of the Project Site. Alternative 1 includes the existing development at the Site at the time of the NOP.

The existing and future intersection operating conditions under Alternative 1 are identical to the Existing without Project conditions and the Future without Project conditions. Alternative 1 would not generate any new traffic on the street network and would not result in significant traffic impacts. Under Alternative 1, the mitigation measures outlined in Section 4.14 Transportation would not be implemented. Alternative 1 would not change the Project site from its existing condition, and therefore would not have significant traffic impacts of any type.

6.7.2.15 Utilities and Services

Wastewater

Alternative 1 would not change existing uses or activities on the Project site. No new wastewater wound be generated or need to be treated, and no changes to wastewater conveyance infrastructure would occur. The proposed Project's less than significant impacts to wastewater would be avoided. Therefore, no impacts to wastewater would occur.

Water Use

Alternative 1 would not change existing uses or activities on the Project site. No changes to water usage, supply, or infrastructure would occur as demand for water would not change. However, the proposed Project's Project Design Features related to water conservation, including Low Impact Development, Best Management Practices, and drought-tolerant plant requirements, would also not be implemented under Alternative 1. The proposed Project's less than significant impacts to water use would be avoided. Therefore, no impacts to water use would occur.

Solid Waste

Alternative 1 would not change existing uses or activities on the Project site. No new solid waste wound be generated that would impact capacity at landfills or solid waste collection, and consistency with solid waste policies would continue. Existing uses would continue to generate

similar levels of solid waste as under existing conditions. This waste would continue to be collected and transported using existing collection routes. As no construction would occur, the proposed Project's construction related solid waste generation would not occur. The proposed Project's less than significant impacts to solid waste would be avoided. Therefore, no impacts to solid waste would occur.

Energy

Electricity

Alternative 1 would not change existing uses or activities on the Project site. No changes would occur to electricity usage or supply that would necessitate changes to electricity distribution infrastructure. Existing uses would continue to generate similar levels of electricity demand as under existing conditions. This electricity would continue to be distributed using existing infrastructure. The proposed Project's less than significant impacts to electricity would be avoided. Therefore, no impacts to electricity would occur.

Natural Gas

Alternative 1 would not change existing uses or activities on the Project site. No changes would occur to natural gas usage or supply that would necessitate changes to natural gas distribution infrastructure. Existing uses would continue to generate similar levels of natural gas demand as under existing conditions. This natural gas would continue to be distributed using existing infrastructure. The proposed Project's less than significant impacts to natural gas would be avoided. Therefore, no impacts to natural gas would occur.

6.7.3 Relationship of the Alternative to the Project Objectives

As the majority of the Project site would remain undeveloped under Alternative 1, Alternative 1 would not meet the proposed Project's objectives related to economic development. Alternative 1 would not include new uses to ensure the Project site achieves fair market value. A new vibrant, sustainable mixed-use center would not be developed in order to revitalize the Project site. The Project site would continue to provide space for new industries to be developed and land use compatibility and economic vitality may be achieved with future development, however, the specific development standards and design guidelines to achieve these uses under the proposed Project would not be enacted under Alternative 1.

Existing urban design guidelines would remain in place under Alternative 1 and would guide future development. Adopted guidelines would allow a larger scale of development than the proposed Project, would require less buffer area between the proposed Project and residences to the north, allow more development and associated parking and traffic impacts, and do not reflect current community and stakeholder interests for additional open space, research and development, recreation, security, community-serving uses, and economic development. Existing guidelines are also not flexible, nor do they reflect best-practices in urban design and sustainability. The majority of the proposed Project's community compatibility, urban design guidelines, and sustainability objectives are not met by Alternative 1.

Under Alternative 1, the LAX Specific Plan permit approval process would not be changed. Therefore, none of the proposed Project's objectives related to the approval process would be met.

Therefore, Alternative 1 would not meet the proposed Project's underlying purpose or proposed Project objectives related to economic development; community compatibility, urban design guidelines, and sustainability; or approval process.

6.8 Analysis of the No Project-Planned Development Alternative

6.8.1 Description of Alternative

The No Project-Planned Development Alternative includes what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services. "No project" does not mean that development on the project site will be prohibited. The No Project Alternative includes "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (CEQA Section 15126.6 [e][2]).Alternative 2 includes development that would be foreseeable in the future according to the existing LAX Specific Plan and 1989 Design Plan and Development Guidelines for LAX Northside. Alternative 2 would permit up to 4,500,000 square feet at the Project site, and would cap vehicle trips to 3,922 in the a.m. peak hour and 4,421 in the p.m. peak hour. The table below further describes Alternative 2 (**Table 6-3**).

Table 6-3

Alternative 2: No Project-Planned Development Alternative

Project	Description	Allowable Development Square Footage	
Alternative 2: No Project Alternative-Planned Development	Development that would be allowed according to the adopted LAX Specific Plan and LAX Northside Design Plan and Development Guidelines. The No Project-Planned Development Alternative would permit up to 4,500,000 square feet at the Project site, and would cap vehicle trips to 3,922 in the a.m. peak hour and 4,421 in the p.m. peak hour.	Office-Low and Mid-Rise	1,360,000
		Office-Low-Rise	220,000
		Research Park	1,170,000
		Airport Support	750,000
		Restaurant and Retail	130,000
		Hotel	870,000
		Total:	**4,500,000**

Source: LAWA, 2014.

6.8.2 Environmental Impacts

6.8.2.1 Aesthetics

Construction

Construction activities under Alternative 2 would be similar to the proposed Project. Although temporary in nature, construction activities generally cause a contrast to, and disruption in the general order and aesthetic character of an area. Alternative 2 construction activities would include grading, clearing, and grubbing the land; installing utilities, building foundations,

superstructures, and building skin/roofing; completing interior framing and finishing; installing hardscape and landscaping; and building testing/commissioning. Construction equipment would include, but is not limited to, drill rigs, cement and mortar mixers, forklifts, graders, cranes, and tractors. As with the proposed Project, all construction activities would comply with LAX Master Plan Commitment DA-1, which requires construction fencing to screen construction areas. Temporary construction fencing would be placed along the periphery of the development sites of the proposed Project to screen much of the construction activity from view at the street level. Although Alternative 2 would allow more construction than the proposed Project, construction activities would be similar in terms of their nature and temporary impacts on aesthetics. The proposed Project's less than significant construction impacts to aesthetics would be similar under Alternative 2. Therefore, construction impacts to aesthetics would be less than significant.

Operation

Visual Character

Aesthetics

Alternative 2 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Existing uses are not anticipated to change under Alternative 2. Additionally, Alternative 2 permits similar uses as the proposed Project, which would have similar impacts to aesthetics. These include offices, research and development, commercial, and light industrial uses. However, Alternative 2 would result in more development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project), would allow taller buildings, would permit smaller building setbacks in most areas, and would provide less buffer area between the Project site and existing residences to the north. Furthermore, Alternative 2 would not include the proposed Project's paseo or design standards intended to reinforce orientation along Westchester Parkway and create a vibrant street front. Alternative 2 would not remove or alter valued visual character of existing uses on the Project site, but it would be less well integrated with surrounding visual character than the proposed Project, and would be less consistent with visual regulations that seek to enhance visual character, transition building heights between uses, and maintain the prevailing scale and character of residential areas. Compared to the proposed Project, Alternative 2 would result in greater contrast with the surrounding visual character due to taller buildings, more intense development, and smaller building setbacks. The proposed Project's less than significant operational impacts to aesthetics would be greater under Alternative 2.

View Impacts

According to the City of Los Angeles CEQA Guidelines, the term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The Project site is located in the vicinity of locally valued scenic resources, including Dockweiler Beach State Park, Vista Del Mar, and Westchester Bluffs. Like the proposed Project, while Alternative 2 is located in the vicinity of the valued scenic resources discussed above, Alternative 2 would not occur within or adjacent to a valued focal or panoramic vista, or within the view of any designated scenic highway, corridor or parkway. Furthermore, Alternative 2 would not obstruct, interrupt, or diminish a valued focal and/or panoramic view as defined in the Community Plan.

Other views in the Project site vicinity include views from private residences to the Pacific Ocean. Views from private residences are not protected under CEQA. However, Alternative 2 would allow taller buildings and reduced setbacks than the proposed Project. Additionally, Alternative 2 does not include the proposed Project's buffer area, which would further lower new development relative to residences to the north.

The proposed Project's less than significant operational impacts to views would be similar under Alternative 2. Therefore, operational impacts to views would be less than significant.

Light and Glare

Ambient Illumination Levels

Operation of Alternative 2 would introduce new lighting on the Project site that would increase ambient illumination levels compared to existing conditions. Like the proposed Project, Alternative 2 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 2 lighting would comply with all applicable LAMC lighting standards. Alternative 2 lighting guidelines would be similar to the proposed Project, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; and requiring service area lighting to be contained in the service yard.

The proposed Project's less than significant operational impacts to ambient illumination levels would be similar under Alternative 2. Therefore, operational impacts to ambient illumination levels would be less than significant.

Light Spillover

Operation of Alternative 2 would introduce new lighting on the Project site that would increase potential for light spillover compared to existing conditions. Like the proposed Project, Alternative 2 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 2 lighting would comply with all applicable Los Angeles Municipal Code (LAMC) lighting standards. Alternative 2 lighting guidelines would be similar to the proposed Project, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; and requiring service area lighting to be contained in the service yard. Existing structures that screen light spillover, such as existing sound walls, are anticipated to remain under Alternative 2. However, Alternative 2 would not include some of the proposed Project's Project Design Features intended to prevent light spillover, including prohibiting exposed bulbs and requiring increased setbacks and stepbacks. Setbacks and stepbacks would increase the distance between new sources of light and adjacent uses, further minimizing light spillover. The

proposed Project's less than significant operational impacts to light spillover would be greater under Alternative 2.

Shading

Alternative 2 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Shading impacts from these uses would remain the same for these structures. However, Alternative 2 would result in more development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project), would allow taller buildings, would permit smaller building setbacks in most areas, and would provide less buffer area between the Project site and existing residences to the north. Alternative 2 would not change shading impacts of existing uses on the Project site, but it would potentially result in increased shading impacts due to taller buildings, smaller setbacks, and no stepback requirements. Compared to the proposed Project, Alternative 2 would potentially result in greater shading on light sensitive uses due to taller buildings, more intense development, and smaller building setbacks. The proposed Project's less than significant operational impacts to shading would likely be greater under Alternative 2.

6.8.2.2 Air Quality

The No Project–Planned Development Alternative includes the development that would be foreseeable in the future according to the adopted LAX Specific Plan and LAX Northside Design Plan and Development Guidelines. This alternative would permit up to 4,500,000 square feet at the Project site, and would cap vehicle trips to 3,922 in the a.m. peak hour and 4,421 in the p.m. peak hour.

Construction Emissions

The construction emissions (**Table 6-4**) for this alternative are estimated based on a ratio of the difference in the square footage between the proposed Project and the alternative. The build out square footage for this alternative is 194 percent of the proposed Project, thus the daily construction emissions for Alternative 2 are estimated to be proportionally greater. Based on these estimates, the daily regional construction emissions for Alternative 2 will be greater than the SCAQMD mass daily significance thresholds for VOC and less than the significance thresholds for NOx, CO, SO2, PM10, and PM2.5. The local ambient air quality impacts from construction are estimated to increase proportionally to the construction emissions and would exceed the SCAQMD air quality significance thresholds for 1-hr NO2 and 24-hr PM10.

Table 6-4

Alternative 2: No Project-Planned Development Alternative
Construction Emissions

	Peak Daily Emissions (lb/day)					
	VOC	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Alternative 2[2]	242	481	0.8	97	61	21
SCAQMD Threshold	75	550	150	100	150	55
Above Threshold	YES	NO	NO	NO	NO	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Emissions estimated based on ratio of the difference in the square footage between the proposed Project and the Project Alternative.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Operational Emissions

The operational criteria air pollutant emissions (**Table 6-5**) are estimated using a ratio of square footages for individual land uses (Office/Research & Development, Mixed Use Commercial/Retail, Airport Support, and Community). Based on these estimates, the daily regional operational emissions from this alternative are estimated to be 210 to 220 percent of the proposed Project depending on the pollutant. These emissions estimates are less than the SCAQMD mass daily significance thresholds for SO2 and PM2.5 and greater than the significance thresholds for CO, VOC, PM10, and NOx. The local ambient air quality impacts from operation are estimated to increase proportionally to the operational emissions and are less than the SCAQMD significance thresholds for all pollutants and averaging times.

Table 6-5

Alternative 2: No Project-Planned Development Alternative
Operational Emissions

		Daily Maximum Emissions (lb/day)[2]					
Land Use	**Square Feet**	**VOC**	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Office	1580,000	148	595	1.54	177	163	10.3
Research and Development	1,170,000						
Airport Support[3]	750,000	14	15	0.05	6	4	0.4
Restaurant and Retail[4]	130,000	95	538	1.37	154	149	8.8
Hotel[4]	870,000						
Total	**4,500,000**	**257**	**1,148**	**2.96**	**337**	**316**	**19.5**
SCAQMD Significance Threshold		55	550	150	55	150	55
Above Threshold		YES	YES	NO	YES	YES	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Project incremental emissions estimated using a ratio of square footages for individual land uses.
3. 273,500 square feet of airport support facilities are moved into the LAX Northside Project footprint from another location in LAX. Emissions from these relocated airport support facilities are not included in Project incremental emission estimates.
4. For purposes of emission estimates restaurant, retail, and hotel land uses are considered comparable to the mixed use commercial/retail land uses in Area 11 of the proposed Project that was modeled as a regional shopping center.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Health Risk

The health risk estimates are estimated to increase proportionally to the sum total of the operational and construction emissions, and the health risk estimates are below the SCAQMD air quality significance thresholds.

6.8.2.3 Biological Resources

Loss or Reduction of Federal, State, and Local Designated Habitats

Alternative 2 would result in more development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project). However, the Project site is not part of a federal-, state-, or local-designated habitat. Under Alternative 2, existing vegetation would be replaced with new vegetation, including palm trees, turf grass, and other types of shrubs and vegetation. Vegetation on the Project site would continue to be

regularly maintained by LAX or private developers, including regular mowing and disking of vegetation. The proposed Project's less than significant impacts on federal, state, or local designated habitats would be similar under Alternative 2. Therefore, impacts to federal, state, or local designated habitats would be less than significant.

Interference with Wildlife Movement/Migration Corridors

Alternative 2 would result in more development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project) that could potentially disrupt more vegetation that supports wildlife movement/migration corridors than the proposed Project. As with the proposed Project, mature trees or other vegetation that supports wildlife movement/migration would be removed under Alternative 2. Vegetation on the Project site would continue to be regularly maintained by LAX or private owners, including regular mowing and disking of vegetation. Although mature trees may be removed as part of Alternative 2, LAX Master Plan EIS/EIR Commitment BC-3 requires compensation for the loss of mature trees at a ratio of 2:1 and would apply to all alternatives. Alternative 2 would not include the proposed Project's Project Design Features that require species of newly planted replacement trees to be a local native tree species to the greatest extent feasible, nor does it require that trees are a 15-gallon or larger specimen. Although loss of vegetation on the Project site may have a short-term adverse impact on nesting migrant birds, implementation of LAX Master Plan EIS/EIR Commitment BC-3 would ensure that any habitat that is removed is replaced. The proposed Project's less than significant impacts on wildlife movement/migration corridors would be similar under Alternative 2. Therefore, no impacts to wildlife movement/migration corridors would occur.

Alteration of an Existing Wetland Habitat

Alternative 2 would result in more development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project) that could potentially alter existing wetland habitat. The only potential wetland habitat, the Argo Drainage Channel, runs along the southern boundary and partially within the Project site. Alternative 2 would not include the proposed Project's Project Design Features to protect potential wetland habitat, including Best Management Practices and prohibiting grading within 50 feet of the Argo Drainage Channel. The proposed Project's less than significant impacts to wetlands would be greater under Alternative 2.

Interference with Habitat/Species Behavior

Alternative 2 would result in more development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project) that could potentially interfere with habitat/species behavior. The Los Angeles Airport/El Segundo Dunes habitat preserve located across Pershing Drive to the west of the Project site supports El Segundo Blue Butterfly. California gnatcatcher and California legless lizards have been observed approximately 0.8 miles south, and 1,000 feet west, respectively, of the proposed Project's Biological Resources Study Area within the Los Angeles Airport/El Segundo Dunes habitat preserve. Alternative 2 would not involve construction or operational activities that would impact this habitat or species behavior within the habitat directly. Additionally, existing uses adjacent to the Los Angeles Airport/El Segundo Dunes habitat preserve, including existing airport support uses and an animal quarantine facility, are anticipated to remain in their existing condition under Alternative 2. The proposed Project's less than significant impacts to

habitat/species behavior would be similar under Alternative 2. Therefore, impacts to habitat/species behavior would be less than significant under Alternative 2.

6.8.2.4 Cultural Resources

Paleontological Resources

Alternative 2 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 2 would potentially be more than the proposed Project; however, the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain paleontological resources that have not been previously identified. However, like the proposed Project, Alternative 2 would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7. These commitments require a paleontological resources qualification and treatment plan, authorization, monitoring, collection, fossil preparation and donation, and reporting. These commitments would minimize potential effects on paleontological resources. The proposed Project's less than significant impacts to paleontological resources would be similar under Alternative 2. Therefore, impacts to paleontological resources would be less than significant.

Archaeological Resources

Alternative 2 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 2 would potentially be more than the proposed Project; however, the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain archaeological resources that have not been previously identified. One known archaeological site is known in the Project site in Area 12B, but this area would not be developed under Alternative 2. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. However, like the proposed Project, Alternative 2 would comply with LAX Master Plan EIS/EIR Commitments HA-1 through HA-10. These commitments require a survey of historic American buildings, historic education materials, discovery and preparation of an archaeological treatment plan, monitoring, excavation and recovery procedures, administrative procedures, archaeological/cultural monitor reporting, and notification. These commitments would minimize potential effects on archaeological resources. The proposed Project's less than significant impacts to archaeological resources would be similar under Alternative 2. Therefore, impacts to archaeological resources would be less than significant.

Historic Architectural Resources

Alternative 2 would not include any demolition of existing buildings as existing uses and structures are assumed to remain under all alternatives, but would introduce new structures. The Project site does not include any historic architectural resources. Alternative 2 would not result in the demolition of any individually historic building, or impair any historic district. The proposed Project's less than significant impacts to historic architectural resources would be similar under Alternative 2. Therefore, impacts to historic architectural resources would be less than significant.

6.8.2.5 Geology and Soils

Geologic Hazards

Fault Rupture

No known active or potentially active faults underlie the Project site. In addition, the Project site is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. Accordingly, the potential for surface fault rupture at the Project site is considered to be low. Alternative 2 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Similar to the proposed Project, all structures would be designed, located, and built in accordance with City of Los Angeles Department of Building and Safety (LADBS) requirements and current seismic design provisions of the California Building Code (CBC). However, as Alternative 2 allows more development than the proposed Project, Alternative 2 would expose more people to risk of injury involving rupture of a known earthquake fault. The proposed Project's less than significant impacts to fault rupture would be greater under Alternative 2.

Seismic Ground Shaking

The Project site is located in the seismically active Los Angeles Basin, and, therefore, has the potential to be subjected to strong seismic ground shaking but is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. However, potential exists for seismic ground shaking related to fault movement in the Project site vicinity. Alternative 2 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving seismic ground shaking. As with any new development in the State of California and similar to the proposed Project, building design and construction for Alternative 2 would be required to conform to the current seismic design provisions of the CBC. The 2010 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program (NEHRP) to mitigate losses from an earthquake and provide for the latest in earthquake safety. These standards are among the strictest standards in the seismic safety requirements contained in the City of Los Angeles Municipal Code (LAMC) Building Code. However, as Alternative 2 allows more development than the proposed Project, Alternative 2 would expose more people to risk of injury involving seismic ground shaking. The proposed Project's less than significant impacts to seismic ground shaking would be greater under Alternative 2.

Liquefaction

Borings conducted at the Project site at depths of 50.5 to 55.5 feet did not encounter groundwater and the Project site is not mapped as being within a liquefaction hazard zone by the State of California. However, the City of Los Angeles General Plan Safety Element (1996) shows a limited portion of the east side of the Project site as being within a liquefaction zone. Alternative 2 would introduce new uses and construction activities that could be located in a City of Los Angeles-designated liquefaction zone. Similar to the proposed Project, the LAMC Building Code and the Uniform Building Code (UBC) require that foundation strength, building design, and building materials be adjusted to limit any impact related to liquefaction for construction in liquefaction zones. However, as Alternative 2 allows more development than the

proposed Project, Alternative 2 would potentially expose more people to liquefaction zones. The proposed Project's less than significant impacts to liquefaction would be greater under Alternative 2.

Landslides

The Project site and surrounding area has an average slope of less than 30 percent, and thus is not susceptible to potential hazards from slope stability. Furthermore, the Project site is not located within a State of California-designated seismic hazard zone for landslide potential or a City of Los Angeles-designated landslide inventory area. Similar to the proposed Project, grading for Alternative 2 would be secured in accordance with the LABC. Therefore, Alternative 2 would not result in substantial damage to structures or infrastructure, or expose people to substantial risk or injury due to landslides. The proposed Project's less than significant impacts to landslides would be similar under Alternative 2. Therefore, impacts to landslides would be less than significant.

Inundation

Based on a review of the California Geologic Survey (CGS) Tsunami Inundation Map for the Venice 7.5-minute quadrangle, the Project site is not located within a tsunami inundation-hazard area (CGS 2009). As such, no impacts associated with tsunamis would occur for Alternative 2.

Furthermore, similar to the proposed Project, Alternative 2 would comply with any applicable strategic plans developed by the State of California Office of Emergency Services and the Los Angeles County Office of Emergency Management, as well as the construction limitations contained in the City of Los Angeles Flood Hazard Management Specific Plan Guidelines (as referenced in the City of Los Angeles General Plan Safety Element).

The Project site is over 100 feet above Marina Del Rey and the Ballona Creek and over 50 feet above the Argo Drainage Channel making wave oscillation topographically improbable. Because there is no threat to the Project site, seiches are not a hazard for Alternative 2. Additionally, no dams or dikes are located within or near the Project site.

Alternative 2 would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury due to inundation by a dam or a seiche. The proposed Project's less than significant impacts to inundation would be similar under Alternative 2. Therefore, impacts to inundation would be less than significant.

Soil Conditions

Near-surface soil encountered within borings conducted for the proposed Project were observed to be sand soils estimated to have a very low to low expansion potential. Project site soils are anticipated to have negligible soluble sulfate levels. Additionally, the Project site soils are anticipated to have low to moderate levels of soluble chloride and relatively low electrical resistivity.

Previously developed areas of the Project site may have deep fill. Construction for Alternative 2 could result in excavation of approximately 45 feet Below Ground Surface (bgs). Thus, discovery of fill may be encountered during excavation activities for Alternative 2. However, compliance with CBC and the LABC requirements would ensure that future buildings would be adequately supported by the underlying soils. Alternative 2 would not cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or

expose people to substantial risk of injury impacts from soil conditions. The proposed Project's less than significant impacts to soil conditions would be similar under Alternative 2. Therefore, impacts to soil conditions would be less than significant.

Sedimentation and Erosion

Erosion

Alternative 2 would include grading, excavation, fill, and other activities that would disturb the ground. However, similar to the proposed Project, construction activities for Alternative 2 would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 2 would reduce erosion effects.

In addition, all construction would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Grading would be required under Alternative 2 in order to accommodate development. Grading would include excavation of earthen material and placement of earthen material. Grading is anticipated to exceed that of the proposed Project due to the larger development intensity of Alternative 2. Grading has the potential to increase the risk of erosion during Project site preparation and construction activities. However, erosion would be reduced by implementing appropriate erosion control measures during excavation and grading activities. During the construction phase of Alternative 2, construction activities will be subject to the requirements of a National Pollutant Discharge Elimination System (NPDES) construction permit. Compliance with the NPDES permit includes implementing BMPs, some of which are specifically implemented to reduce soil erosion and loss of topsoil. Additionally, Alternative 2 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control erosion.

The proposed Project's less than significant impacts to erosion would be similar under Alternative 2. Therefore, impacts to erosion would be less than significant.

Sedimentation

Sedimentation could potentially occur from exposed soils (active dune sand and alluvium) during construction of Alternative 2. However, construction activities would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 2 would reduce sedimentation effects.

Temporary dewatering activities are not expected during construction of Alternative 2. However, if dewatering occurs as a result of unexpected water table discovery during construction it would be conducted in accordance with the requirements of the RWQCB and would also be subject to the review and approval of the LADBS, as appropriate.

In addition, similar to the proposed Project, all construction of Alternative 2 would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion as well as the LAWA Stormwater Pollution Prevention Plan (SWPP) and BMPs.

Additionally, Alternative 2 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control sedimentation.

During operation, Alternative 2 may result in a limited degree of soil sedimentation effects from non-vegetated areas. However, in accordance with National Pollutant Discharge Elimination System (NPDES) requirements, Alternative 2 would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of Alternative 2. The SUSMP would include BMPs that would reduce on-site sedimentation from vegetated areas on the Project site through stormwater control devices. However, Alternative 2 would not include the proposed Project's Project Design Features that require use of bioswales and permeable pavement to capture sediment runoff or deposition and contain and control it on-site.

Alternative 2 would not accelerate natural processes of wind and water erosion and sedimentation, or result in sediment runoff or deposition which would not be contained or controlled-on-site. The proposed Project's less than significant impacts to sedimentation would be similar under Alternative 2. Therefore, impacts to sedimentation would be less than significant.

Landform Alteration

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project site. While Alternative 2 would involve grading that will alter the site topography, the majority of the Project site has been previously disturbed and does not contain prominent geologic or topographic features. Alternative 2 would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. The proposed Project's less than significant impacts to landform alteration would be similar under Alternative 2. Therefore, impacts to landform alteration would be less than significant.

6.8.2.6 Greenhouse Gases

The construction GHG emissions for Alternative 2 are estimated based on a ratio of the difference in the square footage between the proposed Project and the alternative. The build out square footage for this alternative is 194 percent of the proposed Project, thus total construction GHG emissions are estimated to be proportionally greater. The operational GHG emissions and service population are also estimated based on a ratio of square footages for individual land uses (Office/Research & Development, Mixed Use Commercial/Retail, Airport Support and Community). The service population is assumed to increase proportionally with square footage as well. Based on these estimates, this Alternative is estimated to have an efficiency metric of approximately 4.45, similar to the proposed Project and also less than the SCAQMD draft efficiency target of 4.8 MT of CO2e per Service Population (SP) per year.

6.8.2.7 Hazards and Hazardous Materials

Transportation, Use, or Disposal of Hazardous Materials

Alternative 2 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Additionally, Alternative 2 permits similar uses as the proposed Project, which would use similar hazardous materials. These include offices, research and development, commercial, and light industrial uses. However, Alternative 2 would result in more development

on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project), which would result in more transport, use, or disposal of hazardous materials, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. As with the proposed Project, all hazardous materials transported, used, or disposed in association with Alternative 2 would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The proposed Project's less than significant impacts to transport, use, or disposal of hazardous materials would be similar under Alternative 2. Therefore, impacts to transport, use, or disposal of hazardous materials would be less than significant.

Accidental Release of Hazardous Materials

Alternative 2 would include grading, excavation, fill, or other activities that would disturb the ground. Portions of the Project site are located in the City of Los Angeles Methane Hazard and Methane Hazard Buffer zone. The Project site does not contain any known soil or groundwater contamination sites. Alternative 2 would include subterranean elements. The design of the buildings and any associated subterranean elements within identified Methane Hazard and Buffer areas would be required to comply with LADBS methane standards. This would include compliance with the City of Los Angeles Methane Code Ordinance No. 175790 and Ordinance No. 180619. As a result of compliance with these regulations, Alternative 2 would manage risks from methane and would ensure that Alternative 2 does not 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. The proposed Project's less than significant impacts to accidental release of hazardous materials would be similar under Alternative 2. Therefore, impacts to accidental release of hazardous materials would be less than significant.

Contaminated Soils, Groundwater, and Other Hazardous Materials

Alternative 2 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and light industrial uses. The Project site does not contain any known soil or groundwater contamination sites. Construction of Alternative 2 would comply with LAX Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction. This Master Plan Commitment would require development of a program to coordinate all efforts associated with handling any contaminated materials in soil or groundwater encountered during construction. Operation of Alternative 2 within the Project site would not include ongoing digging, grading, or other activities that could potentially expose unknown contaminated soil and groundwater. Any unknown contaminated soil or groundwater encountered during construction would be handled and remediated according to applicable regulations and would not pose a hazard to occupants of Alternative 2 at the time of occupancy and during operations. Incorporation of appropriate monitoring and safety provisions would ensure that Alternative 2 does not 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. The proposed Project's less than significant impacts to contaminated soils, groundwater, and other hazardous materials would be similar under Alternative 2. Therefore, impacts to contaminated soils, groundwater, and other hazardous materials would be less than significant.

Hazardous Emissions and Materials within a Quarter Mile of Existing or Proposed Schools

Alternative 2 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. Use of hazardous materials would be similar to the proposed Project, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. Due to the increased scale and intensity of development as compared to the proposed Project, Alternative 2 would also likely have more hazardous emissions and materials transported within ¼ mile of existing and proposed schools in the Project site vicinity. As with the proposed Project, these materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Alternative 2 would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. The proposed Project's less than significant impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be similar under Alternative 2. Therefore, impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be less than significant.

Airport Hazards

Wildlife Hazards

Alternative 2 would introduce new uses such as offices, research and development, commercial, and light industrial uses. Alternative 2 would remove existing vegetation and introduce new vegetation that could attract wildlife. Alternative 2 does not include the proposed Project's Project Design Features such as prohibiting the casting and spraying of seed for sod, requiring that trees be planted to meet specified spacing requirements, and prohibiting trees that provide fruit. New vegetation installed under Alternative 2 would potentially attract more wildlife hazards than the proposed Project. The proposed Project's less than significant impacts to wildlife hazards would be greater under Alternative 2.

Lighting and Glare Hazards

Alternative 2 would introduce new lighting on the Project site that would increase lighting compared to existing conditions. Like the proposed Project, Alternative 2 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 2 lighting would comply with all applicable LAMC lighting standards. Alternative 2 lighting guidelines would be similar to the proposed Project, including requiring, safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; and requiring service area lighting to be contained in the service yard. Similar to the proposed Project, Alternative 2 prohibits mirror glass and highly reflective surfaces as dominant building materials.

The proposed Project's less than significant impacts to lighting and glare hazards would be similar under Alternative 2. Therefore, impacts to lighting and glare hazards would be less than significant.

Airport Obstruction Hazards

Alternative 2 would introduce new buildings or structures on the Project site. Alternative 2 allows taller buildings than the proposed Project. However, Alternative 2 requires that all improvements conform to Federal Aviation Administration (FAA) regulations, which would minimize airport obstruction hazards. The proposed Project's less than significant impacts to airport obstruction hazards would be similar under Alternative 2. Therefore, impacts to airport obstruction hazards would be less than significant.

Interference with Emergency Response Plans

Alternative 2 would include construction activities that could impact emergency access and would change existing uses and activities on the Project site. Similar to the proposed Project, during construction, roadway access would be maintained by construction detours and diversions. Emergency access would be coordinated and ensured through Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office.

