
California Environmental Quality Act Findings LAX Northside Plan Update

I. Project Description Summary

As explained in more detail in Volume I of the EIR, the proposed Project would update the 1989 Design Plan and Development Guidelines for LAX Northside and permit a maximum of 2,320,000 square feet on the approximately 340 acre Project site. In order to allow for flexibility of future development to respond to future market conditions, transfers and exchanges of uses and development rights will be allowed within limited areas of the Project site, not to exceed certain specified environmental constraints, and in compliance with all applicable development and design standards are met. In order to implement the proposed Project, the LAX Specific Plan will be amended and the 1989 Design Plan and Development Guidelines for LAX Northside will be updated, among other actions.

The proposed Project would permit a mix of retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses. The Project site is divided into three Districts for planning purposes. The planned character of each District is briefly described below.

LAX Northside Campus District

The LAX Northside Campus District is planned as a low-rise, low density office, and research and development park extending from Lincoln Boulevard west to Pershing Drive. Site access will be controlled, with project entry points planned as major design features along Westchester Parkway, incorporating graphic and landscape elements.

Along the north side of Westchester Parkway, buildings will be diverse in design character but will maintain a relationship to the street. Wider setbacks are required at major access points, while smaller setbacks are required elsewhere to create a campus-like environment. These design strategies are intended to reinforce a pedestrian scale that integrates with the Westchester pedestrian paseo.

The proposed Project would permit up to 1,075,000 net square feet of new development in the LAX Northside Campus District, with the majority consisting of commercial and community and civic uses in Areas 2 and 3 and a small amount of new commercial development, up to 10,000 square feet, planned in Area 1.

The proposed grading concept and building height limits will minimize the visual presence of new developments from the residential neighborhoods to the north. In Areas 2 and 3, grading strategies will bring building elevations down in height to orient the buildings to Westchester Parkway, while in Area 1 existing grading will be preserved to provide separation for the potential open space uses planned in these areas from Westchester Parkway.

Landscape buffers are required in two separate locations in the LAX Northside Campus District- a 100-foot wide fenced and secured buffer area along the northern edge of Area 2 and a 20-foot buffer along the northern edge of Area 1. Buildings, parking, and pedestrian access are prohibited in these buffer areas.

LAX Northside Center District

The LAX Northside Center District is planned as a low to mid-rise, retail and office environment extending from Sepulveda Westway to Lincoln Boulevard. Vehicular access will be allowed primarily off of Westchester Parkway, with secondary access allowed along La Tijera Boulevard and Sepulveda Westway.

Building setbacks and setbacks along Westchester Parkway and La Tijera Boulevard are planned to create a pedestrian environment that works with the proposed paseo and consolidates pedestrian activity along primary building frontages.

A maximum amount of 645,000 net square feet of new development would be permitted in the LAX Northside Campus District, consisting of up to 470,000 square feet of commercial development in Areas 11 and 12A East and 175,000 square feet of new community and civic uses in Areas 12A West and 13.

LAX Airport Support District

The areas south of Westchester Parkway will be comprised of low-rise, light industrial structures. The existing site entrance and security checkpoint at the intersection of Falmouth Avenue and Westchester Parkway will be maintained, allowing a secured access point for employees. The topography of this District, including existing landscape berms will be preserved to limit the visibility of new buildings and activities from Westchester Parkway and the new development planned in the Northside Campus District.

Up to 600,000 square feet of new development would be permitted in Areas 4-10 in the Airport Support District, with the majority of building intensity being allocated to Area 4.

II. Project Objectives

CEQA Guidelines state that a clearly written statement of project objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR, and will aid decision makers in preparing findings, or a statement of overriding considerations, if necessary. The statement of objectives includes the underlying purpose of the project.

The underlying purpose of the proposed Project is to permit development that creates a vibrant and sustainable center of employment, retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses. LAWA seeks to foster this development by updating the provisions of the LAX Specific Plan and 1989 Design Plan and Development Guidelines for LAX Northside in order to incorporate community input and current best-practices in sustainability and urban design. The proposed Project would help to revitalize the Project site while providing development that would serve the needs of surrounding communities and LAWA.

The following specific proposed Project objectives support the underlying purpose:

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.

III. Procedural History

Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Los Angeles International Airport (LAX) Northside Plan Update (proposed Project) pursuant to the California Environmental Quality Act (CEQA). An Initial Study (IS) and Notice of Preparation (NOP) for the Draft EIR was circulated for public review from April 4, 2012 to May 4, 2012. During the public review period, LAWA held public Scoping Meetings at St. Bernard High School on April 18, 2012 and April 21, 2012. On May 15, 2014, LAWA published the Draft EIR which was circulated for public review for 45 days, with the review period originally closing on June 30, 2014. In response to public requests, LAWA extended the public review period until July 21, 2014. A public workshop was held on June 11, 2014, during the public review period. The City of Los Angeles published the Final EIR for the proposed Project on December 15, 2014. The

Final EIR incorporates and responds to comments received on the Draft EIR and includes corrections and additions to the Draft EIR. Project Design Features (PDFs), Project-specific Mitigation Measures, and applicable LAX Master Plan Commitments and Mitigation Measures have been included in a Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project. LAWA, the Board of Airport Commissioners (BOAC), and other decision-makers will use the Final EIR to inform their decisions on the proposed Project, as CEQA requires.

The findings herein have been prepared to reflect approval of the proposed Project as amended in Chapter 3.0, Corrections and Additions to the Draft EIR, of the Final EIR.

IV. Environmental Impact Findings

Pursuant to Public Resources Code §21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
- Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

BOAC has made one or more of these specific written findings regarding each significant impact associated with the proposed Project. Those findings are presented below, along with a presentation of facts in support of the findings. Concurrent with the adoption of these findings, BOAC adopts the Project Design Features, Commitments and Mitigation Monitoring and Reporting Program (CEQA Guidelines §15097(a)).

A. Findings on Less than Significant Impacts Identified in the Initial Study

Description of Effects: The Initial Study prepared for the proposed Project (Appendix A of the Draft EIR) evaluated potential impacts on a range of subjects listed in Appendix G of the CEQA Guidelines. The analysis conducted for the Initial Study determined that no impact would occur relative to Agricultural Resources and Mineral Resources.

Findings: Based on substantial evidence in the administrative record, including the Initial Study, provided as Appendix A of the Draft EIR, the BOAC hereby finds and determines that no construction and operation related impacts would occur to Agricultural Resources and Mineral Resources. The Initial Study requires no further action or mitigation measures with respect to these resources or the findings of the Initial Study. The BOAC hereby adopts the conclusions regarding no construction- and operation-related impacts on these environmental subject areas.

B. Findings on Less than Significant and No Impacts**1. Aesthetics**Description of Effects:

Aesthetics are analyzed in Section 4.1 of the Draft EIR.

Visual Character*Aesthetics*

As discussed in Section 4.1, Aesthetics, of the Draft EIR, the Project site does not include landscaping, structures, or features that would be considered valuable visual resources. As the Project site does not contain any known valued visual resources, no construction or operational impacts related to removal or alteration of valued visual resources would occur.

During construction of the proposed Project, the visual appearance of the Project site would be altered due to the removal of the existing vegetation and trees, removal of existing roads and street lights from previous development, and grading. Construction activities would be visible to adjacent residents, pedestrians and motorists, however construction activities would not substantially alter or degrade the existing visual character of the site, would not generate substantial long-term contrast with the visual character of the surrounding area, would be screened at the street level by construction fencing, would comply with Project Design Features related to buffers and setbacks, and would be temporary in nature. Therefore, construction impacts to visual character integration/contrast would be less than significant.

The proposed Project would allow development of the Project site that will add increases in visual mass and dimension to the site. Development will be limited to areas within a defined development envelope that is intended to reduce potential visual contrast with surrounding uses. Provisions for landscape buffers, fencing of recreational uses, and lighting standards will further ensure the proposed Project does not negatively contrast with surrounding development. While the proposed Project will alter the character of the Project site, the proposed Project will have a net benefit on the existing character. Operation of the proposed Project will cohesively blend with the character of existing commercial type development that is located just to the east, residences to the north, and airport uses to the south. Furthermore, the proposed Project will have a net benefit on the existing character of vacant, previously disturbed areas by adding structural dimension, mass, and landscaping in an organized and planned manner. Therefore, operational impacts to visual character integration/contrast would be less than significant.

Construction of the proposed Project would comply with all applicable regulations. Therefore, no construction impacts related to attainment of aesthetic regulations would occur. As analyzed in Table 4.1-4 of Section 4.1, Aesthetics, of the Draft EIR, the proposed Project would be consistent with the goals, policies, and objectives of the City of Los Angeles General Plan, the City of Los Angeles Zoning and Municipal Code, and the LAX Plan. Therefore, no operational impacts related to attainment of aesthetic regulations would occur.

View Impacts

While the proposed Project is located in the vicinity of the valued scenic resources such as Dockweiler Beach State Park, Vista del Mar, and the Westchester Bluffs, the proposed Project 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, the proposed Project would not obstruct, interrupt, or diminish a valued focal and/or panoramic view as defined in the Community Plan.

Sensitive viewer groups located in close proximity to the Project site include residences to the north. Although the Project site contains no documented views of valued scenic resources such as structures or landscapes, limited adjacent residences may have views of the Pacific Ocean, which is a valued visual resource. Construction equipment could temporarily obstruct or interfere with portions of residents' views. The extent of obstruction could completely block particular views for short periods of time during the construction process. However, these impacts would be temporary. This impact would be less than significant based on the short term duration. In most other locations, construction activities will be screened by existing soundwalls or site topography, therefore the nature and character of residents' current views will not change, nor will proposed Project construction interrupt or obstruct their existing views. Therefore, construction impacts to documented views of valued scenic resources would be less than significant.

During operation, the adoption of setback standards and design guidelines will ensure that residents' current views are not obstructed or negatively impacted. The proposed Project would not obstruct, interrupt, or diminish views of valued scenic resources. Construction of new structures could block views of the Pacific Ocean from a limited number of adjacent residences. However, views from private residences are not protected and therefore the proposed Project would have less than significant operational impacts to documented views of valued scenic resources.

Light and Glare

Ambient Illumination Levels

Construction related lighting would include backup lights on vehicles, perimeter lighting, and safety lighting. Construction equipment would not include large expanses of mirror or reflective surfaces that could cause glare impacts. Construction activities would comply with Los Angeles Municipal Code (LAMC) Section 41.40, which limits the hours of construction between 7:00 a.m. and 9:00 p.m. on weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays, with no construction permitted on Sundays. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Construction activities would be temporary and occur mainly during daylight hours. Construction lighting would comply with LAMC hours restrictions, would be shielded from light-sensitive uses by existing soundwalls and topography in some locations, and would take place away from light-sensitive uses per the proposed Project's setback and building location requirements. Therefore, construction lighting and glare impacts would be less than significant.

Operation of the proposed Project would introduce new lighting on the Project site to increase visibility, promote safety, and enhance the nighttime environment. Proposed Project light sources would consist of exterior lighting along pedestrian walkways and the Paseo, 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. Proposed Project lighting would comply with all applicable LAMC lighting standards. Outdoor lights for parking areas would be designed to reflect light away from adjacent streets or property. Exterior light would be designed to

not generate a light intensity greater than two foot-candles onto off-site habitable or recreational uses. Further, signage illumination would be limited to a light intensity of three foot-candles above ambient lighting, as measured at the property line of the nearest residentially-zoned property. Additionally, the proposed Project Design Features control new lighting that may be introduced with the proposed Project. The proposed Project's lighting sources would comply with LAMC requirements and the Project Design Features, would not significantly increase nighttime lighting levels, and would not interfere with nearby sensitive uses. Therefore, operational lighting and glare impacts would be less than significant.

Light Spillover

Construction related lighting would include backup lights on vehicles, perimeter lighting, and safety lighting. Construction activities would comply with LAMC Section 41.40, which limits the hours of construction between 7:00 a.m. and 9:00 p.m. on weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays, with no construction permitted on Sundays. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Construction activities would be temporary and occur mainly during daylight hours. Soundwalls, site topography, and Project Design Features would prevent construction light from spilling over onto sensitive uses. Therefore, construction light spillover impacts would be less than significant.

Operation of the proposed Project would introduce new lighting on the Project site to increase visibility, promote safety, and enhance the nighttime environment. Proposed Project light sources would consist of exterior lighting along pedestrian walkways and the Paseo, 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 spillover on adjacent properties. Proposed Project lighting would comply with all applicable LAMC lighting standards. Outdoor lights for parking areas would be designed to reflect light away from adjacent streets or property. Exterior light would be designed to not generate a light intensity greater than two foot-candles onto off-site habitable or recreational uses. Further, signage illumination would be limited to a light intensity of three foot-candles above ambient lighting, as measured at the property line of the nearest residentially-zoned property. Additionally, the proposed Project Design Features control new lighting that may be introduced with the proposed Project. The proposed Project's lighting sources would comply with LAMC requirements and the Project Design Features and would not spillover onto nearby sensitive uses. Therefore, operational light spillover impacts would be less than significant.

Shading

The proposed Project would construct buildings up to a maximum height of 60 feet. Construction of buildings would require erection of scaffolding and usage of heavy construction equipment, including crane equipment. Usage of scaffolds and tall construction equipment has the potential to cast shadows; however, construction equipment would be expected to be moved throughout the work day and the construction process, and scaffolding would follow building forms, including building stepbacks and setbacks required as Project Design Features. The Project site would be fenced off during construction using chain link fencing with screening. Fencing would follow standard construction practices and would not cast significant shadows.

Construction would be temporary, and would not cast shadows on sensitive uses for a substantial amount of time. Therefore, construction impacts related to casting shadows on sensitive uses would be less than significant.

As described in Section 4.1, Aesthetics, of the Draft EIR, the Project Design Features include height limitations, setbacks, stepbacks, and buffer areas. Based on these restrictions, shade-sensitive uses would not be shaded for more than three hours during the applicable timeframe. Therefore, impacts related to shading would be less than significant.

Transfer/Equivalency Program

Transfers of floor area or equivalency exchanges would not result in new impacts with regard to aesthetics. All new proposed Project development (regardless of where land uses would specifically occur within the Project site) would incorporate the Project Design Features previously described, which include building heights and massing, building design, parking design, and proposed LAX Northside Design Guidelines and Standards. As such, transfers of floor area or equivalency exchanges would not alter the conclusions with regard to aesthetics impacts. Should transfers or equivalency exchanges occur within Districts, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

The Project site is located in a highly urbanized area that includes fully developed residential neighborhoods to the north, the LAX North Airfield to the south, commercial uses along Sepulveda Boulevard to the east, and LAX-owned open space to the west. The LAX-owned open space is part of the Los Angeles Airport/EI Segundo Dunes located to the west of the Project site that will not include future development. As such, it will not contribute to cumulatively significant impacts to visual quality. Areas to the north, south, and east of the Project site are fully developed and urbanized. While redevelopment of these areas may occur, new uses would be of a similar visual character to existing residential, commercial, and airport uses. It is not anticipated that these related projects would introduce new aesthetic elements that would be out of scale or character with the existing visual environment. Therefore, cumulative impacts relative to visual quality would be less than significant.

Development of low-rise structures and lower intensity development anticipated in conjunction with ambient growth in the Project vicinity would not be anticipated to have a substantial effect on views since the Project vicinity is already highly urbanized. Given the limitations on such views under existing conditions, increased building heights and density associated with future growth would merely affect views from adjacent vantages and would have a negligible effect on longer-range views from roadways. Therefore, future development in the Project vicinity would not be expected to cumulatively obstruct public views of valued visual resources.

Development of the proposed Project in combination with future developments in the proximity of the Project site through 2022 would introduce new or expanded sources of artificial light and thus could contribute to increased nighttime light levels as experienced by off-site sensitive uses. As previously described, the area around the Project site is a highly urbanized environment with urban lighting characteristics, exhibiting medium to high ambient nighttime light levels. As such, the additional artificial light sources introduced by the nearby related projects as well as other ambient growth would not significantly alter the existing lighting environment currently experienced in the area.

Additionally, cumulative lighting would not be expected to interfere with the performance of off-site activities given the high ambient light levels already present. Further, proposed Project adherence to applicable guidelines regarding lighting would control the proposed Project's potential artificial light sources to a sufficient degree so as not to be considered cumulatively considerable. Therefore, development of the proposed Project would result in less than significant cumulative lighting impacts.

With regard to glare, only related development immediately adjacent to proposed Project structures would have the potential to create glare that could collectively pose impacts affecting a given off-site use, property, or activity. Development directly adjacent to the Project site is governed by FAA and Los Angeles County Airport Land Use commission guidelines that prohibit the use of highly reflective surfaces that could result in glare. As such, cumulative glare impacts would be less than significant.

Cumulative shading impacts can occur when related projects are located sufficiently close to a Project site so as to create shadows that overlap with those of the proposed Project and affect the same sensitive receptor(s). Sensitive receptors located adjacent to the Project site include residences directly to the north. There are no shade-sensitive receptors to the east, west, or south of the Project site. Given that there are no lands available to develop new projects between the Project site and adjacent sensitive residential receptors (i.e., residences are located directly adjacent to the Project site and are surrounded by other residences to the north, east, and west), impacts relative to shading would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.1, Aesthetics, of the Draft EIR, the BOAC hereby finds and determines that the proposed Project would not have significant construction or operation-related impacts to visual character, light and glare, and cumulative impacts. Applicable LAX Master Plan Commitments and Mitigation Measures as well as project-specific Project Design Features identified in Section 4.1, Aesthetics, of the Draft EIR, will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that aesthetic impacts would be less than significant. No further mitigation measures are required.

2. Air Quality

Description of Effects:

Air quality is analyzed in Section 4.2 of the Draft EIR.

Regional Impacts

Construction

The peak daily emission estimates, resulting from the construction of the proposed Project are summarized in Table 4.2-8 of Section 4.2, Air Quality, of the Draft EIR. The emissions reported are from onsite sources such as construction equipment, fugitive dust and architectural coating, and off-site sources including on-road and off-road mobile sources. The mitigation measures incorporated into the analyses include the use of Tier 4 construction equipment, use of 2007 or newer model year haul trucks and watering for fugitive dust control. The estimated construction emissions show that the regional daily emissions for construction are less than the mass daily significance thresholds for NO_x, CO, SO₂, PM₁₀, and PM_{2.5}.