No aspects of Alternative 2 would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, similar to the proposed Project, Alternative 2 would comply with all applicable City policies related to disaster preparedness and emergency response and emergency vehicles would use sirens to receive priority on roadways. The proposed Project's less than significant impacts to interference with emergency response plans would be similar under Alternative 2. Therefore, impacts to emergency response plans would be less than significant.

6.8.2.8 Hydrology and Water Quality

Hydrology

Surface Water

Alternative 2 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and light industrial uses. Alternative 2 permits more intense development than the proposed Project and does not include the proposed Project's Project Design Features related to pervious paving. Additionally, impervious areas would likely be greater under Alternative 2 as compared to the proposed Project due to the additional square footage of development. However, similar to the proposed Project, Alternative 2 would be subject to SUSMP requirements and associated BMPs that would minimize surface water hydrology impacts. The proposed Project's less than significant impacts to surface water hydrology would be similar under Alternative 2. Therefore, impacts to surface water hydrology would be less than significant.

Groundwater

Alternative 2 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and light industrial uses. Alternative 2 permits more intense development than the proposed Project and does not include

the proposed Project's Project Design Features related to pervious paving. Pervious areas would be smaller than under the proposed Project, resulting in less recharge to groundwater than under the proposed Project. However, similar to the proposed Project, Alternative 2 would be subject to SUSMP requirements and associated BMPs that would minimize groundwater hydrology impacts. The proposed Project's less than significant impacts to groundwater hydrology would be similar under Alternative 2. Therefore, impacts to groundwater hydrology would be less than significant.

Water Quality

Surface Water

Surface water pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be greater with Alternative 2 due to the more intense development allowed. Given the substantially increased development under Alternative 2 relative to the proposed Project, runoff from the site would have greater pollutants. However, similar to the proposed Project, Alternative 2 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize surface water quality impacts. The proposed Project's less than significant impacts to surface water quality would be similar under Alternative 2. Therefore, impacts to surface water quality would be less than significant.

Groundwater

Groundwater pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be greater with Alternative 2 due to the more intense development allowed. Given the substantially increased development under Alternative 2 relative to the proposed Project, groundwater infiltration from the site would have greater pollutants. However, similar to the proposed Project, Alternative 2 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize groundwater quality impacts. The proposed Project's less than significant impacts to groundwater quality would be similar under Alternative 2. Therefore, impacts to groundwater quality would be less than significant.

6.8.2.9 Land Use and Planning

Land Use Plan Consistency

Alternative 2 would not change any adopted land use plans or zoning. Development would be consistent with existing land use and zoning. None of the discretionary approvals required for the proposed Project would be required under Alternative 2. Although fewer discretionary approvals would be required for Alternative 2, Alternative 2 would be less consistent with local and regional goals, policies, and objectives than the proposed Project. For example, Alternative 2 would not identify areas for new open space, reduce vehicular trips, or emphasize pedestrian/bicycle access. Although Alternative 2 is less consistent with long-range local and regional goals, it requires fewer discretionary approvals than the proposed Project. The proposed Project's less than significant impacts to land use plan consistency would be avoided with Alternative 2. Therefore, no impacts to land use plan consistency would occur.

Existing Land Use Compatibility

Alternative 2 permits similar uses as the proposed Project, including offices, research and development, commercial, and light industrial uses. However, Alternative 2 would result in more

development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project), would allow taller buildings, would permit smaller building setbacks in most areas, and would provide less buffer area between the Project site and existing residences to the north. Proposed Project uses that would enhance land use compatibility would also not be introduced under Alternative 2, including mixed-use commercial uses adjacent to the existing Westchester Business District; a buffer area adjacent to residences to the north of the Project site; and airport support uses adjacent to existing airport uses to the south of the Project site. The proposed Project's less than significant impacts to existing land use would be greater under Alternative 2.

6.8.2.10 Noise

Construction

Alternative 2 would result in more construction activity, off-site construction trucks, and ground-borne vibration than the proposed Project as it allows greater development on the Project site (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Noise from construction activities in the vicinity of residences to the north would be greater than with the proposed Project, as Alternative 2 also does not include Project Design Features that buffer construction activities from residences. Short-term construction-period noise impacts would be significant and unavoidable, similar to the proposed Project. Off-site construction traffic would also generate noise similar to the proposed Project, and would be less than significant. Finally, similar to the proposed Project, construction activities for Alternative 2 would likely generate ground borne vibration levels that are less than significant. The proposed Project's significant and unavoidable construction impacts to noise would be similar under Alternative 2. Therefore, construction impacts to noise would be significant and unavoidable.

Operations

Alternative 2 would allow more development and a greater number of vehicle trips than the proposed Project. However, increases in traffic generation are not anticipated to result in a noticeably greater noise impact. Similar to the proposed Project, Alternative 2 would comply with the City of Los Angeles building code requirements. Finally, Alternative 2 would not introduce new uses in the Airport Influence Area that are incompatible with aircraft noise exposure guidelines. The proposed Project's less than significant operational impacts to noise would be similar under Alternative 2. Therefore, operational impacts to noise would be less than significant.

6.8.2.11 Population, Housing, and Employment

Cause or Accelerate Growth in an Undeveloped Area

Alternative 2 would introduce offices, research and development, commercial, and light industrial uses to the Project site and would result in more development on the Project site than the proposed Project (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Alternative 2 would generate 10,437 employees, which is greater than the proposed Project; however, no new housing or related population growth would occur as a result of Alternative 2. Additionally, the Project site was previously developed and is surrounded on all sides by existing development. Alternative 2 would therefore not cause or

accelerate growth in an undeveloped area. The proposed Project's less than significant impacts to growth in an undeveloped area would be similar under Alternative 2. Therefore, impacts to growth in an undeveloped area would be less than significant under Alternative 2.

Consistency with Growth Policies

Alternative 2 would introduce offices, research and development, commercial, and light industrial uses to the Project site and would result in more development on the Project site than the proposed Project (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Similar to the proposed Project, Alternative 2 would provide new employment and mixed-use development consistent with applicable policies. The proposed Project's less than significant impacts to consistency with growth policies would be similar under Alternative 2. Therefore, impacts to consistency with growth policies would be less than significant under Alternative 2.

6.8.2.12 Public Services

Fire

Alternative 2 would increase demand for fire protection and emergency facilities due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 2 would not introduce permanent residents or housing that would require fire protection services. Based on City of Los Angeles estimates for the population served by Fire Station No. 5, the existing number of incidents per 1,000 population is approximately 49 incidents, or an incident generation rate of .0049 per capita. Alternative 2 would add approximately 10,437 daytime employees. Applying the incident generation rate of .0049 to Alternative 2 daytime employees would result in an increase of 51 incidents per year. This would be equivalent to about a 0.8 percent increase over the 5,814 existing emergency incidents within the primary response of LAFD Station No. 5. Alternative 2 would increase the workload of LAFD Station No. 5 by less than one percent.

LAX Master Plan Commitments FP-1, Los Angeles Fire Department (LAFD) Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of FAR and fire code requirements, would ensure maintenance of adequate response times, facilities, and emergency access associated with development of Alternative 2. Impacts associated with staffing, equipment, and facilities would also be continually evaluated and addressed pursuant to standard LAFD procedures and fire code requirements. The implementation of the LAX Master Plan Commitments will further reduce impacts related to fire protection services. Therefore, Alternative 2 would not impact emergency access such that it would require addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services.

Alternative 2 would not result in the need for a new fire station, or expansion, consolidation, or relocation of an existing facility due to impacts on fire protection infrastructure, demand, or emergency access. The proposed Project's less than significant impacts to fire service would be similar under Alternative 2. Therefore, impacts to fire service would be less than significant under Alternative 2.

Police

Alternative 2 would increase demand for police protection due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 2 would not introduce permanent residents or housing that would require police protection services. Based on LAPD statistics on the population served by the Pacific Community Police Station, the existing number of crimes per 1,000 persons is approximately 29.8 or an incident generation rate of .029 per capita. Alternative 2 would add 10,437 daytime employees. Applying the incident generation rate of .029 to Alternative 2 daytime employees would result in an increase of 303 incidents per year. This would be equivalent to less than five percent increase over the 6,069 existing crimes within the Pacific Community Police Station service area. This is a conservative estimate as daytime employees would not be permanent residents requiring police services in the Pacific Community Police Station service area. Alternative 2 would not result in an increase in Project site population that would require a substantial increase in law enforcement services to maintain adequate services or would require new or expanded facilities without providing adequate mechanisms for addressing these additional needs.

Alternative 2 would comply with LAX Master Plan commitments LE-1: Routine Evaluation of Manpower and Equipment Needs; LE-2: Plan Review; PS-1: Fire and Police Facility Relocation Plan; and PS-2: Fire and Police Facility Space and Siting Requirements. These LAX Master Plan Commitments would ensure that LAWAPD and LAPD continue to routinely evaluate and provide additional officers, supporting administrative staff, facilities, and equipment to keep pace with forecast increases in activity and development at the Project site in order to maintain a high level of law enforcement services. Although Alternative 2 would introduce more employees than the proposed Project, LAX Master Plan Commitment LE-2, Plan Review, would ensure that during the design phase of any development on the Project site, LAPD, LAWAPD, and other law enforcement agencies would be consulted to review plans so that, where possible, environmental contributors to criminal activity, such as poorly-lit areas and unsafe design, are reduced. Through implementation of these LAX Master Plan commitments, Alternative 2 would not result in a significant increase in emergency response times due to increased traffic congestion, changes in circulation, or the location of new land uses. The proposed Project's less than significant impacts to police service would be similar under Alternative 2. Therefore, impacts to police service would be less than significant under Alternative 2.

Public Schools

Construction of Alternative 2 could occur as close as 0.3 miles from the nearest public school, the Loyola Village Elementary School. Similar to the proposed Project, Alternative 2 construction activities would comply with LAX Master Plan Commitments C-1, ST-18, ST-19, and ST-22 related to construction, which would minimize impacts on adjacent uses. These measures require a construction traffic management plan, closure restrictions on existing roadways, designation of truck routes, and establishment of a ground transportation/construction coordination office. Although construction for Alternative 2 would be more intense than for the proposed Project, it is not anticipated that construction activities would cause substantial increases in noise levels or impair access to local schools.

Based on an average student generation rate of 0.39, enrollment within the Project site vicinity associated with Alternative 2 employees would increase by 2,032 students.[9] Based on the

[9] Based on an estimated 10,437 new Alternative 2 employees as follows: 10,437 (net new employees) X 0.78 (employees likely to reside within the district) X 0.64 (number of new employee households likely to be located in

estimated current overage of 3,779 seats, the public schools serving the Project site vicinity would still have an excess of 1,747 seats with implementation of Alternative 2. Although excess seats would be greater under the proposed Project, capacity would remain under Alternative 2.

Additionally, Alternative 2 would comply with applicable school impact fee requirements pursuant to California Government Code Section 65995 (Senate Bill 50), which are deemed to provide full and complete school facilities mitigation.

The proposed Project's less than significant impacts to public schools would be similar under Alternative 2. Therefore, impacts to public schools would be less than significant under Alternative 2.

Libraries

Alternative 2 would result in a net increase of 10,437 employees. Project site employees would be anticipated to use library services during typical daytime working hours. Due to time restrictions, employees are most likely to use the Westchester-Loyola Branch Library located nearest to the Project site. The addition of 10,437 employees to the existing 39,480 residents in the Westchester-Playa Del Rey Community would yield a library service population of 49,917. This represents a conservative estimate, since few employees are likely to use library services. However, even with this conservative estimate, Alternative 2 employees would not exceed the forecasted unused capacity to this library. With the addition of Alternative 2 employees, there would still be an unused library capacity of 50,083. The proposed Project's less than significant impacts to libraries would be similar under Alternative 2. Therefore, impacts to libraries would be less than significant under Alternative 2.

6.8.2.13 Recreation

Alternative 2 would maintain the existing golf course on the Project site, which provides recreational space. However, unlike the proposed Project, Alternative 2 does not reserve any acreage within the Project site for recreation and open space uses and would not improve the ratio of open space to residents in the two-mile radius of the Project site boundary.

Alternative 2 does not include a residential development component that would contribute to a net increase in population. However, increase in employment would increase demand for parks and recreational facilities due to daytime or lunchtime use. While there would be an estimated increase in employment of approximately 10,437 individuals, which is greater than the proposed Project employment, it is doubtful that a meaningful number of these new employees would frequent off-site parks at lunchtime such that demand would place constraints on these facilities. Due to time limitations for typical employee lunch breaks, it is expected that such use would not likely involve active sports or require recreational facilities. Incidental increases in daytime employee demand for public parks and recreational facilities would be minimal. Although Alternative 2 would not improve the provision of parks and open space as the proposed Project would, it would not have significant impacts on public parks or recreational facilities. The proposed Project's less than significant impacts to recreation would be similar under Alternative 2. Therefore, impacts to recreation would be less than significant under Alternative 2.

LAUSD) X 0.39 (student generation rate)= 2,032 net new students. Generation rates based on Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2000, Chapter 6, via City of Los Angeles, LAX Master Plan Final EIS/EIR, Section 4.27, Schools, 2004.

6.8.2.14 Traffic and Transportation

Alternative 2 would permit up to 4.5 million square feet of development with a vehicle cap of 3,922 morning peak hour trips and 4,421 afternoon peak hour trips, as allowed for under the LAX Specific Plan. Alternative 2 represents a significant increase in development compared to the proposed Project.

Construction

Alternative 2 represents an increase in scale and scope of development compared to the proposed Project. Therefore, peak construction activity is expected to be greater than that of the proposed Project. In addition to the implementation of the proposed Project mitigation measures, which includes a construction traffic management plan, Alternative 2 would require additional mitigation measures for construction impacts to intersection operations to be less than significant. Alternative 2 could also result in the temporary loss of on-street parking, lane closure, and sidewalk closure related to greater peak construction activity.

Operation

Alternative 2 Trip Generation

Alternative 2 trip generation estimates were based on the rates published in *Trip Generation, 8th Edition* (Institute of Transportation Engineers, 2008) and the vehicle cap prescribed under the LAX Specific Plan. Alternative 2 is estimated to generate approximately 37,834 daily trips on a typical weekday, including 3,922 morning peak hour trips (3,176 inbound, 746 outbound) and 4,421 afternoon peak hour trips (1,201 inbound, 3,220 outbound).[10]

Existing with Alternative 2 Conditions

When the Existing with Alternative 2 conditions are measured against the Existing conditions, Alternative 2 is anticipated to result in significant impacts at 30 of the 108 study intersections during either the morning or afternoon peak hour. The remaining 78 intersections would not be impacted under Existing with Alternative 2 conditions.

Existing with Alternative 2 with Mitigation Conditions

Alternative 2 is anticipated to result in residual impacts at 15 study intersections during either the morning or afternoon peak hours after implementation of the mitigation program. The remaining 93 study intersections would not be impacted under Existing with Alternative 2 with Mitigation conditions. Additional mitigation measures would be necessary to reduce the impacts of Alternative 2 if it were implemented. The proposed Project's significant intersection impacts under Existing with Alternative 2 with Mitigation conditions would be greater under Alternative 2.

Future with Alternative 2 Conditions

When the Future with Alternative 2 conditions are measured against the Future without Project conditions, Alternative 2 is anticipated to result in significant impacts at 44 of the 108 study

[10] Source for all transportation alternatives analysis is, Gibson Transportation, *Draft Transportation Study for the LAX Northside Plan Update*, January 2014 included as Appendix E of this EIR.

intersections during either the morning or afternoon peak hour. The remaining 64 intersections would not be impacted under Future with Alternative 2 conditions.

Future with Alternative 2 with Mitigation Conditions

Alternative 2 is anticipated to result in residual impacts at 22 study intersections during either the morning or afternoon peak hours after implementation of the mitigation program. The remaining 86 study intersections would not be impacted under Future with Alternative 2 with Mitigation conditions. Additional mitigation measures would be necessary to reduce the impact of Alternative 2 if it were implemented. The proposed Project's significant intersection impacts in Year 2022 would be greater under Alternative 2.

CMP Arterial Analysis

Table 6-6 below summarizes the peak hour traffic volumes expected at the Congestion Management Plan (CMP) monitoring locations within and around the Study Area with implementation of Alternative 2. Peak hour traffic volumes for the monitoring locations outside the Study Area were estimated using the methodology described in Appendix E. The peak hour traffic volumes expected at each CMP arterial monitoring intersection are as follows:

Table 6-6
CMP Arterial Analysis-Alternative 2

No.	Intersection	Peak Hour Trips		Requires CMP Analysis?
		A.M.	P.M.	
1.	Lincoln Boulevard & Venice Boulevard	85	96	**Yes**
4.	Lincoln Boulevard & SR-90 Ramps	159	179	**Yes**
12.	Lincoln Boulevard & Manchester Avenue	1,037	1,141	**Yes**
28.	Sepulveda Boulevard & Manchester Avenue	488	540	**Yes**
31.	Sepulveda Boulevard & Lincoln Boulevard	981	1,105	**Yes**
37.	Sepulveda Boulevard & El Segundo Boulevard	220	248	**Yes**
38.	Sepulveda Boulevard & Rosecrans Avenue	194	219	**Yes**
45.	La Cienega & Centinela Avenue	78	137	**Yes**
53.	La Brea Avenue & Manchester Avenue	91	104	**Yes**
88.	La Cienega Boulevard & Stocker Street	133	150	**Yes**
--	Lincoln Boulevard & Pico Boulevard	30	34	No
--	Venice Boulevard & Centinela Avenue	8	10	No
--	La Cienega Boulevard & Jefferson Boulevard	80	67	**Yes**
--	La Cienega Boulevard & Venice Boulevard	51	42	**Yes**
--	Overland Avenue & Venice Boulevard	8	10	No
--	Crenshaw Boulevard & Manchester Avenue	24	27	No
--	PCH & Artesia Boulevard/Gould Street	61	69	**Yes**

Source: Gibson Transportation, 2014

Similar to the proposed Project, Alternative 2 is anticipated to add 50 or more peak hour trips to the 10 CMP arterial monitoring stations which are study intersections. Alternative 2 would also add 50 or more peak hour trips to three arterial monitoring locations outside of the Study Area. As no traffic count data is available for these three locations, impacts were assessed on a worst-case basis – that is, assuming that each of those locations would operate at LOS F and that Alternative 2 traffic would add to the critical movements of each intersection. Using these assumptions as well as the lane configuration and signal phasing at each intersection, a worst case incremental increase in V/C ratio can be calculated. After applying this methodology, the incremental V/C increase resulting from Alternative 2 would be less than 0.02 (the minimum to trigger an impact) at each of the three outlying CMP arterial monitoring locations. Therefore, no CMP arterial impact would occur as a result of Alternative 2 at any of those three locations under Existing with Alternative 2 conditions or Future with Alternative 2 conditions. Alternative 2 is projected to result in a significant impact at the intersection of Sepulveda Boulevard & El Segundo Boulevard during the afternoon peak hour under Existing with Alternative 2 and Future

with Alternative 2 conditions, and Sepulveda Boulevard & Rosecrans Avenue during the afternoon peak hour under Existing with Alternative 2 and Future with Alternative 2 conditions.

After implementation of the proposed Project mitigation program described in Appendix E, Alternative 2 would still result in a residual impact at the intersection of Sepulveda Boulevard & El Segundo Boulevard during the afternoon peak hour under Future with Alternative 2 with Mitigation conditions and Sepulveda Boulevard & Rosecrans Avenue during the afternoon peak hour under both Existing with Alternative 2 with Mitigation and Future with Alternative 2 with Mitigation conditions. The proposed Project's CMP arterial monitoring station impacts would be greater under Alternative 2 compared to no impacts under the Project.

CMP Freeway Analysis

Table 6-7 depicts the peak hour traffic volumes expected at each mainline freeway monitoring location within and around the Study Area:

Table 6-7
CMP Freeway Analysis-Alternative 2

Mainline Freeway Monitoring Location	Peak Hour Trips		Requires CMP Analysis?
	A.M.	P.M.	
I-405 North of La Tijera Avenue			
Northbound	14	60	No
Southbound	59	22	No
I-405 North of Venice Boulevard			
Northbound	69	298	**Yes**
Southbound	294	111	**Yes**
I-405 North of Inglewood Avenue			
Northbound	206	78	**Yes**
Southbound	48	209	**Yes**
I-105 East of Sepulveda Boulevard			
Eastbound	83	358	**Yes**
Westbound	353	134	**Yes**
I-105 East of Crenshaw Boulevard			
Eastbound	53	229	**Yes**
Westbound	226	86	**Yes**

Source: Gibson Transportation, 2014.

Alternative 2 would add 150 or more peak hour trips to four of the freeway monitoring locations in either direction. The freeway monitoring locations would be impacted as follows under

Alternative 2: one monitoring location under both Existing and Future conditions before and after mitigation during the afternoon peak hour; one monitoring location under Future conditions before and after mitigation during the morning peak hour; and one monitoring location under Future conditions before and after mitigation during the afternoon peak hour. The proposed Project's CMP freeway impacts would be greater under Alternative 2 compared to no impacts under the Project.

CMP Transit Analysis

Alternative 2 would generate approximately 412 morning peak hour transit trips and 464 afternoon peak hour transit trips, which is less than the existing and projected future residual transit capacity. Therefore, Alternative 2 would not result in a significant impact on the regional transit system, like the proposed Project.

Additional measures would be necessary to mitigate the impacts at the arterial and freeway monitoring locations if Alternative 2 were implemented.

Parking

According to Los Angeles Municipal Code (LAMC) requirements, Alternative 2 would require approximately 6,299 parking spaces. All parking would be accommodated on-site. Like the proposed Project, Alternative 2 would provide sufficient parking to meet LAMC requirements.

Neighborhood Intrusion

The neighborhood intrusion impact criteria developed by LADOT was used to identify potential neighborhood impacts from Alternative 2 traffic. Alternative 2 would add 1,200 or more daily trips to the following six arterial corridors before implementation of the mitigation program:

- Lincoln Boulevard between Mindanao Way and Sepulveda Boulevard
- Sepulveda Boulevard between Howard Hughes Boulevard and El Segundo Boulevard
- La Tijera Boulevard between Westchester Parkway and La Cienega Boulevard
- Manchester Avenue between Falmouth Avenue and La Cienega Boulevard
- Westchester Parkway/Arbor Vitae Street between Pershing Drive and Inglewood Avenue
- Centinela Avenue between SR-90 and La Cienega Boulevard

The following intersections along the identified corridors would operate at LOS E or F during at least one of the analyzed peak hours:

28. Sepulveda Boulevard & Manchester Avenue

29. Sepulveda Boulevard & La Tijera Avenue

30. Sepulveda Boulevard & Westchester Parking

33. Sepulveda Boulevard & I-105 Westbound Ramps N/O Imperial Highway

34. Sepulveda Boulevard & Imperial Highway

36. Sepulveda Boulevard & Grand Avenue

37. Sepulveda Boulevard & El Segundo Boulevard

46. Airport Boulevard & Manchester Avenue

47. Aviation Boulevard/Florence Avenue & Manchester Avenue

49. La Cienega Boulevard & Manchester Avenue

As under the Project analysis, the corridors of Sepulveda Boulevard and Manchester Avenue should be examined for alternative routes through residential neighborhoods. However, neither Sepulveda Boulevard nor Manchester Avenue has parallel local streets that would serve this purpose. Therefore, based on LADOT's standard criteria and similar to the proposed Project, no potential neighborhood intrusion impacts are identified under Alternative 2.

6.8.2.15 Utilities and Services

Wastewater

Alternative 2 would result in new development, including offices, research and development, commercial, and light industrial uses (4,500,000 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Alternative 2 would generate an estimated 383,410 gallons per day (gpd) of wastewater, which is more than the proposed Project. These projected wastewater flows would be conveyed to the existing facilities operated by the LADPW and Los Angeles Bureau of Sanitation, which would serve Alternative 2 wastewater collection and treatment needs. Sewers to convey wastewater to LADPW facilities would be constructed on-site to serve the proposed development and would be sized according to projected flows, including peak day flows. The estimated 383,410 gpd wastewater generation for Alternative 2 would use approximately 0.13 percent of the total available flow capacity (291 mgd) within the North Central Outfall Sewer (NCOS) and North Outfall Relief Sewer (NORS) that serve the Project site. As such, flows associated with Alternative 2 would not cause the NCOS and NORS to become constrained.

The Hyperion Treatment Plant (HTP) has a design capacity of 450 mgd, and currently has an excess wastewater capacity of approximately 151 mgd. The Integrated Resources Plan (IRP) projects that the average daily water flow (ADWF) of the HTP will increase to 435 mgd by 2020. This would leave an excess wastewater capacity of approximately 15 mgd. The estimated 383,410 gpd wastewater generation of Alternative 2 would use about 2.6 percent of the projected available flow capacity (15 mgd) of the HTP in 2020. Alternative 2 will not generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or the City of Los Angeles' General Plan and its elements.

The proposed Project's less than significant impacts to wastewater would be greater under Alternative 2, but would still be less than significant. Therefore, impacts to wastewater would be less than significant.

Water Use

Alternative 2 is estimated to consume 810,337 gpd of water, which is more than the proposed Project. Water demand in the City of Los Angeles is estimated to be 72.8 mgd in 2022, the proposed Project buildout year. Alternative 2 water demand would represent approximately 1.1 percent of the projected increase in LADWP's water demand from 2010 to 2022. LADWP previously conducted a Water Supply Assessment (WSA) for the Project site as part of the LAX Master Plan, which included up to 4.5 million square feet of planned development on the Project site per Alternative 2.

LAX Master Plan Commitment W-1, Maximize Use of Reclaimed Water, would apply to Alternative 2 to maximize the use of reclaimed water in facilities and landscaping and offset

potable water use to minimize the potential for increased water use resulting from Alternative 2. LAX Master Plan Commitment W-2, Enhance Existing Water Conservation Program, would also be applied to ensure the ongoing use of water conservation practices, such as installing water-efficient fixtures. Alternative 2 would not include the proposed Project's Project Design Features related to requiring drought-tolerant landscaping and encouraging green roofs. However, the total water demand associated with Alternative 2 at buildout would not exceed available supplies.

Alternative 2 would require new water distribution infrastructure that connects to the water transmission lines that serve the Project site, similar to the proposed Project. The construction of this new infrastructure would be incorporated into the LAX Master Plan as part of Master Plan Commitment PU-1, Develop a Utility Relocation Program, and W-1, Maximize Use of Reclaimed Water. The water service needs for Alternative 2 would not exceed distribution infrastructure capabilities and it is anticipated that regional water distribution pipelines would be adequate to accommodate increases in water demand for Alternative 2.

The proposed Project's less than significant impacts to water would be greater under Alternative 2, but would still be less than significant. Therefore, impacts to water would be less than significant.

Solid Waste

Although no demolition of buildings will take place as part of Alternative 2, some inert waste will be generated during construction. Construction activities would include earthwork, grading, clearing of brush and debris, and excavation. Total solid waste generated during construction of Alternative 2 would be 17,505,000 tons. LAX Master Plan Commitments SW-2, Requirements for the Use of Recycled Materials during Construction, and LAX Master Plan Commitment SW-3, Requirements for the Recycling of Construction and Demolition Waste, would reduce the amount of construction waste requiring disposal by requiring contractors to use recycled construction materials and to recycle construction-related waste.

The landfills that serve the City of Los Angeles had a remaining capacity of 93.07 million tons in 2010 and the City of Los Angeles disposed approximately 3.86 million tons in 2000, based on the most recently published reports.[11] Based on solid waste generation rates for the types of land uses in Alternative 2, approximately 65,751 pounds per day would be generated by Alternative 2. Based on the City of Los Angeles' 70 percent diversion goal, only 19,725 pounds of solid waste from Alternative 2 would require disposal per day in 2022. This solid waste disposal, which would amount to 3,600 tons per year, would represent an approximately 0.09 percent increase in the amount of City-generated solid waste that is disposed of at landfills that serve the City of Los Angeles, and approximately 0.004 percent of its remaining capacity. The estimated solid waste generation would not exceed the solid waste capacity at landfills that serve the City of Los Angeles.

Similar to the proposed Project, Alternative 2 would be consistent with applicable solid waste policies. LAX Master Plan Commitments SW-1, SW-2, and SW-3; implementation of the Los Angeles County Solid Waste Management Action Plan; and implementation of the City of Los Angeles Solid Waste Management Action Plan, Source Reduction and Recycling Element (SRRE), Solid Waste Integrated Resources Plan (SWIRP), City of Los Angeles Solid Waste

[11] City of Los Angeles, Department of Public Works, Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, p. 12, online at: http://san.lacity.org/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf, accessed January 16, 2013.

Management Policy Plan (CiSWMPP), LAWA Sustainability Plan, and LAMC Section 66.32 would serve to reduce the amount of solid waste generated. Alternative 2 would be consistent with, and would apply all applicable goals, policies, and strategies of, the CiSWMPP and the associated implementation strategies of the SRRE, including such components as the Curbside Recycling Program, as outlined in the City of Los Angeles' Framework Element. As such, the anticipated on-site diversion programs associated with Alternative 2 would serve to enhance the ability of the City of Los Angeles to meet or exceed its long-term goal of 70 percent diversion by 2020. Alternative 2 would comply with, and implement as necessary, all provisions of the aforementioned City policies and programs to achieve the waste diversion goals of AB 939. In addition to existing programs aimed at reducing solid waste generation, LAWA would implement LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, to enhance the current on-site recycling program, extend recycling requirements to tenants, and address the procurement of recycled materials. With the continuation of existing recycling programs and implementation of LAX Master Plan Commitment SW-1, Alternative 2 would not conflict with solid waste policies and objectives intended to help achieve the requirements of AB 939. As such, Alternative 2 would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, the City of Los Angeles' Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

The proposed Project's less than significant impacts to solid waste would be greater under Alternative 2, but would still be less than significant. Therefore, impacts to solid waste would be less than significant.

Energy

Electricity

The LADWP service area, which encompasses the City of Los Angeles, is projected to have an annual demand of 28,333 GWh at project buildout. Operation of proposed uses under Alternative 2 would consume an estimated total of 66,690 MWh, or 67 GWh, of electricity per year. Current transmission and distribution facilities for electricity are adequate to meet the demands of Alternative 2. Additionally, in order to reduce electricity consumption, LAWA would implement Master Plan Commitment E-1 to maximize the energy efficiency of new facilities. However, Alternative 2 would not include the proposed Project's Project Design Features related to energy conservation, for example use of light-colored roofs.

Changes in peak electrical loads and the location of new electrical loads within the Project site may result in the need for upgrades to the electrical power transmission system. However, under LAX Master Plan Commitment E-2, Coordination with Utility Providers, a utility coordination program would be implemented by LAWA to ensure that adequate electrical distribution facilities are available to support the electricity needs associated with Alternative 2. Development and implementation of a utility coordination program would reduce potential impacts to the electricity distribution system to a level that is less than significant.

Similar to the proposed Project, Alternative 2 may include subterranean elements that may interfere with existing electricity distribution infrastructure, requiring adjustment/relocation. Potential utility conflicts during construction would be minimized with the implementation of a utility relocation program under LAX Master Plan Commitment PU-1, Develop a Utility Relocation Program. Implementing this commitment would ensure that potential impacts would be less than significant.

Operational impacts would not result in an increase in demand for electricity that exceeds available distribution infrastructure capabilities, so the operation of Alternative 2 would not require new distribution infrastructure or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to electricity would be greater under Alternative 2, but would still be less than significant. Therefore, impacts to electricity would be less than significant.

Natural Gas

The Southern California Gas Company (SCGC) service area, which includes the Counties of Fresno, Kings, Tulare, San Luis Obispo, Kern, Santa Barbara, Ventura, Los Angeles, San Bernardino, Orange, Riverside, San Diego, and Imperial, is projected to have an annual demand of 948.64 billion cubic feet at project buildout. Operation of Alternative 2 proposed uses would consume an estimated total of 37 million cubic feet of natural gas per month, or 444 million cubic feet of natural gas per year.

The annual natural gas demand of Alternative 2 is approximately 0.05 percent of the projected total demand of the SCGC service area at buildout, and is within the anticipated service capabilities of SCGC, although it is greater than the proposed Project. Current transmission and distribution facilities for natural gas are adequate to meet the demands of Alternative 2.

Additionally, in order to reduce natural gas consumption, LAWA would implement LAX Master Plan Commitment E-1, Energy Conservation and Efficiency Program. This program would be consistent with federal policies pertaining to energy efficiency of new facilities.

Operational impacts would not result in an increase in demand for natural gas that exceeds available supply infrastructure capabilities, so the operation of Alternative 2 would not require new natural gas supply facilities or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to natural gas would be greater under Alternative 2, but would still be less than significant. Therefore, impacts to natural gas would be less than significant.

6.8.3 Relationship of the Alternative to the Project Objectives

Alternative 2 would develop the Project site with commercial, hotel, research park, and office uses and therefore would meet the proposed Project's objectives related to economic development. Alternative 2 would include new uses to ensure the Project site achieves fair market value. New uses would be developed in order to revitalize the Project site. The Project site would continue to provide space for new industries to be developed and land use compatibility and economic vitality may be achieved with future development, however, the specific development standards and design guidelines to achieve these uses under the proposed Project would not be enacted under Alternative 2.

Existing urban design guidelines would remain in place under Alternative 2 and would guide future development. Adopted guidelines would allow a larger scale of development than the proposed Project, would require less buffer area between the proposed Project and residences to the north, allow more development and associated parking and traffic impacts, and do not reflect current community and stakeholder interests for additional open space, research and development, recreation, security, community-serving uses, and economic development.

Adopted guidelines are also not flexible, nor do they reflect best-practices in urban design and sustainability. The majority of the proposed Project's community compatibility, urban design guidelines, and sustainability objectives are not met by Alternative 2.

Under Alternative 2, the LAX Specific Plan permit approval process would not be changed. Therefore, none of the proposed Project's objectives related to the approval process would be met.

Therefore, Alternative 2 would not meet some of the proposed Project's underlying purpose or proposed Project objectives related to community compatibility, urban design guidelines, and sustainability; or approval process.

6.9 Analysis of the Reduced Density Alternative

6.9.1 Description of Alternative

The goal of Alternative 3 is to reduce one or more of the significant quantitative-based impacts of the project (e.g., traffic, air quality, noise). For the LAX Northside Plan Update, the Reduced Density Alternative is a development program that reduces the density of the proposed Project build-out by approximately a third. The table below further describes Alternative 3 (**Table 6-8**).

Table 6-8

Alternative 3: Reduced Density Alternative

Project	Description	Allowable Development Square Footage	
Alternative 3: Reduced Density Alternative	A development program that reduces the density of the Project at build-out by approximately a third.	Airport Support	400,000
		Community and Civic	150,000
		Office, Research and Development (Office)	441,667
		Office, Research and Development (Research and Development)	275,000
		Office, Research and Development (Higher Education)	133,333
		Mixed-Use-Commercial (Restaurant)	33,333
		Mixed-Use-Commercial (Retail)	93,333
		Mixed-Use-Commercial (Services)	20,000
		Total:	**1,546,667**

Source: LAWA, 2014.

6.9.2 Environmental Impacts

6.9.2.1 Aesthetics

Construction

Construction activities under Alternative 3 would be similar to the proposed Project. Although temporary in nature, construction activities generally cause a contrast to, and disruption in the general order and aesthetic character of an area. Alternative 3 construction activities would include grading, clearing, and grubbing the land; installing utilities, building foundations, superstructures, and building skin/roofing; completing interior framing and finishing; installing hardscape and landscaping; and building testing/commissioning. Construction equipment would include, but is not limited to, drill rigs, cement and mortar mixers, forklifts, graders, cranes, and tractors. As with the proposed Project, all construction activities would comply with LAX Master Plan Commitment DA-1, which requires construction fencing to screen construction areas. Temporary construction fencing would be placed along the periphery of the development sites of the proposed Project to screen much of the construction activity from view at the street level. Although Alternative 3 would allow less construction than the proposed Project, construction activities would be similar in terms of their nature and temporary impacts on aesthetics. The proposed Project's less than significant construction impacts to aesthetics would be similar under Alternative 3. Therefore, construction impacts to aesthetics would be less than significant.

Operation

Visual Character

Aesthetics

Alternative 3 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Existing uses are not anticipated to change under Alternative 3. Additionally, Alternative 3 permits similar uses as the proposed Project, which would have similar impacts to aesthetics. These include offices, research and development, commercial, and airport support uses. However, Alternative 3 would result in less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Although maximum square footage would be less, the proposed Project's design guidelines would apply to Alternative 3 and building heights, setbacks, and buffers would be similar. As with the proposed Project, Alternative 3 would be consistent with visual regulations that seek to enhance visual character, transition building heights between uses, and maintain the prevailing scale and character of residential areas. Compared to the proposed Project, Alternative 3 would result in similar contrast with the surrounding visual character. The proposed Project's less than significant operational impacts to aesthetics would be similar under Alternative 3. Therefore, operational impacts to aesthetics would be less than significant.

View Impacts

According to the City of Los Angeles CEQA Guidelines, the term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The Project site is located in the vicinity of locally valued scenic resources, including Dockweiler Beach State Park, Vista Del Mar, and Westchester Bluffs. Like the proposed Project, while

Alternative 3 is located in the vicinity of the valued scenic resources discussed above, Alternative 3 would not occur within or adjacent to a valued focal or panoramic vista, or within the view of any designated scenic highway, corridor or parkway. Furthermore, Alternative 3 would not obstruct, interrupt, or diminish a valued focal and/or panoramic view as defined in the Community Plan.

Other views in the Project site vicinity include views from private residences to the Pacific Ocean. Views from private residences are not protected under CEQA. Alternative 3 would allow buildings and setbacks similar to the proposed Project. As Alternative 3 permits less overall development, the scale of development would likely be smaller under Alternative 3.

The proposed Project's less than significant operational impacts to views would be similar under Alternative 3. Therefore, operational impacts to views would be less than significant.

Light and Glare

Ambient Illumination Levels

Operation of Alternative 3 would introduce new lighting on the Project site that would increase ambient illumination levels compared to existing conditions. Like the proposed Project, Alternative 3 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 3 lighting would comply with all applicable LAMC lighting standards. Alternative 3 would also comply with the proposed Project's lighting standards, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; and requiring service area lighting to be contained in the service yard.

The proposed Project's less than significant operational impacts to ambient illumination levels would be similar under Alternative 3. Therefore, operational impacts to ambient illumination levels would be less than significant.

Light Spillover

Operation of Alternative 3 would introduce new lighting on the Project site that would increase potential for light spillover compared to existing conditions. Like the proposed Project, Alternative 3 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 3 lighting would comply with all applicable LAMC lighting standards. Alternative 3 would also comply with the proposed Project's lighting standards, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; prohibiting exposed bulbs; requiring increased setbacks and stepbacks; and requiring service area lighting to be contained

in the service yard. Existing structures that screen light spillover, such as existing sound walls, are anticipated to remain under Alternative 3. The proposed Project's less than significant operational impacts to light spillover would be similar under Alternative 3. Therefore, impacts to light spillover would be less than significant.

Shading

Alternative 3 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Shading impacts from these uses would remain the same for these structures. However, Alternative 3 would result in less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Building heights, setbacks, and stepbacks would be the same as under the proposed Project. Alternative 3 would not change shading impacts of existing uses on the Project site. Compared to the proposed Project, Alternative 3 would result in similar shading on light sensitive uses. The proposed Project's less than significant operational impacts to shading would be similar under Alternative 3. Therefore, impacts to shading would be less than significant.

6.9.2.2 Air Quality

Construction Emissions

Alternative 3 construction emissions and air quality impacts are estimated to reduce by 33 percent, which is the same proportion as the reduction in square footage. Based on these estimates, daily regional construction emissions (**Table 6-9**) from this alternative are below SCAQMD mass daily significance thresholds for NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ and above the threshold for VOC. The local ambient air quality impacts from construction are estimated to increase proportionally to the construction emissions and would be below the SCAQMD significance thresholds from construction.

Table 6-9

Alternative 3: Reduced Density Alternative
Construction Emissions

	Peak Daily Emissions (lb/day)					
	VOC	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Alternative 3[2]	83	165	0.3	33	21	7
SCAQMD Threshold	75	550	150	100	150	55
Above Threshold	YES	NO	NO	NO	NO	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Emissions estimated based on ratio of the difference in the square footage between the proposed Project and the Project Alternative.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Operational Emissions

The operational criteria air pollutant emissions (**Table 6-10**) are estimated using a ratio of square footages for individual land uses (Office/Research & Development, Mixed Use Commercial/Retail, Airport Support, and Community). Based on these estimates the daily regional operational emissions from this alternative are estimated to be 64 to 65 percent of the proposed Project depending on the pollutant. These emission estimates are less than the SCAQMD daily mass significance thresholds for CO, SO2, PM10, and PM2.5 and greater than the significance thresholds for daily mass emissions NOx and VOC. The local ambient air quality impacts from operation are estimated to decrease proportionally to the decrease in operational emissions and are below the SCAQMD's significance thresholds.

Table 6-10

Alternative 3: Reduced Density Alternative
Operational Emissions

		Daily Maximum Emissions (lb/day)[2]					
Land Use	**Square Feet**	**VOC**	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Office	441,667	46	184	0.48	55	50	3.2
Research and Development	408,333						
Community and Civic	150,000	14	81	0.21	23	22	1.3
Airport Support[3]	400,000	4	4	0.01	2	1	0.1
Restaurant and Retail[4]	126,666	14	79	0.20	23	22	1.3
Services[4]	20,000						
Total	**1,546,666**	**78**	**347**	**0.90**	**102**	**95**	**5.9**
SCAQMD Significance Threshold		55	550	150	55	150	55
Above Threshold		YES	NO	NO	YES	NO	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Project incremental emissions estimated using a ratio of square footages for individual land uses.
3. 273,500 square feet of airport support facilities are moved into the LAX Northside Project footprint from another location in LAX. Emissions from these relocated airport support facilities are not included in Project incremental emission estimates.
4. For purposes of emission estimates restaurant, retail, and hotel land uses are considered comparable to the mixed use commercial/retail land uses in Area 11 of the proposed Project that was modeled as a regional shopping center.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Health Risk Impacts

Health risk impacts of Alternative 3 are estimated to decrease proportionally to the sum total of construction and operational emissions, and the health risk estimates are less than the SCAQMD significance thresholds.

6.9.2.3 Biological Resources

Loss or Reduction of Federal, State, and Local Designated Habitats

Alternative 3 would result in less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project). However, the Project site is not part of a federal-, state-, or local-designated habitat. Under Alternative 3,

existing vegetation would be replaced with new vegetation, which is designed to be drought-tolerant and locally native. Vegetation on the Project site would continue to be regularly maintained by LAX or private developers, including regular mowing and disking of vegetation. The proposed Project's less than significant impacts on federal, state, or local designated habitats would be similar under Alternative 3. Therefore, impacts to federal, state, or local designated habitats would be less than significant.

Interference with Wildlife Movement/Migration Corridors

Alternative 3 would result in less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project) that could potentially disrupt more vegetation that supports wildlife movement/migration corridors than the proposed Project. As with the proposed Project, mature trees or other vegetation that supports wildlife movement/migration would be removed under Alternative 3. Vegetation on the Project site would continue to be regularly maintained by LAX or private owners, including regular mowing and disking of vegetation. Although mature trees may be removed as part of Alternative 3, LAX Master Plan EIS/EIR Commitment BC-3 requires compensation for the loss of mature trees at a ratio of 2:1 and would apply to all alternatives. Alternative 3 also includes the proposed Project's Project Design Features that require species of newly planted replacement trees to be a local native tree species to the greatest extent feasible and that trees are a 15-gallon or larger specimen. Although loss of vegetation on the Project site may have a short-term adverse impact on nesting migrant birds, implementation of LAX Master Plan EIS/EIR Commitment BC-3 will ensure that any habitat that is removed is replaced. The proposed Project's less than significant impacts on wildlife movement/migration corridors would be similar under Alternative 3. Therefore, impacts to wildlife movement/migration corridors would be less than significant.

Alteration of an Existing Wetland Habitat

Alternative 3 would result in less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project) that could potentially alter existing wetland habitat. The only potential wetland habitat, the Argo Drainage Channel, runs along the southern boundary and partially within the Project site. Alternative 3 would include the proposed Project's Project Design Features to protect potential wetland habitat, including Best Management Practices and prohibiting grading within 50 feet of the Argo Drainage Channel. The proposed Project's less than significant impacts to wetlands would be similar under Alternative 3. Therefore, impacts to existing wetland habitat would be less than significant.

Interference with Habitat/Species Behavior

Alternative 3 would result in less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project) that could potentially interfere with habitat/species behavior. The Los Angeles Airport/El Segundo Dunes habitat preserve located across Pershing Drive to the west of the Project site supports El Segundo Blue Butterfly. California gnatcatcher and California legless lizards have been observed approximately 0.8 miles south, and 1,000 feet west, respectively, of the proposed Project's Biological Resources Study Area within the Los Angeles Airport/El Segundo Dunes habitat preserve. Alternative 3 would not involve construction or operational activities that would impact this habitat or species behavior within the habitat directly. Additionally, existing uses adjacent to the Los Angeles Airport/El Segundo Dunes habitat preserve, including existing

airport support uses and an animal quarantine facility, are anticipated to remain in their existing condition under Alternative 3. The proposed Project's less than significant impacts to habitat/species behavior would be similar under Alternative 3. Therefore, impacts to habitat/species behavior would be less than significant.

6.9.2.4 Cultural Resources

Paleontological Resources

Alternative 3 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 3 would potentially be less than the proposed Project; however, the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain paleontological resources that have not been previously identified. However, like the proposed Project, Alternative 3 would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7. These commitments require a paleontological resources qualification and treatment plan, authorization, monitoring, collection, fossil preparation and donation, and reporting. These commitments would minimize potential effects on paleontological resources. The proposed Project's less than significant impacts to paleontological resources would be similar under Alternative 3. Therefore, impacts to paleontological resources would be less than significant.

Archaeological Resources

Alternative 3 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 3 would potentially be less than the proposed Project; however, the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain archaeological resources that have not been previously identified. One known archaeological site is known in the Project site in Area 12B, but this area would not be developed under Alternative 3. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. However, like the proposed Project, Alternative 3 would comply with LAX Master Plan EIS/EIR Commitments HA-1 through HA-10. These commitments require a survey of historic American buildings, historic education materials, discovery and preparation of an archaeological treatment plan, monitoring, excavation and recovery procedures, administrative procedures, archaeological/cultural monitor reporting, and notification. These commitments would minimize potential effects on archaeological resources. The proposed Project's less than significant impacts to archaeological resources would be similar under Alternative 3. Therefore, impacts to archaeological resources would be less than significant.

Historic Architectural Resources

Alternative 3 would not include any demolition of existing buildings as existing uses and structures are assumed to remain under all alternatives, but would introduce new structures. The Project site does not include any historic architectural resources. Alternative 3 would not result in the demolition of any individually historic building, or impair any historic district. The proposed Project's less than significant impacts to historic architectural resources would be similar under Alternative 3. Therefore, impacts to historic architectural resources would be less than significant.

6.9.2.5 Geology and Soils

Geologic Hazards

Fault Rupture

No known active or potentially active faults underlie the Project site. In addition, the Project site is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. Accordingly, the potential for surface fault rupture at the Project site is considered to be low. Alternative 3 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Similar to the proposed Project, all structures would be designed, located, and built in accordance with City of Los Angeles Department of Building and Safety (LADBS) requirements and current seismic design provisions of the California Building Code (CBC). However, as Alternative 3 allows less development than the proposed Project, Alternative 3 would expose less people to risk of injury involving rupture of a known earthquake fault. The proposed Project's less than significant impacts to fault rupture would be reduced under Alternative 3.

Seismic Ground Shaking

The Project site is located in the seismically active Los Angeles Basin, and, therefore, has the potential to be subjected to strong seismic ground shaking, but is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. However, potential exists for seismic ground shaking related to fault movement in the Project site vicinity. Alternative 3 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving seismic ground shaking. As with any new development in the State of California and similar to the proposed Project, building design and construction for Alternative 3 would be required to conform to the current seismic design provisions of the CBC. The 2010 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program (NEHRP) to mitigate losses from an earthquake and provide for the latest in earthquake safety. These standards are among the strictest standards in the seismic safety requirements contained in the City of Los Angeles Municipal Code (LAMC) Building Code. However, as Alternative 3 allows less development than the proposed Project, Alternative 3 would expose less people to risk of injury involving seismic ground shaking. The proposed Project's less than significant impacts to seismic ground shaking would be reduced under Alternative 3.

Liquefaction

Borings conducted at the Project site at depths of 50.5 to 55.5 feet did not encounter groundwater and the Project site is not mapped as being within a liquefaction hazard zone by the State of California. However, the City of Los Angeles General Plan Safety Element (1996) shows a limited portion of the east side of the Project site as being within a liquefaction zone. Alternative 3 would introduce new uses and construction activities that could be located in a City of Los Angeles-designated liquefaction zone. Similar to the proposed Project, the LAMC Building Code and the Uniform Building Code (UBC) require that foundation strength, building design, and building materials be adjusted to limit any impact related to liquefaction for construction in liquefaction zones. However, as Alternative 3 allows less development than the

proposed Project, Alternative 3 would potentially expose less people to liquefaction zones. The proposed Project's less than significant impacts to liquefaction would be reduced under Alternative 3.

Landslides

The Project site and surrounding area has an average slope of less than 30 percent, and thus is not susceptible to potential hazards from slope stability. Furthermore, the Project site is not located within a State of California-designated seismic hazard zone for landslide potential or a City of Los Angeles-designated landslide inventory area. Similar to the proposed Project, grading for Alternative 3 would be secured in accordance with the LABC. Therefore, Alternative 3 would not result in substantial damage to structures or infrastructure, or expose people to substantial risk or injury due to landslides. The proposed Project's less than significant impacts to landslides would be similar under Alternative 3. Therefore, impacts to landslides would be less than significant.

Inundation

Based on a review of the California Geologic Survey (CGS) Tsunami Inundation Map for the Venice 7.5-minute quadrangle, the Project site is not located within a tsunami inundation-hazard area (CGS 2009). As such, no impacts associated with tsunamis would occur for Alternative 3.

Furthermore, similar to the proposed Project, Alternative 3 would comply with any applicable strategic plans developed by the State of California Office of Emergency Services and the Los Angeles County Office of Emergency Management, as well as the construction limitations contained in the City of Los Angeles Flood Hazard Management Specific Plan Guidelines (as referenced in the City of Los Angeles General Plan Safety Element).

The Project site is over 100 feet above Marina Del Rey and the Ballona Creek and over 50 feet above the Argo Drainage Channel making wave oscillation topographically improbable. Because there is no threat to the Project site, seiches are not a hazard for Alternative 3. Additionally, no dams or dikes are located within or near the Project site.

Alternative 3 would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury due to inundation by a dam or a seiche. The proposed Project's less than significant impacts to inundation would be similar under Alternative 3. Therefore, impacts to inundation would be less than significant.

Soil Conditions

Near-surface soil encountered within borings conducted for the proposed Project were observed to be sand soils estimated to have a very low to low expansion potential. Project site soils are anticipated to have negligible soluble sulfate levels. Additionally, the Project site soils are anticipated to have low to moderate levels of soluble chloride and relatively low electrical resistivity.

Previously developed areas of the Project site may have deep fill. Construction for Alternative 3 could result in excavation of approximately 45 feet Below Ground Surface (bgs). Thus, discovery of fill may be encountered during excavation activities for Alternative 3. However, compliance with CBC and the LABC requirements would ensure that future buildings would be adequately supported by the underlying soils. Alternative 3 would not cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or

expose people to substantial risk of injury impacts from soil conditions. The proposed Project's less than significant impacts to soil conditions would be similar under Alternative 3. Therefore, impacts to soil conditions would be less than significant.

Sedimentation and Erosion

Erosion

Alternative 3 would include grading, excavation, fill, and other activities that would disturb the ground. However, similar to the proposed Project, construction activities for Alternative 3 would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 3 would reduce erosion effects.

In addition, all construction would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Grading would be required under Alternative 3 in order to accommodate development. Grading would include excavation of earthen material and placement of earthen material. Grading is anticipated to be less than that of the proposed Project due to the smaller development intensity of Alternative 3. Grading has the potential to increase the risk of erosion during Project site preparation and construction activities. However, erosion would be reduced by implementing appropriate erosion control measures during excavation and grading activities. During the construction phase of Alternative 3, construction activities will be subject to the requirements of a National Pollutant Discharge Elimination System (NPDES) construction permit. Compliance with the NPDES permit includes implementing BMPs, some of which are specifically implemented to reduce soil erosion and loss of topsoil. Additionally, Alternative 3 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control erosion.

The proposed Project's less than significant impacts to erosion would be similar under Alternative 3. Therefore, impacts to erosion would be less than significant.

Sedimentation

Sedimentation could potentially occur from exposed soils (active dune sand and alluvium) during construction of Alternative 3. However, construction activities would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 3 would reduce sedimentation effects.

Temporary dewatering activities are not expected during construction of Alternative 3. However, if dewatering occurs as a result of unexpected water table discovery during construction it would be conducted in accordance with the requirements of the RWQCB and would also be subject to the review and approval of the LADBS, as appropriate.

In addition, similar to the proposed Project, construction associated with Alternative 3 would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion as well as the LAWA Stormwater Pollution Prevention Plan (SWPP) and Best Management Practices (BMPs).

Additionally, Alternative 3 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control sedimentation.

During operation, Alternative 3 may result in a limited degree of soil sedimentation effects from non-vegetated areas. However, in accordance with National Pollutant Discharge Elimination System (NPDES) requirements, Alternative 3 would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of Alternative 3. The SUSMP would include BMPs that would reduce on-site sedimentation from vegetated areas on the Project site through stormwater control devices. Alternative 3 would include the proposed Project's Project Design Features that require use of bioswales and permeable pavement to capture sediment runoff and deposition and containment to control runoff on-site.

Alternative 3 would not accelerate natural processes of wind and water erosion and sedimentation, or result in sediment runoff or deposition which would not be contained or controlled-on-site. The proposed Project's less than significant impacts to sedimentation would be similar under Alternative 3. Therefore, impacts to sedimentation would be less than significant.

Landform Alteration

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project site. While Alternative 3 would involve grading that will alter the site topography, the majority of the Project site has been previously disturbed and does not contain prominent geologic or topographic features. Alternative 3 would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. The proposed Project's less than significant impacts to landform alteration would be similar under Alternative 3. Therefore, impacts to landform alteration would be less than significant.

6.9.2.6 Greenhouse Gases

The construction GHG emissions for Alternative 3 are estimated to be 33 percent less than the project, which is the same proportion as the reduction in square footage. The operational GHG emissions and service population as estimated to be about 39 and 34 percent less than the proposed Project, respectively, based on the ratio of square footages for individual land uses. Based on these emissions and service population estimates, the efficiency metric for Alternative 3 is projected to be approximately 4.18 MT of CO2e per Service Population (SP) per year, which is less than the proposed Project and less than the SCAQMD draft efficiency target of 4.8 MT of CO2e per SP per year.

6.9.2.7 Hazards and Hazardous Materials

Transportation, Use, or Disposal of Hazardous Materials

Alternative 3 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Additionally, Alternative 3 permits similar uses as the proposed Project, which would use similar hazardous materials. These include offices, research and development, commercial, and airport support uses. However, Alternative 3 would result in less development on the Project site (1,564,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project), which would result in less transport, use, or disposal of hazardous

materials, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. As with the proposed Project, all hazardous materials transported, used, or disposed in association with Alternative 3 would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The proposed Project's less than significant impacts to transport, use, or disposal of hazardous materials would be similar under Alternative 3. Therefore, impacts to transport, use, or disposal of hazardous materials would be less than significant.

Accidental Release of Hazardous Materials

Alternative 3 would include grading, excavation, fill, or other activities that would disturb the ground. Portions of the Project site are located in the City of Los Angeles Methane Hazard and Methane Hazard Buffer zone. The Project site does not contain any known soil or groundwater contamination sites. Alternative 3 would include subterranean elements. The design of the buildings and any associated subterranean elements within identified Methane Hazard and Buffer areas would be required to comply with LADBS methane standards. This would include compliance with the City of Los Angeles Methane Code Ordinance No. 175790 and Ordinance No. 180619. As a result of compliance with these regulations, Alternative 3 would manage risks from methane and would ensure that Alternative 3 does not 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. The proposed Project's less than significant impacts to accidental release of hazardous materials would be similar under Alternative 3. Therefore, impacts to accidental release of hazardous materials would be less than significant.

Contaminated Soils, Groundwater, and Other Hazardous Materials

Alternative 3 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. The Project site does not contain any known soil or groundwater contamination sites. Construction of Alternative 3 would comply with LAX Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction. This Master Plan Commitment would require development of a program to coordinate all efforts associated with handling any contaminated materials in soil or groundwater encountered during construction. Operation of Alternative 3 within the Project site would not include ongoing digging, grading, or other activities that could potentially expose unknown contaminated soil and groundwater. Any unknown contaminated soil or groundwater encountered during construction would be handled and remediated according to applicable regulations and would not pose a hazard to occupants of Alternative 3 at the time of occupancy and during operations. Incorporation of appropriate monitoring and safety provisions would ensure that Alternative 3 does not 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. The proposed Project's less than significant impacts to contaminated soils, groundwater, and other hazardous materials would be similar under Alternative 3. Therefore, impacts to contaminated soils, groundwater, and other hazardous materials would be less than significant.

Hazardous Emissions and Materials within a Quarter Mile of Existing or Proposed Schools

Alternative 3 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. Use of hazardous materials would be similar to the proposed Project, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. Due to the decreased scale and intensity of development as compared to the proposed Project, Alternative 3 would also likely have less hazardous emissions and materials transported within ¼ mile of existing and proposed schools in the Project site vicinity. As with the proposed Project, these materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Alternative 3 would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. The proposed Project's less than significant impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be similar under Alternative 3. Therefore, impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be less than significant.

Airport Hazards

Wildlife Hazards

Alternative 3 would introduce new uses such as offices, research and development, commercial, and airport support uses. Alternative 3 would remove existing vegetation and introduce new vegetation that could attract wildlife, however, Alternative 3 includes the proposed Project's Project Design Features such as prohibiting the casting and spraying of seed for sod, requiring that trees be planted to meet specified spacing requirements, and prohibiting trees that provide fruit. The proposed Project's less than significant impacts to wildlife hazards would be similar under Alternative 3. Therefore, impacts to wildlife hazards would be less than significant.

Lighting and Glare Hazards

Alternative 3 would introduce new lighting on the Project site that would increase lighting compared to existing conditions. Like the proposed Project, Alternative 3 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 3 lighting would comply with all applicable LAMC lighting standards. Alternative 3 lighting design guidelines would be the same as the proposed Project, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; prohibiting mirror glass and highly reflective surfaces as dominant building materials; and requiring service area lighting to be contained in the service yard.

The proposed Project's less than significant impacts to lighting and glare hazards would be similar under Alternative 3. Therefore, impacts to lighting and glare hazards would be less than significant.

Airport Obstruction Hazards

Alternative 3 would introduce new buildings or structures on the Project site. Alternative 3 allows the same building heights as the proposed Project. The proposed Project's less than significant impacts to airport obstruction hazards would be similar under Alternative 3. Therefore, impacts to airport obstruction hazards would be less than significant.

Interference with Emergency Response Plans

Alternative 3 would include construction activities that could impact emergency access and would change existing uses and activities on the Project site. Similar to the proposed Project, during construction, roadway access would be maintained by construction detours and diversions. Emergency access would be coordinated and ensured through Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office.

No aspects of Alternative 3 would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, similar to the proposed Project, Alternative 3 would comply with all applicable City policies related to disaster preparedness and emergency response and emergency vehicles would use sirens to receive priority on roadways. The proposed Project's less than significant impacts to interference with emergency response plans would be similar under Alternative 3. Therefore, impacts to emergency response plans would be less than significant.

6.9.2.8 Hydrology and Water Quality

Hydrology

Surface Water

Alternative 3 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. Alternative 3 permits less intense development than the proposed Project and includes the proposed Project's Project Design Features related to pervious paving. Additionally, impervious areas would likely be less under Alternative 3 as compared to the proposed Project due to the reduced square footage of development. Similar to the proposed Project, Alternative 3 would be subject to SUSMP requirements and associated BMPs that would minimize surface water hydrology impacts. The proposed Project's less than significant impacts to surface water hydrology would be similar under Alternative 3. Therefore, impacts to surface water hydrology would be less than significant.

Groundwater

Alternative 3 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. Alternative 3 permits less intense development than the proposed Project and includes the proposed Project's Project Design Features related to pervious paving. Pervious areas would be greater than under the proposed Project, resulting in more recharge to groundwater than under

the proposed Project. Similar to the proposed Project, Alternative 3 would be subject to SUSMP requirements and associated BMPs that would minimize groundwater hydrology impacts. The proposed Project's less than significant impacts to groundwater hydrology would be similar under Alternative 3. Therefore, impacts to groundwater hydrology would be less than significant.

Water Quality

Surface Water

Surface water pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be less with Alternative 3 due to the less intense development allowed. Given the reduced development under Alternative 3 relative to the proposed Project, runoff from the site would have fewer pollutants. Similar to the proposed Project, Alternative 3 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize surface water quality impacts. The proposed Project's less than significant impacts to surface water quality would be similar under Alternative 3. Therefore, impacts to surface water quality would be less than significant.

Groundwater

Groundwater pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be less with Alternative 3 due to the less intense development allowed. Given the reduced development under Alternative 3 relative to the proposed Project, groundwater infiltration from the site would have fewer pollutants. Similar to the proposed Project, Alternative 3 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize groundwater quality impacts. The proposed Project's less than significant impacts to groundwater quality would be similar under Alternative 3. Therefore, impacts to groundwater quality would be less than significant.

6.9.2.9 Land Use and Planning

Land Use Plan Consistency

Alternative 3 would allow the same uses and provide for the same development standards as the proposed Project. However, the total square footage of development would be reduced from 2,320,000 square feet under the proposed Project to 1,546,666 square feet under Alternative 3. The same discretionary approvals required for the proposed Project would be required under Alternative 3. Similar to the proposed Project, Alternative 3 would be consistent with local and regional goals, policies, and objectives than the proposed Project. For example, Alternative 3 would identify areas for new open space, reduce vehicular trips, and emphasize pedestrian/bicycle access. The proposed Project's less than significant impacts to land use plan consistency would be similar under Alternative 3. Therefore, impacts to land use plan consistency would be less than significant.