Operation

The regional daily emissions estimated due to proposed Project operations are summarized in Table 4.2-9. These emissions were estimated using the methodology as described in Section 4.2.3.1.1 of Section 4.2, Air Quality, of the Draft EIR. The estimated emissions include onsite emissions from stationary sources, and off-site emissions from on-road/mobile sources. The estimated emissions show that the regional daily emissions for operations are less than the South Coast Air Quality Management District (SCAQMD) mass daily significance thresholds for CO, SO₂, PM₁₀ and PM_{2.5}.

Localized Impacts

Air Dispersion Modeling (Construction and Operation)

The air quality impacts of the proposed Project are estimated at residential, worker and sensitive receptors located within one kilometer of the Project boundary. The maximum ambient air quality impacts of the proposed Project from construction and operational activities are summarized in Tables 4.2-10 and 4.2-11 of Section 4.2, Air Quality, of the Draft EIR respectively. The primary construction activities that contribute to the estimated impacts are fuel combustion sources (i.e., off-road construction equipment) and fugitive dust. The operational activities that contribute to the estimated impacts are fuel combustion sources (i.e., natural gas combustion). Air quality impacts from construction and operation would not exceed SCAQMD air quality significance thresholds. The estimated maximum impacts for construction and operation are also less than the Federal 1-hour and annual NO₂ standard.

Localized CO Impacts

Localized CO concentrations are calculated based on a conservative CALINE4 impact analysis procedure accepted by SCAQMD. This analysis was performed for eleven intersections in the future conditions with proposed Project scenario and eight intersections in the existing with proposed Project scenario. The results show that none of these intersections exceed the 8-hour average CO threshold in either scenario.

Odor Impacts

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents and from diesel emissions. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. The proposed Project would comply with DPM reduction strategies such as compliance with USEPA 2007 on-road emission standards for heavy-duty trucks and USEPA Tier 4 off-road emission standards for heavy-duty construction equipment. Due to mandatory compliance with SCAQMD Rules and compliance with the DPM reduction strategies, no construction activities or materials are proposed which would create objectionable odors affecting a substantial number of people. Therefore, no significant impact would occur and no mitigation measures would be required.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors. As the proposed Project activities do not include these sources of odors, potential odor impacts would be less than significant.

Health Risk Impacts

The health risk impacts from construction and operation of the proposed Project are shown in Table 4.2-12 of Section 4.2, Air Quality, of the Draft EIR. The results indicate that the health risk impacts from the proposed Project are below the SCAQMD significance thresholds. The cancer burden estimate for the proposed Project is less than 0.01, which is well below the SCAQMD significance threshold of 0.5.

Transfer/Equivalency Program

The transfer/equivalency program would not result in a substantial change in construction or operational emissions of the proposed Project. Since the localized air quality impacts and health risk impacts are directly proportional to the construction and operational emissions, the floor area transfers or equivalency exchanges would not alter the conclusions with regard to both air quality and health risk impacts of the proposed Project. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Findings: Based on substantial evidence in the administrative record, including Section 4.2, Air Quality, of the Draft EIR, the BOAC hereby finds and determines that regional construction emissions related to NO_x, CO, SO₂, PM₁₀, and PM_{2.5}; regional operational emissions related to CO, SO₂, PM₁₀ and PM_{2.5}; localized air dispersion construction and operation emissions; localized CO; odor; and health risk impacts are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.2, Air Quality, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

3. Biological Resources

Description of Effects:

Biological resources are analyzed in Section 4.3 of the Draft EIR.

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

On-Site Habitat (Construction and Operation)

The Project site is not part of a federal-, state-, or local-designated habitat. Therefore, development of the proposed Project would not result in the loss of individuals, or the reduction of existing habitat of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat and would not result in the loss of individuals or the reduction of existing habitat of a locally-designated species or a reduction in a locally designated natural habitat or plant community. Impacts related to on-site state, federal, and local species and habitats would be less than significant.

Off-Site Habitat (Construction and Operation)

Operation of the uses included in the proposed Project will not have significant impacts to any federal-, state-, or local-designated habitats. The Los Angeles Airport/El Segundo Dunes preserve, is the closest locally-designated habitat area. The Los Angeles Airport/El Segundo Dunes preserve currently functions within the flight path of LAX and is subject to traffic noise from S. Pershing Drive. The increased traffic volumes on S.

Pershing Drive resulting from the operation of the proposed Project would not generate noise louder than the noise generated by the existing or projected aircraft activity. California gnatcatcher and the California legless lizard observed approximately 0.8 mile south and 1,000 feet west, respectively, of the BRSA have occupied an area with high noise levels from departing aircraft. Therefore, it is not anticipated that operational noise associated with development and use of the proposed Project would adversely affect the species. Additionally, no California gnatcatcher or California legless lizards have been observed within the Project site or the BRSA and suitable habitat does not exist for them in these areas. Therefore, operational impacts related to off-site federal, state, or local designated habitats would be less than significant.

Interference with Wildlife Movement/Migration Corridors*Construction and Operation*

The Project site does not serve as a movement corridor for wildlife or serve as a linkage between core habitats. Additionally, it is maintained by LAX in order to comply with FAA bird hazard reduction mandates for safe airport operation which includes regular mowing and disking of vegetation and trimming of trees to avoid the creation of thick canopies. As such, only marginal habitat for wildlife that utilize open grassland and tree habitat is present. The Project site does not support fisheries or nursery site habitats.

Although mature trees may be removed as part of the proposed Project, LAX Master Plan EIS/EIR Commitment BC-3 requires compensation for the loss of mature trees at a ratio of 2:1. The species of newly planted replacement trees is required to be a local native tree species to the greatest extent feasible and trees are required to be 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. Therefore, impacts related to construction and operational interference with wildlife movement/migration corridors for the proposed Project would be less than significant.

Alteration of an Existing Wetland*On-Site Habitat (Construction and Operation)*

One potential wetland habitat, the Argo Drainage Channel, has been identified within the Project site along the southern boundary and partially within Area 4. The proposed Project does not include any modifications to the Argo Drainage Channel. Additionally, construction, structures, and grading are prohibited within 50 feet of the Argo Drainage Channel. Indirect impacts during construction and operations associated with runoff will be minimized by a combination of federal and state regulation of water quality, the LAX Master Plan EIS/EIR mitigation commitments associated with water quality, and Best Management Practices (BMPs). Therefore, impacts related to alteration or other impacts to existing on-site wetland habitats would be less than significant.

Off-Site Habitat (Construction and Operation)

One potential wetland habitat, the Argo Drainage Channel, has been identified within the Project site along the southern boundary and partially within Area 4. The proposed Project does not include any modifications to the Argo Drainage Channel. Additionally, construction, structures, and grading are prohibited within 50 feet of the Argo Drainage Channel. Indirect impacts during construction and operations associated with runoff will be minimized by a combination of federal and state regulation of water quality, the LAX Master Plan EIS/EIR mitigation commitments associated with water quality, and BMPs.

Therefore, impacts related to alteration or other impacts to existing off-site wetland habitats would be less than significant.

Interference with Habitat/Species Behavior

Construction and Operation

The Project site is maintained by LAX in order to comply with FAA mandates for safe airport operations, which includes regular mowing and disking of vegetation and trimming of trees. Results of the current biological survey and prior studies indicate that no sensitive species reside in the majority of the Project site. One observation of a burrowing owl occurred within Area 4 in 2011. No burrowing owls or signs of their presence were encountered during the site survey conducted for the Draft EIR, and the Project site does not appear to be a breeding site for this species. Construction activities would include ground-disturbing equipment for grading and excavation which could impact potential habitat for the burrowing owl, a California species of special concern. As required under the LAX Master Plan EIS/EIR commitment BC-9: Conservation of Faunal Resources, pre-construction surveys to determine the presence of various sensitive wildlife species, including the Burrowing Owl, are required. Furthermore, if a member of this species is found, a plan must be developed to relocate it within the Habitat Restoration Area.

The Los Angeles Airport/El Segundo Dunes habitat preserve located across Pershing Drive to the west of the Project site within the BRSA supports El Segundo Blue Butterfly. California gnatcatcher and California legless lizards have been observed outside of and approximately 0.8 miles south, and 1,000 feet west, respectively, of the BRSA within the Los Angeles Airport/El Segundo Dunes habitat preserve. The proposed Project would allow new uses which would have similar light, noise, and dust characteristics as existing conditions. LAX Master Plan EIR/EIS Commitments BC-1 and ET-3 require that fugitive dust be controlled during construction and operation to avoid any impacts to adjacent habitat. Additionally, the Project Design Features require light to be shielded and directed to avoid any potential light spillover impacts to adjacent habitat. Therefore, impacts related to interference with habitat/species behavior would be less than significant.

Transfer/Equivalency Program

Floor area transfers or equivalency exchanges would not result in new impacts related to biological resources. The applicable LAX Master Plan EIS/EIR commitments and Project Design Features regarding tree replacement, dust mitigation, light shielding, and new landscaping would continue to apply resulting in less than significant impacts related to biological resources. As earth-disturbing activities would be similar to the proposed Project under the transfer/equivalency program, impacts on listed and designated species, habitats, and plant communities would be similar. As building placement and volume would be similar to the proposed Project under the transfer/equivalency program, impacts on wildlife movement/migration corridors and interference with habitat/species behavior would be similar. Implementation of the transfer/equivalency program would therefore not cause or accelerate any adverse impacts to biological resources. In summary, transfers or equivalency exchanges would not alter the conclusions with regard to impacts to biological resources. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

The majority of projects in the area surrounding the Project site would add or increase the intensity of development in an already urbanized setting. Projects in these urbanized settings would be sited on currently empty or already developed lots and are not generally considered a factor in reducing sensitive habitat or special status species populations. The proposed Project would not result in significant impacts related to biological resources. Related projects within LAX that may contribute to cumulative impacts to the Burrowing Owl, California gnatcatcher, California legless lizard, and El Segundo blue butterfly include the LAX Specific Plan Amendment Study; various proposed ongoing, and completed airside improvement projects; and the ongoing residential acquisition in Manchester Square. The ongoing Coastal Dunes Improvement Project would result in beneficial impacts to biological resources in the Los Angeles Airport/El Segundo Dunes preserve. Similar to the proposed Project, related LAX projects would have to comply with the LAX Master Plan EIS/EIR commitments that would avoid and minimize potential impacts to biological resources. Therefore, cumulative impacts related to biological resources would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.3, Biological Resources, of the Draft EIR, the BOAC hereby finds and determines that impacts related to biological resources are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.3, Biological Resources, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

4. Cultural ResourcesDescription of Effects:

Cultural resources are analyzed in Section 4.4 of the Draft EIR.

Paleontological Resources*Construction*

The Los Angeles County Museum of Natural History records search revealed that no fossil remains have been found at the Project site. Therefore, the proposed Project would have no construction impacts related to previously-identified paleontological resources.

Construction of structures and parking as well as landscaping would require excavation and grading activities. Several portions of the Project site contain artificial fill. While this fill may contain paleontological resources, they would have been brought from a different site and have lost their scientific significance. Portions of the Project site are characterized by Quaternary dune sand or alluvial deposit, which has the potential to contain paleontological resources that have not been previously identified. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments PA-1 through PA-7, potential effects on paleontological resources would be minimized. Therefore, construction impacts related to unknown paleontological resources would be less than significant.

Operation

The Project site does not contain known fossil deposits. Impacts to unknown paleontological 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. Any major site excavation activities would require their own CEQA clearance to determine impact significance to paleontological resources. Therefore, operational impacts related to paleontological resources would be less than significant.

Archaeological Resources*Construction*

One archaeological site, 19-001118, is located within Area 12B. 19-001118 was not identified as NRHP, CRHR, or local register-eligible or -listed as a result of the SCCIC records search. No archaeological resources were identified as NRHP, CRHR, or local register-eligible or -listed within the remainder of the Project site as a result of the SCCIC records search. Therefore, construction impacts related to previously-identified archaeological resources would be less than significant.

There exists the potential for discovery of unknown archaeological resources at the Project site, given the pre-history and history of development in the Los Angeles Basin. However, as the proposed Project would comply with LAX Master Plan EIS/EIR Commitments HA-4 through HA-10, potential effects on archaeological resources would be minimized. Therefore, construction impacts related to unknown archaeological resources would be less than significant.

Operation

One known archaeological site is known in the Project site in Area 12B, but this area would not be developed under the proposed Project. The remainder of the Project site does not contain known archaeological resources. 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. Any excavation activity would be required to comply with the LAX Master Plan EIS/EIR Commitments and any major site excavation activities would require their own CEQA clearance to determine impact significance to archaeological resources. Therefore, operational impacts related to archaeological resources would be less than significant.

Historic Architectural Resources*Construction*

The Project site does not contain structures that meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Construction activities that would occur would be restricted to the Project site, and would not directly or indirectly affect any known historical resources in the vicinity of the Project site. Therefore, construction impacts related to historic architectural resources would not occur.

Operation

The Project site does not contain structures that meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA.

Additionally, the development of the proposed Project would be compatible with the existing structures on the Project site and would not encroach onto them. Therefore, operational impacts related to on-site historic architectural resources would not occur.

The proposed LAX Northside Design Guidelines and Standards contain architectural and landscape guidelines to integrate the proposed development into the community. These guidelines will ensure that the proposed development does not have the potential to significantly impact historic properties in the vicinity of the Project site by restricting heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development. Therefore, indirect operational impacts related to off-site historic architectural resources would be less than significant.

Transfer/Equivalency Program

Floor area transfers or equivalency exchanges would not result in new impacts related to paleontological, archaeological, or historic architectural resources. Even if floor area transfers or equivalency exchanges would result in deeper excavation for foundations, the applicable LAX Master Plan EIR/EIS Commitments listed in Section 4.4.3.3.1 of the Draft EIR would be implemented and would result in less than significant impacts. The applicable design guidelines regarding heights, using similar materials as surrounding development, and using similar color schemes as the surrounding development would also apply resulting in less than significant impacts related to historic architectural resources. In summary, floor area transfers or equivalency exchanges would not alter the conclusions with regard to impacts to cultural resources. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

The Project site does not contain known fossil deposits. Impacts to unknown paleontological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to paleontological resources are also typically localized. Furthermore, any potential impacts to unknown paleontological resources would be mitigated by LAX Master Plan EIR/EIS Commitments PA-1 through PA-7. Therefore, the proposed Project would not contribute cumulatively to impacts to paleontological resources.

One known archaeological site is known in the LAX Northside Center District in Area 12B, but this area would not be developed under the proposed Project. The remainder of the Project site does not contain known archaeological resources. Impacts to unknown archaeological resources typically occur during excavation activities, which typically occur during construction. As excavation and grading activities are typically localized, direct impacts to archaeological resources are also typically localized. Furthermore, any potential impacts to unknown archaeological resources would be mitigated by LAX Master Plan EIR/EIS Commitments HA-4 through HA-10. Therefore, the proposed Project would not contribute cumulatively to impacts to archaeological resources.

The Project site does not contain structures that meet the criteria of eligibility for inclusion on the NRHP or CRHR, or as a historical resource for purposes of CEQA. Therefore, the proposed Project would not contribute cumulatively to impacts to historic architectural resources.

The proposed LAX Northside Design Guidelines and Standards include guidance to restrict heights, for using similar materials as surrounding development, and for using similar color schemes as the surrounding development. Implementation of these design

features would result in less than significant operational impacts related to off-site historic architectural resources. Therefore, the proposed Project would not contribute cumulatively to impacts to off-site historic architectural resources.

Findings: Based on substantial evidence in the administrative record, including Section 4.4, Cultural Resources, of the Draft EIR, the BOAC hereby finds and determines that impacts related to cultural resources are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.4, Cultural Resources, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

5. Geology/Soils

Description of Effects:

Geology/soils is analyzed in Section 4.5 of the Draft EIR.

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. As discussed under Project Design Features, 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). Therefore, the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Impacts associated with surface fault rupture would be less than significant.

Seismic Ground Shaking

As with any new development in the State of California, building design and construction for the proposed Project 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 LAMC Building Code. Therefore, the proposed Project 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. Impacts related to seismic ground shaking would be less than significant.

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, within the LAX Northside Center and LAX Northside Airport Support Districts, as being within a

liquefaction zone. The LAMC Building Code and the Uniform Building Code require that foundation strength, building design, and building materials be adjusted to limit any impact related to liquefaction for construction in liquefaction zones. Therefore, impacts related to liquefaction would be less than significant.

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. Additionally, all construction would reduce slope percentages through grading and would be secured in accordance with the Los Angeles Building Code (LABC). Therefore, the proposed Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk or injury due to landslides. Therefore, impacts related 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.

Furthermore, the proposed Project would comply with all 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).

Seiches are oscillations and waves generated in an enclosed body of water by seismic shaking. The closest bodies of water which would be susceptible to a seiche would be the marina in Marina Del Rey (1.2 miles north) and Ballona Creek (1.5 miles north) and Argo Drainage Channel (directly south of the Project site along the boundary of Area 4 and the LAX North Airfield). 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 the proposed Project. Additionally, no dams or dikes are located within or near the Project site.

Therefore, the proposed Project 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. Impacts related to inundation by seiche/dam failure 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. Proposed Project construction could result in excavation of approximately 45 feet Below Ground Surface (bgs) for subterranean parking. Thus, discovery of fill may be encountered during

excavation activities for the proposed Project. However, compliance with CBC and the LABC requirements would ensure that future buildings would be adequately supported by the underlying soils. Therefore, the proposed Project 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. Impacts related to soil conditions would be less than significant.

Sedimentation and Erosion

Erosion

Erosion could potentially occur from exposed soils (active dune sand and alluvium) during construction of the proposed Project. 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 the proposed Project would reduce erosion effects. 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. Therefore, construction-related impacts related to soil erosion would be less than significant.

Despite the Project site having an average slope of less than 30 percent, grading would still be required under the proposed Project in order to accommodate all proposed development. Grading would include excavation of earthen material and placement of earthen material. 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 the proposed Project, 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, the proposed Project would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control erosion.