Existing Land Use Compatibility

Alternative 3 permits similar uses as the proposed Project, including offices, research and development, commercial, and airport support uses. Alternative 3 would result in less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project), but would include the proposed Project's height, setback, buffer, and stepback requirements. Proposed Project uses that would enhance

land use compatibility would be introduced under Alternative 3, including mixed-use commercial uses adjacent to the existing Westchester Business District; a buffer area adjacent to residences to the north of the Project site; and airport support uses adjacent to existing airport uses to the south of the Project site, although less of these uses would be developed. The proposed Project's less than significant impacts to existing land use would be similar under Alternative 3. Therefore, impacts to existing land use compatibility would be less than significant.

6.9.2.10 Noise

Construction

Alternative 3 would result in less construction activity, off-site construction trucks, and ground-borne vibration than the proposed Project as it allows less development on the Project site (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Noise from construction activities in the vicinity of residences to the north would be less than with the proposed Project, as Alternative 3 includes Project Design Features that buffer construction activities from residences, and would have less construction activity. Although less construction activity would occur under Alternative 3, short-term construction-period noise impacts would be significant and unavoidable, similar to the proposed Project, due to the fact that mitigation measures included as part of the proposed Project could not reduce noise impacts to less than significant levels for certain receptors located adjacent to the Project site. These conditions would also occur under Alternative 3. The type of construction would be similar to the proposed Project, resulting in similar daily construction-related noise levels, although the duration of construction would likely be shorter. Off-site construction traffic would also generate noise similar to the proposed Project, and would be less than significant. Finally, similar to the proposed Project, construction activities for Alternative 3 would likely generate ground borne vibration levels that are less than significant. The proposed Project's significant and unavoidable construction impacts to noise would be similar under Alternative 3. Therefore, construction impacts to noise would be significant and unavoidable.

Operations

Alternative 3 would allow less development and a fewer number of vehicle trips than the proposed Project. Alternative 3 would result in a reduction in noise levels associated with on-site equipment and activity and off-site traffic. Similar to the proposed Project, Alternative 3 would comply with the City of Los Angeles building code requirements. Finally, Alternative 3 would not introduce new uses in the Airport Influence Area that are incompatible with aircraft noise exposure guidelines. The proposed Project's less than significant operational impacts to noise would be similar under Alternative 3. Therefore, operational impacts to noise would be less than significant.

6.9.2.11 Population, Housing, and Employment

Cause or Accelerate Growth in an Undeveloped Area

Alternative 3 would introduce offices, research and development, commercial, and airport support uses to the Project site and would result in less development on the Project site than the proposed Project (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Alternative 3 would generate 4,405 employees, which is less

than the proposed Project. Additionally, no new housing or related population growth would occur as a result of Alternative 3. The Project site was previously developed and is surrounded on all sides by existing development. Alternative 3 would therefore not cause or accelerate growth in an undeveloped area. The proposed Project's less than significant impacts to growth in an undeveloped area would be similar under Alternative 3. Therefore, impacts to growth in an undeveloped area would be less than significant under Alternative 3.

Consistency with Growth Policies

Alternative 3 would introduce offices, research and development, commercial, and airport support uses to the Project site and would result in less development on the Project site than the proposed Project (1,564,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Similar to the proposed Project, Alternative 3 would provide new employment and mixed-use development consistent with applicable policies, however, new jobs would be less than under the proposed Project. The proposed Project's less than significant impacts to consistency with growth policies would be similar under Alternative 3. Therefore, impacts to consistency with growth policies would be less than significant under Alternative 3.

6.9.2.12 Public Services

Fire

Alternative 3 would increase demand for fire protection and emergency facilities due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 3 would not introduce permanent residents or housing that would require fire protection services. Based on City of Los Angeles estimates for the population served by Fire Station No. 5, the existing number of incidents per 1,000 population is approximately 49 incidents, or an incident generation rate of .0049 per capita. Alternative 3 would add approximately 4,405 daytime employees. Applying the incident generation rate of .0049 to Alternative 3 daytime employees would result in an increase of 22 incidents per year. This would be equivalent to about a 0.37 percent increase over the 5,814 existing emergency incidents within the primary response of LAFD Station No. 5. Alternative 3 would increase the workload of LAFD Station No. 5 by less than one percent.

LAX Master Plan Commitments FP-1, Los Angeles Fire Department (LAFD) Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of FAR and fire code requirements, would ensure maintenance of adequate response times, facilities, and emergency access associated with development of Alternative 3. Impacts associated with staffing, equipment, and facilities would also be continually evaluated and addressed pursuant to standard LAFD procedures and fire code requirements. The implementation of the LAX Master Plan Commitments will further reduce impacts related to fire protection services. Therefore, Alternative 3 would not impact emergency access such that it would require addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services.

Alternative 3 would not result in the need for a new fire station, or expansion, consolidation, or relocation of an existing facility due to impacts on fire protection infrastructure, demand, or emergency access. The proposed Project's less than significant impacts to fire service would be similar under Alternative 3. Therefore, impacts to fire service would be less than significant under Alternative 3.

Police

Alternative 3 would increase demand for police protection due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 3 would not introduce permanent residents or housing that would require police protection services. Based on LAPD statistics on the population served by the Pacific Community Police Station, the existing number of crimes per 1,000 persons is approximately 29.8 or an incident generation rate of .029 per capita. Alternative 3 would add 4,405 daytime employees. Applying the incident generation rate of .029 to Alternative 3 daytime employees would result in an increase of 128 incidents per year. This would be equivalent to a two percent increase over the 6,069 existing crimes within the Pacific Community Police Station service area. This is a conservative estimate as daytime employees would not be permanent residents requiring police services in the Pacific Community Police Station service area. Alternative 3 would not result in an increase in Project site population that would require a substantial increase in law enforcement services to maintain adequate services or would require new or expanded facilities.

Alternative 3 would comply with LAX Master Plan commitments LE-1: Routine Evaluation of Manpower and Equipment Needs; LE-2: Plan Review; PS-1: Fire and Police Facility Relocation Plan; and PS-2: Fire and Police Facility Space and Siting Requirements. These LAX Master Plan Commitments would ensure that LAWAPD and LAPD continue to routinely evaluate and provide additional officers, supporting administrative staff, facilities, and equipment to keep pace with forecast increases in activity and development at the Project site in order to maintain a high level of law enforcement services. Alternative 3 would introduce less employees than the proposed Project, and LAX Master Plan Commitment LE-2, Plan Review, would ensure that during the design phase of any development on the Project site, LAPD, LAWAPD, and other law enforcement agencies would be consulted to review plans so that, where possible, environmental contributors to criminal activity, such as poorly-lit areas and unsafe design, are reduced. Through implementation of these LAX Master Plan commitments, Alternative 3 would not result in a significant increase in emergency response times due to increased traffic congestion, changes in circulation, or the location of new land uses. The proposed Project's less than significant impacts to police service would be similar under Alternative 3. Therefore, impacts to police service would be less than significant under Alternative 3.

Public Schools

Construction of Alternative 3 could occur as close as 0.3 miles from the nearest public school, the Loyola Village Elementary School. Similar to the proposed Project, Alternative 3 construction activities would comply with LAX Master Plan Commitments C-1, ST-18, ST-19, and ST-22 related to construction, which would minimize impacts on adjacent uses. These measures require a construction traffic management plan, closure restrictions on existing roadways, designation of truck routes, and establishment of a ground transportation/construction coordination office. Additionally, construction under Alternative 3 would be less intense than for the proposed Project, and it is not anticipated that construction activities would cause substantial increases in noise levels or impair access to local schools.

Based on an average student generation rate of 0.39, enrollment within the Project site vicinity associated with Alternative 3 employees would increase by 857 students.[12] Based on the

[12] Based on an estimated 4,405 new Alternative 3 employees as follows: 4,405 (net new employees) X 0.78 (employees likely to reside within the district) X 0.64 (number of new employee households likely to be located in LAUSD) X 0.39 (student generation rate)= 857 net new students. Generation rates based on Los Angeles Unified

estimated current overage of 3,779 seats, the public schools serving the Project site vicinity would still have an excess of 2,922 seats with implementation of Alternative 3. Excess seats would be greater under Alternative 3 than the proposed Project and capacity would remain under Alternative 3.

Additionally, Alternative 3 would comply with applicable school impact fee requirements pursuant to California Government Code Section 65995 (Senate Bill 50), which are deemed to provide full and complete school facilities mitigation.

The proposed Project's less than significant impacts to public schools would be similar under Alternative 3. Therefore, impacts to public schools would be less than significant under Alternative 3.

Libraries

Alternative 3 would result in a net increase of 4,405 employees. Project site employees would be anticipated to use library services during typical daytime working hours. Due to time restrictions, employees are most likely to use the Westchester-Loyola Branch Library located nearest to the Project site. The addition of 4,405 employees to the existing 39,480 residents in the Westchester-Playa Del Rey Community would yield a library service population of 43,885. This represents a conservative estimate, since few employees are likely to use library services. However, even with this conservative estimate, Alternative 3 employees would not exceed the forecasted unused capacity to this library. With the addition of Alternative 3 employees, there would still be an unused library capacity of 56,115. The proposed Project's less than significant impacts to libraries would be similar under Alternative 3. Therefore, impacts to libraries would be less than significant under Alternative 3.

6.9.2.13 Recreation

Alternative 3 would maintain the existing golf course on the Project site, which provides recreational space. Like the proposed Project, Alternative 3 would reserve acreage within the Project site for recreation and open space uses and would improve the ratio of open space to residents in the two-mile radius of the Project site boundary.

Alternative 3 does not include a residential development component that would contribute to a net increase in population. However, increase in employment would increase demand for parks and recreational facilities due to daytime or lunchtime use. While there would be an estimated increase in employment of approximately 4,405 individuals, which is less than the proposed Project employment, it is doubtful that a meaningful number of these new employees would frequent off-site parks at lunchtime such that demand would place constraints on these facilities. Due to time limitations for typical employee lunch breaks, it is expected that such use would not likely involve active sports or require recreational facilities. Incidental increases in daytime employee demand for public parks and recreational facilities would be minimal. Alternative 3 would improve the provision of parks and open space as the proposed Project would, and it would not have significant impacts on public parks or recreational facilities. The proposed Project's less than significant impacts to recreation would be similar under Alternative 3. Therefore, impacts to recreation would be less than significant under Alternative 3.

School District, School Facilities Fee Plan, March 2, 2000, Chapter 6, via City of Los Angeles, LAX Master Plan Final EIS/EIR, Section 4.27, Schools, 2004.

6.9.2.14 Traffic and Transportation

The goal of Alternative 3 is to reduce the significant impacts of the proposed Project by reducing total development program by approximately one-third as compared to proposed Project development. Alternative 3 represents a significant decrease in development compared to the proposed Project

Construction

Alternative 3 represents a reduction in scale and scope of development compared to the proposed Project. However, peak construction activity is conservatively assumed to be comparable to that of the Project. As with the proposed Project, with implementation of the proposed Project mitigation measures including a construction traffic management plan, construction impacts to intersection operations would be less than significant. However, similar to the proposed Project, Alternative 3 could result in the temporary loss of on-street parking, lane closure, and sidewalk closure. The impact on the overall transportation system from construction activities would be temporary in nature and would cause an intermittent reduction in street and intersection operating capacity near the Project site. Detailed construction traffic management plans, including street closure information, detour plans, and haul routes would be prepared as necessary and satisfactory to the City of Los Angeles. Within the context of these plans, provisions would also be made to incorporate safety precautions for pedestrians and bicyclists, while also maintaining access to adjacent properties, to the extent feasible. Therefore, construction impacts would be less than significant.

Operation

Alternative 3 Trip Generation

Alternative 3 trip generation estimates were based on the rates published in *Trip Generation, 8th Edition* (Institute of Transportation Engineers, 2008). Alternative 3 is estimated to generate approximately 15,485 daily trips on a typical weekday, including 1,433 morning peak hour trips (1,139 inbound, 294 outbound) and 1,647 afternoon peak hour trips (428 inbound, 1,219 outbound).

Existing with Alternative 3 Conditions

When the Existing with Alternative 3 conditions are measured against the Existing conditions, Alternative 3 is anticipated to result in significant impacts at six of the 108 study intersections during either the morning or afternoon peak hour. The remaining 102 intersections would not be impacted under Existing with Alternative 3 conditions.

Existing with Alternative 3 with Mitigation Conditions

Alternative 3 is anticipated to result in residual impacts at one study intersection during either the morning or afternoon peak hours after implementation of the mitigation program. The remaining 107 study intersections would not be impacted under Existing with Alternative 3 with Mitigation conditions. The proposed Project's significant intersection impacts in Year 2012 would be less under Alternative 3.

Future with Alternative 3 Conditions

When the Future with Alternative 3 conditions are measured against the Future without Project conditions, Alternative 3 is anticipated to result in significant impacts at 11 of the 108 study intersections during either the morning or afternoon peak hour. The remaining 97 intersections are not projected to be impacted under Future with Alternative 3 conditions.

Future with Alternative 3 with Mitigation Conditions

Alternative 3 is anticipated to result in residual impacts at one study intersection during either the morning or afternoon peak hours after implementation of the mitigation program. The remaining 107 study intersections would not be impacted under Future with Alternative 3 with Mitigation conditions. The proposed Project's significant intersection impacts in Year 2022 would be less under Alternative 3.

CMP Arterial Analysis

Table 6-11 below summarizes the number of peak hour traffic volumes expected at the CMP monitoring locations within the around the Study Area with implementation of Alternative 3. Peak hour traffic volumes for the monitoring locations outside the Study Area were estimated using the methodology described in Appendix E. The peak hour traffic volumes expected at each CMP arterial monitoring intersection are as follows:

Table 6-11

CMP Arterial Analysis-Alternative 3

No.	Intersection	Peak Hour Trips		Requires CMP Analysis?
		A.M.	P.M.	
1.	Lincoln Boulevard & Venice Boulevard	30	37	NO
4.	Lincoln Boulevard & SR-90 Ramps	58	66	**YES**
12.	Lincoln Boulevard & Manchester Avenue	426	465	**YES**
28.	Sepulveda Boulevard & Manchester Avenue	199	218	**YES**
31.	Sepulveda Boulevard & Lincoln Boulevard	358	412	**YES**
37.	Sepulveda Boulevard & El Segundo Boulevard	81	94	**YES**
38.	Sepulveda Boulevard & Rosecrans Avenue	71	83	**YES**
45.	La Cienega & Centinela Avenue	29	50	**YES**
53.	La Brea Avenue & Manchester Avenue	34	39	NO
88.	La Cienega Boulevard & Stocker Street	48	55	**YES**
--	Lincoln Boulevard & Pico Boulevard	11	13	NO
--	Venice Boulevard & Centinela Avenue	3	4	NO
--	La Cienega Boulevard & Jefferson Boulevard	29	24	NO
--	La Cienega Boulevard & Venice Boulevard	18	15	NO

Table 6-11

CMP Arterial Analysis-Alternative 3

No.	Intersection	Peak Hour Trips		Requires CMP Analysis?
		A.M.	P.M.	
--	Overland Avenue & Venice Boulevard	3	4	NO
--	Crenshaw Boulevard & Manchester Avenue	9	10	NO
--	PCH & Artesia Boulevard/Gould Street	22	26	NO

Source: Gibson Transportation, 2014

Alternative 3 is anticipated to add 50 or more peak hour trips to eight of the 10 CMP arterial monitoring station within the Study Area. Alternative 3 would not add more than 50 trips to the CMP arterial monitoring locations outside of the Study Area.

Appendix E shows the results of the CMP impact analysis at the eight CMP arterial monitoring locations for the Existing with Alternative 3 conditions and the results of the analysis for the Future with Alternative 5 conditions. As shown in Appendix E, Alternative 3 is not projected to result in a significant impact at any of the CMP arterial monitoring locations under Existing or Future conditions. This is the same as under Project conditions.

CMP Freeway Analysis

Table 6-12 depicts the peak hour traffic volumes expected at each mainline freeway monitoring location within and around the Study Area.

Table 6-12

CMP Freeway Analysis-Alternative 3

Mainline Freeway Monitoring Location	Peak Hour Trips		Requires CMP Analysis?
	A.M.	P.M.	
I-405 North of La Tijera Avenue			
Northbound	5	23	No
Southbound	21	8	No
I-405 North of Venice Boulevard			
Northbound	27	113	No
Southbound	106	40	No
I-405 North of Inglewood Avenue			
Northbound	74	28	No
Southbound	19	79	No
I-105 East of Sepulveda Boulevard			
Eastbound	33	136	No
Westbound	127	48	No
I-105 East of Crenshaw Boulevard			
Eastbound	21	87	No
Westbound	81	30	No

Source: Gibson Transportation, 2014

Alternative 3 would not add 150 or more peak hour trips to any of the five freeway monitoring locations in either direction. Therefore, no further analysis is required, as under the proposed Project.

CMP Transit Analysis

Alternative 3 would generate approximately 150 morning peak hour transit trips and 173 afternoon peak hour transit trips, which is less than the existing and projected future residual transit capacity. Therefore, Alternative 3 would not result in a significant impact on the regional transit system, as under the proposed Project.

Parking

According to Los Angeles Municipal Code (LAMC) requirements, Alternative 3 would require approximately 2,670 parking spaces. All parking would be accommodated on-site. Like the proposed Project, Alternative 3 would provide sufficient parking to meet LAMC requirements.

Neighborhood Intrusion

The neighborhood intrusion impact criteria developed by LADOT was used to identify potential neighborhood impacts from Alternative 3 traffic. Alternative 3 would add 1,200 or more daily trips to the following four arterial corridors before implementation of the mitigation program:

- Lincoln Boulevard between Fiji Way and Sepulveda Boulevard
- Sepulveda Boulevard between Howard Hughes Boulevard and Mariposa Avenue
- La Tijera Boulevard between Westchester Parkway and La Cienega Boulevard
- Westchester Parkway/Arbor Vitae Street between Pershing Drive and Aviation Boulevard

The following intersections along the identified corridors would operate at LOS E or F during at least one of the analyzed peak hours:

30. Sepulveda Boulevard & Westchester Parkway
33. Sepulveda Boulevard & I-105 Westbound Ramps N/O Imperial Highway
34. Sepulveda Boulevard & Imperial Highway
36. Sepulveda Boulevard & Grand Avenue
37. Sepulveda Boulevard & El Segundo Boulevard
46. Airport Boulevard & Manchester Avenue
49. La Cienega Boulevard & Manchester Avenue

As under the Project analysis, the corridors of Sepulveda Boulevard and Manchester Avenue should be examined for alternative routes through residential neighborhoods. However, neither Sepulveda Boulevard nor Manchester Avenue has parallel local streets that would serve this purpose. Therefore, based on LADOT's standard criteria similar to the proposed Project, no potential neighborhood intrusion impacts are identified under Alternative 3.

6.9.2.15 Utilities and Services

Wastewater

Alternative 3 would result in new development, including offices, research and development, commercial, and airport support uses (1,546,666 square feet of development as opposed to 2,320,000 square feet under the proposed Project). Alternative 3 would generate an estimated 169,660 gallons per day (gpd) of wastewater, which is less than the proposed Project. These projected wastewater flows would be conveyed to the existing facilities operated by the LADPW and Los Angeles Bureau of Sanitation, which would serve Alternative 3 wastewater collection and treatment needs. Sewers to convey wastewater to LADPW facilities would be constructed on-site to serve the proposed development and would be sized according to projected flows, including peak day flows. The estimated 169,660 gpd wastewater generation for Alternative 3 would use approximately 0.06 percent of the total available flow capacity (291 mgd) within the North Central Outfall Sewer (NCOS) and North Outfall Relief Sewer (NORS) that serve the Project site. As such, flows associated with Alternative 3 would not cause the NCOS and NORS to become constrained.

The Hyperion Treatment Plant (HTP) has a design capacity of 450 mgd, and currently has an excess wastewater capacity of approximately 151 mgd. The Integrated Resources Plan (IRP) projects that the average daily water flow (ADWF) of the HTP will increase to 435 mgd by 2020. This would leave an excess wastewater capacity of approximately 15 mgd. The estimated 169,660 gpd wastewater generation of Alternative 3 would use about 1.13 percent of the projected available flow capacity (15 mgd) of the HTP in 2020. Alternative 3 will not generate

wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or the City of Los Angeles' General Plan and its elements.

The proposed Project's less than significant impacts to wastewater would be less under Alternative 3. Therefore, impacts to wastewater would be less than significant.

Water Use

Alternative 3 is estimated to consume 342,754 gpd of water, which is less than the proposed Project. Water demand in the City of Los Angeles is estimated to be 72.8 mgd in 2022, the proposed Project buildout year. Alternative 3 water demand would represent approximately 0.47 percent of the projected increase in LADWP's water demand from 2010 to 2022.

LAX Master Plan Commitment W-1, Maximize Use of Reclaimed Water, would apply to Alternative 3 to maximize the use of reclaimed water in facilities and landscaping and offset potable water use to minimize the potential for increased water use resulting from Alternative 3. LAX Master Plan Commitment W-2, Enhance Existing Water Conservation Program, would also be applied to ensure the ongoing use of water conservation practices, such as installing water-efficient fixtures. Alternative 3 would also include the proposed Project's Project Design Features related to requiring drought-tolerant landscaping and encouraging green roofs and water demand at buildout would not exceed available supplies.

Alternative 3 would require new water distribution infrastructure that connects to the water transmission lines that serve the Project site, similar to the proposed Project. The construction of this new infrastructure would be incorporated into the LAX Master Plan as part of Master Plan Commitment PU-1, Develop a Utility Relocation Program, and W-1, Maximize Use of Reclaimed Water. The water service needs for Alternative 3 would not exceed distribution infrastructure capabilities and it is anticipated that regional water distribution pipelines would be adequate to accommodate increases in water demand for Alternative 3.

The proposed Project's less than significant impacts to water would be less under Alternative 3. Therefore, impacts to water would be less than significant.

Solid Waste

Although no demolition of buildings will take place as part of Alternative 3, some inert waste will be generated during construction. Construction activities would include earthwork, grading, clearing of brush and debris, and excavation. Total solid waste generated during construction of Alternative 3 would be 6,016,530 tons. LAX Master Plan Commitments SW-2, Requirements for the Use of Recycled Materials during Construction, and LAX Master Plan Commitment SW-3, Requirements for the Recycling of Construction and Demolition Waste, would reduce the amount of construction waste requiring disposal by requiring contractors to use recycled construction materials and to recycle construction-related waste.

The landfills that serve the City of Los Angeles had a remaining capacity of 93.07 million tons in 2010 and the City of Los Angeles disposed approximately 3.86 million tons in 2000, based on the most recently published reports.[13] Based on solid waste generation rates for the types of land uses in Alternative 3, approximately 27,751 pounds per day would be generated by

[13] City of Los Angeles, Department of Public Works, Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, p. 12, online at http://san.lacity.org/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf, accessed January 16, 2013.

Alternative 3. Based on the City of Los Angeles' 70 percent diversion goal, only 8,325 pounds of solid waste from Alternative 3 would require disposal per day in 2022. This solid waste disposal, which would amount to 1,519 tons per year, would represent an approximately 0.04 percent increase in the amount of City-generated solid waste that is disposed of at landfills that serve the City of Los Angeles, and approximately 0.002 percent of its remaining capacity. The estimated solid waste generation would not exceed the solid waste capacity at landfills that serve the City of Los Angeles.

Similar to the proposed Project, Alternative 3 would be consistent with applicable solid waste policies. LAX Master Plan Commitments SW-1, SW-2, and SW-3; implementation of the Los Angeles County Solid Waste Management Action Plan; and implementation of the City of Los Angeles Solid Waste Management Action Plan, Source Reduction and Recycling Element (SRRE), Solid Waste Integrated Resources Plan (SWIRP), City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), LAWA Sustainability Plan, and LAMC Section 66.32 would serve to reduce the amount of solid waste generated. Alternative 3 would be consistent with, and would apply all applicable goals, policies, and strategies of, the CiSWMPP and the associated implementation strategies of the SRRE, including such components as the Curbside Recycling Program, as outlined in the City of Los Angeles' Framework Element. As such, the anticipated on-site diversion programs associated with Alternative 3 would serve to enhance the ability of the City of Los Angeles to meet or exceed its long-term goal of 70 percent diversion by 2020. Alternative 3 would comply with, and implement as necessary, all provisions of the aforementioned City policies and programs to achieve the waste diversion goals of AB 939. In addition to existing programs aimed at reducing solid waste generation, LAWA would implement LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, to enhance the current on-site recycling program, extend recycling requirements to tenants, and address the procurement of recycled materials. With the continuation of existing recycling programs and implementation of LAX Master Plan Commitment SW-1, Alternative 3 would not conflict with solid waste policies and objectives intended to help achieve the requirements of AB 939. As such, Alternative 3 would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, the City of Los Angeles' Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

The proposed Project's less than significant impacts to solid waste would be less under Alternative 3. Therefore, impacts to solid waste would be less than significant.

Energy

Electricity

The LADWP service area, which encompasses the City of Los Angeles, is projected to have an annual demand of 28,333 GWh at project buildout. Operation of proposed uses under Alternative 3 would consume an estimated total of 23,083,724 MWh, or 23 GWh, of electricity per year. Current transmission and distribution facilities for electricity are adequate to meet the demands of Alternative 3. Additionally, in order to reduce electricity consumption, LAWA would implement Master Plan Commitment E-1 to maximize the energy efficiency of new facilities. Alternative 3 would also include the proposed Project's Project Design Features related to energy conservation, for example use of light-colored roofs.

Changes in peak electrical loads and the location of new electrical loads within the Project site may result in the need for upgrades to the electrical power transmission system. However,

under LAX Master Plan Commitment E-2, Coordination with Utility Providers, a utility coordination program would be implemented by LAWA to ensure that adequate electrical distribution facilities are available to support the electricity needs associated with Alternative 3. Development and implementation of a utility coordination program would reduce potential impacts to the electricity distribution system to a level that is less than significant.

Similar to the proposed Project, Alternative 3 may include subterranean elements that may interfere with existing electricity distribution infrastructure, requiring adjustment/relocation. Potential utility conflicts during construction would be minimized with the implementation of a utility relocation program under LAX Master Plan Commitment PU-1, Develop a Utility Relocation Program. Implementing this commitment would ensure that potential impacts would be less than significant.

Operational impacts would not result in an increase in demand for electricity that exceeds available distribution infrastructure capabilities, so the operation of Alternative 3 would not require new distribution infrastructure or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to electricity would be less under Alternative 3. Therefore, impacts to electricity would be less than significant.

Natural Gas

The Southern California Gas Company (SCGC) service area, which includes the Counties of Fresno, Kings, Tulare, San Luis Obispo, Kern, Santa Barbara, Ventura, Los Angeles, San Bernardino, Orange, Riverside, San Diego, and Imperial, is projected to have an annual demand of 948.64 billion cubic feet at project buildout. Operation of Alternative 3 proposed uses would consume an estimated total of 15.6 million cubic feet of natural gas per month, or 187 million cubic feet of natural gas per year.

The annual natural gas demand of Alternative 3 is approximately 0.02 percent of the projected total demand of the SCGC service area at buildout, and is within the anticipated service capabilities of SCGC, which is less than the proposed Project. Current transmission and distribution facilities for natural gas are adequate to meet the demands of Alternative 3.

Additionally, in order to reduce natural gas consumption, LAWA would implement LAX Master Plan Commitment E-1, Energy Conservation and Efficiency Program. This program would be consistent with federal policies pertaining to energy efficiency of new facilities.

Operational impacts would not result in an increase in demand for natural gas that exceeds available supply infrastructure capabilities, so the operation of Alternative 3 would not require new natural gas supply facilities or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to natural gas would be less under Alternative 3. Therefore, impacts to natural gas would be less than significant.

6.9.3 Relationship of the Alternative to the Project Objectives

Alternative 3 would develop the Project site with the same types of uses as the proposed Project, however, the amount of development and associated economic impacts and jobs would be less than the proposed Project. Alternative 3 would include new uses; however, the square footage of development would be limited and would not achieve as much market value as the proposed Project. New uses would be developed in order to revitalize the Project site. The

Project site would continue to provide space for new industries to be developed and land use compatibility and economic vitality may be achieved with future development, however, less revitalization, economic investment, and job creation would occur under Alternative 3 as compared to the proposed Project.

Alternative 3 would be subject to the same urban design guidelines as the proposed Project. These guidelines would control the scale of development, require buffer area between the proposed Project and residences to the north, reduce development and associated parking and traffic impacts, and reflect current community and stakeholder interests for additional open space, research and development, recreation, security, community-serving uses, and economic development. These guidelines are flexible and reflect best-practices in urban design and sustainability. The proposed Project's design guidelines, which would be the same under Alternative 3, are consistent with the LAX Plan and LAX Specific Plan, do provide transportation options, and do provide for landscaping, public facilities, and open space. The majority of the proposed Project's community compatibility, urban design guidelines, and sustainability objectives are met by Alternative 3.

Under Alternative 3, the LAX Specific Plan permit approval process would be changed to establish an overall framework for development standards, provide a basis for reviewing and coordinating plans, establish a high level of design standards and method for reviewing conformance, streamline the approval process, and provide certainty and consistency for future developments. Therefore, the proposed Project's objectives related to the approval process would be met.

Therefore, Alternative 3 would meet the proposed Project objectives related to community compatibility, urban design guidelines, and sustainability and approval process. However, Alternative 3 would not fully meet the proposed Project's objectives related to economic development.

6.10 Analysis of the Reduced Retail Alternative

6.10.1 Description of Alternative

The goal of Alternative 4 is to reduce one or more of the significant impacts of the proposed Project, by changing the mix of allowable uses. For the LAX Northside Plan Update, the Reduced Retail Alternative would eliminate any retail uses in exchange for office uses within the Project site. The table below further describes Alternative 4 (**Table 6-13**).

Table 6-13

Alternative 4: Reduced Retail Alternative

Project	Description	Allowable Development Square Footage	
Alternative 4: Reduced Retail Alternative	Eliminates retail uses within the Project site and increases office uses accordingly. This alternative does not change the design guidelines.	Airport Support	600,000
		Community and Civic	225,000
		Office, Research and Development (Office)	802,500
		Office, Research and Development (Research and Development)	412,500
		Office, Research and Development (Higher Education)	200,000
		Mixed Use- Commercial (Restaurant)	50,000
		Mixed Use- Commercial (Services)	30,000
		Total:	**2,320,000**

Source: LAWA, 2014.

6.10.2 Environmental Impacts

6.10.2.1 Aesthetics

Construction

Construction activities under Alternative 4 would be similar to the proposed Project. Although temporary in nature, construction activities generally cause a contrast to, and disruption in the general order and aesthetic character of an area. Alternative 4 construction activities would include grading, clearing, and grubbing the land; installing utilities, building foundations, superstructures, and building skin/roofing; completing interior framing and finishing; installing hardscape and landscaping; and building testing/commissioning. Construction equipment would include, but is not limited to, drill rigs, cement and mortar mixers, forklifts, graders, cranes, and tractors. As with the proposed Project, all construction activities would comply with LAX Master Plan Commitment DA-1, which requires construction fencing to screen construction areas. Temporary construction fencing would be placed along the periphery of the development sites of the proposed Project to screen much of the construction activity from view at the street level. Alternative 4 would allow the same square footage of construction (although for a different mix of uses) than the proposed Project, and construction activities would be similar in terms of their nature and temporary impacts on aesthetics. The proposed Project's less than significant construction impacts to aesthetics would be similar under Alternative 4. Therefore, construction impacts to aesthetics would be less than significant.

Operation

Visual Character

Aesthetics

Alternative 4 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Existing uses are not anticipated to change under Alternative 4. Alternative 4 permits some similar uses as the proposed Project, such as airport support, community, office, research and development, restaurant, and services, which would have similar impacts to aesthetics. However, Alternative 4 would not include the proposed Project's retail component. Although square footage would be the same and the proposed Project's design guidelines would apply to Alternative 4 resulting in similar building heights, setbacks, and buffers, Alternative 4 would have a different visual character as it would not include the retail components of the proposed Project. As with the proposed Project, Alternative 4 would be consistent with visual regulations that seek to enhance visual character, transition building heights between uses, and maintain the prevailing scale and character of surrounding areas. Compared to the proposed Project, Alternative 4 would result in similar contrast with the surrounding visual character. The proposed Project's less than significant operational impacts to aesthetics would be similar under Alternative 4. Therefore, operational impacts to aesthetics would be less than significant.

View Impacts

According to the City of Los Angeles CEQA Guidelines, the term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The Project site is located in the vicinity of locally valued scenic resources, including Dockweiler Beach State Park, Vista Del Mar, and Westchester Bluffs. Like the proposed Project, while Alternative 4 is located in the vicinity of the valued scenic resources discussed above, Alternative 4 would not occur within or adjacent to a valued focal or panoramic vista, or within the view of any designated scenic highway, corridor or parkway. Furthermore, Alternative 4 would not obstruct, interrupt, or diminish a valued focal and/or panoramic view as defined in the Community Plan.

Other views in the Project site vicinity include views from private residences to the Pacific Ocean. Views from private residences are not protected under CEQA. Alternative 4 would allow buildings and setbacks similar to the proposed Project. As Alternative 4 permits the same overall development square footage, the scale of development would likely be similar under Alternative 4.

The proposed Project's less than significant operational impacts to views would be similar under Alternative 4. Therefore, operational impacts to views would be less than significant.

Light and Glare

Ambient Illumination Levels

Operation of Alternative 4 would introduce new lighting on the Project site that would increase ambient illumination levels compared to existing conditions. Like the proposed Project, Alternative 4 light sources would consist of exterior lighting along pedestrian walkways, vehicle

driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 4 lighting would comply with all applicable LAMC lighting standards. Alternative 4 would also comply with the proposed Project's lighting standards, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; and requiring service area lighting to be contained in the service yard.

The proposed Project's less than significant operational impacts to ambient illumination levels would be similar under Alternative 4 as eliminating the proposed Project's retail component would not substantially change lighting needs. Therefore, operational impacts to ambient illumination levels would be less than significant.

Light Spillover

Operation of Alternative 4 would introduce new lighting on the Project site that would increase potential for light spillover compared to existing conditions. Like the proposed Project, Alternative 4 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 4 lighting would comply with all applicable LAMC lighting standards. Alternative 4 would also comply with the proposed Project's lighting standards, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; prohibiting exposed bulbs; requiring increased setbacks and stepbacks; and requiring service area lighting to be contained in the service yard. Existing structures that screen light spillover, such as existing sound walls, are anticipated to remain under Alternative 4. The proposed Project's less than significant operational impacts to light spillover would be similar under Alternative 4. Therefore, impacts to light spillover would be less than significant.

Shading

Alternative 4 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Shading impacts from these uses would remain the same for these structures. Alternative 4 would also result in the same square footage of development on the Project site. Building heights, setbacks, and stepbacks would be the same as under the proposed Project. Alternative 4 would not change shading impacts of existing uses on the Project site. Compared to the proposed Project, Alternative 4 would result in similar shading on light sensitive uses. The proposed Project's less than significant operational impacts to shading would be similar under Alternative 4. Therefore, impacts to shading would be less than significant.

6.10.2.2 Air Quality

Construction Emissions

The total square footage of Alternative 4 at build out will be the same as that of the Proposed Project, Therefore, criteria pollutant emissions and ambient air quality impacts from construction are assumed to be similar to that of proposed Project. Based on these estimates, construction emissions (**Table 6-14**) for Alternative 4 are less than the SCAQMD mass daily regional significance thresholds for NOx, CO, SO2, PM10, and PM2.5 and greater than the threshold for VOC. Additionally, the local ambient air quality impact from construction of Alternative 4 would not exceed SCAQMD air quality significance thresholds.

Table 6-14

Alternative 4: Reduced Retail Alternative
Construction Emissions

	Peak Daily Emissions (lb/day)					
	VOC	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Alternative 4[2]	125	248	0.4	50	32	11
SCAQMD Threshold	75	550	150	100	150	55
Above Threshold	YES	NO	NO	NO	NO	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Emissions estimated based on ratio of the difference in the square footage between the proposed Project and the Project Alternative.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Operational Emissions

The operational criteria air pollutant emissions (**Table 6-15**) are estimated using a ratio of square footages for individual land uses Office/Research & Development, Mixed Use Commercial/Retail, Airport Support, and Community). Based on these estimates, the operational emissions of Alternative 4 are estimated to be five to ten percent lower than the proposed Project depending on the pollutant. These estimates are below the SCAQMD mass daily regional significance threshold for CO, SO2, PM10, and PM2.5 and exceed the significance thresholds for VOC and NOx. The operational local ambient air quality impacts of this Alternative are estimated to be decrease proportional to the operational emissions and are below the SCAQMD significance thresholds.

Table 6-15

Alternative 4: Reduced Retail Alternative
Operational Emissions

		Daily Maximum Emissions (lb/day)[2]					
Land Use	**Square Feet**	**VOC**	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Office	802,500	76	306	0.79	91	84	5.3
Research and Development	612,500						
Community and Civic	225,000	21	121	0.31	35	33	2.0
Airport Support[3]	600,000	10	10	0.03	4	3	0.3
Restaurant and Retail[4]	50,000	8	43	0.11	12	12	0.7
Services[4]	30,000						
Total	**2,320,000**	**115**	**481**	**1.24**	**142**	**132**	**8.3**
SCAQMD Significance Threshold		55	550	150	55	150	55
Above Threshold		YES	NO	NO	YES	NO	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Project incremental emissions estimated using a ratio of square footages for individual land uses.
3. 273,500 square feet of airport support facilities are moved into the LAX Northside Project footprint from another location in LAX. Emissions from these relocated airport support facilities are not included in Project incremental emission estimates.
4. For purposes of emission estimates restaurant, retail, and hotel land uses are considered comparable to the mixed use commercial/retail land uses in Area 11 of the proposed Project that was modeled as a regional shopping center.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Health Risk Impacts

The health risk impacts of Alternative 4 are estimated to be proportional to the sum total of construction and operational emissions. These health risk estimates are similar to the health risk estimates of the proposed Project and below the SCAQMD's significance thresholds.

6.10.2.3 Biological Resources

Loss or Reduction of Federal, State, and Local Designated Habitats

Alternative 4 would result in the same total square footage of development on the Project site as the proposed Project. The Project site is not part of a federal-, state-, or local-designated habitat. Under Alternative 4, existing vegetation would be replaced with new vegetation, which is

designed to be drought-tolerant and locally native. Vegetation on the Project site would continue to be regularly maintained by LAX or private developers, including regular mowing and disking of vegetation. The proposed Project's less than significant impacts on federal, state, or local designated habitats would be similar under Alternative 4. Therefore, impacts to federal, state, or local designated habitats would be less than significant.

Interference with Wildlife Movement/Migration Corridors

Alternative 4 would result in the same total square footage of development on the Project site as the proposed Project and would disrupt similar amounts of vegetation that support wildlife movement/migration corridors as the proposed Project. As with the proposed Project, mature trees or other vegetation that supports wildlife movement/migration would be removed under Alternative 4. Vegetation on the Project site would continue to be regularly maintained by LAX or private owners, including regular mowing and disking of vegetation. Although mature trees may be removed as part of Alternative 4, LAX Master Plan EIS/EIR Commitment BC-3 requires compensation for the loss of mature trees at a ratio of 2:1 and would apply to all alternatives. Alternative 4 also includes the proposed Project's Project Design Features that require species of newly planted replacement trees to be a local native tree species to the greatest extent feasible and that trees are a 15-gallon or larger specimen. Although loss of vegetation on the Project site may have a short-term adverse impact on nesting migrant birds, implementation of LAX Master Plan EIS/EIR Commitment BC-3 will ensure that any habitat that is removed is replaced. The proposed Project's less than significant impacts on wildlife movement/migration corridors would be similar under Alternative 4. Therefore, impacts to wildlife movement/migration corridors would be less than significant.

Alteration of an Existing Wetland Habitat

Alternative 4 would result in the same total square footage of development on the Project site as the proposed Project that could potentially alter existing wetland habitat. The only potential wetland habitat, the Argo Drainage Channel, runs along the southern boundary and partially within the Project site. Alternative 4 would include the proposed Project's Project Design Features to protect potential wetland habitat, including Best Management Practices and prohibiting grading within 50 feet of the Argo Drainage Channel. The proposed Project's less than significant impacts to wetlands would be similar under Alternative 4. Therefore, impacts to existing wetland habitat would be less than significant.

Interference with Habitat/Species Behavior

Alternative 4 would result in the same total square footage of development on the Project site as the proposed Project that could potentially interfere with habitat/species behavior. The Los Angeles Dunes/El Segundo Dunes habitat preserve located across Pershing Drive to the west of the Project site supports El Segundo Blue Butterfly. California gnatcatcher and California legless lizards have been observed approximately 0.8 miles south, and 1,000 feet west, respectively, of the proposed Project's Biological Resources Study Area within the Los Angeles Airport/El Segundo Dunes habitat preserve. Alternative 4 would not involve construction or operational activities that would impact this habitat or species behavior within the habitat directly. Additionally, existing uses adjacent to the Los Angeles Airport/El Segundo Dunes habitat preserve, including existing airport support uses and an animal quarantine facility, are anticipated to remain in their existing condition under Alternative 4. The proposed Project's less than significant impacts to habitat/species behavior would be similar under Alternative 4. Therefore, impacts to habitat/species behavior would be less than significant.

6.10.2.4 Cultural Resources

Paleontological Resources

Alternative 4 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 4 would be similar to the proposed Project and the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain paleontological resources that have not been previously identified. However, like the proposed Project, Alternative 4 would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7. These commitments require a paleontological resources qualification and treatment plan, authorization, monitoring, collection, fossil preparation and donation, and reporting. These commitments would minimize potential effects on paleontological resources. The proposed Project's less than significant impacts to paleontological resources would be similar under Alternative 4. Therefore, impacts to paleontological resources would be less than significant.

Archaeological Resources

Alternative 4 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 4 would be similar to the proposed Project and the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain archaeological resources that have not been previously identified. One known archaeological site is known in the Project site in Area 12B, but this area would not be developed under Alternative 4. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. However, like the proposed Project, Alternative 4 would comply with LAX Master Plan EIS/EIR Commitments HA-1 through HA-10. These commitments require a survey of historic American buildings, historic education materials, discovery and preparation of an archaeological treatment plan, monitoring, excavation and recovery procedures, administrative procedures, archaeological/cultural monitor reporting, and notification. These commitments would minimize potential effects on archaeological resources. The proposed Project's less than significant impacts to archaeological resources would be similar under Alternative 4. Therefore, impacts to archaeological resources would be less than significant.

Historic Architectural Resources

Alternative 4 would not include any demolition of existing buildings as existing uses and structures are assumed to remain under all alternatives, but would introduce new structures. The Project site does not include any historic architectural resources. Alternative 4 would not result in the demolition of any individually historic building, or impair any historic district. The proposed Project's less than significant impacts to historic architectural resources would be similar under Alternative 4. Therefore, impacts to historic architectural resources would be less than significant.

6.10.2.5 Geology and Soils

Geologic Hazards

Fault Rupture

No known active or potentially active faults underlie the Project site. In addition, the Project site is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. Accordingly, the potential for surface fault rupture at the Project site is considered to be low. Alternative 4 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Similar to the proposed Project, all structures would be designed, located, and built in accordance with City of Los Angeles Department of Building and Safety (LADBS) requirements and current seismic design provisions of the California Building Code (CBC). Alternative 4 allows the same amount of development as the proposed Project, however, due to the different mix of uses, fewer employees would be generated by Alternative 4 and Alternative 4 would expose less people to risk of injury involving rupture of a known earthquake fault. The proposed Project's less than significant impacts to fault rupture would be reduced under Alternative 4.

Seismic Ground Shaking

The Project site is located in the seismically active Los Angeles Basin, and, therefore, has the potential to be subjected to strong seismic ground shaking, but is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. However, potential exists for seismic ground shaking related to fault movement in the Project site vicinity. Alternative 4 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving seismic ground shaking. As with any new development in the State of California and similar to the proposed Project, building design and construction for Alternative 4 would be required to conform to the current seismic design provisions of the CBC. The 2010 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program (NEHRP) to mitigate losses from an earthquake and provide for the latest in earthquake safety. These standards are among the strictest standards in the seismic safety requirements contained in the City of Los Angeles Municipal Code (LAMC) Building Code. Alternative 4 allows the same amount of development as the proposed Project, however, due to the different mix of uses, fewer employees would be generated by Alternative 4 and Alternative 4 would expose less people to risk of injury involving seismic ground shaking. The proposed Project's less than significant impacts to seismic ground shaking would be reduced under Alternative 4.

Liquefaction

Borings conducted at the Project site at depths of 50.5 to 55.5 feet did not encounter groundwater and the Project site is not mapped as being within a liquefaction hazard zone by the State of California. However, the City of Los Angeles General Plan Safety Element (1996) shows a limited portion of the east side of the Project site as being within a liquefaction zone. Alternative 4 would introduce new uses and construction activities that could be located in a City of Los Angeles-designated liquefaction zone. Similar to the proposed Project, the LAMC Building Code and the Uniform Building Code (UBC) require that foundation strength, building

design, and building materials be adjusted to limit any impact related to liquefaction for construction in liquefaction zones. Alternative 4 allows the same amount of development as the proposed Project, however, due to the different mix of uses, fewer employees would be generated by Alternative 4 and Alternative 4 would potentially expose less people to liquefaction zones. The proposed Project's less than significant impacts to liquefaction would be reduced under Alternative 4.

Landslides

The Project site and surrounding area has an average slope of less than 30 percent, and thus is not susceptible to potential hazards from slope stability. Furthermore, the Project site is not located within a State of California-designated seismic hazard zone for landslide potential or a City of Los Angeles-designated landslide inventory area. Similar to the proposed Project, grading for Alternative 4 would be secured in accordance with the LABC. Therefore, Alternative 4 would not result in substantial damage to structures or infrastructure, or expose people to substantial risk or injury due to landslides. The proposed Project's less than significant impacts to landslides would be similar under Alternative 4. Therefore, impacts to landslides would be less than significant.

Inundation

Based on a review of the California Geologic Survey (CGS) Tsunami Inundation Map for the Venice 7.5-minute quadrangle, the Project site is not located within a tsunami inundation-hazard area (CGS 2009). As such, no impacts associated with tsunamis would occur for Alternative 4.

Furthermore, similar to the proposed Project, Alternative 4 would comply with any applicable strategic plans developed by the State of California Office of Emergency Services and the Los Angeles County Office of Emergency Management, as well as the construction limitations contained in the City of Los Angeles Flood Hazard Management Specific Plan Guidelines (as referenced in the City of Los Angeles General Plan Safety Element).

The Project site is over 100 feet above Marina Del Rey and the Ballona Creek and over 50 feet above the Argo Drainage Channel making wave oscillation topographically improbable. Because there is no threat to the Project site, seiches are not a hazard for Alternative 4. Additionally, no dams or dikes are located within or near the Project site.

Alternative 4 would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury due to inundation by a dam or a seiche. The proposed Project's less than significant impacts to inundation would be similar under Alternative 4. Therefore, impacts to inundation would be less than significant.

Soil Conditions

Near-surface soil encountered within borings conducted for the proposed Project were observed to be sand soils estimated to have a very low to low expansion potential. Project site soils are anticipated to have negligible soluble sulfate levels. Additionally, the Project site soils are anticipated to have low to moderate levels of soluble chloride and relatively low electrical resistivity.

Previously developed areas of the Project site may have deep fill. Construction for Alternative 4 could result in excavation of approximately 45 feet Below Ground Surface (bgs). Thus, discovery of fill may be encountered during excavation activities for Alternative 4. However,

compliance with CBC and the LABC requirements would ensure that future buildings would be adequately supported by the underlying soils. Alternative 4 would not cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury impacts from soil conditions. The proposed Project's less than significant impacts to soil conditions would be similar under Alternative 4. Therefore, impacts to soil conditions would be less than significant.

Sedimentation and Erosion

Erosion

Alternative 4 would include grading, excavation, fill, and other activities that would disturb the ground. However, similar to the proposed Project, construction activities for Alternative 4 would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 4 would reduce erosion effects.

In addition, all construction would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Grading would be required under Alternative 4 in order to accommodate development. Grading would include excavation of earthen material and placement of earthen material. Grading is anticipated to be similar to that of the proposed Project due to the same development intensity of Alternative 4. Grading has the potential to increase the risk of erosion during Project site preparation and construction activities. However, erosion would be reduced by implementing appropriate erosion control measures during excavation and grading activities. During the construction phase of Alternative 4, construction activities will be subject to the requirements of a National Pollutant Discharge Elimination System (NPDES) construction permit. Compliance with the NPDES permit includes implementing BMPs, some of which are specifically implemented to reduce soil erosion and loss of topsoil. Additionally, Alternative 4 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control erosion.

The proposed Project's less than significant impacts to erosion would be similar under Alternative 4. Therefore, impacts to erosion would be less than significant.

Sedimentation

Sedimentation could potentially occur from exposed soils (active dune sand and alluvium) during construction of Alternative 4. However, construction activities would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 4 would reduce sedimentation effects.

Temporary dewatering activities are not expected during construction of Alternative 4. However, if dewatering occurs as a result of unexpected water table discovery during construction it would be conducted in accordance with the requirements of the RWQCB and would also be subject to the review and approval of the LADBS, as appropriate.

In addition, similar to the proposed Project, all construction of Alternative 4 would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion as well as the LAWA Stormwater Pollution Prevention Plan (SWPP) and BMPs.

Additionally, Alternative 4 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control sedimentation.

During operation, Alternative 4 may result in a limited degree of soil sedimentation effects from non-vegetated areas. However, in accordance with National Pollutant Discharge Elimination System (NPDES) requirements, Alternative 4 would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of Alternative 4. The SUSMP would include BMPs that would reduce on-site sedimentation from vegetated areas on the Project site through stormwater control devices. Alternative 4 would include the proposed Project's Project Design Features that require use of bioswales and permeable pavement to capture sediment runoff and deposition and containment to control runoff on-site.

Alternative 4 would not accelerate natural processes of wind and water erosion and sedimentation, or result in sediment runoff or deposition which would not be contained or controlled-on-site. The proposed Project's less than significant impacts to sedimentation would be similar under Alternative 4. Therefore, impacts to sedimentation would be less than significant.

Landform Alteration

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project site. While Alternative 4 would involve grading that will alter the site topography, the majority of the Project site has been previously disturbed and does not contain prominent geologic or topographic features. Alternative 4 would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. The proposed Project's less than significant impacts to landform alteration would be similar under Alternative 4. Therefore, impacts to landform alteration would be less than significant.

6.10.2.6 Greenhouse Gases

The total square footage of Alternative 4 at buildout will be the same as that of the proposed Project, therefore GHG emissions from construction is assumed to be similar to that of the proposed Project. Based on the change in land use square footage ratios, the operational emissions are estimated to be 6 percent lower and the service population is 3 percent higher than the proposed Project. This results in an efficiency metric estimate for Alternative 4 of approximately 4.11 MT CO2e per Service Population (SP) per year, which is less than the proposed Project and less than the draft SCAQMD draft efficiency target of 4.8 MT CO2e per SP per year.

6.10.2.7 Hazards and Hazardous Materials

Transportation, Use, or Disposal of Hazardous Materials

Alternative 4 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing

configurations. Additionally, Alternative 4 permits similar uses as the proposed Project, which would use similar hazardous materials. These include offices, research and development, service, and airport support uses. Alternative 4 would result in the same amount of development on the Project site as the proposed Project, which would result in similar amounts of transport, use, or disposal of hazardous materials, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. As with the proposed Project, all hazardous materials transported, used, or disposed in association with Alternative 4 would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The proposed Project's less than significant impacts to transport, use, or disposal of hazardous materials would be similar under Alternative 4. Therefore, impacts to transport, use, or disposal of hazardous materials would be less than significant.

Accidental Release of Hazardous Materials

Alternative 4 would include grading, excavation, fill, or other activities that would disturb the ground. Portions of the Project site are located in the City of Los Angeles Methane Hazard and Methane Hazard Buffer zone. The Project site does not contain any known soil or groundwater contamination sites. Alternative 4 would include subterranean elements. The design of the buildings and any associated subterranean elements within identified Methane Hazard and Buffer areas would be required to comply with LADBS methane standards. This would include compliance with the City of Los Angeles Methane Code Ordinance No. 175790 and Ordinance No. 180619. As a result of compliance with these regulations, Alternative 4 would manage risks from methane and would ensure that Alternative 4 does not 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. The proposed Project's less than significant impacts to accidental release of hazardous materials would be similar under Alternative 4. Therefore, impacts to accidental release of hazardous materials would be less than significant.

Contaminated Soils, Groundwater, and Other Hazardous Materials

Alternative 4 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, service, and airport support uses. The Project site does not contain any known soil or groundwater contamination sites. Construction of Alternative 4 would comply with LAX Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction. This Master Plan Commitment would require development of a program to coordinate all efforts associated with handling any contaminated materials in soil or groundwater encountered during construction. Operation of Alternative 4 within the Project site would not include ongoing digging, grading, or other activities that could potentially expose unknown contaminated soil and groundwater. Any unknown contaminated soil or groundwater encountered during construction would be handled and remediated according to applicable regulations and would not pose a hazard to occupants of Alternative 4 at the time of occupancy and during operations. Incorporation of appropriate monitoring and safety provisions would ensure that Alternative 4 does not 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. The proposed Project's less than significant impacts to contaminated soils, groundwater, and other hazardous materials would be similar under Alternative 4. Therefore, impacts to contaminated soils, groundwater, and other hazardous materials would be less than significant.

Hazardous Emissions and Materials within a Quarter Mile of Existing or Proposed Schools

Alternative 4 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, service, and airport support uses. Use of hazardous materials would be similar to the proposed Project, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. Due to the same scale and intensity of development as compared to the proposed Project, Alternative 4 would also likely have similar hazardous emissions and materials transported within ¼ mile of existing and proposed schools in the Project site vicinity. As with the proposed Project, these materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Alternative 4 would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. The proposed Project's less than significant impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be similar under Alternative 4. Therefore, impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be less than significant.

Airport Hazards

Wildlife Hazards

Alternative 4 would introduce new uses such as offices, research and development, commercial, and airport support uses. Alternative 4 would remove existing vegetation and introduce new vegetation that could attract wildlife, however, Alternative 4 includes the proposed Project's Project Design Features such as prohibiting the casting and spraying of seed for sod, requiring that trees be planted to meet specified spacing requirements, and prohibiting trees that provide fruit. The proposed Project's less than significant impacts to wildlife hazards would be similar under Alternative 4. Therefore, impacts to wildlife hazards would be less than significant.

Lighting and Glare Hazards

Alternative 4 would introduce new lighting on the Project site that would increase lighting compared to existing conditions. Like the proposed Project, Alternative 4 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 4 lighting would comply with all applicable LAMC lighting standards. Alternative 4 lighting design guidelines would be the same as the proposed Project, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; prohibiting mirror glass and highly reflective surfaces as dominant building materials; and requiring service area lighting to be contained in the service yard.

The proposed Project's less than significant impacts to lighting and glare hazards would be similar under Alternative 4. Therefore, impacts to lighting and glare hazards would be less than significant.

Airport Obstruction Hazards

Alternative 4 would introduce new buildings or structures on the Project site. Alternative 4 allows the same building heights as the proposed Project. The proposed Project's less than significant impacts to airport obstruction hazards would be similar under Alternative 4. Therefore, impacts to airport obstruction hazards would be less than significant.

Interference with Emergency Response Plans

Alternative 4 would include construction activities that could impact emergency access and would change existing uses and activities on the Project site. Similar to the proposed Project, during construction, roadway access would be maintained by construction detours and diversions. Emergency access would be coordinated and ensured through Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office.

No aspects of Alternative 4 would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, similar to the proposed Project, Alternative 4 would comply with all applicable City policies related to disaster preparedness and emergency response and emergency vehicles would use sirens to receive priority on roadways. The proposed Project's less than significant impacts to interference with emergency response plans would be similar under Alternative 4. Therefore, impacts to emergency response plans would be less than significant.

6.10.2.8 Hydrology and Water Quality

Hydrology

Surface Water

Alternative 4 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. Alternative 4 permits the same amount of development as the proposed Project and includes the proposed Project's Project Design Features related to pervious paving. Similar to the proposed Project, Alternative 4 would be subject to SUSMP requirements and associated BMPs that would minimize surface water hydrology impacts. The proposed Project's less than significant impacts to surface water hydrology would be similar under Alternative 4. Therefore, impacts to surface water hydrology would be less than significant.

Groundwater

Alternative 4 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. Alternative 4 permits the same amount of development as the proposed Project and includes the proposed Project's Project Design Features related to pervious paving. Pervious areas would be similar to those under the proposed Project, resulting in similar levels of recharge to groundwater as under the proposed Project. Similar to the proposed Project, Alternative 4 would be subject to SUSMP requirements and associated BMPs that would minimize groundwater

hydrology impacts. The proposed Project's less than significant impacts to groundwater hydrology would be similar under Alternative 4. Therefore, impacts to groundwater hydrology would be less than significant.

Water Quality

Surface Water

Surface water pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be similar under Alternative 4 due to the same amount of development allowed. Runoff from the site would have similar pollutants as under the proposed Project. Similar to the proposed Project, Alternative 4 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize surface water quality impacts. The proposed Project's less than significant impacts to surface water quality would be similar under Alternative 4. Therefore, impacts to surface water quality would be less than significant.

Groundwater

Groundwater pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be similar under Alternative 4 due to the same amount of development allowed. Given the similar development under Alternative 4 relative to the proposed Project, groundwater infiltration from the site would have similar pollutants. Similar to the proposed Project, Alternative 4 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize groundwater quality impacts. The proposed Project's less than significant impacts to groundwater quality would be similar under Alternative 4. Therefore, impacts to groundwater quality would be less than significant.

6.10.2.9 Land Use and Planning

Land Use Plan Consistency

Alternative 4 would allow the same uses and provide for the same development standards as the proposed Project. However, the mix of uses would change to increase office uses and eliminate retail uses under Alternative 4. The same discretionary approvals required for the proposed Project would be required under Alternative 4. Similar to the proposed Project, Alternative 4 would be consistent with local and regional goals, policies, and objectives. For example, Alternative 4 would identify areas for new open space, reduce vehicular trips, and emphasize pedestrian/bicycle access. However, Alternative 4 would not provide as vibrant a mix of uses or respond to community needs for local-serving retail as the proposed Project does and would be inconsistent with land use goals and policies that support these uses. The proposed Project's less than significant impacts to land use plan consistency would be greater under Alternative 4.

Existing Land Use Compatibility

Alternative 4 permits similar uses as the proposed Project, including offices, research and development, service, and airport support uses. Alternative 4 would result in the same amount of development as the proposed Project and would include the proposed Project's height, setback, buffer, and stepback requirements. Proposed Project features that would enhance land use compatibility would be introduced under Alternative 4, including a buffer area adjacent to residences to the north of the Project site and airport support uses adjacent to existing airport

uses to the south of the Project site, however, retail, commercial uses adjacent to the existing Westchester Business District would not be included as part of Alternative 4. The proposed Project's less than significant impacts to existing land use would be greater under Alternative 4.

6.10.2.10 Noise

Construction

Alternative 4 would result in similar levels of construction activity, off-site construction trucks, and ground-borne vibration as the proposed Project as it allows the same amount of development on the Project site. Noise from construction activities in the vicinity of residences to the north would be similar to the proposed Project, as Alternative 4 includes Project Design Features that buffer construction activities from residences. Similar to the proposed Project, it is anticipated that under Alternative 4, short-term construction-period noise impacts would be significant and unavoidable, due to the fact that mitigation measures included as part of the proposed Project could not reduce noise impacts to less than significant levels for certain receptors located adjacent to the Project site. These conditions would also occur under Alternative 4. The type of construction would be similar to the proposed Project, resulting in similar daily construction-related noise levels, and the duration of construction would likely be similar. Off-site construction traffic would also generate noise similar to the proposed Project, and would be less than significant. Finally, similar to the proposed Project, construction activities for Alternative 4 would likely generate ground borne vibration levels that are less than significant. The proposed Project's significant and unavoidable construction impacts to noise would be similar under Alternative 4. Therefore, construction impacts to noise would be significant and unavoidable.

Operations

Alternative 4 would allow similar amounts of development and associated vehicle trips as the proposed Project. Alternative 4 would result in similar noise levels associated with on-site equipment and activity and off-site traffic. Similar to the proposed Project, Alternative 4 would comply with the City of Los Angeles building code requirements. Finally, Alternative 4 would not introduce new uses in the Airport Influence Area that are incompatible with aircraft noise exposure guidelines. The proposed Project's less than significant operational impacts to noise would be similar under Alternative 4. Therefore, operational impacts to noise would be less than significant.

6.10.2.11 Population, Housing, and Employment

Cause or Accelerate Growth in an Undeveloped Area

Alternative 4 would introduce offices, research and development, service, and airport support uses to the Project site and would result in the same amount of development on the Project site as the proposed Project. Alternative 4 would generate 6,687 employees, which is less than the proposed Project. Additionally, no new housing or related population growth would occur as a result of Alternative 4. The Project site was previously developed and is surrounded on all sides by existing development. Alternative 4 would therefore not cause or accelerate growth in an undeveloped area. The proposed Project's less than significant impacts to growth in an undeveloped area would be similar under Alternative 4. Therefore, impacts to growth in an undeveloped area would be less than significant under Alternative 4.

Consistency with Growth Policies

Alternative 4 would introduce offices, research and development, service, and airport support uses to the Project site and would result in the same amount of development on the Project site as the proposed Project. Similar to the proposed Project, Alternative 4 would provide new employment consistent with applicable policies, however, new jobs would be less than under the proposed Project. The proposed Project's less than significant impacts to consistency with growth policies would be similar under Alternative 4. Therefore, impacts to consistency with growth policies would be less than significant under Alternative 4.