Therefore, the proposed Project would not constitute a geologic hazard to other properties by causing or accelerating instability from erosion. Impacts related to erosion would be less than significant.

Sedimentation

Sedimentation could potentially occur from exposed soils (active dune sand and alluvium) during construction of the proposed Project. 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 the proposed Project would reduce sedimentation effects.

Temporary dewatering activities are not expected during construction of the proposed Project. 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 Regional Water Quality Control Board (RWQCB) and would also be subject to the review and approval of the LADBS, as appropriate.

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 as well as the LAWA Stormwater Pollution Prevention Plan (SWPPP). The LAWA SWPPP provides general stormwater plans, such as drainage system layout maps, descriptions of past and present potential sources of pollutants in its stormwater runoff and discharges, and identifies programs that will be implemented to address these runoff pollutants. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible.

Additionally, the proposed Project would comply with LAX Master Plan EIR/EIS commitments and mitigation measures MM-AQ-2 and HWQ-1 that require measures to control sedimentation. Therefore, construction-related impacts related to soil sedimentation would be less than significant.

During operation, the proposed Project may result in a limited degree of soil sedimentation effects from non-vegetated areas. However, in accordance with NPDES requirements, the proposed Project would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of the proposed Project. The SUSMP would include BMPs that would reduce on-site sedimentation from vegetated areas on the Project site through stormwater control devices. These stormwater control devices include, but are not be limited to, vegetated swales and strips, oil/water separators, clarifiers, and catch basin inserts and screens. Additionally, the Project Design Features include the use of bioswales and permeable pavement to capture sediment runoff or deposition and contain and control it on-site.

Therefore, the proposed Project 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. Impacts related to wind and water 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 the proposed Project 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. Therefore, the proposed Project would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. Impacts associated with landform alteration would not occur.

Transfer/Equivalency Program

Floor area transfers or equivalency exchanges would not result in new impacts with regard to geology and soils. Geological conditions are typically site-specific. Thus, transfers or equivalency exchanges would not affect the assessment of the proposed Project site's geological and soil conditions as provided within the Draft EIR section. Furthermore, all new proposed Project development would incorporate the Project Design Features previously described (e.g., compliance with construction and design recommendations provided within site-specific geotechnical reports, CBC, and LADBS Building Code) and would comply with LAX Master Plan EIR/EIS commitments MM-AQ-2 and HWQ-1. As such, floor area transfers or equivalency exchanges would not alter the conclusions with regard to geology and soil impacts. Should transfers or equivalency

exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

Due to the site-specific nature of geological conditions (i.e., soils, geological features, seismic features, etc.), geology impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. Nonetheless, cumulative growth through 2022 (inclusive of the related projects identified in Section 3, Environmental Setting, of the Draft EIR) would expose a greater number of people to seismic hazards. However, as with the proposed Project, related projects and other future development projects would be subject to the same local, regional, state, and Federal regulations pertaining to geology and soils, including CBC and LABC requirements. Therefore, with adherence to such regulations, cumulative impacts with regard to geology and soils would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.5, Geology/Soils, of the Draft EIR, the BOAC hereby finds and determines that impacts related to geology/soils are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.5, Geology/Soils, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

6. Greenhouse Gases

Description of Effects:

Greenhouse gases are analyzed in Section 4.6 of the Draft EIR.

Construction and Operation

Future operational greenhouse gas (GHG) emissions are 30,950 metric tonnes CO₂e per year, which when combined with the amortized construction and vegetation emissions, would contribute to a total of 31,970 metric tonnes CO₂e per year.

Although no numeric threshold for determining the significance of construction or operational GHG emissions from a commercial/airport development project has been adopted by the lead agency or by the SCAQMD, the Project's emissions will be compared to the SCAQMD's Tier 4 draft efficiency target threshold for 2020 of 4.8 MT of CO₂e per Service Population (SP) per year. This efficiency target is derived from average reductions needed to be consistent with AB 32.

Table 4.6-10 of the Draft EIR reports the Project's annualized GHG emissions (operation, construction and vegetation) as 4.50 MT per service population per year. This is below the SCAQMD's draft significance threshold. Under this analysis, the Project would have less than significant GHG emission impacts.

Consistency with Greenhouse Gas Reduction Plans

The proposed Project would comply with the Los Angeles Green Building Code (LAGBC) Tier 1 requirements. LAWA has based its new sustainable construction standards on the mandatory and voluntary tiers defined in the LAGBC. All building

projects with an LADBS permit-valuation over \$200,000 shall achieve LAGBC Tier 1 conformance, to be certified by LADBS during final plan check (on the issued building permit) and validated by the LADBS inspector during final inspection (on the Certificate of Occupancy).

The requirements of the adopted LAGBC apply to new building construction, building renovations, and building additions within the City of Los Angeles. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. The proposed Project would comply with the mandatory requirements for nonresidential buildings including the mandatory requirements for Tier 1 conformance. Project Design Features also serve to reduce greenhouse gas emissions. Certain measures of note include but are not limited to compliance with enhanced construction waste reduction goals, exceeding the California Energy Code requirements (based on the 2008 Energy Efficiency Standards) by 15 percent, use of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 30 percent, providing readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, and use of low-emitting adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, caulks, and other materials. As a result, the proposed Project would be consistent with the LAGBC requirements to reduce GHG emissions.

Transfer/Equivalency Program

The transfer/equivalency program would not result in a substantial change in GHG emission sources nor the service population, thus floor area transfers or equivalency exchanges would not alter the conclusions with regard to GHG emissions. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for proposed Project given that the GHG emission sources and the service population are not expected to substantially change.

Cumulative Impacts

The proposed Project would be consistent with the State's goals of reducing statewide emissions to 1990 levels. The methods used to evaluate the Project are consistent with the approach used by the California Air Resources Board for the implementation of Assembly Bill 32. In particular, the proposed Project achieves greater energy efficiency and emphasizes smart growth to minimize mobile source related emissions. The proposed Project is also consistent with the Tier 1 requirements of LAGBC. Given the proposed Project's consistency with State and City greenhouse gas emission reduction goals and objectives, and the proposed Project's less than significant greenhouse gas emissions the proposed Project would not be considered to be cumulatively considerable.

Findings: Based on substantial evidence in the administrative record, including Section 4.6, Greenhouse Gas Emissions, of the Draft EIR, the BOAC hereby finds and determines that impacts related to greenhouse gas emissions are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.6, Greenhouse Gas Emissions, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and

Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

7. Hazards/Hazardous Materials

Description of Effects:

Hazards/hazardous materials are analyzed in Section 4.7 of the Draft EIR.

Transportation, Use, or Disposal of Hazardous Materials

Construction

The handling of any hazardous materials, substances, and wastes during construction would be controlled through the implementation of LAX Master Plan Commitment HM-2, the HSP, to avoid any significant hazards to the public or the environment. Additionally, the proposed Project construction activities would comply with all applicable local, state, and federal laws and would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, construction impacts related to transportation, use, or disposal of hazardous materials would be less than significant.

Operation

The uses proposed in the Project site consist of moderate intensity commercial development including retail, shopping, dining, hotel, and office; civic; open space; and typical light industrial uses, and would use and produce typical hazardous materials and wastes such as fuel, paints, commercial cleansers, herbicides, pesticides, solvents, and lubricants. These hazardous materials are regulated by applicable federal, state, and local regulations. Compliance with these requirements would serve to minimize the health and safety risks to people or structures associated with routine use, transport, and disposal as well as accidental release of or exposure to hazardous materials. Additionally, public access to the LAX Northside Airport Support District is prohibited, further minimizing the potential for public exposure to any hazardous materials used on-site. Therefore, operational impacts related to transport, use, or disposal of hazardous materials would be less than significant.

Accidental Release of Hazardous Materials

Construction

Portions of the LAX Northside Campus District in Areas 1 and 2 are located in the City of Los Angeles Methane Hazard and Methane Hazard Buffer zone. The remainder of the Project site is not located in a Methane Hazard and Methane Hazard Buffer zone. The proposed Project would require grading where development would occur and excavation for building foundations and subterranean parking. However, the LADBS would require all new structures within a designated methane zone to be provided with methane mitigation improvements. The LADBS provides specific direction for site testing standards, site investigation, and construction in methane zones and methane buffer zones. New structures would be required to comply with all LADBS procedures and regulations for methane risk. In order to minimize the risks of accidental release or explosion, the proposed Project would also comply with all federal, state, and local regulations for working in an environment with soil gas, including Chapter 71 of the City of Los Angeles Building Code.

In addition, the proposed Project's Health and Safety Plan (HSP), required by LAX Master Plan Commitment HM-2, would include sufficient training and protective

measures for construction workers. All construction would incorporate industry best practices and standards in addition to complying with all regulations regarding working with and around methane. Incorporation of appropriate monitoring and safety provisions in the HSP and proposed Project design would ensure that the proposed Project 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. Therefore, construction impacts related to accidental release of hazardous gases would be less than significant.

Operation

Portions of the LAX Northside Campus District are located in a City of Los Angeles Methane Hazard or Methane Hazard Buffer zone. The remainder of the Project site is not located in a Methane Hazard and Methane Hazard Buffer zone. The proposed Project would include subterranean elements, such as parking garages and underground utility vaults and lines, during operations.

Buildup of methane gases could increase danger in confined spaces such as underground garages and could endanger building occupants in these areas. Underground utility line corridors and vaults with gravel beds would also increase potential hazards due to the possibility of methane infiltration and buildup.

Areas within designated methane zones would be classified on a scale of Level 1 to Level 5 (from lowest to highest level of methane). This would be in compliance with LADBS requirements and would determine the appropriate methane mitigation improvements to be included in the proposed Project. The design of the buildings and any associated subterranean parking within these areas would be required to comply with LADBS methane mitigation standards. This would include compliance with the City of Los Angeles Methane Code Ordinance No. 175790 and Ordinance No. 180619. Methane mitigation requirements include passive systems (de-watering, perforated horizontal pipes, gravel blanket thickness under impervious membrane, gravel thickness surrounding perforated horizontal pipes, vent risers, and impervious membrane), active systems (pressure sensors below impervious membrane, mechanical extraction systems, gas detection system, mechanical ventilation, alarm system, and control panels), and miscellaneous systems (trench dams, conduit or cable seal fittings, additional vent risers). As a result of compliance with these regulations, the proposed Project would manage and mitigate risks from methane and would ensure that the proposed Project 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. Therefore, operational impacts related to accidental release of hazardous soil gas would be less than significant.

Contaminated Soils, Groundwater, and Other Hazardous Materials

Construction

Construction of the proposed Project would require potential demolition of existing infrastructure (such as old pavement and utility lines) as well as grading and excavation. Construction of the proposed Project would not involve demolition of structures as all existing uses would remain in their existing locations and configurations. Excavation for subterranean parking would occur to depths of 20 to 45 feet below ground surface (bgs). As discussed in Section 4.7.2.2 Existing Conditions, of the Draft EIR, the Project site does not contain any known contamination or known previous uses likely to cause contamination. Groundwater in the West Coast Basin is of good quality and

contaminated groundwater is not anticipated to be encountered during excavation for the proposed Project, as site specific borings conducted at locations throughout the Project site did not encounter groundwater at depths up to 55 feet. However, when soil excavation occurs and abandoned pavement is removed, exposed soils could indicate the need for additional soil sampling. Any such sampling and associated remediation would be carried out in accordance with RWQCB remediation options. Furthermore, OSHA guidelines would apply to ensure construction worker safety at, or near, sites with known contamination. All excavation, grading, and demolition associated with the proposed Project construction would be conducted in compliance with local, state, and federal regulations. Compliance with such regulations would reduce accidental release of hazardous materials risks to levels acceptable to regulatory agencies. Additionally, any hazardous materials/wastes uncovered by construction activities would be removed and managed, and areas would be remediated per applicable regulations, such that impacts would be reduced to levels acceptable to federal, state, and local regulatory agencies. Compliance with these regulations would effectively avoid worker exposure to hazardous materials that may be encountered during construction activities.

The proposed Project would also be developed in compliance 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. Prior to any excavation, grading, or pile-driving for the proposed Project, LAWA would identify the nature and extent of contamination in the area. This investigation would be conducted in compliance with LAX Master Plan Commitment HM-2. If previously unidentified contaminated soil or groundwater is encountered, all activities would be required to comply with LAX Master Plan Commitment HM-2 and impacts would therefore be minimized. The contractor for the proposed Project would be required to prepare an HSP specific to the Project site with comprehensive coverage of managing contamination to soil and groundwater, including protective measures for workers, accident response, decontamination procedures, and more.

Compliance with LAX Master Plan Commitment HM-2, as well as with all applicable local, state, and federal regulations would ensure that the proposed Project does not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous soils and groundwater into the environment. Therefore, construction impacts related to accidental release of hazardous materials would be less than significant.

Operation

The proposed Project would introduce several new uses on the Project site, including office, research and development, mixed use commercial, community and civic, open space and recreation, and airport support uses. The Project site does not contain any known soil or groundwater contamination sites. Operation of the proposed uses 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 the proposed Project at the time of occupancy and during proposed Project operations. Incorporation of appropriate monitoring and safety provisions in the HSP and proposed Project design would ensure that the proposed Project 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. Therefore, operational impacts related to accidental release of hazardous soils and groundwater would be less than significant.

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

Construction

Several schools are located within ¼ mile of the Project site. The Project site does not contain any known contamination or hazardous materials sites. Construction of the proposed Project would involve hazardous materials typical to construction, including gasoline, motor oils, and other similar materials. Acutely hazardous materials would not be used during construction of the proposed Project. All potentially hazardous construction materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any risk associated with transport, use, or disposal of these materials would be minimized to less than significant levels through compliance with these standards and regulations. Emissions from such materials would be minimal and localized to the Project site. Additionally, construction activities would comply with the LAX Master Plan EIR/EIS Commitment HM-2, including development of a site-specific HSP.

The handling of any hazardous materials, substances, and wastes during construction would be controlled through the implementation of LAX Master Plan Commitment HM-2, the HSP, and would comply with all applicable local, state, and federal laws to avoid any significant hazards to schools. Although schools are located within one-quarter mile of the Project site, compliance with applicable regulations and implementation of LAX Master Plan Commitment HM-2 would ensure that construction activities would not affect any of the schools in the vicinity of Project site. Schools would be notified of construction activities as required by California Public Resources Code Section 21151.4. Therefore, construction impacts related to hazardous emissions and materials within a quarter-mile of a school would be less than significant.

Operation

Although schools are located within one-quarter mile of the Project site, the types and amounts of hazardous materials associated with routine, day-to-day operation of the uses permitted in the Project site would include typical cleaning, building maintenance, and landscaping materials and chemicals. The use of these common cleaning, maintenance, and landscaping materials would not affect any of the schools in the vicinity of the Project site. Additionally, any use of gasoline would comply with all applicable regulations to ensure use, transport, and emissions meet regulatory standards. Therefore, operational impacts related to hazardous emissions and materials within a quarter-mile of a school would be less than significant.

Airport Hazards

Wildlife Hazards

Project Design Features such as prohibiting the casting and spraying of seed for sod would help to minimize aviation and aircraft hazards. Elimination of seeds that would potentially attract large flocks of birds would reduce the number of birds attracted to the Project site during construction. In addition, Project Design Features require that trees be planted to meet specified spacing requirements, and that trees that do not provide habitat or fruit would be planted.

The construction site itself would not attract significant numbers of birds. Construction debris and materials would be comprised of dirt, concrete, and other materials and would not attract birds. In addition, food waste from construction worker meals and other sources would generate little waste, and would be disposed of in sealed containers so as to not attract large flocks of birds. Therefore, construction impacts related to wildlife hazards would be less than significant.

Project Design Features such as prohibiting the casting and spraying of seed for sod would help to minimize aviation and aircraft hazards. Elimination of seeds that would potentially attract large flocks of birds would reduce the number of birds attracted to the Project site during operations. In addition, Project Design Features require that trees be planted to meet specified spacing requirements, and that trees that do not provide habitat or fruit would be planted.

There is no allowable development in the Project site that would attract a large number of birds or other wildlife, such as a recycling plant. The Project site would also implement any required measures to reduce wildlife attractants per FAA requirements. Therefore, operational impacts related to wildlife hazards would be less than significant.

Lighting and Glare

As the Project site is located directly north of the LAX North Airfield, lighting, glare, and reflection would need to be properly managed to ensure impacts to aircraft would not occur. Per the Project Design Features, construction lighting would be shielded to prevent glare or light spillover from reaching aviation and aircraft operations. Additionally, reflective or mirroring building materials are not allowed as primary building materials and their use would be minimal during construction. Materials on the Project site during construction of structures would not create reflective hazards. Therefore, construction impacts related to lighting and glare hazards would be less than significant.

As the Project site is located directly north of the LAX North Airfield, lighting, glare, and reflection would need to be properly managed to ensure impacts to aircraft would not occur. Per the Project Design Features, building, street, and safety lighting would be shielded to prevent glare or light spillover from reaching aviation and aircraft operations. The surfaces of buildings would not include reflective materials so as to avoid potential glare impacts. Therefore, operational impacts related to lighting and glare hazards would be less than significant.

Airport Obstruction Hazards

Portions of Areas 9 and 10 are located in the RPZs of the North Airfield runways and all construction activities would require filing notification with the FAA, and all construction activities would be approved by the FAA prior to construction. With approval of the FAA of the construction activities in Areas 9 and 10, construction impacts related to airport obstruction hazards in Areas 9 and 10 would be less than significant. The remainder of the Project site is not located in the RPZs. The height of the cranes would not interfere with aircraft operations. Therefore, construction impacts related to airport obstruction hazards in the remainder of the Project site would not occur.