6.10.2.12 Public Services

Fire

Alternative 4 would increase demand for fire protection and emergency facilities due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 4 would not introduce permanent residents or housing that would require fire protection services. Based on City of Los Angeles estimates for the population served by Fire Station No. 5, the existing number of incidents per 1,000 population is approximately 49 incidents, or an incident generation rate of .0049 per capita. Alternative 4 would add approximately 6,687 daytime employees. Applying the incident generation rate of .0049 to Alternative 4 daytime employees would result in an increase of 33 incidents per year. This would be equivalent to about a 0.57 percent increase over the 5,814 existing emergency incidents within the primary response of LAFD Station No. 5. Alternative 4 would increase the workload of LAFD Station No. 5 by less than one percent.

LAX Master Plan Commitments FP-1, Los Angeles Fire Department (LAFD) Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of FAR and fire code requirements, would ensure maintenance of adequate response times, facilities, and emergency access associated with development of Alternative 4. Impacts associated with staffing, equipment, and facilities would also be continually evaluated and addressed pursuant to standard LAFD procedures and fire code requirements. The implementation of the LAX Master Plan Commitments will further reduce impacts related to fire protection services. Therefore, Alternative 4 would not impact emergency access such that it would require addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services.

Alternative 4 would not result in the need for a new fire station, or expansion, consolidation, or relocation of an existing facility due to impacts on fire protection infrastructure, demand, or emergency access. The proposed Project's less than significant impacts to fire service would be similar under Alternative 4. Therefore, impacts to fire service would be less than significant under Alternative 4.

Police

Alternative 4 would increase demand for police protection due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 4 would not introduce permanent residents or housing that would require police protection services. Based on LAPD statistics on the population served by the Pacific Community Police Station, the existing number of crimes per 1,000 persons is approximately 29.8 or an incident generation rate of .029 per capita. Alternative 4 would add 6,687 daytime employees. Applying the incident generation

rate of .029 to daytime employees would result in an increase of 194 incidents per year under Alternative 4. This would be equivalent to a 3.2 percent increase over the 6,069 existing crimes within the Pacific Community Police Station service area. This is a conservative estimate as daytime employees would not be permanent residents requiring police services in the Pacific Community Police Station service area. Alternative 4 would not result in an increase in Project site population that would require a substantial increase in law enforcement services to maintain adequate services or would require new or expanded facilities.

Alternative 4 would comply with LAX Master Plan commitments LE-1: Routine Evaluation of Manpower and Equipment Needs; LE-2: Plan Review; PS-1: Fire and Police Facility Relocation Plan; and PS-2: Fire and Police Facility Space and Siting Requirements. These LAX Master Plan Commitments would ensure that LAWAPD and LAPD continue to routinely evaluate and provide additional officers, supporting administrative staff, facilities, and equipment to keep pace with forecast increases in activity and development at the Project site in order to maintain a high level of law enforcement services. Alternative 4 would introduce less employees than the proposed Project, and LAX Master Plan Commitment LE-2, Plan Review, would ensure that during the design phase of any development on the Project site, LAPD, LAWAPD, and other law enforcement agencies would be consulted to review plans so that, where possible, environmental contributors to criminal activity, such as poorly-lit areas and unsafe design, are reduced. Through implementation of these LAX Master Plan commitments, Alternative 4 would not result in a significant increase in emergency response times due to increased traffic congestion, changes in circulation, or the location of new land uses. The proposed Project's less than significant impacts to police service would be similar under Alternative 4. Therefore, impacts to police service would be less than significant under Alternative 4.

Public Schools

Construction of Alternative 4 could occur as close as 0.3 miles from the nearest public school, the Loyola Village Elementary School. Similar to the proposed Project, Alternative 4 construction activities would comply with LAX Master Plan Commitments C-1, ST-18, ST-19, and ST-22 related to construction, which would minimize impacts on adjacent uses. These measures require a construction traffic management plan, closure restrictions on existing roadways, designation of truck routes, and establishment of a ground transportation/construction coordination office. Additionally, it is not anticipated that construction activities would cause substantial increases in noise levels or impair access to local schools.

Based on an average student generation rate of 0.39, enrollment within the Project site vicinity associated with Alternative 4 employees would increase by 1,302 students.[14] Based on the estimated current overage of 3,779 seats, the public schools serving the Project site vicinity would still have an excess of 2,477 seats with implementation of Alternative 4. Excess seats would be greater under Alternative 4 than the proposed Project. As a result, schools would continue to have capacity for students under Alternative 4.

Additionally, Alternative 4 would comply with applicable school impact fee requirements pursuant to California Government Code Section 65995 (Senate Bill 50), which are deemed to provide full and complete school facilities mitigation.

[14] Based on an estimated 6,687 new Alternative 4 employees as follows: 6,687 (net new employees) X 0.78 (employees likely to reside within the district) X 0.64 (number of new employee households likely to be located in LAUSD) X 0.39 (student generation rate)= 1,302 net new students. Generation rates based on Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2000, Chapter 6, via City of Los Angeles, LAX Master Plan Final EIS/EIR, Section 4.27, Schools, 2004.

The proposed Project's less than significant impacts to public schools would be similar under Alternative 4. Therefore, impacts to public schools would be less than significant under Alternative 4.

Libraries

Alternative 4 would result in a net increase of 6,687 employees. Project site employees would be anticipated to use library services during typical daytime working hours. Due to time restrictions, employees are most likely to use the Westchester-Loyola Branch Library located nearest to the Project site. The addition of 6,687 employees to the existing 39,480 residents in the Westchester-Playa Del Rey Community would yield a library service population of 46,167. This represents a conservative estimate, since few employees are likely to use library services. However, even with this conservative estimate, employees would not exceed the forecasted unused capacity to this library under Alternative 4. With the addition of employees, there would still be an unused library capacity of 53,833. The proposed Project's less than significant impacts to libraries would be similar under Alternative 4. Therefore, impacts to libraries would be less than significant under Alternative 4.

6.10.2.13 Recreation

Alternative 4 would maintain the existing golf course on the Project site, which provides recreational space. Like the proposed Project, Alternative 4 would reserve acreage within the Project site for recreation and open space uses and would improve the ratio of open space to residents in the two-mile radius of the Project site boundary.

Alternative 4 does not include a residential development component that would contribute to a net increase in population. However, increase in employment would increase demand for parks and recreational facilities due to daytime or lunchtime use. While there would be an estimated increase in employment of approximately 6,687 individuals, which is less than the proposed Project employment, it is doubtful that a meaningful number of these new employees would frequent off-site parks at lunchtime such that demand would place constraints on these facilities. Due to time limitations for typical employee lunch breaks, it is expected that such use would not likely involve active sports or require recreational facilities. Incidental increases in daytime employee demand for public parks and recreational facilities would be minimal. Alternative 4 would improve the provision of parks and open space as the proposed Project would, and it would not have significant impacts on public parks or recreational facilities. The proposed Project's less than significant impacts to recreation would be similar under Alternative 4. Therefore, impacts to recreation would be less than significant under Alternative 4.

6.10.2.14 Traffic and Transportation

Alternative 4 represents a significant decrease in retail development compared to the proposed Project.

Construction

Alternative 4 represents a similar scale and scope of development to that of the proposed Project. Therefore, peak construction activity is expected to be comparable to that of the proposed Project. As with the proposed Project, with implementation of the proposed Project mitigation measures including a construction traffic management plan, construction impacts to

intersection operations would be less than significant. However, similar to the proposed Project, Alternative 4 could result in the temporary loss of on-street parking, lane closure, and sidewalk closure. The impact on the overall transportation system from construction activities would be temporary in nature and would cause an intermittent reduction in street and intersection operating capacity near the Project site. Detailed construction traffic management plans, including street closure information, detour plans, and haul routes would be prepared as necessary and satisfactory to the City of Los Angeles. Within the context of these plans, provisions would also be made to incorporate safety precautions for pedestrians and bicyclists, while also maintaining access to adjacent properties, to the extent feasible. Therefore, construction impacts would be less than significant.

Operation

Alternative 4 Trip Generation

Alternative 4 trip generation estimates were based on the rates published in *Trip Generation, 8th Edition* (Institute of Transportation Engineers, 2008). Alternative 4 is estimated to generate approximately 20,148 daily trips on a typical weekday, including 2,226 morning peak hour trips (1,806 inbound, 420 outbound) and 2,288 afternoon peak hour trips (494 inbound, 1,794 outbound).

Existing with Alternative 4 Conditions

Appendix E shows the results of the intersection impact analysis when the Existing with Alternative 4 conditions are measured against the Existing conditions. Alternative 4 is anticipated to result in significant impacts at nine of the 108 study intersections during either the morning or afternoon peak hour. The remaining 97 intersections would not be impacted under Existing with Alternative 4 conditions.

Existing with Alternative 4 with Mitigation Conditions

Alternative 4 is anticipated to result in residual impacts at one study intersections during either the morning or afternoon peak hours after implementation of the mitigation program. The remaining 107 study intersections would not be impacted under Existing with Alternative 4 with Mitigation conditions. The proposed Project's significant intersection impacts under Existing Conditions would be less under Alternative 4.

Future with Alternative 4 Conditions

When the Future with Alternative 4 conditions are measured against the Future without Project conditions, Alternative 4 is anticipated to result in significant impacts at 18 of the 108 study intersections during either the morning or afternoon peak hour. The remaining 90 intersections would not be impacted under Future with Alternative 4 conditions.

Future with Alternative 4 with Mitigation Conditions

Alternative 4 is anticipated to result in residual impacts at three study intersections during either the morning or afternoon peak hours after implementation of the mitigation program. The remaining 105 study intersections would not be impacted under Future with Alternative 4. Additional mitigation measures would be necessary to reduce the impact of Alternative 4 if it were implemented. The proposed Project's significant intersection impacts in under Future Conditions would be less under Alternative 4.

CMP Arterial Analysis

Table 6-16 below summarizes the number of peak hour traffic volumes expected at the CMP monitoring locations within the around the Study Area with implementation of Alternative 4. Peak hour traffic volumes for the monitoring locations outside the Study Area were estimated using the methodology described in Appendix E. The peak hour traffic volumes expected at each CMP arterial monitoring intersection are as follows:

Table 6-16

CMP Arterial Analysis-Alternative 4

No.	Intersection	Peak Hour Trips		Requires CMP Analysis?
		A.M.	P.M.	
1.	Lincoln Boulevard & Venice Boulevard	49	50	**YES**
4.	Lincoln Boulevard & SR-90 Ramps	90	93	**YES**
12.	Lincoln Boulevard & Manchester Avenue	649	652	**YES**
28.	Sepulveda Boulevard & Manchester Avenue	302	307	**YES**
31.	Sepulveda Boulevard & Lincoln Boulevard	556	573	**YES**
37.	Sepulveda Boulevard & El Segundo Boulevard	125	127	**YES**
38.	Sepulveda Boulevard & Rosecrans Avenue	111	113	**YES**
45.	La Cienega & Centinela Avenue	44	73	**YES**
53.	La Brea Avenue & Manchester Avenue	53	55	**YES**
88.	La Cienega Boulevard & Stocker Street	77	78	**YES**
--	Lincoln Boulevard & Pico Boulevard	17	18	NO
--	Venice Boulevard & Centinela Avenue	5	5	NO
--	La Cienega Boulevard & Jefferson Boulevard	46	34	NO
--	La Cienega Boulevard & Venice Boulevard	30	21	NO
--	Overland Avenue & Venice Boulevard	5	5	NO
--	Crenshaw Boulevard & Manchester Avenue	14	14	NO
--	PCH & Artesia Boulevard/Gould Street	35	36	NO

Source: Gibson Transportation, 2014

Similar to the proposed Project, Alternative 4 is anticipated to add 50 or more peak hour trips to the 10 CMP arterial monitoring station which are study intersections. Alternative 4 would not add more than 50 peak hour trips to the CMP arterial monitoring locations outside of the Study Area. Alternative 4 is not projected to result in a significant impact at any of the 10 CMP arterial monitoring locations under Existing or Future conditions. This is the same as under Project conditions.

CMP Freeway Analysis

Table 6-17 depicts the peak hour traffic volumes expected at each mainline freeway monitoring location within and around the Study Area.

Table 6-17

CMP Freeway Analysis-Alternative 4

Mainline Freeway Monitoring Location	Peak Hour Trips		Requires CMP Analysis?
	A.M.	P.M.	
I-405 North of La Tijera Avenue			
Northbound	8	34	No
Southbound	34	9	No
I-405 North of Venice Boulevard			
Northbound	39	166	**Yes**
Southbound	167	46	**Yes**
I-405 North of Inglewood Avenue			
Northbound	117	32	No
Southbound	27	117	No
I-105 East of Sepulveda Boulevard			
Eastbound	47	200	**Yes**
Westbound	201	55	**Yes**
I-105 East of Crenshaw Boulevard			
Eastbound	30	128	No
Westbound	129	35	No

Source: Gibson Transportation, 2014

Alternative 4 would add 150 or more peak hour trips to two of the freeway monitoring locations in either direction. One of the freeway monitoring locations (I-105 East of Sepulveda Boulevard) would be impacted by Alternative 4 traffic under both Existing and Future conditions, before and after mitigation. This is a greater impact than projected under Project conditions.

CMP Transit Analysis

Alternative 4 would generate approximately 234 morning peak hour transit trips and 240 afternoon peak hour transit trips, which is less than the existing and projected future residual transit capacity. Therefore, Alternative 4 would not result in a significant impact on the regional transit system, as under the proposed Project.

Parking

According to Los Angeles Municipal Code (LAMC) requirements, Alternative 4 would require approximately 3,725 parking spaces. All parking would be accommodated on-site. Like the proposed Project, Alternative 4 would provide sufficient parking to meet LAMC requirements.

Neighborhood Intrusion

The neighborhood intrusion impact criteria developed by LADOT was used to identify potential neighborhood impacts from Alternative 4 traffic. Alternative 4 would add 1,200 or more daily trips to the following five arterial corridors before implementation of the mitigation program:

- Lincoln Boulevard between Mindanao Way and Sepulveda Boulevard
- Sepulveda Boulevard between Howard Hughes Boulevard and Grand Avenue
- La Tijera Boulevard between Westchester Parkway and La Cienega Boulevard
- Manchester Avenue between Emerson Avenue and La Cienega Boulevard
- Westchester Parkway/Arbor Vitae Street between Pershing Drive and Inglewood Avenue

The following intersections along the identified corridors would operate at LOS E or F during at least one of the analyzed peak hours:

30. Sepulveda Boulevard & Westchester Parkway

33. Sepulveda Boulevard & I-105 Westbound Ramps N/O Imperial Highway

34. Sepulveda Boulevard & Imperial Highway

36. Sepulveda Boulevard & Grand Avenue

37. Sepulveda Boulevard & El Segundo Boulevard

46. Airport Boulevard & Manchester Avenue

49. La Cienega Boulevard & Manchester Avenue

As under the Project analysis, the corridors of Sepulveda Boulevard and Manchester Avenue should be examined for alternative routes through residential neighborhoods. However, neither Sepulveda Boulevard nor Manchester Avenue has parallel local streets that would serve this purpose. Therefore, based on LADOT's standard criteria and similar to the proposed Project, no potential neighborhood intrusion impacts are identified under Alternative 4.

6.10.2.15 Utilities and Services

Wastewater

Alternative 4 would result in new development, including offices, research and development, service, and airport support uses. Alternative 4 would generate an estimated 256,860 gallons per day (gpd) of wastewater, which is less than the proposed Project. These projected wastewater flows would be conveyed to the existing facilities operated by the LADPW and Los Angeles Bureau of Sanitation, which would serve Alternative 4 wastewater collection and treatment needs. Sewers to convey wastewater to LADPW facilities would be constructed on-site to serve the proposed development and would be sized according to projected flows, including peak day flows. The estimated 256,860 gpd wastewater generation for Alternative 4 would use approximately 0.09 percent of the total available flow capacity (291 mgd) within the North Central Outfall Sewer (NCOS) and North Outfall Relief Sewer (NORS) that serve the

Project site. As such, the flows associated with Alternative 4 would not cause the NCOS and NORS to become constrained.

The Hyperion Treatment Plant (HTP) has a design capacity of 450 mgd, and currently has an excess wastewater capacity of approximately 151 mgd. The Integrated Resources Plan (IRP) projects that the average daily water flow (ADWF) of the HTP will increase to 435 mgd by 2020. This would leave an excess wastewater capacity of approximately 15 mgd. The estimated 256,860 gpd wastewater generation of Alternative 4 would use about 1.71 percent of the projected available flow capacity (15 mgd) of the HTP in 2020. Alternative 4 will not generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or the City of Los Angeles' General Plan and its elements.

The proposed Project's less than significant impacts to wastewater would be less under Alternative 4. Therefore, impacts to wastewater would be less than significant.

Water Use

Alternative 4 is estimated to consume 520,274 gpd of water, which is less than the proposed Project. Water demand in the City of Los Angeles is estimated to be 72.8 mgd in 2022, the proposed Project buildout year. Alternative 4 water demand would represent approximately 0.71 percent of the projected increase in LADWP's water demand from 2010 to 2022.

LAX Master Plan Commitment W-1, Maximize Use of Reclaimed Water, would apply to Alternative 4 to maximize the use of reclaimed water in facilities and landscaping and offset potable water use to minimize the potential for increased water use resulting from Alternative 4. LAX Master Plan Commitment W-2, Enhance Existing Water Conservation Program, would also be applied to ensure the ongoing use of water conservation practices, such as installing water-efficient fixtures. Alternative 4 would also include the proposed Project's Project Design Features related to requiring drought-tolerant landscaping and encouraging green roofs and water demand at buildout would not exceed available supplies.

Alternative 4 would require new water distribution infrastructure that connects to the water transmission lines that serve the Project site, similar to the proposed Project. The construction of this new infrastructure would be incorporated into the LAX Master Plan as part of Master Plan Commitment PU-1, Develop a Utility Relocation Program, and W-1, Maximize Use of Reclaimed Water. The water service needs for Alternative 4 would not exceed distribution infrastructure capabilities and it is anticipated that regional water distribution pipelines would be adequate to accommodate increases in water demand for Alternative 4.

The proposed Project's less than significant impacts to water would be less under Alternative 4. Therefore, impacts to water would be less than significant.

Solid Waste

Although no demolition of buildings will take place as part of Alternative 4, some inert waste will be generated during construction. Construction activities would include earthwork, grading, clearing of brush and debris, and excavation. Total solid waste generated during construction of Alternative 4 would be 9,024,800 tons. LAX Master Plan Commitments SW-2, Requirements for the Use of Recycled Materials during Construction, and LAX Master Plan Commitment SW-3, Requirements for the Recycling of Construction and Demolition Waste, would reduce the amount of construction waste requiring disposal by requiring contractors to use recycled construction materials and to recycle construction-related waste.

The landfills that serve the City of Los Angeles had a remaining capacity of 93.07 million tons in 2010 and the City of Los Angeles disposed approximately 3.86 million tons in 2000, based on the most recently published reports.[15] Based on solid waste generation rates for the types of land uses in Alternative 4, approximately 42,128 pounds per day would be generated by Alternative 4. Based on the City of Los Angeles' 70 percent diversion goal, only 12,638 pounds of solid waste from Alternative 4 would require disposal per day in 2022. This solid waste disposal, which would amount to 2,306 tons per year, would represent an approximately 0.06 percent increase in the amount of City-generated solid waste that is disposed of at landfills that serve the City of Los Angeles, and approximately 0.002 percent of its remaining capacity. The estimated solid waste generation would not exceed the solid waste capacity at landfills that serve the City of Los Angeles.

Similar to the proposed Project, Alternative 4 would be consistent with applicable solid waste policies. LAX Master Plan Commitments SW-1, SW-2, and SW-3; implementation of the Los Angeles County Solid Waste Management Action Plan; and implementation of the City of Los Angeles Solid Waste Management Action Plan, Source Reduction and Recycling Element (SRRE), Solid Waste Integrated Resources Plan (SWIRP), City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), LAWA Sustainability Plan, and LAMC Section 66.32 would serve to reduce the amount of solid waste generated. Alternative 4 would be consistent with, and would apply all applicable goals, policies, and strategies of, the CiSWMPP and the associated implementation strategies of the SRRE, including such components as the Curbside Recycling Program, as outlined in the City of Los Angeles' Framework Element. As such, Alternative 4 anticipated on-site diversion programs would serve to enhance the ability of the City of Los Angeles to meet or exceed its long-term goal of 70 percent diversion by 2020. Alternative 4 would comply with, and implement as necessary, all provisions of the aforementioned City policies and programs to achieve the waste diversion goals of AB 939. In addition to existing programs aimed at reducing solid waste generation, LAWA would implement LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, to enhance the current on-site recycling program, extend recycling requirements to tenants, and address the procurement of recycled materials. With the continuation of existing recycling programs and implementation of LAX Master Plan Commitment SW-1, Alternative 4 would not conflict with solid waste policies and objectives intended to help achieve the requirements of AB 939. As such, Alternative 4 would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, the City of Los Angeles' Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

The proposed Project's less than significant impacts to solid waste would be less under Alternative 4. Therefore, impacts to solid waste would be less than significant.

Energy

Electricity

The LADWP service area, which encompasses the City of Los Angeles, is projected to have an annual demand of 28,333 GWh at project buildout. Operation of proposed uses under Alternative 4 would consume an estimated total of 31,558,850 MWh, or 31 GWh, of electricity

[15] City of Los Angeles, Department of Public Works, Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, p. 12, online at http://san.lacity.org/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf, accessed January 16, 2013.

per year. Current transmission and distribution facilities for electricity are adequate to meet the demands of Alternative 4. Additionally, in order to reduce electricity consumption, LAWA would implement Master Plan Commitment E-1 to maximize the energy efficiency of new facilities. Alternative 4 would also include the proposed Project's Project Design Features related to energy conservation, for example use of light-colored roofs.

Changes in peak electrical loads and the location of new electrical loads within the Project site may result in the need for upgrades to the electrical power transmission system. However, under LAX Master Plan Commitment E-2, Coordination with Utility Providers, a utility coordination program would be implemented by LAWA to ensure that adequate electrical distribution facilities are available to support the electricity needs associated with Alternative 4. Development and implementation of a utility coordination program would reduce potential impacts to the electricity distribution system to a level that is less than significant.

Similar to the proposed Project, Alternative 4 may include subterranean elements that may interfere with existing electricity distribution infrastructure, requiring adjustment/relocation. Potential utility conflicts during construction would be minimized with the implementation of a utility relocation program under LAX Master Plan Commitment PU-1, Develop a Utility Relocation Program. Implementing this commitment would ensure that potential impacts would be less than significant.

Operational impacts would not result in an increase in demand for electricity that exceeds available distribution infrastructure capabilities, so the operation of Alternative 4 would not require new distribution infrastructure or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to electricity would be less under Alternative 4. Therefore, impacts to electricity would be less than significant.

Natural Gas

The Southern California Gas Company (SCGC) service area, which includes the Counties of Fresno, Kings, Tulare, San Luis Obispo, Kern, Santa Barbara, Ventura, Los Angeles, San Bernardino, Orange, Riverside, San Diego, and Imperial, is projected to have an annual demand of 948.64 billion cubic feet at project buildout. Operation of Alternative 4 proposed uses would consume an estimated total of 23.7 million cubic feet of natural gas per month, or 284 million cubic feet of natural gas per year.

The annual natural gas demand of Alternative 4 is approximately 0.03 percent of the projected total demand of the SCGC service area at buildout, and is within the anticipated service capabilities of SCGC, which is less than the proposed Project. Current transmission and distribution facilities for natural gas are adequate to meet the demands of Alternative 4.

Additionally, in order to reduce natural gas consumption, LAWA would implement LAX Master Plan Commitment E-1, Energy Conservation and Efficiency Program. This program would be consistent with federal policies pertaining to energy efficiency of new facilities.

Operational impacts would not result in an increase in demand for natural gas that exceeds available supply infrastructure capabilities, so the operation of Alternative 4 would not require new natural gas supply facilities or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to natural gas would be less under Alternative 4. Therefore, impacts to natural gas would be less than significant.

6.10.3 Relationship of the Alternative to the Project Objectives

Alternative 4 would develop the Project site with most of the same types of uses as the proposed Project, including community, office, research and development, service, and airport support uses; however, Alternative 4 would eliminate retail uses and have more office uses than the proposed Project. Alternative 4 would include new uses; however, the mix of uses would be limited and would not achieve as much market value as the proposed Project. New uses would be developed in order to revitalize the Project site, however, Alternative 4 does not include retail uses that would help revitalize and complement the Westchester Business District. The Project site would continue to provide space for new industries to be developed and land use compatibility and economic vitality may be achieved with future development, however, less revitalization, economic investment, and job creation would occur under Alternative 4 as compared to the proposed Project due to fewer jobs being created and no retail uses to respond to market needs.

Alternative 4 would be subject to the same urban design guidelines as the proposed Project. These guidelines would control the scale of development, require buffer area between the proposed Project and residences to the north, reduce development and associated parking and traffic impacts, and reflect current community and stakeholder interests for additional open space, research and development, recreation, security, and economic development. These guidelines are flexible and reflect best-practices in urban design and sustainability. However, Alternative 4 does not include retail uses and therefore would not provide community-serving uses. The proposed Project's design guidelines, which would be the same under Alternative 4, are consistent with the LAX Plan and LAX Specific Plan, do provide transportation options, and do provide for landscaping, public facilities, and open space. The majority of the proposed Project's community compatibility, urban design guidelines, and sustainability objectives are met by Alternative 4.

Under Alternative 4, the LAX Specific Plan permit approval process would be changed to establish an overall framework for development standards, provide a basis for reviewing and coordinating plans, establish a high level of design standards and method for reviewing conformance, streamline the approval process, and provide certainty and consistency for future developments. Therefore, the proposed Project's objectives related to the approval process would be met.

Therefore, Alternative 4 would meet the proposed Project objectives related to the approval process. However, Alternative 4 would not meet all of the proposed Project's objectives related to community compatibility, urban design guidelines, sustainability, and economic development.

6.11 Analysis of the Cargo Alternative

6.11.1 Description of Alternative

The goal of Alternative 5 is to reduce one or more of the significant impacts of the proposed Project, by limiting allowable uses. Alternative 5 changes in the allowable uses to include warehousing and cargo storage only. The table below further describes Alternative 5 (**Table 6-18**).

Table 6-18

Alternative 5: Cargo Alternative

Project	Description	Allowable Development Square Footage	
Alternative 5: Cargo Alternative	Changes allowable uses to include warehousing and cargo storage only.	Warehousing	1,160,000
		Cargo Storage	1,160,000
		Total:	**2,320,000**

Source: LAWA, 2014.

6.11.2 Environmental Impacts

6.11.2.1 Aesthetics

Construction

Construction activities under Alternative 5 would be similar to the proposed Project. Although temporary in nature, construction activities generally cause a contrast to, and disruption in the general order and aesthetic character of an area. Alternative 5 construction activities would include grading, clearing, and grubbing the land; installing utilities, building foundations, superstructures, and building skin/roofing; completing interior framing and finishing; installing hardscape and landscaping; and building testing/commissioning. Construction equipment would include, but is not limited to, drill rigs, cement and mortar mixers, forklifts, graders, cranes, and tractors. As with the proposed Project, all construction activities would comply with LAX Master Plan Commitment DA-1, which requires construction fencing to screen construction areas. Temporary construction fencing would be placed along the periphery of the development sites of the proposed Project to screen much of the construction activity from view at the street level. Alternative 5 would allow the same square footage of construction (although for a different mix of uses) than the proposed Project, and construction activities would be similar in terms of their nature and temporary impacts on aesthetics. The proposed Project's less than significant construction impacts to aesthetics would be similar under Alternative 5. Therefore, construction impacts to aesthetics would be less than significant.

Operation

Visual Character

Aesthetics

Alternative 5 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Existing uses are not anticipated to change under Alternative 5. Alternative 5 does not permit the proposed Project's community, office, open space, research and development, restaurant, or services uses. Uses under Alternative 5 are limited to warehousing and cargo storage. Although square footage would be the same and the proposed Project's design guidelines would apply to Alternative 5 resulting in similar building heights, setbacks, and buffers, Alternative 5 would have a different visual character as it would not include the vibrant,

mixed-use retail, open space, and commercial components of the proposed Project. As with the proposed Project, Alternative 5 would be consistent with visual regulations that seek to enhance visual character, transition building heights between uses, and maintain the prevailing scale and character of residential areas. Compared to the proposed Project, Alternative 5 would result in increased contrast with the surrounding visual character, as warehouse and cargo storage would contrast more than the proposed Project's uses with neighboring commercial and residential uses. The proposed Project's less than significant operational impacts to aesthetics would be greater under Alternative 5.

View Impacts

According to the City of Los Angeles CEQA Guidelines, the term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The Project site is located in the vicinity of locally valued scenic resources, including Dockweiler Beach State Park, Vista Del Mar, and Westchester Bluffs. Like the proposed Project, while Alternative 5 is located in the vicinity of the valued scenic resources discussed above, Alternative 5 would not occur within or adjacent to a valued focal or panoramic vista, or within the view of any designated scenic highway, corridor or parkway. Furthermore, Alternative 5 would not obstruct, interrupt, or diminish a valued focal and/or panoramic view as defined in the Community Plan.

Other views in the Project site vicinity include views from private residences to the Pacific Ocean. Views from private residences are not protected under CEQA. Alternative 5 would allow buildings and setbacks similar to the proposed Project. As Alternative 5 permits the same overall development square footage, the scale of development would likely be similar under Alternative 5.

The proposed Project's less than significant operational impacts to views would be similar under Alternative 5. Therefore, operational impacts to views would be less than significant.

Light and Glare

Ambient Illumination Levels

Operation of Alternative 5 would introduce new lighting on the Project site that would increase ambient illumination levels compared to existing conditions. Like the proposed Project, Alternative 5 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 5 lighting would comply with all applicable LAMC lighting standards. Alternative 5 would also comply with the proposed Project's lighting standards, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; and requiring service area lighting to be contained in the service yard.

The proposed Project's less than significant operational impacts to ambient illumination levels would be similar under Alternative 5 as eliminating the proposed Project's retail, community, office, open space, and research and development components would not substantially change

lighting needs. Therefore, operational impacts to ambient illumination levels would be less than significant.

Light Spillover

Operation of Alternative 5 would introduce new lighting on the Project site that would increase potential for light spillover compared to existing conditions. Like the proposed Project, Alternative 5 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 5 lighting would comply with all applicable LAMC lighting standards. Alternative 5 would also comply with the proposed Project's lighting standards, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting; prohibiting exposed bulbs; requiring increased setbacks and stepbacks; and requiring service area lighting to be contained in the service yard. Existing structures that screen light spillover, such as existing sound walls, are anticipated to remain under Alternative 5. The proposed Project's less than significant operational impacts to light spillover would be similar under Alternative 5. Therefore, impacts to light spillover would be less than significant.

Shading

Alternative 5 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Shading impacts from these uses would remain the same for these structures. Alternative 5 would also result in the same square footage of development on the Project site. Building heights, setbacks, and stepbacks would be the same as under the proposed Project. Alternative 5 would not change shading impacts of existing uses on the Project site. Compared to the proposed Project, Alternative 5 would result in similar shading on light sensitive uses. The proposed Project's less than significant operational impacts to shading would be similar under Alternative 5. Therefore, impacts to shading would be less than significant.