Areas 9 and 10 are located within the RPZs of the North Airfield runways. The proposed allowable building heights would meet FAA requirements under FAR Part 77, Subpart C, which provides standards for determining obstructions to Air Navigation or Navigational Aids or Facilities and the FAA Interim Guidance on Land Uses Within a Runway Protection Zone Memorandum. In order to prevent creating obstacles for aircraft, the LAX Northside Airport Support District would have limited trees and landscaping would

consist mostly of groundcover and shrubs due to proximity to the airfield. Any trees added under the proposed Project would replace dying or damaged existing trees and would be chosen to prevent illegal access to the airfield through the existing airport security fence. No uses within the Project site would produce smoke or steam that would potentially obstruct the vision of aircraft. As discussed in Section 4.7.3.3 Project Design Features, of the Draft EIR, structures, signage, and all other proposed Project elements would be designed to avoid disruption of the North Airfield. Therefore, operational impacts related to airport obstruction hazards in Areas 9 and 10 would be less than significant. The remainder of the Project site is not located within the RPZs for the North Airfield runways, and the heights of the proposed buildings and landscape would not interfere with aircraft operations. Therefore, operational impacts related to airport obstruction hazards in the remainder of the Project site would not occur.

Interference with Emergency Response Plans

Construction

A lack of adequate access could impair the implementation of adopted emergency response plans by impeding the movement of emergency vehicles. However, construction of the proposed Project would not substantially alter ground access to, from, and around the Project site. 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. Therefore, construction impacts related to interference with the implementation of emergency response plans would be less than significant.

Operation

No aspects of the proposed Project would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, the proposed Project would comply with all applicable City policies related to disaster preparedness and emergency response. Although the proposed Project would have significant traffic impacts to certain intersections (Refer to Chapter 4.16 Traffic and Transportation), emergency vehicles use sirens to receive priority on roadways. Therefore, operational impacts related to interference with the implementation of emergency response plans would be less than significant.

Transfer/Equivalency Program

Transfers of floor area or equivalency exchanges would not result in similar impacts related to hazards and hazardous materials. The proposed Project would still be required to comply with all of the LAX Master Plan EIS/EIR Commitments and the Project Design Features discussed in Section 4.7.3.3 of the Draft EIR. These commitments and measures would continue to apply even if transfers of floor area or equivalency exchanges occur. As such, floor area transfers or equivalency exchanges would not alter the conclusions with regard to hazards and hazardous materials. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

Accidental Release of Hazardous Materials

Impacts related to methane emissions are site-specific and are not typically cumulatively considerable. The only parts of the Project site that are located in a methane and/or

methane buffer zone are portions of the LAX Northside Campus District in Areas 1 and 2. However, the LADBS would require all new structures within a designated methane zone to be provided with methane mitigation improvements. The LADBS provides specific direction for site testing standards, site investigation, and construction in methane zones and methane buffer zones. New structures in Areas 1 and 2 would be required to comply with all LADBS procedures and regulations for methane risk. In order to minimize the risks of accidental release or explosion, the proposed Project would also comply with all federal, state, and local regulations for working in an environment with soil gas, including Chapter 71 of the City of Los Angeles Building Code.

In addition, the proposed Project's HSP, required by LAX Master Plan Commitment HM-2, would include sufficient training and protective measures for construction workers. All construction would incorporate industry best practices and standards in addition to complying with all regulations regarding working with and around methane. Incorporation of appropriate monitoring and safety provisions in the HSP and proposed Project design would ensure that the proposed Project 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. Therefore, construction and operational impacts related to methane would not be cumulatively considerable, and cumulative impacts would be less than significant.

Contaminated Soils, Groundwater, and Other Hazardous Materials

Impacts related to contaminated soils, groundwater, and other hazardous materials are site-specific and are not typically cumulatively considerable. The proposed Project's HSP, required by LAX Master Plan Commitment HM-2, would include sufficient training and protective measures for construction workers. All construction would incorporate industry best practices and standards in addition to complying with all regulations regarding working with and around contaminated soils, groundwater, and other hazardous materials. Therefore, construction and operational impacts related to contaminated soils, groundwater, and other hazardous materials would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

There are several schools that are located within a quarter-mile of the Project site. However, the Project site does not contain any known contamination or hazardous materials sites. Construction of the proposed Project would involve hazardous materials typical to construction, including gasoline, motor oils, and other similar materials. Acutely hazardous materials would not be used during construction of the proposed Project. All potentially hazardous construction materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any risk associated with transport, use, or disposal of these materials would be minimized to less than significant levels through compliance with these standards and regulations. Emissions from such materials would be minimal and localized to the Project site. The handling of any hazardous materials, substances, and wastes during construction and operations would be controlled through the implementation of LAX Master Plan Commitment HM-2, the HSP, and would comply with all applicable local, state, and federal laws to avoid any significant hazards to schools. Although schools are located within one-quarter mile of the Project site, compliance with applicable regulations and implementation of LAX Master Plan Commitment HM-2 would ensure that construction activities would not affect any of the schools. Schools would be

notified of construction activities as required by California Public Resources Code Section 21151.4. Therefore, construction and operational impacts related to hazardous emissions and materials within a quarter-mile of existing or proposed schools would not be considered cumulatively considerable, and cumulative impacts would be less than significant.

Airport Hazards

The allowable uses within the Project site would include Project Design Features and follow all required FAA guidance on minimizing wildlife attractants during construction and operations of the proposed Project. Wildlife hazards are typically site-specific and while the effect of wildlife attractants can be cumulative if sites are in close vicinity, it has been determined that impacts during construction and operations in the Project site would be less than significant. Therefore, construction and operational impacts related to wildlife hazards would not be considered cumulatively considerable, and cumulative impacts would be less than significant.

The area around LAX has a substantial amount of nighttime illumination, although in its current mostly vacant condition, the Project site is not a considerable contributor to nighttime illumination or daytime glare. However, implementation of the Project Design Features related to lighting and glare would result in less than significant impacts during construction and operations of the proposed Project. Therefore, construction and operational impacts related to lighting and glare hazards would not be considered cumulatively considerable, and cumulative impacts would be less than significant.

Airport obstruction hazards are site-specific and obstructions on one site do not affect obstructions on another. Implementation of the Project Design Features related to airport obstruction hazards, including building heights would result in less than significant impacts during construction and operations of the proposed Project. Therefore, construction and operational impacts related to airport obstruction hazards would not be considered cumulatively considerable, and cumulative impacts would be less than significant.

Interference with Emergency Response Plans

The proposed Project would not introduce elements that would interfere with the implementation of emergency response plans. The proposed Project would result in less than significant impacts related to interference with emergency response plans. Therefore, construction and operational impacts related to interference with emergency response plans would not be considered cumulatively considerable, and cumulative impacts would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.7, Hazards/Hazardous Materials, of the Draft EIR, the BOAC hereby finds and determines that impacts related to hazards/hazardous materials are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.7, Hazards/Hazardous Materials, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

8. Hydrology/Water Quality

Description of Effects:

Hydrology/water quality is analyzed in Section 4.8 of the Draft EIR.

Hydrology

Surface Water

Construction

The proposed Project would involve construction of new structures and new parking areas in the Project site, as well as new landscaping areas. Construction of buildings and parking areas would involve typical construction practices, including: use of large construction equipment such as cranes, bulldozers, and earthmovers; temporary storage of materials and earth; and grading of the Project site. These grading activities would involve excavation, stockpiling, and moving of earth, which may temporarily redirect surface water runoff during construction.

The proposed Project would be required to implement the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (GCP) during all construction activities, starting from mobilization through final closeout. The GCP includes regulations required of projects during construction. Construction would require the implementation of a SWPPP and temporary BMPs. The SWPPP would provide a plan that manages the specific needs and requirements of the Project site, and individual construction sites within it, and would manage the hydrology of surface water on the Project site during construction. The SWPPP would be required to be in place prior to ground disturbance on the Project site.

The Project site is not in a flood hazard zone, but the proposed Project would still implement measures in order to prevent flooding during construction activities. Construction would not substantially alter the topography of the Project site. Construction would increase impervious surface area through construction of permanent aspects of the proposed Project such as pavement as well as temporary uses such as tarps but these elements would be put into place in accordance with the SWPPP, which would ensure that they do not cause localized flooding. The Project site drains to the Pacific Ocean and would not substantially increase or decrease the amount of surface water in this surface water body. Furthermore, given that construction activities and impacts would be temporary and minimized through Project Design Features and other measures, a permanent, adverse change to the movement of surface water would not occur and there would not be a substantial change in the current or direction of water flow. The temporary measures and BMPs put into place by the SWPPP would prevent flooding, substantial changes to surface water bodies, and permanent adverse changes to surface water movement, current, or direction. Therefore, construction impacts related to surface water hydrology would be less than significant.

Surface Water

Operation

The Project site is mostly undeveloped and comprised of mostly pervious surface area. The proposed Project would increase the impervious surface area by constructing new buildings and new parking areas in portions of the Project site that are currently undeveloped. In addition, grading would occur in portions of the Project site that are not currently developed. Demolition of abandoned paved areas would potentially reduce impervious surface areas. The proposed grading would occur in the same portions of the

Project site as the construction of new impervious surface area. Landscape buffer areas would be vegetated and would not increase in impervious surface area.

While the proposed Project would potentially affect surface water hydrology by increasing impervious surface area and changing grading, the proposed Project would comply with LAX Master Plan EIS/EIR Commitment HWQ-1 and LAX Master Plan EIS/EIR Mitigation Measure MM-HWQ-1. The Conceptual Drainage Plan (CDP) prepared under LAX Master Plan EIS/EIR Commitment HWQ-1 provides a basis for future detailed drainage plans engineered for specific elements. Future developments of the proposed Project would implement all necessary drainage to comply with the CDP, which was prepared to the satisfaction of the City of Los Angeles Department of Public Works, and would incorporate methods to reduce peak flow of surface water runoff and to ensure drainage is sufficient to prevent flooding. LAWA has, through LAX Master Plan EIS/EIR Commitment HWQ-1, committed that the overall result will be a drainage infrastructure that provides adequate drainage capacity to prevent flooding and control peak flow discharges.

The proposed Project increases the impervious surface area and thus increases the amount of runoff during a 50-year storm event. However, in all areas, the proposed Project would have runoff rates below those incorporated into the CDP. The amount of stormwater management that LAX Master Plan Commitment HWQ-1 provides, through the CDP, exceeds the requirements of the proposed Project. As stated in LAX Master Plan Commitment HWQ-1, the CDP provides detailed drainage improvement specifications “at a level of detail sufficient to identify the overall improvements necessary to provide adequate drainage capacity to prevent flooding” at LAX, including the Project site.

In addition to the requirements set forth by the regulatory standards and by LAX Master Plan EIS/EIR Commitment HWQ-1 and LAX Master Plan EIS/EIR Mitigation Measure MM-HWQ-1, the proposed Project would implement several Project Design Features that would reduce impacts related to surface water hydrology. All areas within the Project site would integrate LID best practices into the future developments on the Project site and would incorporate stormwater management compliant with Los Angeles Regional Water Quality Control Board (LARWQCB), City of Los Angeles, and County of Los Angeles requirements, including the preparation of a SUSMP for operations and maintenance. Parking would be designed to maximize stormwater runoff management, impervious surface area would be minimized, and landscaping would be compatible with stormwater management.

LAWA would implement LAX Master Plan EIR/EIS Commitment HWQ-1, LAX Master Plan EIR/EIS Mitigation Measure MM-HWQ-1, and the Project Design Features in the proposed Project. The proposed Project’s development and grading would therefore not substantially increase stormwater runoff, both onsite and flowing into the Santa Monica Bay, and would not substantially alter the movement, current, or direction of surface water hydrology. Therefore, operational impacts related to surface water hydrology would be less than significant.

Groundwater

Construction

Groundwater beneath the Project site is not used for municipal or agricultural purposes. Construction and operation of the proposed Project would not require the use of groundwater and, thus, would not deplete groundwater supplies.

As most construction would involve excavation for footings and subterranean parking, construction of the proposed Project would not reach groundwater and would not require dewatering or cause changes to the rate or direction of groundwater flow. In addition, construction activities would not require usage of potable water in groundwater below the construction sites. Infiltration of stormwater into groundwater would not change significantly, as the proposed Project would be required to implement the NPDES GCP during all construction activities, starting from mobilization through final closeout. Construction would require the implementation of a SWPPP and temporary BMPs. The SWPPP would be required to be in place prior to ground disturbance on the Project site. The SWPPP would provide a plan that manages the specific needs and requirements of the Project site, and individual construction sites within it, and would manage the changes to surface water that would influence hydrology of groundwater beneath the Project site during construction.

As surface water hydrology would not change substantially during construction, groundwater would continue to infiltrate in a similar manner as existing conditions. Construction would be temporary, and would thus not cause changes in potable water levels sufficient to reduce the ability of a water utility to use the West Coast Basin or result in a demonstrable and sustained reduction in groundwater recharge capacity. Construction is not anticipated to reach groundwater beneath the Project site and would therefore not adversely change the rate or direction of flow of groundwater. The closest well to the Project site is 1.72 miles away and construction would not result in changes to potable groundwater levels sufficient enough to reduce yields at the closest well. Therefore, construction impacts related to groundwater hydrology would be less than significant.

Groundwater

Operation

Groundwater beneath the Project site is not used for municipal or agricultural purposes. Construction and operation of the proposed Project would not require the use of groundwater and, thus, would not deplete groundwater supplies.

The proposed Project would include operations of new structures and new parking areas, as well as maintenance of landscaping areas. New landscaping areas would remain pervious surface area and would not substantially affect the amount of groundwater infiltrated where they are installed; landscaping may potentially improve infiltration where new vegetation improves retention and absorption of surface water when compared to existing minimal vegetation. The existing uses on the Project site would not change in terms of pervious surface area.

LAX Master Plan EIS/EIR Commitment HWQ-1 discusses measures that reduce stormwater runoff via infiltration to groundwater. While the proposed Project would involve an increase in impervious surface area, requirements set forth by LAWA would apply, including decreasing impervious areas through removal of unnecessary pavement and utilization of porous concrete or modular pavement. Runoff would also be diverted to pervious areas in order to reduce directly-connected impervious areas. Vegetated swales, bioretention, and infiltration would also be implemented to control stormwater runoff, and would increase groundwater infiltration, reducing the effect of the increase in impervious surface area.

The Project Design Features require that the proposed Project submit Stormwater Management strategies and design features and comply with LARWQCB and County of

Los Angeles requirements, including the preparation of a SUSMP for operations and maintenance. The proposed Project would be designed to maximize infiltration even in areas of the Project site that are developed. Parking areas would minimize the amount of impervious area to the maximum extent feasible, and would use landscaping and design features to infiltrate stormwater from paved areas into groundwater. These Project Design Features would reduce the amount of stormwater that runs off of the Project site and maximize groundwater infiltration.

Although the proposed Project would reduce infiltration into the West Coast Basin, the reduction is negligible in comparison to the adjudicated extraction of groundwater permitted annually in the West Coast Basin, 64,468.25 AFY. Furthermore, the primary source of groundwater for the West Coast Basin is not the 6,700 AFY infiltration from surface water, but is instead groundwater that flows from the Central Basin. Development of the proposed Project would result in a negligible reduction in the amount of water recharged in the West Coast Basin and the ability of a utility to use the West Coast Basin would not be impacted. The nearest well to the Project site is 1.72 miles away and would therefore not be impacted by this minor change in infiltration.

The changes in infiltration related to the implementation of the proposed Project would therefore not adversely affect groundwater recharge capacity or impact the ability of a utility or of a well to utilize the groundwater in the West Coast Basin. In addition, the small changes in infiltration would not substantially change groundwater flow. Building foundations and subterranean parking would not impede groundwater and would not adversely change the rate or direction of the flow of groundwater. The level of groundwater would also not change due to the presence of these elements.

The proposed Project would not change potable levels in the West Coast Basin in a sufficient quantity to reduce yields of wells or well fields, to reduce the ability of a utility to use the basin, or to result in a demonstrable and sustained reduction of groundwater recharge capacity. The proposed Project would not materially impact groundwater hydrology, and impacts to groundwater recharge capacity would be minimal. Therefore, impacts related to groundwater hydrology during operations would be less than significant.

Water Quality

Surface Water

Construction

The proposed Project would involve construction of new structures and new parking areas, as well as new landscaping areas. Construction of buildings and parking areas would involve typical construction practices, including: use of construction equipment which has the potential to leak oils and chemicals; temporary storage of building materials and earth; construction of concrete and installation of paving; and grading of the Project site. These temporary construction uses on the Project site have the potential to affect surface water quality by discharging sediments from earth and various potential pollutants from equipment operation, equipment storage, material storage, and construction activities.

The proposed Project would be required to implement the NPDES GCP during all construction activities, starting from mobilization through final closeout. The GCP includes regulations required of projects during construction. Construction would require the implementation of a SWPPP and temporary BMPs. The SWPPP would provide a plan that manages the specific needs and requirements of the Project site, and individual

construction sites within it, and would manage the release of pollutants and contaminants from construction into surface water on the Project site during construction. The SWPPP would be required to be in place prior to ground disturbance on the Project site. Erosion and sediment controls would be also established as part of the SWPPP and put in place to manage erosion of the Project site and the release of sediment into receiving water bodies, thereby reducing the potential for sediment to be released into the Argo Ditch and Santa Monica Bay.

The temporary measures and BMPs put into place by the SWPPP would prevent typical construction activity discharges from creating pollution, contamination, or nuisance in surface water, and would be compliant with all regulatory requirements. Therefore, construction impacts related to surface water quality would be less than significant.

Surface Water

Operation

The majority of the Project site is currently vacant. During operation, new uses would occur with new buildings, parking, and landscaped areas. Development of these proposed uses would reduce sedimentation as structures and paved parking would be operated on currently exposed earth. These uses would introduce potential contaminants typical of commercial and parking uses, such as metals and oils from automobiles. These new uses and developments would not increase indicator bacteria, a USEPA TMDL for Santa Monica Beach, part of Santa Monica Bay, the receiving body of water for the Project site. New landscaping areas would use pesticides and other chemicals, similar to existing conditions. However, the existing vacant areas that would be landscaped would release a similar amount of sediment under the proposed Project as under existing conditions, as these areas would remain vegetated.

LAX Master Plan EIS/EIR Commitment HWQ-1 would apply to surface water hydrology during operations of the proposed Project. This commitment states that BMPs will be incorporated to prevent a net increase in pollutant loads to surface water resulting from the selected Master Plan alternative, including the proposed Project. LAWA would prepare a specific SUSMP compliant with LARWQCB, City of Los Angeles, and County of Los Angeles requirements for future developments under the proposed Project. This SUSMP would specify source control, structural, and treatment control BMPs in order to reduce discharge of pollutants from the stormwater conveyance system to the maximum extent practicable. Erosion, sedimentation, and other water quality issues would be managed through BMPs under LAX Master Plan EIS/EIR Commitment HWQ-1. Non-structural and source control BMPs would also be integrated to reduce pollutant loads.

The Project Design Features for the proposed Project serve to implement LAWA's commitment to preventing a net increase in pollutant loads to surface water. Development projects would include Stormwater Management strategies and design features that are compliant with all LARWQCB, City of Los Angeles, and County of Los Angeles regulations for water quality. Non-structural BMPs would be used unless infeasible, where structural BMPs would then be implemented.

The water quality measures incorporated in the Project Design Features, such as bioswales, design of parking to mitigate stormwater, and the commitment to pre-treat stormwater prior to discharge from the Project site ensure that surface water quality would not violate regulatory standards or cause pollution, contamination, or nuisance. Therefore, operational impacts related to surface water quality would be less than significant.

*Groundwater*Construction

The proposed Project would involve construction of new structures and new parking areas, as well as new landscaping areas. Construction of buildings and parking areas would involve typical construction practices, including use of construction equipment which has the potential to leak oils and chemicals; temporary storage of building materials and earth; construction of concrete and installation of paving; and grading of the Project site. These temporary construction uses on the Project site have the potential to affect groundwater quality by discharging various potential pollutants from equipment operation, equipment storage, material storage, and construction activities into groundwater via infiltration and direct contact.

Based on the results of the geotechnical borings and the soil distribution under the Project site, it is anticipated that groundwater would be evenly distributed throughout the LAX Northside Campus District, and therefore would not be encountered any shallower than 50.5 feet bgs.

The proposed Project would be required to implement the NPDES GCP during all construction activities, starting from mobilization through final closeout. The GCP includes regulations required of projects during construction. Construction would require the implementation of a SWPPP and temporary BMPs. The SWPPP would provide a plan that manages the specific needs and requirements of the Project site, and individual construction sites within it, and implementation of BMPs and other measures would manage the release of pollutants and contaminants from construction into surface water on the Project site during construction. The SWPPP would be required to be in place prior to ground disturbance on the Project site. The SWPPP would address not only surface water quality and hydrology, but also impacts to groundwater hydrology and quality. The BMPs and measures required by the SWPPP would protect surface waters from pollutants. By ensuring that surface waters are not contaminated or harmed, the SWPPP would protect groundwater quality as all water infiltrated by the proposed Project during construction would be treated for any pollutants released during construction.

The proposed Project would involve construction with excavation. Elements of the proposed Project, such as buildings, landscaping, and surface parking, would not encounter groundwater, which is not anticipated above 50.5 feet bgs. Construction excavation would not reach groundwater and would not directly contaminate or otherwise impact groundwater quality. As no known contaminated groundwater is present, existing contaminants are not anticipated and the rate or change of the direction of their movement would not be affected. The temporary measures and BMPs put into place by the SWPPP would prevent typical construction activity discharges from creating pollution, contamination, or nuisance in surface water, and construction activities would be compliant with all regulatory requirements. Upon infiltration, this surface water would not affect the rate or change of existing contaminants, expand the area affected by contaminants, or result in an increased level of groundwater contamination if any. In addition, infiltration from the proposed Project to groundwater would not violate regulatory water quality standards at an existing production well, the nearest of which is 1.72 miles away. Furthermore, groundwater beneath the Project site is not used for municipal or agricultural purposes. Therefore, construction impacts related to groundwater quality would be less than significant.

Groundwater

Operation

Operation of the proposed Project would involve new structures and new parking areas, as well as new landscaping areas. New landscaping, open space, and recreation areas would remain pervious surface area and would not substantially affect the amount of groundwater infiltrated where they are installed. Landscaping would maintain similar levels of infiltration to existing conditions as vegetation aids the retention and absorption of surface water. The existing uses on the Project site would continue to operate as during existing conditions and would not affect groundwater quality. Groundwater beneath the Project site would not be used for municipal or agricultural purposes. Construction and operation of the proposed Project would not require the use of groundwater and, thus, would not deplete groundwater supplies. Based on the results of the geotechnical borings and the soil distribution under the Project site, it is anticipated that groundwater would be evenly distributed throughout the Project site, and therefore would not be encountered any shallower than 50.5 feet bgs. The proposed Project would include relatively shallow building foundations and subterranean parking that would be located below ground. As groundwater is not anticipated to be encountered higher than 50.5 feet bgs, the proposed Project would not reach groundwater during operations. The Project site has no known existing groundwater contamination and the proposed Project would not affect the rate or change the direction of movement of existing contaminants if any, or otherwise alter contamination through direct contact with groundwater.

The proposed Project would increase the impervious surface area in the Project site with the operation of new structures and parking areas, reducing groundwater infiltration. This increase in impervious surface area would create a greater amount of surface water discharge, than under existing conditions. Surface water discharges (i.e., rainfall, landscape irrigation) from the Project site would either discharge into the stormwater drainage system or infiltrate into groundwater. Operations of the proposed Project would release potential contaminants typical of commercial and parking uses, such as metals and oils dropped from automobiles. Infiltration of these contaminants would have the potential to contaminate groundwater.

The same measures that are in place to protect surface water quality would minimize impacts to groundwater quality caused by the proposed Project. LAX Master Plan EIS/EIR Commitment HWQ-1 would apply to groundwater hydrology during operations of the proposed Project. This commitment states that BMPs will be incorporated to prevent a net increase in pollutant loads to surface water resulting from the selected Master Plan alternative, including the proposed Project. The implementation of BMPs and measures substantial enough to prevent a net increase in pollutant loads to surface water would also result in a significant reduction in the pollutant loads infiltrated into groundwater.

The Project Design Features further reduce impacts to groundwater quality. Groundwater infiltration would be maximized through the use of Project Design Features. The Project Design Features require that stormwater be pre-treated prior to infiltration into groundwater. Operation of the proposed Project would include Stormwater Management strategies and design features that are compliant with all LARWQCB, City of Los Angeles, and County of Los Angeles regulations for water quality. Non-structural BMPs would be used unless infeasible. Structural BMPs would be implemented where non-structural BMPs are infeasible. Underground stormwater treatment facilities would be permitted, with conditions, in the LAX Northside Campus

District (as a separate and independent related project within the Project site). Parking areas would be designed to be compatible with stormwater management, including bioswales and permeable paving systems that would be required to treat stormwater prior to infiltration.

Impacts to groundwater quality under the Project site would be minimized through the implementation of LAX Master Plan EIS/EIR Commitment HWQ-1 and Project Design Features. In addition, the proposed Project would comply with all LARWQCB, City of Los Angeles, and County of Los Angeles requirements during operations, including implementing a SUSMP. Compliance with these BMPs and regulations would ensure that groundwater quality meets regulatory standards. Furthermore the groundwater beneath the Project site is not used for municipal or agricultural purposes and therefore would not be extracted from a well that is used for drinking water.

The proposed Project would not directly contaminate groundwater during operations, and water infiltrated from typical operations of commercial and parking uses would be pre-treated through the BMPs and elements required by LAX Master Plan Commitment HWQ-1 and the Project Design Features. The proposed Project would therefore have minimal effects on the rate, direction, area, or level of contamination in groundwater, and would comply with regulatory standards for an existing well, the nearest of which is 1.72 miles away. Therefore, impacts related to groundwater quality during operations would be less than significant.

Transfer/Equivalency Program

Hydrology

Impervious surface area would not be substantially different than that analyzed herein with the implementation of the transfer/equivalency program. The LAX Master Plan Commitment HWQ-1 and LAX Master Plan Mitigation Measure MM-HWQ-1; the GCP; the SWPPP; and the Project Design Features, including permeable paving, use of BMPs, LID best practices, landscaping requirements, and other stormwater management methods would continue to apply even if transfers or equivalency exchanges occur. As such, transfers of floor area or equivalency exchanges would not alter the conclusions with regard to hydrology impacts. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Water Quality

Floor area and land uses within each LAX Northside district would not be substantially different than that analyzed herein. They would all have similar impacts on water quality and would not result in a higher or more concentrated level of contamination. The proposed Project would still be required to comply with all of the measures discussed within the Draft EIR analysis, including the LAX Master Plan Commitment HWQ-1 and LAX Master Plan Mitigation Measure MM-HWQ-1; the GCP; the SWPPP; and the Project Design Features, including permeable paving, filtration of runoff prior to discharge or infiltration, use of BMPs, LID best practices, landscaping requirements, and other water quality management methods. These water quality management commitments and measures would continue to apply even if transfers of floor area or equivalency exchanges occur. As such, floor area transfers or equivalency exchanges would not alter the conclusions with regard to water quality impacts. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts*Hydrology*Surface Water

As discussed in Section 4.8.3.4.1 of the Draft EIR, impacts related to surface water hydrology would be less than significant for the proposed Project. The existing Project drainage system consists of catch basins, subsurface storm drains and open channel, and outfalls. The Argo Drain is the storm water outfall for surface runoff captured on site. Project runoff discharged into the Argo Drain system along the LAX perimeter flows several miles off-shore and is released into the Pacific Ocean via a 10-foot diameter pipe. The surface body of water of concern receiving runoff from the Project site is the Santa Monica Bay, an embayment of the Pacific Ocean. The proposed Project in conjunction with the 115 related projects identified in Section 3.0 Environmental Setting of the Draft EIR would cumulatively increase stormwater runoff flows to the Argo Drain system and the Santa Monica Bay potentially resulting in cumulative impacts to surface water hydrology. However, each of these projects would be required to comply with LARWQCB, County of Los Angeles, and their respective city's regulations when designed and developed. These related projects would have SWPPPs for construction and SUSMPs for operations when required by the respective agencies and regulations, and would implement BMPs and other measures to manage stormwater runoff. The region where the related projects are located is highly urbanized and therefore has little potential to substantially increase regional runoff levels from existing conditions. In addition, each development would be analyzed during the compliance review for future buildout and implementation of the proposed Project, and would ensure that sufficient drainage exists or is developed both locally and within the region to handle runoff from each project. Therefore, cumulative impacts to surface water hydrology would be less than significant.

*Hydrology*Groundwater

As discussed in Section 4.8.3.4.1 of the Draft EIR, impacts related to groundwater hydrology would be less than significant for the proposed Project. The proposed Project is not anticipated to directly reach groundwater and would not substantially change the flow, level, or utility of existing groundwater. Impacts to groundwater hydrology would be minor and very localized, and would not have any measurable regional effect. Furthermore, as groundwater beneath the Project site is not utilized for municipal, agricultural, or drinking water purposes, these changes to groundwater recharge would not affect regional groundwater usage. The proposed Project in conjunction with the 115 related projects identified in Section 3.0 Environmental Setting of the Draft EIR would have the potential to cumulatively decrease groundwater levels, affect groundwater flows, and decrease recharge. However, the region where the related projects are located is highly urbanized and therefore has little potential to decrease the amount of groundwater recharge from existing conditions. In addition, the West Coast Basin has set limits, as discussed in Existing Conditions, on the amount of groundwater that projects can remove from groundwater each year. All related projects would be required to comply with these regulations and would therefore not substantially deplete groundwater levels. As a result, wells and utilities would not be impacted in their ability to use potable groundwater. Structures requiring dewatering during construction and operations would be required to comply with all regulations regarding groundwater and

would not substantially affect the flow of groundwater. Therefore, cumulative impacts related to groundwater hydrology would be less than significant.

Water Quality

Surface Water

As discussed in Section 4.8.3.4.2 of the Draft EIR, the proposed Project would have a less than significant impact on surface water quality. The proposed Project would be developed in compliance with regulatory requirements; the LAX Master Plan Commitment HWQ-1 and LAX Master Plan Mitigation Measure MM-HWQ-1 described in Section 4.8.3.3.1 of the Draft EIR; and the proposed Project Design Features described in Section 4.8.3.3.2 of the Draft EIR. The proposed Project would be developed in compliance with LARWQCB, City of Los Angeles, and County of Los Angeles requirements, and would include Stormwater Management Strategies and a SUSMP. Furthermore, LAX Master Plan Commitment HWQ-1 states that LAWA will use BMPs to prevent a net increase in pollutant loads to surface water.

The proposed Project in conjunction with the 115 related projects identified in Section 3.0 Environmental Setting of the Draft EIR would have the potential to cumulatively impact surface water quality. However, these related projects would all be subject to the same regulations as the proposed Project, including NPDES permits, TMDLs, and LARWQCB, County of Los Angeles, and cities' requirements. Construction of each individual project would be anticipated to be managed with a SWPPP and operations would be anticipated to be managed with a SUSMP where applicable. In addition, the region where the related projects are located is highly urbanized and therefore related projects would not be anticipated to substantially change regional water quality from existing conditions. The cumulative impacts of these projects along with the proposed Project would be less than significant.

Water Quality

Groundwater

As discussed in Section 4.8.3.4.2 of the Draft EIR, the proposed Project would have a less than significant impact on groundwater quality. Groundwater quality in the West Coast Basin is generally good. The proposed Project would have minimal effects on groundwater quality, and these impacts would be localized. The Project site is not used for municipal or agricultural purposes. The proposed Project in conjunction with the 115 related projects identified Section 3.0 Environmental Setting of the Draft EIR would have the potential to cumulatively impact groundwater quality. However, these related projects would all be subject to the same regulations as the proposed Project, including NPDES permits and LARWQCB, County of Los Angeles, and cities' requirements. Construction of each individual project would be anticipated to be managed with a SWPPP and operations would be anticipated to be managed with a SUSMP where applicable. In addition, the region where the related projects are located is highly urbanized and therefore related projects would not be anticipated to substantially change infiltration of contaminants into groundwater from existing conditions. Therefore, cumulative impacts related to groundwater quality would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.8, Hydrology and Water Quality, of the Draft EIR, the BOAC hereby finds and determines that impacts related to hydrology and water quality are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.8, Hydrology and Water Quality,

of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

9. Land Use

Description of Effects:

Land use is analyzed in Section 4.9 of the Draft EIR.

Land Use Plan Consistency

Regional Plans

The Project site is located within the six county Southern California Association of Governments (SCAG) Planning Area, which includes Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. The SCAG 2012-2035 Regional Transportation/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future was adopted on April 4, 2012 and amended on September 11, 2014. The RTP/SCS includes goals and policies related to mobility, accessibility, safety, productivity of the transportation system, protection of the environment and energy efficiency, and land use and growth patterns that complement the state and region's transportation investments. An integral component of the RTP/SCS is a strong commitment to reduce emissions from transportation sources, in order to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the Clean Air Act.

The proposed Project includes a mix of land uses to improve livability and sustainability. Active transportation is encouraged through the provision of the Paseo, a new multi-use trail along the length of the Project site. The Project site is proposed for a mix of uses, including various types of retail, restaurants, civic, open space, airport support, higher education, research and development, and office uses. The proposed Project would therefore introduce jobs near existing housing located in Westchester. Additionally, the majority of the Project site was previously developed but is now mostly vacant. The proposed Project would introduce new uses in an existing, developed urban area to revitalize this area. The proposed Project is therefore consistent with the SCAG RTP/SCS.

The Project site is located within the LAX airport influence area and the CLUP. The CLUP identifies compatible land uses within Airport Influence Areas based on community noise exposure. Per the CLUP land use compatibility table, mixed use commercial, civic, and open space uses should review noise insulation needs in this area. The proposed Project would comply with the City of Los Angeles Noise Ordinance, Chapter 11 of the Los Angeles Municipal Code. Heights in the Project site are limited to a maximum of 60 feet. The proposed Project's heights comply with FAR Part 77. The proposed Project prohibits uses that will negatively affect safe air navigation, including landscaping that could attract birds, and lighting and reflective materials that could impact aircraft navigation. The proposed Project is therefore consistent with the CLUP.

Citywide Plans

The Project site is located in the City of Los Angeles General Plan planning area. The City of Los Angeles General Plan consists of the Framework Element (adopted in 1996), the Land Use Element (divided into 35 community plans), and the Urban Form and

Neighborhood Design Element (development pending). The City of Los Angeles Citywide General Plan Framework defines the City's long-range comprehensive growth strategy, and sets forth policies, goals, and objectives to guide land use regulations for Community Plans.

The proposed Project accommodates a mix of retail, restaurants, civic, open space, airport support, higher education, research and development, and office uses that support the needs of the City's existing and future residents and visitors. Introduction of these new uses will provide jobs adjacent to existing residential areas in Westchester. Project Design Features provide for siting and design of development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. Heights are compatible with commercial uses in the Westchester Business District, while setbacks and stepbacks ensure compatibility with residences to the north. Pedestrian and bicycle activity is enhanced through the introduction of the Paseo. The proposed Project is therefore consistent with the City of Los Angeles General Plan.

Community/Specific Plan

Land use and zoning for the Project site are provided by the LAX Plan (the City of Los Angeles General Plan Land Use Element for the Project site) and LAX Specific Plan. The LAX Master Plan outlines improvement programs to modernize the Airport, including runway and taxiway system modernization, redevelopment of terminal areas, airport access improvements, and passenger safety, security, and convenience enhancements.

The LAX Plan designates four land use areas. The Project site is designated as LAX Northside. The LAX Plan states that the LAX Northside area provides for the development of uses consistent with Airport needs and neighborhood conditions, while also serving as an Airport buffer zone for the Westchester community located immediately north of the Project site. The LAX Plan categorizes the allowable uses within the LAX Northside to include commercial development; office; light industrial, research and development; hotel and conference facilities; retail and restaurant uses; school and community facilities; open space; bicycle paths; and greenway buffers. The proposed Project accommodates a mix of retail, restaurants, civic, open space, airport support, higher education, research and development, and office uses that are consistent with the LAX Plan land use designation. Neighborhood context and compatibility between the Project site and adjacent uses is provided through Project Design Features that require setbacks and stepbacks adjacent to residential areas. Additionally, buildings are oriented towards Westchester Parkway. The proposed Project is therefore consistent with the LAX Plan.