6.11.2.2 Air Quality

Construction Emissions

The total square footage of Alternative 5 will be the same as that of the proposed Project. Criteria pollutant emissions and air quality impacts from construction (**Table 6-19**) are assumed to be proportional to the total square footage and are, therefore, estimated to be similar to that of the proposed Project. These emissions estimates are less than the SCAQMD mass daily regional construction thresholds for NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ and greater than the thresholds for VOC. The local ambient air quality impacts from construction are estimated to be proportional to the construction emissions and would be below the SCAQMD significance thresholds.

Table 6-19

Alternative 5: Cargo Alternative
Construction Emissions

	Peak Daily Emissions (lb/day)					
	VOC	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Alternative 5[2]	125	248	0.4	50	32	11
SCAQMD Threshold	75	550	150	100	150	55
Above Threshold	YES	NO	NO	NO	NO	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Emissions estimated based on ratio of the difference in the square footage between the proposed Project and the Project Alternative.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Operational Emissions

The operational criteria air pollutant emissions (**Table 6-20**) are estimated using a ratio of square footage for the airport support land use. Based on these estimates the operational emissions are estimated to be 11 to 18 percent of the proposed Project for CO, SO_2, NO_x, PM_{10}, and $PM_{2.5}$ and 51% of the proposed Project for VOC. These estimates are below the SCAQMD daily regional mass significance thresholds for CO, SO_2, NO_x, PM_{10}, and $PM_{2.5}$ and above the significance threshold for VOC. The operational local ambient air quality impacts are estimated to be proportional to the operational emissions and are less than the SCAQMD significance thresholds.

Table 6-20

Alternative 5: Cargo Alternative
Operational Emissions

		Daily Maximum Emissions (lb/day)[2]					
Land Use	**Square Feet**	**VOC**	**CO**	**SO_2**	**NO_x**	**PM_{10}[1]**	**$PM_{2.5}$[1]**
Warehousing[3,4]	1,160,000	62	65	0.22	25	17	1.6
Cargo Storage[3,4]	1,160,000						
Total	**2,320,000**	**62**	**65**	**0.22**	**25**	**17**	**1.6**
SCAQMD Significance Threshold		55	550	150	55	150	55
Above Threshold		YES	NO	NO	YES	NO	NO

Notes:
1. PM emissions include exhaust PM and fugitive dust emissions.
2. Project incremental emissions estimated using a ratio of square footages for individual land uses.
3. 273,500 square feet of airport support facilities are moved into the LAX Northside Project footprint from another location in LAX. Emissions from these relocated airport support facilities are not included in Project incremental emission estimates.
4. Warehousing and cargo storage land uses represent airport support facilities.

Abbreviations:
CalEEMod- California Emissions Estimator Model
CO- carbon monoxide
lb- pounds
NO_x – nitrogen oxides
PM- particulate matter
SCAQMD- South Coast Air Quality Management District
SO_2 – sulfur dioxide
VOC – volatile organic compound
Source: ENVIRON, LAX Northside Plan Update Air Quality Technical Report, 2014.

Health Risk Impacts

The health risk impacts of Alternative 5 are estimated to decrease proportional to the sum total of construction and operational emissions, and the health risk estimates are below the SCAQMD significance thresholds.

6.11.2.3 Biological Resources

Loss or Reduction of Federal, State, and Local Designated Habitats

Alternative 5 would result in the same total square footage of development on the Project site as the proposed Project. The Project site is not part of a federal-, state-, or local-designated habitat. Under Alternative 5, existing vegetation would be replaced with new vegetation, which is designed to be drought-tolerant and locally native. Vegetation on the Project site would continue to be regularly maintained by LAX or private developers, including regular mowing and disking of vegetation. The proposed Project's less than significant impacts on federal, state, or local designated habitats would be similar under Alternative 5. Therefore, impacts to federal, state, or local designated habitats would be less than significant.

Interference with Wildlife Movement/Migration Corridors

Alternative 5 would result in the same total square footage of development on the Project site as the proposed Project and would disrupt similar amounts of vegetation that support wildlife movement/migration corridors as the proposed Project. As with the proposed Project, mature trees or other vegetation that supports wildlife movement/migration would be removed under Alternative 5. Vegetation on the Project site would continue to be regularly maintained by LAX or private owners, including regular mowing and disking of vegetation. Although mature trees may be removed as part of Alternative 5, LAX Master Plan EIS/EIR Commitment BC-3 requires compensation for the loss of mature trees at a ratio of 2:1 and would apply to all alternatives. Alternative 5 also includes the proposed Project's Project Design Features that require species of newly planted replacement trees to be a local native tree species to the greatest extent feasible and that trees are a 15-gallon or larger specimen. Although loss of vegetation on the Project site may have a short-term adverse impact on nesting migrant birds, implementation of LAX Master Plan EIS/EIR Commitment BC-3 will ensure that any habitat that is removed is replaced. The proposed Project's less than significant impacts on wildlife movement/migration corridors would be similar under Alternative 5. Therefore, impacts to wildlife movement/migration corridors would be less than significant.

Alteration of an Existing Wetland Habitat

Alternative 5 would result in the same total square footage of development on the Project site as the proposed Project that could potentially alter existing wetland habitat. The only potential wetland habitat, the Argo Drainage Channel, runs along the southern boundary and partially within the Project site. Alternative 5 would include the proposed Project's Project Design Features to protect potential wetland habitat, including Best Management Practices and prohibiting grading within 50 feet of the Argo Drainage Channel. The proposed Project's less than significant impacts to wetlands would be similar under Alternative 5. Therefore, impacts to existing wetland habitat would be less than significant.

Interference with Habitat/Species Behavior

Alternative 5 would result in the same total square footage of development on the Project site as the proposed Project that could potentially interfere with habitat/species behavior. The Los Angeles Airport/El Segundo Dunes habitat preserve located across Pershing Drive to the west of the Project site supports El Segundo Blue Butterfly. California gnatcatcher and California legless lizards have been observed approximately 0.8 miles south, and 1,000 feet west, respectively, of the proposed Project's Biological Resources Study Area within the Los Angeles Airport/El Segundo Dunes habitat preserve. Alternative 5 would not involve construction or operational activities that would impact this habitat or species behavior within the habitat directly. Additionally, existing uses adjacent to the Los Angeles Airport/El Segundo Dunes habitat preserve, including existing airport support uses and an animal quarantine facility, are anticipated to remain in their existing condition under Alternative 5. The proposed Project's less than significant impacts to habitat/species behavior would be similar under Alternative 5. Therefore, impacts to habitat/species behavior would be less than significant.

6.11.2.4 Cultural Resources

Paleontological Resources

Alternative 5 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 5 would be similar to the proposed Project and the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain paleontological resources that have not been previously identified. However, like the proposed Project, Alternative 5 would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7. These commitments require a paleontological resources qualification and treatment plan, authorization, monitoring, collection, fossil preparation and donation, and reporting. These commitments would minimize potential effects on paleontological resources. The proposed Project's less than significant impacts to paleontological resources would be similar under Alternative 5. Therefore, impacts to paleontological resources would be less than significant.

Archaeological Resources

Alternative 5 would include grading, excavation, fill, or other activities that would disturb the ground. The amount of disturbed groundcover under Alternative 5 would be similar to the proposed Project and the depths of excavation and types of activities would be similar. The Project site contains soil types that have the potential to contain archaeological resources that have not been previously identified. One known archaeological site is known in the Project site in Area 12B, but this area would not be developed under Alternative 5. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. Any additional excavation activities that would occur during operations would be minor and not as deep as those required to install foundations or subterranean parking. Subterranean parking is also unlikely for Alternative 5, given the reduced parking needs of warehouse and cargo uses. However, like the proposed Project, Alternative 5 would comply with LAX Master Plan EIS/EIR Commitments HA-1 through HA-10. These commitments require a survey of historic American buildings, historic education materials, discovery and preparation of an archaeological treatment plan, monitoring, excavation and recovery procedures, administrative procedures, archaeological/cultural monitor reporting, and notification. These commitments would minimize potential effects on archaeological resources. The proposed Project's less than significant impacts to archaeological resources would be similar under Alternative 5. Therefore, impacts to archaeological resources would be less than significant.

Historic Architectural Resources

Alternative 5 would not include any demolition of existing buildings as existing uses and structures are assumed to remain under all alternatives, but would introduce new structures. The Project site does not include any historic architectural resources. Alternative 5 would not result in the demolition of any individually historic building, or impair any historic district. The proposed Project's less than significant impacts to historic architectural resources would be similar under Alternative 5. Therefore, impacts to historic architectural resources would be less than significant.

6.11.2.5 Geology and Soils

Geologic Hazards

Fault Rupture

No known active or potentially active faults underlie the Project site. In addition, the Project site is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. Accordingly, the potential for surface fault rupture at the Project site is considered to be low. Alternative 5 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Similar to the proposed Project, all structures would be designed, located, and built in accordance with City of Los Angeles Department of Building and Safety (LADBS) requirements and current seismic design provisions of the California Building Code (CBC). Alternative 5 allows the same amount of development as the proposed Project, however, due to the different mix of uses, fewer employees would be generated by Alternative 5 and Alternative 5 would expose less people to risk of injury involving rupture of a known earthquake fault. The proposed Project's less than significant impacts to fault rupture would be reduced under Alternative 5.

Seismic Ground Shaking

The Project site is located in the seismically active Los Angeles Basin, and, therefore, has the potential to be subjected to strong seismic ground shaking, but is not located within an Alquist-Priolo Special Study Zone or City of Los Angeles Rupture Study Zone. However, potential exists for seismic ground shaking related to fault movement in the Project site vicinity. Alternative 5 would introduce new uses and construction activities that could result in substantial damage to structures and infrastructure, or expose people to substantial risk of injury involving seismic ground shaking. As with any new development in the State of California and similar to the proposed Project, building design and construction for Alternative 5 would be required to conform to the current seismic design provisions of the CBC. The 2010 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program (NEHRP) to mitigate losses from an earthquake and provide for the latest in earthquake safety. These standards are among the strictest standards in the seismic safety requirements contained in the City of Los Angeles Municipal Code (LAMC) Building Code. Alternative 5 allows the same amount of development as the proposed Project, however, due to the different mix of uses, fewer employees would be generated by Alternative 5 and Alternative 5 would expose less people to risk of injury involving seismic ground shaking. The proposed Project's less than significant impacts to seismic ground shaking would be reduced under Alternative 5.

Liquefaction

Borings conducted at the Project site at depths of 50.5 to 55.5 feet did not encounter groundwater and the Project site is not mapped as being within a liquefaction hazard zone by the State of California. However, the City of Los Angeles General Plan Safety Element (1996) shows a limited portion of the east side of the Project site as being within a liquefaction zone. Alternative 5 would introduce new uses and construction activities that could be located in a City of Los Angeles-designated liquefaction zone. Similar to the proposed Project, the LAMC Building Code and the Uniform Building Code (UBC) require that foundation strength, building

design, and building materials be adjusted to limit any impact related to liquefaction for construction in liquefaction zones. Alternative 5 allows the same amount of development as the proposed Project, however, due to the different mix of uses, fewer employees would be generated by Alternative 5 and Alternative 5 would potentially expose less people to liquefaction zones. The proposed Project's less than significant impacts to liquefaction would be reduced under Alternative 5.

Landslides

The Project site and surrounding area has an average slope of less than 30 percent, and thus is not susceptible to potential hazards from slope stability. Furthermore, the Project site is not located within a State of California-designated seismic hazard zone for landslide potential or a City of Los Angeles-designated landslide inventory area. Similar to the proposed Project, grading for Alternative 5 would be secured in accordance with the LABC. Therefore, Alternative 5 would not result in substantial damage to structures or infrastructure, or expose people to substantial risk or injury due to landslides. The proposed Project's less than significant impacts to landslides would be similar under Alternative 5. Therefore, impacts to landslides would be less than significant.

Inundation

Based on a review of the California Geologic Survey (CGS) Tsunami Inundation Map for the Venice 7.5-minute quadrangle, the Project site is not located within a tsunami inundation-hazard area (CGS 2009). As such, no impacts associated with tsunamis would occur for Alternative 5.

Furthermore, similar to the proposed Project, Alternative 5 would comply with any applicable strategic plans developed by the State of California Office of Emergency Services and the Los Angeles County Office of Emergency Management, as well as the construction limitations contained in the City of Los Angeles Flood Hazard Management Specific Plan Guidelines (as referenced in the City of Los Angeles General Plan Safety Element).

The Project site is over 100 feet above Marina Del Rey and the Ballona Creek and over 50 feet above the Argo Drainage Channel making wave oscillation topographically improbable. Because there is no threat to the Project site, seiches are not a hazard for Alternative 5. Additionally, no dams or dikes are located within or near the Project site.

Alternative 5 would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury due to inundation by a dam or a seiche. The proposed Project's less than significant impacts to inundation would be similar under Alternative 5. Therefore, impacts to inundation would be less than significant.

Soil Conditions

Near-surface soil encountered within borings conducted for the proposed Project were observed to be sand soils estimated to have a very low to low expansion potential. Project site soils are anticipated to have negligible soluble sulfate levels. Additionally, the Project site soils are anticipated to have low to moderate levels of soluble chloride and relatively low electrical resistivity.

Previously developed areas of the Project site may have deep fill. Construction for Alternative 5 could result in excavation of approximately 45 feet Below Ground Surface (bgs). Thus, discovery of fill may be encountered during excavation activities for Alternative 5. However,

compliance with CBC and the LABC requirements would ensure that future buildings would be adequately supported by the underlying soils. Alternative 5 would not cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury impacts from soil conditions. The proposed Project's less than significant impacts to soil conditions would be similar under Alternative 5. Therefore, impacts to soil conditions would be less than significant.

Sedimentation and Erosion

Erosion

Alternative 5 would include grading, excavation, fill, and other activities that would disturb the ground. However, similar to the proposed Project, construction activities for Alternative 5 would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 5 would reduce erosion effects.

In addition, all construction would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Grading would be required under Alternative 5 in order to accommodate development. Grading would include excavation of earthen material and placement of earthen material. Grading is anticipated to be similar to that of the proposed Project due to the same development intensity of Alternative 5. Grading has the potential to increase the risk of erosion during Project site preparation and construction activities. However, erosion would be reduced by implementing appropriate erosion control measures during excavation and grading activities. During the construction phase of Alternative 5, construction activities will be subject to the requirements of a National Pollutant Discharge Elimination System (NPDES) construction permit. Compliance with the NPDES permit includes implementing BMPs, some of which are specifically implemented to reduce soil erosion and loss of topsoil. Additionally, Alternative 5 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control erosion.

The proposed Project's less than significant impacts to erosion would be similar under Alternative 5. Therefore, impacts to erosion would be less than significant.

Sedimentation

Sedimentation could potentially occur from exposed soils (active dune sand and alluvium) during construction of Alternative 5. However, construction activities would occur in accordance with City of Los Angeles erosion control requirements that include grading and dust control measures. Additionally, construction would comply with the LABC, which requires necessary permits, plans, plan checks, and inspections to ensure that Alternative 5 would reduce sedimentation effects.

Temporary dewatering activities are not expected during construction of Alternative 5. However, if dewatering occurs as a result of unexpected water table discovery during construction it would be conducted in accordance with the requirements of the RWQCB and would also be subject to the review and approval of the LADBS, as appropriate.

In addition, similar to the proposed Project, all construction of Alternative 5 would be required to comply with the City of Los Angeles grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion as well as the LAWA Stormwater Pollution Prevention Plan (SWPP) and BMPs.

Additionally, Alternative 5 would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control sedimentation.

During operation, Alternative 5 may result in a limited degree of soil sedimentation effects from non-vegetated areas. However, in accordance with National Pollutant Discharge Elimination System (NPDES) requirements, Alternative 5 would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of Alternative 5. The SUSMP would include BMPs that would reduce on-site sedimentation from vegetated areas on the Project site through stormwater control devices. Alternative 5 would include the proposed Project's Project Design Features that require use of bioswales and permeable pavement to capture sediment runoff and deposition and containment to control runoff on-site.

Alternative 5 would not accelerate natural processes of wind and water erosion and sedimentation, or result in sediment runoff or deposition which would not be contained or controlled-on-site. The proposed Project's less than significant impacts to sedimentation would be similar under Alternative 5. Therefore, impacts to sedimentation would be less than significant.

Landform Alteration

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project site. While Alternative 5 would involve grading that will alter the site topography, the majority of the Project site has been previously disturbed and does not contain prominent geologic or topographic features. Alternative 5 would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. The proposed Project's less than significant impacts to landform alteration would be similar under Alternative 5. Therefore, impacts to landform alteration would be less than significant.

6.11.2.6 Greenhouse Gases

The total square footage of Alternative 5 will be the same as that of the proposed Project. Construction emissions are assumed to be proportional to the total square footage; therefore, GHG emissions from construction of Alternative 5 is estimated to be similar to that of the proposed Project. Based on the change in land use square footage ratios, the operational emissions are estimated to be 40 percent lower and the service population is 89 percent lower than the proposed Project. Using these emissions and service population estimates, the efficiency metric for Alternative 5 is predicted to be approximately 25 MT of CO2e per service population, which is higher than the proposed Project and higher than the SCAQMD draft efficiency target of 4.8 MT of CO2e per Service Population (SP) per year.

6.11.2.7 Hazards and Hazardous Materials

Transportation, Use, or Disposal of Hazardous Materials

Alternative 5 is assumed to leave the existing animal quarantine facility, airport support uses, fire station, golf course, and child development center on the Project site in their existing configurations. Additionally, Alternative 5 permits new cargo and warehouse facilities, which would use similar hazardous materials. Alternative 5 would result in the same amount of development on the Project site as the proposed Project, which would result in similar amounts of transport, use, or disposal of hazardous materials, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. As with the proposed Project, all hazardous materials transported, used, or disposed in association with Alternative 5 would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The proposed Project's less than significant impacts to transport, use, or disposal of hazardous materials would be similar under Alternative 5. Therefore, impacts to transport, use, or disposal of hazardous materials would be less than significant.

Accidental Release of Hazardous Materials

Alternative 5 would include grading, excavation, fill, or other activities that would disturb the ground. Portions of the Project site are located in the City of Los Angeles Methane Hazard and Methane Hazard Buffer zone. The Project site does not contain any known soil or groundwater contamination sites. Alternative 5 may include subterranean elements. The design of the buildings and any associated subterranean elements within identified Methane Hazard and Buffer areas would be required to comply with LADBS methane standards. This would include compliance with the City of Los Angeles Methane Code Ordinance No. 175790 and Ordinance No. 180619. As a result of compliance with these regulations, Alternative 5 would manage risks from methane and would ensure that Alternative 5 does not 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. The proposed Project's less than significant impacts to accidental release of hazardous materials would be similar under Alternative 5. Therefore, impacts to accidental release of hazardous materials would be less than significant.

Contaminated Soils, Groundwater, and Other Hazardous Materials

Alternative 5 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, service, and airport support uses. The Project site does not contain any known soil or groundwater contamination sites. Construction of Alternative 5 would comply with LAX Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction. This Master Plan Commitment would require development of a program to coordinate all efforts associated with handling any contaminated materials in soil or groundwater encountered during construction. Operation of Alternative 5 within the Project site would not include ongoing digging, grading, or other activities that could potentially expose unknown contaminated soil and groundwater. Any unknown contaminated soil or groundwater encountered during construction would be handled and remediated according to applicable regulations and would not pose a hazard to occupants of Alternative 5 at the time of occupancy and during operations. Incorporation of appropriate monitoring and safety provisions would ensure that Alternative 5 does not 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. The proposed Project's less than significant impacts to contaminated soils, groundwater, and other hazardous materials would be similar under Alternative 5. Therefore, impacts to contaminated soils, groundwater, and other hazardous materials would be less than significant.

Hazardous Emissions and Materials within a Quarter Mile of Existing or Proposed Schools

Alternative 5 would include grading, excavation, fill, or other activities and would introduce new warehouse and cargo uses. Use of hazardous materials would be similar to the proposed Project, including but not limited to household and industrial cleaners, herbicides and fertilizer for landscaping, fire-retardant chemicals, and limited amounts of gasoline. Due to the same scale and intensity of development as compared to the proposed Project, Alternative 5 would also likely have similar hazardous emissions and materials transported within ¼ mile of existing and proposed schools in the Project site vicinity. As with the proposed Project, these materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Alternative 5 would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. The proposed Project's less than significant impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be similar under Alternative 5. Therefore, impacts to hazardous emissions and materials within a ¼ mile of existing or proposed schools would be less than significant.

Airport Hazards

Wildlife Hazards

Alternative 5 would introduce new warehouse and cargo uses. Alternative 5 would remove existing vegetation and introduce new vegetation that could attract wildlife, however, Alternative 5 includes the proposed Project's Project Design Features such as prohibiting the casting and spraying of seed for sod, requiring that trees be planted to meet specified spacing requirements, and prohibiting trees that provide fruit. The proposed Project's less than significant impacts to wildlife hazards would be similar under Alternative 5. Therefore, impacts to wildlife hazards would be less than significant.

Lighting and Glare Hazards

Alternative 5 would introduce new lighting on the Project site that would increase lighting compared to existing conditions. Like the proposed Project, Alternative 5 light sources would consist of exterior lighting along pedestrian walkways, vehicle driveways, and parking lots, as well as lighting for signage, security, architectural, and landscaping purposes.

Existing street lights would remain, while new street lights would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting on sidewalks and roadways, while minimizing light and glare on adjacent properties. Alternative 5 lighting would comply with all applicable LAMC lighting standards. Alternative 5 lighting design guidelines would be the same as the proposed Project, including requiring safety lighting in parking areas, access drives, and vehicle circulation areas; requiring full cut-off shield light fixtures or indirect light; requiring indirect building illumination and architectural lighting;

prohibiting mirror glass and highly reflective surfaces as dominant building materials; and requiring service area lighting to be contained in the service yard.

The proposed Project's less than significant impacts to lighting and glare hazards would be similar under Alternative 5. Therefore, impacts to lighting and glare hazards would be less than significant.

Airport Obstruction Hazards

Alternative 5 would introduce new buildings or structures on the Project site. Alternative 5 allows the same building heights as the proposed Project. The proposed Project's less than significant impacts to airport obstruction hazards would be similar under Alternative 5. Therefore, impacts to airport obstruction hazards would be less than significant.

Interference with Emergency Response Plans

Alternative 5 would include construction activities that could impact emergency access and would change existing uses and activities on the Project site. Similar to the proposed Project, during construction, roadway access would be maintained by construction detours and diversions. Emergency access would be coordinated and ensured through Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office.

No aspects of Alternative 5 would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, similar to the proposed Project, Alternative 5 would comply with all applicable City policies related to disaster preparedness and emergency response and emergency vehicles would use sirens to receive priority on roadways. The proposed Project's less than significant impacts to interference with emergency response plans would be similar under Alternative 5. Therefore, impacts to emergency response plans would be less than significant.

6.11.2.8 Hydrology and Water Quality

Hydrology

Surface Water

Alternative 5 would include grading, excavation, fill, or other activities and would introduce new uses such as offices, research and development, commercial, and airport support uses. Alternative 5 permits the same amount of development as the proposed Project and includes the proposed Project's Project Design Features related to pervious paving. Similar to the proposed Project, Alternative 5 would be subject to SUSMP requirements and associated BMPs that would minimize surface water hydrology impacts. The proposed Project's less than significant impacts to surface water hydrology would be similar under Alternative 5. Therefore, impacts to surface water hydrology would be less than significant.

Groundwater

Alternative 5 would include grading, excavation, fill, or other activities and would introduce new cargo and warehouse uses. Alternative 5 permits the same amount of development as the proposed Project and includes the proposed Project's Project Design Features related to pervious paving. Pervious areas would be similar to those under the proposed Project, resulting

in similar levels of recharge to groundwater as under the proposed Project. Similar to the proposed Project, Alternative 5 would be subject to SUSMP requirements and associated BMPs that would minimize groundwater hydrology impacts. The proposed Project's less than significant impacts to groundwater hydrology would be similar under Alternative 5. Therefore, impacts to groundwater hydrology would be less than significant.

Water Quality

Surface Water

Surface water pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be similar under Alternative 5 due to the same amount of development allowed. Runoff from the site would have similar pollutants as under the proposed Project. Similar to the proposed Project, Alternative 5 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize surface water quality impacts. The proposed Project's less than significant impacts to surface water quality would be similar under Alternative 5. Therefore, impacts to surface water quality would be less than significant.

Groundwater

Groundwater pollutants such as pesticides, fertilizers, vehicle fuel, or oil would be similar under Alternative 5 due to the same amount of development allowed. Given the similar development under Alternative 5 relative to the proposed Project, groundwater infiltration from the site would have similar pollutants. Similar to the proposed Project, Alternative 5 would be subject to Stormwater Pollution Prevention Plan (SWPP) requirements that would minimize groundwater quality impacts. The proposed Project's less than significant impacts to groundwater quality would be similar under Alternative 5. Therefore, impacts to groundwater quality would be less than significant.

6.11.2.9 Land Use and Planning

Land Use Plan Consistency

Alternative 5 would have the same development standards as the proposed Project, however, the mix of uses would change as only cargo and warehouse uses are allowed under Alternative 5. The same discretionary approvals required for the proposed Project would be required under Alternative 5. Alternative 5 would be less consistent with local and regional goals, policies, and objectives than the proposed Project. For example, Alternative 5 would not identify areas for new open space, allow community-serving uses, or emphasize pedestrian/bicycle access. Alternative 5 would not provide a vibrant mix of uses or respond to community needs for local-serving retail as the proposed Project does and would be inconsistent with land use goals and policies that support these uses. Additionally, Alternative 5 would not be consistent with the LAX-N Zone permitted uses, which include office, business park, commercial, hotel, and other uses. The proposed Project's less than significant impacts to land use plan consistency would be greater under Alternative 5.

Existing Land Use Compatibility

Alternative 5 permits warehouse and cargo uses. Alternative 5 would result in the same amount of development as the proposed Project and would include the proposed Project's height, setback, buffer, and stepback requirements. However, mixed-use commercial uses adjacent to

the existing Westchester Business District; open space to serve adjacent community needs; retail and commercial uses to revitalize the Project site; and community and civic uses to serve the community are not included as part of Alternative 5. The proposed Project's less than significant impacts to existing land use would be greater under Alternative 5.

6.11.2.10 Noise

Construction

Alternative 5 would result in similar levels of construction activity, off-site construction trucks, and ground-borne vibration as the proposed Project as it allows the same amount of development on the Project site. Noise from construction activities in the vicinity of residences to the north would be similar to the proposed Project, as Alternative 5 includes Project Design Features that buffer construction activities from residences. Similar to the proposed Project, it is anticipated that under Alternative 5, short-term construction-period noise impacts would be significant and unavoidable, due to the fact that mitigation measures included as part of the proposed Project could not reduce noise impacts to less than significant levels for certain receptors located adjacent to the Project site. These conditions would also occur under Alternative 5. The type of construction would be similar to the proposed Project, resulting in similar daily construction-related noise levels, and the duration of construction would likely be similar. Off-site construction traffic would also generate noise similar to the proposed Project, and would be less than significant. Finally, similar to the proposed Project, construction activities for Alternative 5 would likely generate ground borne vibration levels that are less than significant. The proposed Project's significant and unavoidable construction impacts to noise would be similar under Alternative 5. Therefore, construction impacts to noise would be significant and unavoidable.

Operations

Alternative 5 would allow similar amounts of development and fewer associated vehicle trips as the proposed Project. Alternative 5 would result in similar to lower noise levels associated with on-site equipment and activity and off-site traffic. Similar to the proposed Project, Alternative 5 would comply with the City of Los Angeles building code requirements. Finally, Alternative 5 would not introduce new uses in the Airport Influence Area that are incompatible with aircraft noise exposure guidelines. Compared to the proposed Project, Alternative 5 would have lower noise impacts related to vehicle trips due to fewer associated vehicle trips, and may have higher noise impacts related to operation of cargo and warehouse uses. The proposed Project's less than significant operational impacts to noise would be similar under Alternative 5. Therefore, operational impacts to noise would be less than significant.

6.11.2.11 Population, Housing, and Employment

Cause or Accelerate Growth in an Undeveloped Area

Alternative 5 would introduce cargo and warehouse uses to the Project site and would result in the same amount of development on the Project site as the proposed Project. Alternative 5 would generate 2,850 employees, which is less than the proposed Project. Additionally, no new housing or related population growth would occur as a result of Alternative 5. The Project site was previously developed and is surrounded on all sides by existing development. Alternative 5 would therefore not cause or accelerate growth in an undeveloped area. The proposed Project's

less than significant impacts to growth in an undeveloped area would be similar under Alternative 5. Therefore, impacts to growth in an undeveloped area would be less than significant under Alternative 5.

Consistency with Growth Policies

Alternative 5 would introduce cargo and warehouse uses to the Project site and would result in the same amount of development on the Project site as the proposed Project. Similar to the proposed Project, Alternative 5 would provide new employment consistent with applicable policies, however, new jobs would be less than under the proposed Project. The proposed Project's less than significant impacts to consistency with growth policies would be similar under Alternative 5. Therefore, impacts to consistency with growth policies would be less than significant under Alternative 5.

6.11.2.12 Public Services

Fire

Alternative 5 would increase demand for fire protection and emergency facilities due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 5 would not introduce permanent residents or housing that would require fire protection services. Based on City of Los Angeles estimates for the population served by Fire Station No. 5, the existing number of incidents per 1,000 population is approximately 49 incidents, or an incident generation rate of .0049 per capita. Alternative 5 would add approximately 2,850 daytime employees. Applying the incident generation rate of .0049 to Alternative 5 daytime employees would result in an increase of 14 incidents per year. This would be equivalent to about a 0.24 percent increase over the 5,814 existing emergency incidents within the primary response of LAFD Station No. 5. Alternative 5 would increase the workload of LAFD Station No. 5 by less than one percent.

LAX Master Plan Commitments FP-1, Los Angeles Fire Department (LAFD) Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of FAR and fire code requirements, would ensure maintenance of adequate response times, facilities, and emergency access associated with development of Alternative 5. Impacts associated with staffing, equipment, and facilities would also be continually evaluated and addressed pursuant to standard LAFD procedures and fire code requirements. The implementation of the LAX Master Plan Commitments will further reduce impacts related to fire protection services. Therefore, Alternative 5 would not impact emergency access such that it would require addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services.

Alternative 5 would not result in the need for a new fire station, or expansion, consolidation, or relocation of an existing facility due to impacts on fire protection infrastructure, demand, or emergency access. The proposed Project's less than significant impacts to fire service would be similar under Alternative 5. Therefore, impacts to fire service would be less than significant under Alternative 5.

Police

Alternative 5 would increase demand for police protection due to an increase in daytime service population (employees). Similar to the proposed Project, Alternative 5 would not introduce

permanent residents or housing that would require police protection services. Based on LAPD statistics on the population served by the Pacific Community Police Station, the existing number of crimes per 1,000 persons is approximately 29.8 or an incident generation rate of .029 per capita. Alternative 5 would add 2,850 daytime employees. Applying the incident generation rate of .029 to daytime employees would result in an increase of 83 incidents per year under Alternative 5. This would be equivalent to a 1.3 percent increase over the 6,069 existing crimes within the Pacific Community Police Station service area. This is a conservative estimate as daytime employees would not be permanent residents requiring police services in the Pacific Community Police Station service area. Alternative 5 would not result in an increase in the Project site population that would require a substantial increase in law enforcement services to maintain adequate services or would require new or expanded facilities.

Alternative 5 would comply with LAX Master Plan commitments LE-1: Routine Evaluation of Manpower and Equipment Needs; LE-2: Plan Review; PS-1: Fire and Police Facility Relocation Plan; and PS-2: Fire and Police Facility Space and Siting Requirements. These LAX Master Plan Commitments would ensure that LAWAPD and LAPD continue to routinely evaluate and provide additional officers, supporting administrative staff, facilities, and equipment to keep pace with forecast increases in activity and development at the Project site in order to maintain a high level of law enforcement services. Alternative 5 would introduce less employees than the proposed Project, and LAX Master Plan Commitment LE-2, Plan Review, would ensure that during the design phase of any development on the Project site, LAPD, LAWAPD, and other law enforcement agencies would be consulted to review plans so that, where possible, environmental contributors to criminal activity, such as poorly-lit areas and unsafe design, are reduced. Through implementation of these LAX Master Plan commitments, Alternative 5 would not result in a significant increase in emergency response times due to increased traffic congestion, changes in circulation, or the location of new land uses. The proposed Project's less than significant impacts to police service would be similar under Alternative 5. Therefore, impacts to police service would be less than significant under Alternative 5.

Public Schools

Construction of Alternative 5 could occur as close as 0.3 miles from the nearest public school, the Loyola Village Elementary School. Similar to the proposed Project, Alternative 5 construction activities would comply with LAX Master Plan Commitments C-1, ST-18, ST-19, and ST-22 related to construction, which would minimize impacts on adjacent uses. These measures require a construction traffic management plan, closure restrictions on existing roadways, designation of truck routes, and establishment of a ground transportation/construction coordination office. Additionally, it is not anticipated that construction activities would cause substantial increases in noise levels or impair access to local schools.

Based on an average student generation rate of 0.39, enrollment within the Project site vicinity associated with Alternative 5 employees would increase by 555 students.[16] Based on the estimated current overage of 3,779 seats, the public schools serving the Project site vicinity would still have an excess of 3,224 seats with implementation of Alternative 5. Excess seats

[16] Based on an estimated 2,850 new Alternative 5 employees as follows: 2,850 (net new employees) X 0.78 (employees likely to reside within the district) X 0.64 (number of new employee households likely to be located in LAUSD) X 0.39 (student generation rate)= 1,302 net new students. Generation rates based on Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2000, Chapter 6, via City of Los Angeles, LAX Master Plan Final EIS/EIR, Section 4.27, Schools, 2004.

would be greater under Alternative 5 than the proposed Project and capacity would remain under Alternative 5.

Additionally, Alternative 5 would comply with applicable school impact fee requirements pursuant to California Government Code Section 65995 (Senate Bill 50), which are deemed to provide full and complete school facilities mitigation.

The proposed Project's less than significant impacts to public schools would be reduced under Alternative 5. Therefore, impacts to public schools would be less than significant under Alternative 5.

Libraries

Alternative 5 would result in a net increase of 2,850 employees. Project site employees would be anticipated to use library services during typical daytime working hours. Due to time restrictions, employees are most likely to use the Westchester-Loyola Branch Library located nearest to the Project site. The addition of 2,850 employees to the existing 39,480 residents in the Westchester-Playa Del Rey Community would yield a library service population of 42,330. This represents a conservative estimate, since few employees are likely to use library services. However, even with this conservative estimate, employees would not exceed the forecasted unused capacity to this library under Alternative 5. With the addition of employees, there would still be an unused library capacity of 57,670. The proposed Project's less than significant impacts to libraries would be reduced under Alternative 5. Therefore, impacts to libraries would be less than significant under Alternative 5.

6.11.2.13 Recreation

Alternative 5 would maintain the existing golf course on the Project site, which provides recreational space. However, Alternative 5 would not reserve acreage within the Project site for recreation and open space uses that would improve the ratio of open space to residents in the two-mile radius of the Project site boundary, as Alternative 5 only permits cargo and warehouse uses.

Alternative 5 does not include a residential development component that would contribute to a net increase in population. However, increase in employment would increase demand for parks and recreational facilities due to daytime or lunchtime use. While there would be an estimated increase in employment of approximately 2,850 individuals, which is less than the proposed Project employment, it is doubtful that a meaningful number of these new employees would frequent off-site parks at lunchtime such that demand would place constraints on these facilities. Due to time limitations for typical employee lunch breaks, it is expected that such use would not likely involve active sports or require recreational facilities. Incidental increases in daytime employee demand for public parks and recreational facilities would be minimal. Alternative 5 would not improve the provision of parks and open space as the proposed Project would, however, it would not have significant impacts on public parks or recreational facilities. The proposed Project's less than significant impacts to recreation would be similar under Alternative 5. Therefore, impacts to recreation would be less than significant under Alternative 5.

6.11.2.14 Traffic and Transportation

Construction

Alternative 5 represents a similar scale, but reduction in the scope of development compared to the proposed Project. Construction traffic activity is expected to be similar or less than that of the proposed Project, as warehouse and cargo spaces would require less intensive construction activities than the mix of uses in the proposed Project. As with the proposed Project, with implementation of the proposed Project mitigation measures including a construction traffic management plan, construction impacts to intersection operations would be less than significant. However, similar to the proposed Project, Alternative 5 could result in the temporary loss of on-street parking, lane closure, and sidewalk closure. The impact on the overall transportation system from construction activities would be temporary in nature and would cause an intermittent reduction in street and intersection operating capacity near the Project site. Detailed construction traffic management plans, including street closure information, detour plans, and haul routes would be prepared as necessary and satisfactory to the City of Los Angeles. Within the context of these plans, provisions would also be made to incorporate safety precautions for pedestrians and bicyclists, while also maintaining access to adjacent properties, to the extent feasible. Therefore, construction impacts would be less than significant.

Operation

Alternative 5 Trip Generation

Alternative 5 trip generation estimates were based on the projected number of employees and the current schedule for existing employees at the similar existing uses on the Project Site. Alternative 5 is estimated to generate approximately 967 daily trips on a typical weekday, including 62 morning peak hour trips (0 inbound, 62 outbound) and 271 afternoon peak hour trips (0 inbound, 271 outbound).

Existing with Alternative 5 Conditions

Alternative 5 is not anticipated to result in a significant impact at any of the 108 study intersections during either the morning or afternoon peak hour, therefore no mitigation measures are necessary under Existing with Alternative 5 conditions. There would be no intersection impact under Existing Conditions under Alternative 5, which is a lesser impact than the significant impact identified under the proposed Project.

Future with Alternative 5 Conditions

Alternative 5 is not anticipated to result in a significant impact any of the 108 study intersections during either the morning or afternoon peak hour, therefore no mitigation measures are necessary under Future with Alternative 5 conditions. There would be no intersection impact under Future conditions under Alternative 5, which is a lesser impact than the significant impact identified under the proposed Project.

Congestion Management Program

Table 6-21 below summarizes the number of peak hour traffic volumes expected at the CMP monitoring locations within and around the Study Area with implementation of Alternative 5. Peak hour traffic for the study intersections outside the Study Area were estimated using the

same methodology described in Appendix E. The peak hour traffic volumes expected at each CMP arterial monitoring intersection are as follows:

Table 6-21

CMP Arterial Analysis-Alternative 5

No.	Intersection	Peak Hour Trips		Requires CMP Analysis?
		A.M.	P.M.	
1.	Lincoln Boulevard & Venice Boulevard	1	6	NO
4.	Lincoln Boulevard & SR-90 Ramps	3	11	NO
12.	Lincoln Boulevard & Manchester Avenue	17	75	**YES**
28.	Sepulveda Boulevard & Manchester Avenue	7	30	NO
31.	Sepulveda Boulevard & Lincoln Boulevard	16	68	**YES**
37.	Sepulveda Boulevard & El Segundo Boulevard	3	16	NO
38.	Sepulveda Boulevard & Rosecrans Avenue	2	14	NO
45.	La Cienega & Centinela Avenue	2	9	NO
53.	La Brea Avenue & Manchester Avenue	1	6	NO
88.	La Cienega Boulevard & Stocker Street	2	9	NO
--	Lincoln Boulevard & Pico Boulevard	1	2	NO
--	Venice Boulevard & Centinela Avenue	0	1	NO
--	La Cienega Boulevard & Jefferson Boulevard	1	3	NO
--	La Cienega Boulevard & Venice Boulevard	1	2	NO
--	Overland Avenue & Venice Boulevard	0	1	NO
--	Crenshaw Boulevard & Manchester Avenue	1	2	NO
--	PCH & Artesia Boulevard/Gould Street	1	4	NO

Source: Gibson Transportation, 2014

Alternative 5 is anticipated to add 50 or more peak hour trips to two of the 10 CMP arterial monitoring station in the Study Area. Alternative 5 will not add more than 50 peak hour trips to the CMP arterial monitoring locations outside of the Study Area. This is the same as under proposed Project conditions.

Alternative 5 is not projected to result in a significant impact at the CMP arterial monitoring locations under both Existing and Future conditions.

Table 6-22 shows the peak hour traffic volumes expected at each mainline freeway monitoring location within and around the Study Area.

Table 6-22

CMP Arterial Analysis-Alternative 5

Mainline Freeway Monitoring Location	Peak Hour Trips		Requires CMP Analysis?
	A.M.	P.M.	
I-405 North of La Tijera Avenue			
Northbound	1	5	No
Southbound	0	0	No
I-405 North of Venice Boulevard			
Northbound	6	25	No
Southbound	0	0	No
I-405 North of Inglewood Avenue			
Northbound	0	0	No
Southbound	4	18	No
I-105 East of Sepulveda Boulevard			
Eastbound	7	30	No
Westbound	0	0	No
I-105 East of Crenshaw Boulevard			
Eastbound	4	19	No
Westbound	0	0	No

Source: Gibson Transportation, 2014

Alternative 5 would not add 150 or more peak hour trips to any of the freeway monitoring locations in either direction. Therefore, no further analysis is required. Like under the proposed Project, there would be no impacts to CMP freeways under Alternative 5.

Alternative 5 would generate approximately 7 morning peak hour transit trips and 28 afternoon peak hour transit trips, which is less than the existing and projected future residual transit capacity. Therefore, Alternative 5 would not result in a significant impact on the regional transit system, as under the proposed Project.

Parking

Based on the number of additional employees expected under Alternative 5, Alternative 5 would require approximately 493 parking spaces. All parking would be accommodated on-site. Like the proposed Project, Alternative 5 would provide sufficient parking to meet LAMC requirements.

Neighborhood Intrusion

The neighborhood intrusion impact criteria developed by LADOT was used to identify potential neighborhood impacts from Alternative 5 traffic. Alternative 5 would not add 1,200 or more daily trips to any arterial corridors within the vicinity of the Project Site. Therefore, Alternative 5 is not anticipated to result in any neighborhood intrusion impacts, like the proposed Project.

6.11.2.1 Utilities and Services

Wastewater

Alternative 5 would result in new cargo and warehouse uses. Alternative 5 would generate an estimated 85,500 gallons per day (gpd) of wastewater, which is less than the proposed Project. These projected wastewater flows would be conveyed to the existing facilities operated by the LADPW and Los Angeles Bureau of Sanitation, which would serve Alternative 5 wastewater collection and treatment needs. Sewers to convey wastewater to LADPW facilities would be constructed on-site to serve the proposed development and would be sized according to projected flows, including peak day flows. The estimated 85,500 gpd wastewater generation for Alternative 5 would use approximately 0.03 percent of the total available flow capacity (291 mgd) within the North Central Outfall Sewer (NCOS) and North Outfall Relief Sewer (NORS) that serve the Project site. As such, flows associated with Alternative 5 would not cause the NCOS and NORS to become constrained.

The Hyperion Treatment Plant (HTP) has a design capacity of 450 mgd, and currently has an excess wastewater capacity of approximately 151 mgd. The Integrated Resources Plan (IRP) projects that the average daily water flow (ADWF) of the HTP will increase to 435 mgd by 2020. This would leave an excess wastewater capacity of approximately 15 mgd. The estimated 85,500 gpd wastewater generation of Alternative 5 would use about 0.57 percent of the projected available flow capacity (15 mgd) of the HTP in 2020. Alternative 5 will not generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or the City of Los Angeles' General Plan and its elements.

The proposed Project's less than significant impacts to wastewater would be less under Alternative 5. Therefore, impacts to wastewater would be less than significant.

Water Use

Alternative 5 is estimated to consume 219,450 gpd of water, which is less than the proposed Project. Water demand in the City of Los Angeles is estimated to be 72.8 mgd in 2022, the proposed Project buildout year. Alternative 5 water demand would represent approximately 0.3 percent of the projected increase in LADWP's water demand from 2010 to 2022.

LAX Master Plan Commitment W-1, Maximize Use of Reclaimed Water, would apply to Alternative 5 to maximize the use of reclaimed water in facilities and landscaping and offset potable water use to minimize the potential for increased water use resulting from Alternative 5. LAX Master Plan Commitment W-2, Enhance Existing Water Conservation Program, would also be applied to ensure the ongoing use of water conservation practices, such as installing water-efficient fixtures. Alternative 5 would also include the proposed Project's Project Design Features related to requiring drought-tolerant landscaping and encouraging green roofs and water demand at buildout would not exceed available supplies.

Alternative 5 would require new water distribution infrastructure that connects to the water transmission lines that serve the Project site, similar to the proposed Project. The construction of this new infrastructure would be incorporated into the LAX Master Plan as part of Master Plan Commitment PU-1, Develop a Utility Relocation Program, and W-1, Maximize Use of Reclaimed Water. The water service needs for Alternative 5 would not exceed distribution infrastructure capabilities and it is anticipated that regional water distribution pipelines would be adequate to accommodate increases in water demand for Alternative 5.

The proposed Project's less than significant impacts to water would be less under Alternative 5. Therefore, impacts to water would be less than significant.

Solid Waste

Although no demolition of buildings will take place as part of Alternative 5, some inert waste will be generated during construction. Construction activities would include earthwork, grading, clearing of brush and debris, and excavation. Total solid waste generated during construction of Alternative 5 would be 9,024,800 tons. LAX Master Plan Commitments SW-2, Requirements for the Use of Recycled Materials during Construction, and LAX Master Plan Commitment SW-3, Requirements for the Recycling of Construction and Demolition Waste, would reduce the amount of construction waste requiring disposal by requiring contractors to use recycled construction materials and to recycle construction-related waste.

The landfills that serve the City of Los Angeles had a remaining capacity of 93.07 million tons in 2010 and the City of Los Angeles disposed approximately 3.86 million tons in 2000, based on the most recently published reports.[17] Based on solid waste generation rates for the types of land uses in Alternative 5, approximately 17,955 pounds per day would be generated by Alternative 5. Based on the City of Los Angeles' 70 percent diversion goal, only 5,386 pounds of solid waste from Alternative 5 would require disposal per day in 2022. This solid waste disposal, which would amount to 983 tons per year, would represent an approximately 0.03 percent increase in the amount of City-generated solid waste that is disposed of at landfills that serve the City of Los Angeles, and approximately 0.001 percent of its remaining capacity. The estimated solid waste generation would not exceed the solid waste capacity at landfills that serve the City of Los Angeles.

Similar to the proposed Project, Alternative 5 would be consistent with applicable solid waste policies. LAX Master Plan Commitments SW-1, SW-2, and SW-3; implementation of the Los Angeles County Solid Waste Management Action Plan; and implementation of the City of Los Angeles Solid Waste Management Action Plan, Source Reduction and Recycling Element (SRRE), Solid Waste Integrated Resources Plan (SWIRP), City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), LAWA Sustainability Plan, and LAMC Section 66.32 would serve to reduce the amount of solid waste generated. Alternative 5 would be consistent with, and would apply all applicable goals, policies, and strategies of, the CiSWMPP and the associated implementation strategies of the SRRE, including such components as the Curbside Recycling Program, as outlined in the City of Los Angeles' Framework Element. As such, anticipated on-site diversion programs associated with Alternative 5 would serve to enhance the ability of the City of Los Angeles to meet or exceed its long-term goal of 70 percent diversion by 2020. Alternative 5 would comply with, and implement as necessary, all provisions of the

[17] City of Los Angeles, Department of Public Works, Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, p. 12, online at http://san.lacity.org/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf, accessed January 16, 2013.

aforementioned City policies and programs to achieve the waste diversion goals of AB 939. In addition to existing programs aimed at reducing solid waste generation, LAWA would implement LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, to enhance the current on-site recycling program, extend recycling requirements to tenants, and address the procurement of recycled materials. With the continuation of existing recycling programs and implementation of LAX Master Plan Commitment SW-1, Alternative 5 would not conflict with solid waste policies and objectives intended to help achieve the requirements of AB 939. As such, Alternative 5 would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, the City of Los Angeles' Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 5 of the SRRE.

The proposed Project's less than significant impacts to solid waste would be less under Alternative 5. Therefore, impacts to solid waste would be less than significant.

Energy

Electricity

The LADWP service area, which encompasses the City of Los Angeles, is projected to have an annual demand of 28,333 GWh at project buildout. Operation of proposed uses under Alternative 5 would consume an estimated total of 36,586,400 MWh, or 36 GWh, of electricity per year. Current transmission and distribution facilities for electricity are adequate to meet the demands of Alternative 5. Additionally, in order to reduce electricity consumption, LAWA would implement Master Plan Commitment E-1 to maximize the energy efficiency of new facilities. Alternative 5 would also include the proposed Project's Project Design Features related to energy conservation, for example use of light-colored roofs.

Changes in peak electrical loads and the location of new electrical loads within the Project site may result in the need for upgrades to the electrical power transmission system. However, under LAX Master Plan Commitment E-2, Coordination with Utility Providers, a utility coordination program would be implemented by LAWA to ensure that adequate electrical distribution facilities are available to support the electricity needs associated with Alternative 5. Development and implementation of a utility coordination program would reduce potential impacts to the electricity distribution system to a level that is less than significant.

Similar to the proposed Project, Alternative 5 may include subterranean elements that may interfere with existing electricity distribution infrastructure, requiring adjustment/relocation. Potential utility conflicts during construction would be minimized with the implementation of a utility relocation program under LAX Master Plan Commitment PU-1, Develop a Utility Relocation Program. Implementing this commitment would ensure that potential impacts would be less than significant.

Operational impacts would not result in an increase in demand for electricity that exceeds available distribution infrastructure capabilities, so the operation of Alternative 5 would not require new distribution infrastructure or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to electricity would be similar under Alternative 5. Therefore, impacts to electricity would be less than significant.

Natural Gas

The Southern California Gas Company (SCGC) service area, which includes the Counties of Fresno, Kings, Tulare, San Luis Obispo, Kern, Santa Barbara, Ventura, Los Angeles, San Bernardino, Orange, Riverside, San Diego, and Imperial, is projected to have an annual demand of 948.64 billion cubic feet at project buildout. Operation of proposed uses associated with Alternative 5 would consume an estimated total of 10 million cubic feet of natural gas per month, or 121 million cubic feet of natural gas per year.

The annual natural gas demand of Alternative 5 is approximately 0.013 percent of the projected total demand of the SCGC service area at buildout, and is within the anticipated service capabilities of SCGC, which is less than the proposed Project. Current transmission and distribution facilities for natural gas are adequate to meet the demands of Alternative 5.

Additionally, in order to reduce natural gas consumption, LAWA would implement LAX Master Plan Commitment E-1, Energy Conservation and Efficiency Program. This program would be consistent with federal policies pertaining to energy efficiency of new facilities.

Operational impacts would not result in an increase in demand for natural gas that exceeds available supply infrastructure capabilities, so the operation of Alternative 5 would not require new natural gas supply facilities or capacity enhancing alterations to existing facilities.

The proposed Project's less than significant impacts to natural gas would be less under Alternative 5. Therefore, impacts to natural gas would be less than significant.

6.11.3 Relationship of the Alternative to the Project Objectives

Alternative 5 would develop the Project site with cargo and warehouse uses only, and would not include the proposed Project's community, office, research and development, service, and airport support uses. Alternative 5 would include new uses; however, the mix of uses would be limited and would not achieve as much market value as the proposed Project. New uses would be developed in order to revitalize the Project site, however, Alternative 5 does not include retail uses that would help revitalize and complement the Westchester Business District. The Project site would continue to provide space for new industries to be developed and land use compatibility and economic vitality may be achieved with future development, however, less revitalization, economic investment, and job creation would occur under Alternative 5 as compared to the proposed Project due to fewer jobs being created and no retail uses to respond to market needs.

Alternative 5 would be subject to the same urban design guidelines as the proposed Project. These guidelines would control the scale of development, require buffer area between the proposed Project and residences to the north and reduce development and associated parking and traffic impacts. However, as Alternative 5 only permits cargo and warehouse uses, it does not reflect current community and stakeholder interests for additional open space, research and development, recreation, and community and civic uses. The design guidelines associated with Alternative 5 are flexible and reflect best-practices in urban design and sustainability. However, Alternative 5 does not include retail, civic, or open space uses and therefore would not provide community-serving uses. The proposed Project's design guidelines, which would be the same under Alternative 5, would be consistent with the LAX Plan and LAX Specific Plan, do provide transportation options, and do provide for landscaping, public facilities, and open space. The proposed uses under Alternative 5 do not fully fulfill the purpose of the LAX-N Zone, which

allows a greater mix of uses that are consistent with airport needs and neighborhood conditions. The majority of the proposed Project's community compatibility, urban design guidelines, and sustainability objectives are not met by Alternative 5.

Under Alternative 5, the LAX Specific Plan permit approval process would be changed to establish an overall framework for development standards, provide a basis for reviewing and coordinating plans, establish a high level of design standards and method for reviewing conformance, streamline the approval process, and provide certainty and consistency for future developments. Therefore, the proposed Project's objectives related to the approval process would be met.

Therefore, Alternative 5 would meet the proposed Project objectives related to the approval process. However, Alternative 5 would not fully meet the proposed Project's objectives related to community compatibility, urban design guidelines, sustainability, and economic development.

6.12 Environmentally Superior Alternative

Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project Alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives. **Table 6-23** compares the impacts of the proposed Project and Project Alternatives.

Of the alternatives analyzed in the EIR, Alternative 1-No Project-Existing Conditions is considered the Environmentally Superior Alternative. As no construction activities would occur and no new uses would be introduced under Alternative 1, it would reduce the vast majority of the significant impacts under the proposed Project to no impact levels or levels that are less than significant. However, as discussed above, Alternative 1 would not meet most of the objectives established by the proposed Project.

CEQA Guidelines also require an EIR to identify an Environmentally Superior Alternative other than the No Project Alternative. A comparison of the remaining alternatives indicates that Alternative 3-Reduced Retail would reduce more of the proposed Project impacts than any of the other remaining alternatives, and would not introduce new significant impacts. However, although Alternative 3 would meet the proposed Project objectives related to community compatibility, urban design guidelines, sustainability and approval process it would not fully meet the proposed Project's objectives related to economic development. Less revitalization, economic investment, and job creation would occur under Alternative 3 as compared to the proposed Project. Additionally, although environmental impacts would be reduced under Alternative 3, Alternative 3 would not avoid any of the proposed Project's significant impacts.

Table 6-23

Comparison of Impacts Associated with the Proposed Project and Impacts of Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project-Existing Conditions	Alternative 2 No Project-Planned Development	Alternative 3 Reduced Retail	Alternative 4 Reduced Density	Alternative 5 Cargo
Aesthetics						
Construction	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Visual Character- Aesthetics	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less than Significant Impact	Less than Significant Impact	Greater Impacts than Proposed Project
Visual Character- View Impacts	Less than Significant Impact	No Impact	Less than Significant Impact Similar to Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Light and Glare- Ambient Illumination Levels	Less than Significant Impact	No Impact	Less than Significant Impact Similar to Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Light and Glare- Light Spillover	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Light and Glare- Shading	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Air Quality						
Construction Emissions	Significant and Unavoidable Regional VOC Emissions Less than Significant Localized Impacts	No Impact	Significant Impact VOC Emissions Greater than Proposed Project	Significant Impact VOC Emissions Less than Proposed Project	Significant Impact VOC Emissions Same As Proposed Project	Significant Impact VOC Emissions Same As Proposed Project
Operational Emissions	Significant and Unavoidable VOC and NOx Emissions Less than Significant Localized, CO, Odor Impacts	No Impact	Significant Impact VOC, CO, NO_x, and PM_{10}	Significant Impact VOC and NOx,	Significant Impact VOC and NOx,	Significant Impact VOC and NOx,
Health Risk Impacts	Less than Significant	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Biological Resources						
Loss or Reduction of Federal State, and Local Designated Habitats	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact

Table 6-23

Comparison of Impacts Associated with the Proposed Project and Impacts of Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project-Existing Conditions	Alternative 2 No Project-Planned Development	Alternative 3 Reduced Retail	Alternative 4 Reduced Density	Alternative 5 Cargo
Interference with Wildlife Movement/Migration Corridors	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Alteration of an Existing Wetland Habitat	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Interference with Habitat/Species Behavior	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Cultural Resources						
Paleontological Resources	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Archaeological Resources	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Historic Architectural Resources	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Geology and Soils						
Geologic Hazards- Fault Rupture	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less Impacts than Proposed Project	Less Impacts than Proposed Project	Less Impacts than Proposed Project
Geologic Hazards- Seismic Ground Shaking	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less Impacts than Proposed Project	Less Impacts than Proposed Project	Less Impacts than Proposed Project
Geologic Hazards- Liquefaction	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less Impacts than Proposed Project	Less Impacts than Proposed Project	Less Impacts than Proposed Project
Geologic Hazards- Landslides	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Geologic Hazards- Inundation	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Geologic Hazards- Soil Conditions	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Sedimentation and Erosion- Erosion	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Sedimentation and Erosion- Sedimentation	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact

Table 6-23

Comparison of Impacts Associated with the Proposed Project and Impacts of Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project-Existing Conditions	Alternative 2 No Project-Planned Development	Alternative 3 Reduced Retail	Alternative 4 Reduced Density	Alternative 5 Cargo
Landform Alteration	No Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Greenhouse Gases						
GHG Emissions	Less than Significant Impact	No Change Undefined Impact	Less than Significant Impact	Less than Significant Impact Less GHG than Proposed Project	Less than Significant Impact Less GHG than Proposed Project	Significant Impact More GHG than proposed Project
Hazards and Hazardous Materials						
Transportation, Use or Disposal of Hazardous Materials	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Accidental Release of Hazardous Materials	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Contaminated Soils, Groundwater, and Other Hazardous Materials	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Hazardous Emissions and Materials within ¼ Mile of Existing or Proposed Schools	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Airport Hazards- Wildlife	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Airport Hazards- Lighting and Glare	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Airport Hazards- Airport Obstruction	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Interference with Emergency Response Plans	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Hydrology and Water Quality						
Hydrology- Surface Water	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact

Table 6-23

Comparison of Impacts Associated with the Proposed Project and Impacts of Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project-Existing Conditions	Alternative 2 No Project-Planned Development	Alternative 3 Reduced Retail	Alternative 4 Reduced Density	Alternative 5 Cargo
Hydrology- Groundwater	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Water Quality- Surface Water	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Water Quality- Groundwater	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Land Use and Planning						
Land Use Plan Consistency	Less than Significant Impact	No Impact	No Impact	Less than Significant Impact	Greater Impacts than Proposed Project	Greater Impacts than Proposed Project
Existing Land Use Compatibility	Less than Significant Impact	No Impact	Greater Impacts than Proposed Project	Less than Significant Impact	Greater Impacts than Proposed Project	Greater Impacts than Proposed Project
Noise						
Construction	Significant and Unavoidable Area 3, 12A East, 13	No Impact	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Operation	Less than Significant	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Population, Housing, and Employment						
Cause or Accelerate Growth in an Undeveloped Area	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Consistency with Growth Policies	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Public Services						
Fire	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Police	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Public Schools	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Libraries	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Recreation						

Table 6-23

Comparison of Impacts Associated with the Proposed Project and Impacts of Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project-Existing Conditions	Alternative 2 No Project-Planned Development	Alternative 3 Reduced Retail	Alternative 4 Reduced Density	Alternative 5 Cargo
Recreation	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Traffic and Transportation						
Construction- Intersection Operations	Less than Significant Impact	No Impact	Greater Impact than Proposed Project	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact Less than Proposed Project
Construction- On-Street Impacts on Parking and Sidewalks	Less than Significant Impact	No Impact	Potential Temporary Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Operation- Existing with Alternative (2012 Conditions)	Significant Impact 11 intersections	No Impact	Significant Impact 30 Intersections	Significant Impact 6 intersections	Significant Impact 9 intersection	Less than Significant Impact
Operation- Existing with Alternative with Mitigation (2012 Conditions)	Significant Impact 3 intersections	No Impact	Significant Impact 15 Intersections	Significant Impact 1 intersection	Significant Impact 1 intersection	Less than Significant Impact
Operation- Future with Alternative (2022 Conditions)	Significant Impact 18 intersections	No Impact	Significant Impact 44 Intersections	Significant Impact 11 intersections	Significant Impact 18 intersections	Less than Significant Impact
Future with Alternative with Mitigation (2022 Conditions)	Significant Impact 4 intersections	No Impact	Significant Impact 22 Intersections	Significant Impact 1 intersection	Significant Impact 3 intersections	Less than Significant Impact
CMP Arterial Analysis- Existing with Alternative (2012 Conditions)	Less than Significant Impact	No Impact	Significant Impact 2 locations	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
CMP Arterial Analysis- Future with Alternative (2022 Conditions)	Less than Significant Impact	No Impact	Significant Impact 2 locations	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
CMP Arterial Analysis- Existing with Alternative with Mitigation (2012 Conditions)	Less than Significant Impact	No Impact	Significant Impact 1 location	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
CMP Arterial Analysis- Future with Alternative with Mitigation (2022 Conditions)	Less than Significant Impact	No Impact	Significant Impact 2 Intersections	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact

Table 6-23

Comparison of Impacts Associated with the Proposed Project and Impacts of Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project-Existing Conditions	Alternative 2 No Project-Planned Development	Alternative 3 Reduced Retail	Alternative 4 Reduced Density	Alternative 5 Cargo
CMP Freeway Analysis- Existing with Alternative (2012 Conditions)	Less than Significant Impact	No Impact	Significant Impact 1 location	No Impact	Significant Impact 1 location	Less than Significant Impact
CMP Freeway Analysis- Future with Alternative (2022 Conditions)	Less than Significant Impact	No Impact	Significant Impact 3 locations	No Impact	Significant Impact 1 location	Less than Significant Impact
CMP Transit Analysis	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Parking	Less than Significant Impact	No Impact	6,299 Spaces Required	2,670 Spaces Required	3,725 Spaces Required	493 Spaces Required
Neighborhood Intrusion	Less than Significant Impact	No Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact	Less than Significant Impact
Utilities and Services						
Wastewater	Less than Significant Impact	No Impact	Less than Significant Impact Greater than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project
Water Use	Less than Significant Impact	No Impact	Less than Significant Impact Greater than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project
Solid Waste	Less than Significant Impact	No Impact	Less than Significant Impact Greater than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project
Energy- Electricity	Less than Significant Impact	No Impact	Less than Significant Impact Greater than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Similar to Proposed Project
Energy- Natural Gas	Less than Significant Impact	No Impact	Less than Significant Impact Greater than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project	Less than Significant Impact Less than Proposed Project

Source, URS, 2014

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