The LAX Specific Plan designates three sub-areas in the Specific Plan (Landside, Airside, and Northside). The LAX Northside is zoned as "LAX-N" under the LAX Specific Plan. This zoning designation allows commercial uses, including offices, hotel, restaurant, service, and retail uses; commercial golf course, including golf driving tees and ranges; business park; automobile station; public automobile parking; airport support; research and development; and recreational facilities and public benefit uses. The proposed Project allows a mix of retail, restaurants, civic, open space, airport support, higher education, research and development, and office uses and would maintain the existing golf course. The proposed Project is consistent with the LAX-N land uses. The Proposed Project also introduces maximum square footages, building heights, setbacks, and buffers that are consistent with or more restrictive than existing

LAX-N development standards. The proposed Project is therefore consistent with the LAX Specific Plan.

The LAX Master Plan promotes compatibility between LAX and surrounding neighborhoods and seeks to achieve a balance between LAX operations and environmental, social, land use, ground access, economic and air commerce impacts. The proposed Project is planned for a mix of retail, restaurants, civic, open space, airport support, higher education, research and development, and office uses to respond to future demand for these uses. Development will be oriented towards Westchester Parkway. The proposed Project would provide job opportunities. The entire Project site serves as a means to reduce impacts to surrounding land uses by providing a buffer between the airport and adjacent land uses. The proposed Project is therefore consistent with the LAX Master Plan.

The proposed Project is consistent with the adopted land use/density designation in the LAX Plan and Specific Plan, and is consistent with the City of Los Angeles General Plan and adopted environmental goals or policies contained in other applicable plans. Therefore, impacts related to land use consistency are less than significant.

Existing Land Use Compatibility

Construction

Development within the proposed Project would result in temporary construction-related impacts. Construction of the proposed Project would result in temporary significant impacts associated with air quality and noise. However, these impacts would be short-term in nature and would be staged to minimize disruption to neighboring streets and land uses. Additionally, application of construction mitigation measures and commitments from the LAX Master Plan EIR would reduce temporary construction related impacts to a less than significant level.

Construction staging and activities would be limited to areas within the Project site. Additionally, through implementation of the commitments and mitigation measures, construction activities would remain on designated routes outside of residential areas, would occur only during designated hours, and would be screened with fencing. Construction activity impacts would be limited to the Project site and designated roads to the maximum extent feasible; would not disrupt, divide, or isolate neighborhoods, communities, or land uses on a long or permanent basis; and would not have secondary impacts. Therefore, construction impacts related to land use compatibility would be less than significant.

Operation

Existing land uses within the Project site would not be displaced as part of the proposed Project. Proposed land uses reflect a mix of mix of retail, restaurants, civic, open space, airport support, higher education, research and development, and office uses. The proposed Project land uses are designed to be compatible with existing commercial uses in the Westchester Business District to the east, residences to the north, LAX to the south, and habitat preservation areas to the west. Building heights are limited. Project Design Features include buffers, setbacks, height limits, and stepbacks to ensure compatibility with surrounding uses

The proposed Project uses would not disrupt, divide, or isolate any communities or neighborhoods. The Project site is located south of the community of Westchester, separated from the community by existing streets including Manchester Avenue, Lincoln

Boulevard, and La Tijera Boulevard. Proposed land uses would provide connections with the existing Westchester Business District. Potential civic, cultural, or other non-profit facilities would not result in new land use impacts or be incompatible with existing land uses or surrounding adjacent land uses since there are currently civic and community uses operating on the site. Introduction of airport support uses south of Westchester Parkway would be compatible with existing uses at LAX. Additionally, introduction of the proposed Project uses in areas that are currently vacant and previously disturbed would not disrupt existing uses on the Project site. The proposed Project would occur on LAX-owned property. No acquisition or new facilities are proposed that would physically divide an established community. Therefore, operational impacts to land use compatibility would be less than significant.

Transfer/Equivalency Program

Floor area transfers or equivalency exchanges would not result in new impacts with regard to land use. Floor area transfers or equivalency exchanges would not alter the proposed mix of uses proposed by the proposed Project or the development standards (height, setbacks, stepbacks, buffers, etc.) set forth for each District. As analyzed previously, development of the proposed Project land uses would be consistent with the goals, objectives, and policies of land use plans and would be compatible with surrounding land uses. As such, floor area transfers or equivalency exchanges would not alter the conclusions with regard to land use impacts. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

The geographic context for the cumulative impact analysis for land use is the Westchester-Playa del Rey Community Plan and LAX Plan area. Future growth through 2022 (the proposed Project buildout year) as a result of ambient growth and related projects would have the potential to alter the existing land use environment due to infill development at increased densities, conversions of vacant land to new development, and/or conversions of land uses (e.g., commercial to residential). However, future development projects would be subject to existing land use zoning and designations as well as environmental review by the City of Los Angeles. Therefore, such future projects are not expected to fundamentally alter the existing land use relationships in the community.

The Project site is bordered on the west by the Los Angeles Airport/El Segundo Dunes, on the south by LAX, on the north by the residential communities of Westchester and Playa del Rey, and on the east by the Westchester Business District. The Los Angeles Airport/El Segundo Dunes is a protected open space area and is not anticipated to be developed. While related improvement and modernization projects are anticipated at LAX, these will not change the overall land use and character of LAX from its current airport land use. Residences to the north are in stable, single-family areas. Finally, while the Westchester Business District may be intensified and revitalized, it is anticipated to remain a commercial area consistent with adopted plans. Anticipated changes to land use in areas adjacent to the Project site are therefore not anticipated to fundamentally alter the existing land use relationships in the community.

As indicated in Section 3.0, Environmental Setting, of the Draft EIR there are 35 related projects that have been identified in the City of Los Angeles in the Project vicinity. Such related projects consist of mixed use commercial, office, retail, airport parking, airport modernization, transit, school, recreation, and residential uses. Approximately 18 of

these projects are expansions of existing uses or on project sites that are currently developed and therefore would not conflict with existing land uses. The remainder of the related projects are separated from the Project site by intervening development or are at distances from the Project site that would preclude cumulative impacts.

Additionally, given that the proposed Project would be compatible with existing surrounding land uses, the proposed Project would not contribute to significant cumulative land use compatibility impacts. Cumulative impacts would be less than significant.

As with the proposed Project, future development projects would be reviewed by the City of Los Angeles for consistency with relevant land use plans and regulations, including but not limited to the General Plan Framework, the Community Plan, and the LAMC. Therefore, as the proposed Project would generally be consistent with applicable land use plans, policies, and regulations, the proposed Project would not incrementally contribute to significant cumulative land use inconsistencies. Cumulative impacts would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.9, Land Use and Planning, of the Draft EIR, the BOAC hereby finds and determines that impacts related to land use and planning are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.9, Land Use and Planning, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

10. Noise

Description of Effects:

Noise is analyzed in Section 4.10 of the Draft EIR.

On-Site Construction Activities

As described in Section 4.10.2.6.1 Construction in Section 4.10 Noise of the Draft EIR, noise impacts from construction activities occurring within the Project site would be a function of the noise generated by construction equipment, the equipment location, the timing and duration of the noise-generating activities, and the relative distance to noise sensitive receptors. Development of the proposed Project would include grading, clear and grub, installation of utilities, building foundations, building construction, architectural coating, and paving. Each one of these activities would include a mix of light and heavy equipment types such as tractors, forklifts, rollers, air compressors, and dozers. In addition to the equipment used on-site, trucks would be used to deliver equipment and building materials, and to haul away waste materials. Smaller equipment would also be used throughout the site during the construction phases, such as saws, hammers, and jackhammers. Construction equipment would generate both steady state and episodic noise that would be heard both on and off the Project site.

Table 4.10-12 and Table 4.10-13 of the Draft EIR depict the noise levels and change in hourly noise level at the representative sensitive receptor locations that are located in close proximity to the Project site. Construction related activities would not result in significant noise levels in excess of ambient measured noise in Area 2 and 12A West.

Additionally, there are no sensitive receptors adjacent to Areas 4 through 10. Therefore, construction related noise impacts in Areas 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12A West, and 12B would be less than significant.

Off-Site Construction Trucks

Construction activities would temporarily increase ambient noise levels in the immediate vicinity of the construction and land clearing activities as well as along the haul routes where construction trucks and employee vehicles would travel. Construction trucks would only be able to use haul routes designated by LAX Master Plan EIS/EIR Commitment ST-16. These routes will be selected to ensure that trucks use the area freeway systems (the San Diego Freeway [I-405] and the Century Freeway [I-105]) as much as possible, and use only major arterial routes to travel as short a distance as possible from the freeways to the proposed Project construction sites. All of the designated haul routes accommodate relatively high traffic volumes today. As a result of limiting trucks to the already heavily traveled routes that are away from noise-sensitive land uses, no significant construction traffic noise impacts are anticipated.

Construction Ground-Borne Vibration

Construction activities can generate varying degrees of ground-borne vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude (strength) with distance from the source (construction equipment). The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach the levels that damage structures. With regard to the proposed Project, high levels of ground-borne vibration would be generated primarily during grading/excavation activities on Project site.

Ground-borne vibration decreases rapidly with distance. Vibration velocities from typical heavy construction equipment operations that would be used during the proposed Project construction range from 0.003 inches per second to 0.089 inches per second PPV at 25 feet from the equipment, based on the FTA data. At 50 feet from the source of activity, vibration velocities would be reduced to 0.001 inches per second to 0.031 inches per second PPV. As each of these values is well below the 0.3 inches per second and 0.12 inches per second PPV significance threshold for older residential and historic structures, vibration impacts associated with construction would be less than significant.

On-Site Stationary Noise

The proposed Project would allow the development of mix of employment, retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses. Stationary noise sources associated with these uses include heating, ventilating, and air conditioning facilities; water and waste water systems; elevators; escalators; intake and discharge fans; truck and loading noise; and rubbish collection and disposal noise. Noise would also be generated by human activity within the Project site. Human activity-related noise would include people talking, doors slamming, truck deliveries, landscape maintenance equipment operation, stereos, domestic animals, etc. Introducing the proposed Project land uses would not cause the ambient noise level measured at the property line of affected uses to increase by 3.0

dba in CNEL to or within the “normally acceptable” or “clearly unacceptable” category, or any 5 dba or greater noise increase. Therefore, operational impacts related to stationary noise sources would be less than significant.

Off-Site Traffic (Mobile Sources)

Traffic noise levels during AM and PM peak hour traffic on the primary roads in the Project site vicinity were analyzed for existing (2012) and future (2022) traffic conditions with and without the proposed Project. Table 4.10-23 and Table 4.10-24 of the Draft EIR summarize the calculated traffic noise levels for AM and PM peak hours, respectively, at a reference distance of 100 feet from each roadway segment, and compare the future traffic noise levels with the proposed Project to those under the existing traffic noise level and future without proposed Project noise levels. Future (2022) AM peak hour traffic noise levels after full proposed Project implementation would increase over existing (2012) noise levels by approximately 1.0 dba to 4.0 dba. Such increases are below the established threshold of significance of 5.0 dba increase. Similarly, future PM peak hour traffic noise level increases over existing traffic noise levels would be in the range of 1.0 dba to 4.0 dba, which is below the threshold of significance. Therefore, operational impacts related to mobile noise would be less than significant.

Aircraft Noise Exposure

The Project site is not currently located in the flight path of LAX and is not expected to be in the future. However, the Project site is located within the LAX noise impact area and therefore, the proposed Project may introduce new land uses to noise impacts above those permitted by applicable regulations and thresholds. The Project site is currently located within the 65 dba CNEL to 70 dba CNEL noise contour, with limited portions of the Project site south of Westchester Parkway located within the 70 dba CNEL to 75 dba CNEL noise contour.

The proposed Project does not introduce any land uses that would be considered clearly unacceptable according to the City of Los Angeles land use compatibility guidelines for noise. The majority of the proposed Project land uses are also “satisfactory” or “allowed with conditions (should review noise insulation needs)” according to the Los Angeles County Airport Land Use Commission land use compatibility guidelines. Similarly, the majority of land uses are compatible with Caltrans and FAA standards. However, the portions of the Project site located within the 65 dba CNEL to 70 dba CNEL noise contour would potentially include higher educational uses in the Office and Research and Development land use category. The Los Angeles County Airport Land Use Commission land use compatibility guidelines stipulate that educational land uses should be avoided in these areas, unless related to airport services. Caltrans Title 21, Section 5014b stipulates that private schools are incompatible unless an aviation easement for noise has been acquired by the airport proprietor, or acoustic performance ensures an interior CNEL of 45 dB or less in all classrooms. FAA Part 150 states that schools are incompatible, however, where the community determines that schools must be allowed, measures to achieve outdoor to indoor Noise Level Reduction of at least 25 dB and 30 dB should be incorporated into building codes and be considered in individual approvals. FAA Part 150 notes that these measures will not eliminate outdoor noise problems. The Project Design Features include that prior to the issuance of building permits for any proposed higher educational uses, the Project Applicant shall utilize an acoustical engineer to demonstrate to the City of Los Angeles that the 45 dB interior noise standard and an outdoor to indoor Noise Level Reduction of at least 25 dB and 30 dB has been achieved. Outdoor areas associated with higher educational uses shall be designed to

minimize noise exposure. Additionally, should the property owner of any land proposed for higher educational use be any entity other than LAWA, the property owner shall be required to grant LAWA a permanent and irrevocable avigation easement. Therefore, the proposed Project will comply with all applicable Los Angeles County Airport Land Use Commission, Caltrans, and FAA standards and guidance regarding land use compatibility.

Presumed ambient noise levels for common land uses in the City of Los Angeles range from a low of 40 dBA Leq for residential uses at night to a high of 65 dBA for heavy manufacturing uses during the day. The proposed Project land uses would have similar stationary noise sources as commercial or manufacturing uses, which are presumed to have ambient noise levels ranging from 60 dBA Leq during the day to 55 dBA Leq during the night. The existing ambient noise levels at the Project site range from 65 dBA Leq to 75 dBA Leq. The proposed Project would not increase ambient noise levels by 1.5 dB CNEL or greater. Therefore, operational impacts related to aircraft noise exposure would be less than significant.

Transfer/Equivalency Program

Floor area transfers or equivalency exchanges would not result in new impacts with regard to noise. Floor area transfers or equivalency exchanges would not change the construction noise sources and operational stationary noise sources from what was analyzed within the Draft EIR section. Additionally, transfers between uses within Districts would be trip neutral, as they would have to comply with the LAX Northside Land Use Equivalency Matrix. Specifically, floor area transfers or equivalency exchanges would not cause the number of total trips to exceed the estimated number of proposed Project vehicle trips (approximately 23,635 total new daily trips) as analyzed in this Draft EIR. Therefore, as floor area transfers or equivalency exchanges would be trip neutral, off-site traffic noise levels would be similar to those analyzed herein. In summary, floor area transfers or equivalency exchanges would not alter the conclusions with regard to noise impacts. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

Noise

The Project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources including vehicle travel, mechanical equipment, and outdoor maintenance activities as well as noise related to aircraft operation at LAX. Future projects would also generate stationary-source and mobile-source noise as a result of ongoing day-to-day operations. These future related projects are generally residential, retail, commercial, or institutional in nature. Such uses are not typically associated with excessive exterior noise. In addition, noise levels would be less than significant at the property line for each related project due to City provisions that limit onsite stationary-source noise such as outdoor air-conditioning equipment. However, each related project would produce traffic volumes (off-site mobile sources) that are capable of generating roadway noise impacts.

The future with Project traffic conditions represent the cumulative conditions for purposes of the traffic noise cumulative impacts analysis. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from “existing” conditions to “future” conditions to the applicable significance criteria. Future cumulative conditions include all projected regional development (as projected by

the Southern California Association of Governments) in the Study Area between 2010 and 2022, including related projects. As shown by the data in Table 4.10-23 of the Draft EIR, future (2022) AM peak hour traffic noise levels after full proposed Project implementation would increase over existing (2012) noise levels by approximately 1.0 dBA to 4.0 dBA. Such increases are below the established threshold of significance of 5.0 dBA increase. Similarly, the data in Table 4.10-24 of the Draft EIR indicate that future PM peak hour traffic noise level increases over existing traffic noise levels would be in the range of 1.0 dBA to 4.0 dBA, which is below the threshold of significance. Therefore, cumulative impacts related to noise would be less than significant.

Ground-Borne Vibration

As discussed in Section 3.0 Environmental Setting of the Draft EIR, future growth including the development of 115 related projects is anticipated in the Project site vicinity through 2022. Noise from construction activities associated with this future growth together with proposed Project-related construction activities could contribute to the cumulative noise impact for receptors located between the two construction sites. However, cumulative construction-related noise levels from future development would be intermittent and temporary. In addition, like the proposed Project, it is anticipated that future construction of related projects in the Project site vicinity would comply with time restrictions and other relevant provisions in the City's Municipal Code. Furthermore, noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for the related project.

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the proposed Project, there is no potential for a cumulative construction-period impact with respect to ground-borne vibration. Therefore, cumulative impacts related to ground-borne vibration would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.10, Noise, of the Draft EIR, the BOAC hereby finds and determines that impacts related to construction in Areas 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12A West, and 12B; off-site construction trucks; construction ground-borne vibration; on-site stationary noise; off-site traffic (mobile sources); aircraft noise exposure; the transfer/equivalency program, and cumulative impacts to noise are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.10, Noise, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

11. Population, Housing, and Employment

Description of Effects:

Population, housing, and employment are analyzed in Section 4.11 of the Draft EIR.

Cause or Accelerate Growth in an Undeveloped Area

Construction

Construction of the proposed Project does not include any permanent or temporary structures that would be used as housing. Consequently, no direct population growth is

anticipated. Therefore, no direct construction impacts related to causing or accelerating population growth in an undeveloped area would occur.

Construction of the proposed Project would generate a maximum of 527 construction jobs over a seven-year construction schedule. On most days there would be far fewer construction workers at the Project site, as construction workers are typically on the Project site on a temporary basis and during limited hours. As construction jobs are temporary in nature, and due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the proposed Project. Furthermore, the study area is comprised of Westchester and Playa del Rey which are built-out, primarily single-family communities without a significant excess of housing stock. Therefore, indirect construction impacts related to causing or accelerating population growth in an undeveloped area would be less than significant.

Operation

The operation of the proposed Project would not result in direct population growth impacts because the proposed Project does not include any residential uses. The study area and City of Los Angeles are projected to increase in population by approximately 12 percent, and the County of Los Angeles is projected to increase in population by approximately 16 percent by the time of proposed Project buildout in 2022. As the proposed Project would not include residential or group-quarters land uses, it would not directly cause or accelerate population growth in any of the geographies in the study area. Therefore, no direct operational impacts related to causing or accelerating population growth in an undeveloped area would occur.

Although the proposed Project would not include any residential development, there exists the potential for indirect population growth due to the buildout employment generation (7,111 jobs) associated with the proposed Project. In effect, there exists the potential for contributing to population growth in neighboring communities as employees move near the proposed Project's job opportunities. Given the built-out character of the surrounding areas and communities, there does not exist the potential to cause or accelerate growth in undeveloped areas. The opportunity for relocation would be dependent on housing stock available, affordability, distance from existing residence to the Project site, and an average household size that varies with the communities surrounding the Project site. It is not likely that any scenario calculations would exceed the study area population growth forecasts as the areas of Westchester and Playa del Rey are built-out, primarily single-family communities without a significant excess of housing stock. Compared to both the City of Los Angeles and the County of Los Angeles, however, any indirect population growth would not exceed projected growth. For the evaluation of indirect growth impacts, the conservative Draft EIR scenario assumes: 1) the total number of jobs is equal to the same number of non-related individuals; 2) all individuals have a family size equivalent to the average household size for the County of Los Angeles (2.98 persons per household); and 3) that all of the individuals and their families would relocate to the study area. In this scenario, the approximate indirect population growth associated with 7,111 employees would be approximately 21,185 persons. This indirect increase would comprise 22 percent of the projected population growth in the City of Los Angeles, and seven percent of the projected population growth in the County of Los Angeles. Consequently, even in this scenario, the indirect population growth associated with the proposed Project employment would not exceed projected population growth in the larger geographies

used for comparison. Therefore, indirect operational impacts related to causing or accelerating population growth in an undeveloped area would be less than significant.

Housing

Construction

Construction of the proposed Project does not include any permanent or temporary structures that would be used as housing. Consequently, no direct housing growth is anticipated. Therefore, no direct construction impacts related to causing or accelerating housing growth in an undeveloped area would occur.

Construction of the proposed Project would generate a maximum of 527 construction jobs over a seven-year construction schedule. On most days there would be far fewer construction workers at the Project site, as construction workers are typically on the Project site on a temporary basis and during limited hours. As construction jobs are temporary in nature, and due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the proposed Project. Furthermore, the study area is comprised of Westchester and Playa del Rey which are built out, primarily single-family communities without a significant excess of housing stock. Therefore, indirect construction impacts related to causing or accelerating housing growth in an undeveloped area would be less than significant.

Operation

The operation of the proposed Project would not result in direct housing growth impacts because the proposed Project does not include any residential uses. The study area and City of Los Angeles are projected to increase in housing by 5.4 percent and 6.7 percent respectively, and the County of Los Angeles is projected to increase in housing by 8.1 percent by the time of proposed Project buildout in 2022. As the proposed development within the Project site would not include residential or group-quarters land uses, it would not directly cause or accelerate housing growth in any of the geographies in the study area. Therefore, no direct operational impacts related to causing or accelerating housing growth in an undeveloped area would occur.

Although the proposed Project would not include any residential development, there exists the potential for indirect housing growth due to the buildout employment generation (7,111 jobs) associated with the proposed Project. In effect, there exists the potential for contributing to population growth in neighboring communities as employees move near the proposed Project's job opportunities. Given the built-out character of the surrounding areas and communities, the potential to cause or accelerate growth in undeveloped areas does not exist. The opportunity for relocation would be dependent on housing stock available, affordability, distance from existing residence to the Project site, and an average household size that varies with the communities surrounding the Project site. It is not likely that any scenario calculations would exceed the study area housing growth forecasts as the areas of Westchester and Playa del Rey are built-out, primarily single-family communities without a significant excess of housing stock. Compared to both the City of Los Angeles and the County of Los Angeles, however, any indirect housing growth would not exceed projected growth. For the evaluation of indirect growth impacts, the conservative Draft EIR scenario assumes: 1) the total number of jobs is equal to the same number of non-related individuals, 2) all individuals have a family size equivalent to the average household size for the County of Los Angeles (2.98 persons

per household), and 3) that all of the individuals and their families would relocate to the study area. In this scenario, the approximate indirect housing growth associated with 7,111 employees would be approximately 21,185 persons. This indirect increase would comprise 22 percent of the projected population growth in the City of Los Angeles, and seven percent of the projected population growth in the County of Los Angeles. Consequently, even in the conservative scenario, the indirect housing growth associated with the proposed Project employment would not exceed projected housing growth in the larger geographies used for comparison. Therefore, indirect operational impacts related to causing or accelerating housing growth in an undeveloped area would be less than significant. Growth inducing impacts related to the proposed Project are further discussed in Chapter 5 of the Draft EIR, Other CEQA Considerations.

Employment

Construction

Construction of the proposed Project would generate a maximum of 527 construction jobs over a seven-year construction schedule. On most days there would be far fewer construction workers at the Project site, as construction workers are typically on the Project site on a temporary basis and during limited hours. Construction employment would be temporary and would not contribute to permanent increases of employment in the Project site vicinity, as construction staff will not be employed on-site once the construction is completed.

In addition, construction of the proposed Project would not displace existing businesses or jobs. All existing businesses and permanent development with permanent employees in Area 1 (Jet Pets Animal Quarantine Facility), Area 9 (Radar Facility), Area 12A East (Los Angeles Fire Department (LAFD) Fire Station Number 5), Area 12B (Westchester Golf Course), and Area 13 (First Flight Child Development Center) are not part of the proposed Project's scope. Moreover, construction activities would occur within the Project site and would not involve demolition or displacement of any existing businesses in the Project site vicinity. Haul routes, delivery routes, and construction-related trips would occur via established roadways and would similarly not involve demolition or displacement of any existing businesses.

Therefore, direct and indirect construction impacts related to causing or accelerating employment growth in an undeveloped area would be less than significant.

Operation

The operation of the proposed Project is forecast to result in a total employment increase of 7,111. The employment generated by the proposed Project would represent seven percent of the SCAG employment forecast for the study area, .37 percent of the SCAG employment forecast for the City of Los Angeles, and .14 percent of the SCAG employment forecast for the County of Los Angeles. The employment generated by the proposed Project would represent 124 percent of projected employment growth in the study area, eight percent of the projected employment growth in the City of Los Angeles, and 2.8 percent of the projected employment growth in the County of Los Angeles between 2010 and 2022. Although the proposed Project employment is greater than the projected employment growth for the study area, it is within the total projected employment at buildout for the study area and within the projected growth for the City and County of Los Angeles. Thus, the proposed Project is consistent with SCAG's forecasts for the study area, City of Los Angeles, and County of Los Angeles. Therefore,

operational impacts related to causing or accelerating employment growth in an undeveloped area would be less than significant.

The proposed Project would introduce new employment opportunities for the residential communities of Westchester and Playa del Rey, as well as for the larger City of Los Angeles and County of Los Angeles areas. The 2010 jobs/housing balance is 3.22 for the study area, 1.28 for the City of Los Angeles, and 1.31 for the County of Los Angeles. The estimated 2022 jobs/housing balance is 3.24 for the study area, 1.26 for the City of Los Angeles, and 1.28 for the County of Los Angeles. The proposed Project would contribute to a positive jobs/housing balance in the study area and would partially offset the projected decline in jobs/housing balance in the City of Los Angeles and County of Los Angeles.

Consistency with Growth Policies

As analyzed in Section 4.11 Population, Housing, and Employment, of the Draft EIR the proposed Project would be consistent with the goals, policies, and objectives of the SCAG Regional Comprehensive Plan, City of Los Angeles General Plan, and the LAX Plan pertaining to population, housing, and employment growth. The proposed Project focuses on employment-generating uses in the emerging Project site; includes a mix of uses and pedestrian-friendly development; and would revitalize the mostly vacant, previously disturbed Project site. Furthermore, the proposed Project would introduce new employment opportunities for the residential communities of Westchester and Playa del Rey, as well as for the larger City of Los Angeles and County of Los Angeles areas. At the local level, the proposed Project is consistent with the LAX Plan and LAX Specific Plan, which support the redevelopment of land previously used for residential uses to uses that are consistent with LAX needs and community conditions. The proposed Project would provide employment opportunities for LAX employees and would redevelop the Project site with uses that are compatible with LAX. Although the operational impacts of the proposed Project will cause employment growth, the proposed Project would not create impacts that are inconsistent with applicable adopted plans for the year of the proposed Project buildout. Therefore, operational impacts related to consistency with growth policies would be less than significant.

Transfer/Equivalency Program

Floor area transfers or equivalency exchanges would not substantially change the populations of employees and students that were analyzed for the proposed Project. Additionally, transfers or equivalency exchanges may only occur between uses permitted within the proposed Project, and in no event would residential uses that could contribute to direct population or housing growth be allowed. Therefore, as populations would be unchanged as a result of floor area transfers or equivalency exchanges, floor area transfers or equivalency exchanges would not alter the conclusions with regard to population, housing, or employment. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated herein.

Cumulative Impacts

The geographic context for cumulative impacts analysis is the City of Los Angeles. The proposed Project would generate direct employment on the Project site. No direct population or housing would be generated as a result of the proposed Project and therefore no cumulative population or housing impacts would occur. The sum of direct employment generated by the proposed Project at buildout is 7,111 net new employees. SCAG employment projections are used as a proxy for “related projects” because the

employment impacts of individual developments that may actually occur between 2010 and 2022 cannot be reasonably foreseen over the period of Project buildout. As shown in Table 4.11-16 of the Draft EIR, the proposed Project's total employment represents 0.37 percent of the projected total employment in the City of Los Angeles. The proposed Project's total employment impact falls within the projected employment for the City of Los Angeles. It is also within the forecasted employment growth over the 2010-2022 period for the City of Los Angeles (88,552). The proposed Project's total employment accounts for eight percent of the 2010-2022 employment growth forecast in the Subregion and cumulative employment represents five percent of the 2022 employment in the Subregion.

Therefore, the proposed Projects incremental employment effect is not cumulatively considerable and cumulative impacts to population, housing, and employment are less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.11, Population, Housing, and Employment, of the Draft EIR, the BOAC hereby finds and determines that impacts related to population, housing, and employment are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.11, Population, Housing, and Employment, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

12. Public Services

Description of Effects:

Public services are analyzed in Section 4.12 of the Draft EIR.

Fire Protection

Construction

Existing uses on the Project site would remain in their existing locations and configurations. Construction of the proposed Project could result in accidents at construction sites and in a temporary increase in risk to vehicles, bicycles, and pedestrians, along with increased response times for fire protection personnel, as a result of traffic detours. However, LAWA is currently implementing existing LAX Master Plan Commitments that ensure that any construction-related impacts to fire services are avoided or mitigated to less than significant levels. These include: FP-1: LAFD Design Recommendations; PS-1: Fire and Police Facility Relocation Plan; and C-1: Establishment of a Ground Transportation/Construction Coordination Office.

In addition, the following LAX Master Plan Commitments would reduce traffic related detours or fire protection response times during construction: ST-9: Construction Deliveries; ST-12: Designated Truck Delivery Hours; ST-14: Construction Employee Shift Hours; ST-17: Maintenance of Haul Routes; ST-18: Construction Traffic Management Plan; ST-19: Closure Restrictions of Existing Roadways; ST-21: Construction Employee Parking Locations; and ST-22: Designated Truck Routes.

In the event construction activities were to result in deterioration of traffic conditions, use of emergency sirens, alternate response routes, and multiple station responses when

needed would help facilitate emergency access and response as occurs under current congested conditions. A new fire station or expansion, consolidation, or relocation of an existing facility would not be required to maintain service during construction. Therefore, construction impacts to fire services would be less than significant.

Operation

Fire Protection Infrastructure

LAFD operates four fire stations (Fire Station Nos. 5, 51, 80, and 95) located inside the LAX property boundary, each with unique station sizes, number of personnel, and available equipment.

The proposed Project would require the provision of fire flows per City of Los Angeles requirements for the type of development proposed. It is expected that the required fire flow would be 6,000 to 9,000 gallons per minute from four hydrants flowing simultaneously, based on the development types included in the proposed Project. The City of Los Angeles Fire Prevention and Protection Plan establishes maximum response distances for fire stations that are tied to fire flow requirements. The maximum response distance for a required flow of 6,000 to 9,000 gallons per minute is one mile for an engine company and 1.5 miles for a truck company. The nearest fire station to the Project site is Fire Station Number 5, which includes an Engine and Truck Company. Fire Station Number 5 is located within Area 12A East of the LAX Northside Center District. Therefore, operation of the proposed Project would not impact infrastructure such that it would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services.

Operation

Demand

The estimated increase in emergency incidents has been determined by prorating the existing ratio of incidents per capita in the service district of the “first-in” station to the employee population that would occur on the Project site. Fire Station Number 5 is located within the LAX Northside Center District and would be the “first-in” station to respond to an emergency. Fire Station Number 5 had 5,814 incidents in 2012. Based on City of Los Angeles estimates for the population served by Fire Station Number 5, the existing number of incidents per 1,000 population is approximately 49 incidents, or an incident generation rate of .0049 per capita. The proposed Project would add approximately 7,111 daytime employees. Applying the incident generation rate of .0049 to the proposed Project’s daytime employees would result in an increase of 35 incidents per year. This would be equivalent to about a 0.59 percent increase over the 5,814 existing emergency incidents within the primary response of LAFD Station Number 5. The proposed Project would increase the workload of LAFD Station Number 5 by less than one percent. Therefore, operation of the proposed Project would not impact demand such that it would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services.

Operation

Emergency Access

Emergency access to the Project site would be provided by the existing and proposed street systems. City of Los Angeles review of street widths, street lighting and street signage will include an evaluation of requirements for the provision of emergency access.

LAFD's average response time to calls located in and around the Project site may increase as a result of the response distance and traffic conditions at the intersections involved; however, the average response time for emergency calls for City of Los Angeles is 6 minutes and 47 seconds.

Generally, the Los Angeles Fire Department considers intersections operating at LOS E and F to be non-conductive to the flow of emergency vehicles. With implementation of the proposed Project and its traffic mitigation measures (year 2012), there will be additional intersections operating at LOS E or LOS F in the a.m. or p.m. peak hour in the Project site vicinity, however none of those intersections is located between the Project site and LAFD stations that serve the Project site. Such intersections could reduce response times, subject to the ability of the LAFD to select the most efficient routes and implement emergency travel procedures. While the proposed Project will add additional travel trips to the local roadway network, impacted intersections would not be located between the Project site and fire stations serving the Project site, and implementation of existing LAX Master Plan Commitments would ensure continued maintenance of adequate response times.

LAX Master Plan Commitments FP-1, LAFD Design Recommendations, and PS-2, Fire and Police Facility Space and Siting Requirements, as well as enforcement of Federal Aviation Regulations (FAR) and fire code requirements, would ensure maintenance of adequate response times, facilities, and emergency access associated with development of the Project site. 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, operation of the proposed Project 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.

The proposed Project 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. Therefore, impacts related to fire protection for the LAX Northside Center District would be less than significant.

Police Protection

Construction

Existing uses on the Project site would remain in their existing locations and configurations and no construction activities would occur in these areas. Construction of the proposed Project could result in accidents at construction sites and/or a temporary increase in risk to vehicles, bicycles and pedestrians, along with increased response times for law enforcement personnel, as a result of traffic detours. In addition, criminal activities around the construction sites could include theft of equipment and materials, or vandalism after work hours. However, potential impacts related to construction would be reduced or avoided with the implementation of the following LAX Master Plan Commitments: LE-1: Routing Evaluation of Manpower and Equipment Needs; LE-2: Plan Review; PS-1: Fire and Police Facility Relocation Plan; PS-2: Fire and Police Facility Space and Siting Requirements; and C-1: Establishment of a Ground Transportation/Construction Coordination Office.

In addition, the following LAX Master Plan Commitments would reduce traffic-related detours or law enforcement response times during construction: ST-9: Construction

Deliveries; ST-12: Designated Truck Delivery Hours; ST-14: Construction Employee Shift Hours; ST-17: Maintenance of Haul Routes; ST-18: Construction Traffic Management Plan; ST-19: Closure Restrictions of Existing Roadways; ST-21: Construction Employee Parking Locations; and ST-22: Designated Truck Routes.

In the event construction activities were to result in deterioration of traffic conditions, use of emergency sirens, alternate response routes, and multiple station responses when needed would help facilitate police access and response as occurs under current congested conditions. Therefore, construction impacts related to police services would be less than significant.

Operation

The proposed Project would not increase residential service population of the Pacific Community Police Station. The proposed Project would add approximately 7,111 daytime employees. The operations of the proposed daytime airport support, civic, commercial, recreational, office, educational, and community serving activities associated with the proposed Project would increase the need for patrol services at the Project site and the projected number of calls for police protection services of the LAPD. 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. The proposed Project would add 7,111 daytime employees. Applying the incident generation rate of .029 to the proposed Project's daytime employees would result in an increase of 206 incidents per year. This would be equivalent to about a three 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. The proposed Project would increase the workload of the Pacific Community Police Station by three percent. Therefore, operation of the proposed Project 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.

Also, with the incorporation of the following LAX Master Plan commitments, impacts related to police services would be less than significant: 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. This would be achieved through LAWAPD notification to LAWAPD and LAPD regarding pending development and construction through LAWAPD review of status reports on law enforcement services at LAX. 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, the proposed Project would not result in an increase in emergency response times beyond the limits required by applicable jurisdictions within the study area due to increased traffic congestion, changes in circulation, or the location

of new land uses. Therefore, impacts related to police services would be less than significant.

Public Schools*Construction*

Construction of the proposed Project could occur as close as 0.3 miles from the nearest public school, the Loyola Village Elementary School. However, proposed Project 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. It is not anticipated that construction activities would cause substantial increases in noise levels or impair access to local schools. Therefore, construction impacts related to public school services would be less than significant.

Operation

Based on an average student generation rate of 0.39, enrollment within the Project site vicinity associated with proposed Project employees would increase by 1,384 students. This number of students is within the excess capacity of public schools currently serving the Project site vicinity. Based on the estimated current overage of 3,779 seats, the public schools serving the Project site vicinity would still have an excess of 2,395 seats with implementation of the proposed Project.

As a result, the proposed Project would not require the construction of new facilities and/or modifications to the existing operational characteristics of the schools (e.g., major reorganization of students or classrooms, major revisions to the school calendar, etcetera). In addition, developers of commercial uses associated with the proposed Project are expected to comply with California Government Code 65995 and pay the school facility fees, as determined by LAUSD, prior to construction. Per Section 65996 of the California Government Code, compliance with Section 65995 is "...deemed to provide full and complete school facilities mitigation..." for the purposes of CEQA. Therefore, impacts related to public schools would be less than significant.

Libraries*Construction*

Construction of the proposed Project could occur as close as 0.5 miles from the Westchester-Loyola Village Branch Library. However, the proposed Project construction activities would comply with LAX Master Plan Commitments related to construction, including C-1, ST-18, ST-19, and ST-22, which would minimize impacts on adjacent uses. It is not anticipated that construction activities would cause substantial increases in noise levels or impair access to local libraries, including the Westchester-Loyola Village Branch Library. Therefore, construction impacts related to library services would be less than significant.

Operation

The proposed Project would result in a net increase of 7,111 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 7,111 employees to the existing 39,480 residents in the Westchester-Playa del Rey Community would yield a library service population of 46,591. This represents a conservative estimate, since not all employees are likely to use library services. However, even with this conservative estimate, the proposed Project's employees would not exceed the forecasted unused

capacity to this library. With the addition of the proposed employees, there would still be an unused library capacity of 28,858. As a result, the proposed Project would not substantially exceed the maximum population for the library facility or a planned and committed facility based on applicable library planning standards. Therefore, impacts related to library services would be less than significant.

Transfer/Equivalency Program

Fire Protection

The proposed Project would include flexibility to allow for transfers of floor area or equivalency exchanges. While transfers of floor area and equivalency exchanges would be permitted, the maximum proposed Project total of 2,320,000 square feet may not be exceeded. Floor area transfers or equivalency exchanges would not result in new impacts with regard to fire protection services. Floor area transfers or equivalency exchanges would not substantially change the populations of employees and students that were analyzed for the proposed Project. Additionally, transfers or equivalency exchanges may only occur between uses permitted within the proposed Project, and in no event would residential uses that could contribute to permanent population growth be allowed. Therefore, as populations would not be changed as a result of floor area transfers or equivalency exchanges, floor area transfers or equivalency exchanges would not alter the conclusions with regard to fire protection services. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Police Protection

Floor area transfers or equivalency exchanges would not result in new impacts with regard to police protection services. Floor area transfers or equivalency exchanges would not substantially change the populations of employees and students that were analyzed for the proposed Project. Additionally, transfers or equivalency exchanges may only occur between uses permitted within the proposed Project, and in no event would residential uses that could contribute to permanent population growth be allowed. Therefore, as populations would not be changed as a result of floor area transfers or equivalency exchanges, floor area transfers or equivalency exchanges would not alter the conclusions with regard to police protection services. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Public Schools

Floor area transfers or equivalency exchanges would not result in new impacts with regard to school services. Floor area transfers or equivalency exchanges would not substantially change the populations of employees and students that were analyzed for the proposed Project. Additionally, transfers or equivalency exchanges may only occur between uses permitted within the proposed Project, and in no event would residential uses that could contribute to direct population growth be allowed. Therefore, as populations would not be changed as a result of floor area transfers or equivalency exchanges, floor area transfers or equivalency exchanges would not alter the conclusions with regard to school services. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Libraries

Floor area transfers or equivalency exchanges would not result in new impacts with regard to library services. Floor area transfers or equivalency exchanges would not substantially change the populations of employees and students that were analyzed for the proposed Project. Additionally, transfers or equivalency exchanges may only occur between uses permitted within the proposed Project, and in no event would residential uses that could contribute to direct population growth be allowed. Therefore, as populations would not be changed as a result of floor area transfers or equivalency exchanges, floor area transfers or equivalency exchanges would not alter the conclusions with regard to library services. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

Fire Protection

The geographic context for the cumulative impact analysis for fire protection services is the service area of LAFD Station Number 5, the first-in station that serves the Project site. The buildout year for the proposed Project is 2022. Therefore, cumulative impacts on fire protection services were analyzed relative to 2022 cumulative growth projected in the service area of LAFD Station Number 5. The 2022 growth projections are based on the Southern California Association of Government's (SCAG's) 2008 Regional Transportation Plan. As shown in Table 4.12-4 of the Draft EIR, based on SCAG 2022 growth projections for the census tracts located within the service area of LAFD Station Number 5, it is anticipated that the residential service population of LAFD Station Number 5 would be approximately 42,208 in 2022. The proposed Project would generate 7,111 employees. Project site employees would be present during daytime hours primarily and would not represent a permanent increase to LAFD Station Number 5's service population. As a conservative approach, the proposed Project's daytime employees are used to evaluate potential cumulative impacts. The proposed Project would introduce an additional 7,111 employees into Fire Station Number 5's service area. This employee population together with that generated by other future growth would generate a demand for fire protection services and facilities. The proposed Project's introduction of daytime employee population to the station's service area would represent approximately 16.8 percent of the projected 2022 residential population of the fire station. Given the proposed Project's planned fire safety features and compliance with the Fire Code, as well as existing response times and distances the proposed Project's contribution to cumulative impacts on fire protection services would be less than significant.

Police Protection

The geographic context for the cumulative impact analysis for police services is the service area of the Pacific Community Police Station. The buildout year for the proposed Project is 2022. Therefore, cumulative impacts on police services were analyzed relative to 2022 cumulative growth projected in the service area of the Pacific Community Police Station. The 2022 growth projection for the service area is based on SCAG's 2008 Regional Transportation Plan. Based on SCAG projections, it is anticipated that the residential service population of the Pacific Community Police Station would be approximately 12,646 persons in 2022 (Table 4.12-6 of the Draft EIR). This residential population growth would generate an increased demand for police protection services and facilities. In addition, the proposed Project would generate an additional daytime

population increase of approximately 7,111 employees that would generate an increased demand for police protection services. Related projects would increase the demand for police protection services as provided by the Pacific Community Police Station. As indicated in Section 3, Environmental Setting, of the Draft EIR, the growth associated with these related projects have been accounted for in SCAG growth projections. Therefore, the population growth for these related projects have been accounted for in the above estimated 2022 service population of the Pacific Police Station. Furthermore, as with the proposed Project, the related projects and all other future development projects through 2022 would be subject to discretionary review by the LAPD and would be required to implement measures to ensure that no significant impacts to police protection would occur. In addition, given the proposed Project's planned security design features, the proposed Project's contribution to cumulative impacts on police services provided would be less than significant.

Public Schools

The geographic context for the cumulative impact analysis for LAUSD facilities and services are the attendance boundaries of the LAUSD schools serving the Project site. The buildout year for the proposed Project is 2022. The proposed Project does not include residential development, and therefore will have no direct impact on population growth and associated increases in the number of students.

An average student generation rate of 0.39 would cause enrollment within the Project site vicinity associated with proposed Project employees to increase by 1,384 students. This number of students is within the excess capacity of public schools currently serving the Project site vicinity. Based on the estimated current overage of 3,779 seats, the public schools serving the Project site vicinity would still have an excess of 2,395 seats with implementation of the proposed Project.

Cumulative growth through 2022 (including the related projects identified in Section 3, Environmental Setting of the Draft EIR) within the attendance boundaries of the LAUSD schools serving the Project site would generate K-12 students to the LAUSD. The LAUSD's adopted Strategic Execution Plan outlines the addition of 166,643 seats through new school construction (from active, completed, and finalized projects). As discussed, the schools serving the Project site vicinity currently have excess capacity and implementation of LAUSD's Strategic Execution Plan would add seats to accommodate future growth. Additionally, the related projects and other future development projects through 2022 would aid in funding construction for increased classroom capacity. Related projects are expected to comply with California Government Code 65995 and pay the school facility fees, as determined by LAUSD, prior to construction. Per Section 65996 of the California Government Code, compliance with Section 65995 is "...deemed to provide full and complete school facilities mitigation..." for the purposes of CEQA. Therefore, impacts related to public schools would be less than significant.

As a result, the proposed Project and related projects would not require the construction of new facilities and/or modifications to the existing operational characteristics of the schools (e.g., major reorganization of students or classrooms, major revisions to the school calendar, etc.). Therefore, cumulative impacts to public schools would be less than significant.

Libraries

The geographic context for the cumulative impact analysis for libraries is the service area of the Westchester-Loyola Village Branch Library, the community of Westchester. The buildout year for the proposed Project is 2022. Therefore, cumulative impacts on library services and facilities were analyzed relative to 2022 growth projected within the service area of the Westchester-Loyola Village Branch Library. Based on SCAG 2022 population projections for the community of Westchester-Playa del Rey, the 2022 service population of this library is anticipated to be 64,301 residents. This additional population would generate a demand for library services and facilities typically during daytime.

When including the Project's estimated 7,111 employees, a cumulative total of approximately 71,412 new potential users would be generated in the Westchester-Loyola Village Branch Library's service area in 2022. Project site employees would be anticipated to use library services typically during daytime working hours. The addition of 7,111 employees to the projected 64,301 residents in the Westchester-Playa del Rey Community would yield a library service population of 71,412. This represents a conservative estimate, since not all employees are likely to use library services. However, even with this conservative estimate, the proposed Project's employees would not exceed the forecasted unused capacity to this library. With the addition of the proposed Project's employees, there would still be an unused library capacity of 28,858. As such, the proposed Project, when considered with future projected growth would not substantially exceed the maximum population for the library facility or a planned and committed facility based on applicable library planning standards. Therefore, the proposed Project's contribution to cumulative impacts on library services would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.12, Public Services, of the Draft EIR, the BOAC hereby finds and determines that impacts related to public services are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.12, Public Services, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

13. Recreation

Description of Effects:

Recreation is analyzed in Section 4.13 of the Draft EIR.

Construction

Proposed Project construction is not expected to increase the population within the proposed Project area, or significantly increase the use of existing neighborhood and regional parks. An increase of employment during construction would temporarily increase demand for parks and recreational facilities due to daytime or lunchtime use. As these uses would be temporary it is doubtful that a meaningful number of these temporary employees would frequent off-site parks at lunchtime such that demand would place constraints on these facilities. Therefore, construction-related impacts to parks and recreational facilities due to increases in employment would be less than significant.

Operation

The proposed Project does not include a residential development component that would contribute to a net increase in population. However, increase in employment and visitors, compared to baseline conditions 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 7,111 individuals compared to baseline conditions, 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. As a result, impacts on parks and recreational facilities due to increases in demand would be less than significant.

Transfer/Equivalency Program

The proposed Project would include flexibility to allow for transfers of floor area or equivalency exchanges. While transfers of floor area or equivalency exchanges would be permitted, the maximum proposed Project total of 2,320,000 square feet may not be exceeded. Floor area transfers or equivalency exchanges would not result in new impacts with regard to parks and recreation. Floor area transfers or equivalency exchanges would not substantially change the populations of employees and students that were analyzed for the proposed Project. Additionally, transfers or equivalency exchanges may only occur between uses permitted within the proposed Project, and in no event would residential uses that could contribute to permanent population growth be allowed. Therefore, as populations would not be changed as a result of floor area transfers or equivalency exchanges, floor area transfers or equivalency exchanges would not alter the conclusions with regard to parks and recreation. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

The geographic context for the cumulative impact analysis for parks and recreation is the City of Los Angeles. The buildout year for the proposed Project is 2022. Therefore, cumulative impacts on parks and recreation were analyzed relative to 2022 growth projected within the City of Los Angeles. The 2022 growth projections are based on the Southern California Association of Governments' (SCAG) 2008 Regional Transportation Plan. As shown in Table 4.13-10 of the Draft EIR, per SCAG estimates, the City of Los Angeles is estimated to have a 2022 residential population of 4,241,020. As indicated in Section 4.11, Population, Housing, and Employment, of the Draft EIR, the 2010 population of the City of Los Angeles was approximately 3,792,625 residents according to the United States Census. Thus, between 2010 and 2022, the City of Los Angeles will experience a growth of approximately 448,395 residents.

As shown in Table 4.13-10 of the Draft EIR, the zero residents estimated to be associated with the proposed Project, in addition to the City of Los Angeles' estimated 2010-2022 growth of 448,395 residents would result in a cumulative population increase of approximately 448,395 residents. Applying the PRP standards for the City of Los Angeles (one acre per 1,000 residents for short-range; and two acres per 1,000 residents for long range), the estimated citywide park space requirement for this cumulative growth would be as follows: 448 acres to meet short-range standards and 897 acres to meet long-range standards. While future development projects would

cumulatively generate the need for additional parks and recreation facilities, the proposed Project does not contribute population growth that could contribute to cumulatively significant impacts. Additionally, future development projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC. In particular, pursuant to LAMC Section 12.33, any rezoning of properties for multiple residential uses would be subject to the requirements of Section 17.12. In addition, the proposed Project includes new potential open space and recreational facilities which would be publicly accessible. The proposed Project could increase the future supply of neighborhood parks and community parks while not increasing the population or demand for such parks. Therefore, potential cumulative impacts on parks and recreation would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.13, Recreation, of the Draft EIR, the BOAC hereby finds and determines that impacts related to recreation are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.13, Recreation, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

14. Traffic

Description of Effects:

Traffic is analyzed in Section 4.14 of the Draft EIR.

Construction

Four types of temporary construction impacts were evaluated according to the Los Angeles CEQA Thresholds Guide: traffic impacts, loss of access, loss of bus stops or rerouting of bus lines, and on-street parking. The proposed Project construction is anticipated to occur in phases between 2015 and 2022.

The proposed Project will be developed from 2015 through 2022. Based on the conceptual grading plan, earth materials will be exported from most of the proposed Project Areas, but some will require the import of earth materials. Grading schedules for the proposed Project Areas requiring export and those requiring import will coincide, when feasible, in order to minimize haul trips to off-site disposal areas. As part of the LAX Master Plan, LAWA committed to several specific measures related to truck routes for LAX construction traffic. For dirt and aggregate and all other materials and equipment, truck deliveries will be on designated routes only (freeways and non-residential streets). Any transportation of equipment and materials on state facilities would be subject to applicable provisions of the State of California Vehicle and Street and Highway Codes, which require the issuance of permits for all loads that exceed Caltrans weight, length, or width standards for public roadways.

There are three primary routes for haul trucks to travel between the Project site and off-site locations that could accept exported earth materials from the site:

1. Pershing Drive to Imperial Highway to I-105;
2. Sepulveda Boulevard to I-105; and
3. La Tijera Boulevard to I-405.

Haul truck trips and worker trips were estimated throughout the proposed Project development period to assess potential impacts based on the preliminary project construction schedule. At peak activity, there would be a maximum of 238 daily haul truck trips and 527 construction workers. After converting the truck trips into passenger-car equivalent (PCE) trips and accounting for the average vehicle occupancy (AVO) of workers in vehicles, construction activity would result in a maximum of 145 morning peak hour trips and 271 afternoon peak hour trips. This is a conservative estimate because the maximum number of daily truck trips and the maximum daily worker level would not occur during the same phases of construction. Depending on what route is chosen for haul trucks, construction traffic could result in one temporary traffic impact at the intersection of Sepulveda Boulevard and Lincoln Boulevard.

The impact of construction traffic (including haul trucks) would be a lessening of the capacities of access streets and haul routes due to slower movements and larger turning radii of trucks. Construction on Area 12B and Area 13 could require temporary sidewalk closures and lane closures on Manchester Avenue and Lincoln Boulevard, affecting pedestrians and transit operations. Construction on Area 1 could cause temporary loss of on-street parking on Falmouth Avenue.

Construction impacts would be minimized through the development of detailed construction traffic management plans as necessary and satisfactory to the City of Los Angeles. These plans may include street closure information, detour plans, haul routes, and construction staging details in order to ensure safe vehicle travel in general, and emergency vehicle access. The proposed Project would include the use of standard engineering practices to avoid design elements that would increase street hazards or inadequate emergency access. Moreover, the proposed Project would not result in land use incompatibilities that would lead to the creation of traffic hazards, or emergency access.

During construction, an adequate number of parking spaces for construction workers would be available at all times on the Project site. 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

Existing with Project (2012 Conditions)

The impact of the proposed Project on existing traffic conditions was evaluated by adding the traffic that would be generated by the proposed Project to the intersection configurations that exist in 2012. The Existing 2012 with Project Conditions was compared to the Existing 2012 Conditions to determine the impact of the proposed Project at each study intersection based on the applicable significance criteria for each jurisdiction in the Study Area. In each jurisdiction, a sliding scale has been developed in which the minimum allowable increase in the V/C ratio attributable to a project decreases as the LOS worsens.

As shown in Table 4.14-9 of the Draft EIR, Existing With Project Conditions (Year 2012) Significant Impact Analysis 94 of the 108 intersections evaluated would operate at LOS D or better during both the morning and afternoon peak hours under Existing with Project Conditions. Traffic impacts would be less than significant at the following intersections: 1, 2, 3, 4, 6 (AM only), 7, 8 (AM only), 9, 10, 11, 12 (AM only), 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, (AM only), 29 (AM only), 30 (AM only), 31, 32, 34 (AM only), 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46 (AM only), 47 (AM only), 48 (AM only), 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, and 108. Ninety-seven study intersections would not be significantly impacted during either peak hour.

Future with Project (2022 Conditions)

The Future 2022 with Project conditions were compared to the Future 2022 without Project conditions to determine the impact of the proposed Project at each study intersection based on the applicable significance criteria for each jurisdiction in the Study Area.

The Future without Project conditions analysis projects the intersection operating conditions as a result of regional growth and related project traffic in the vicinity of the Project site based on the traffic volumes, streets, and intersection configurations projected to exist in 2022. The growth rate used was determined by averaging the overall growth within the SCAG model for the Study Area between the SCAG baseline year (2003) and the SCAG future year (2035). This overall growth was evaluated to ensure that the relevant trip generation information contained in the LAX Master Plan Final EIR/EIS was included in the SCAG model and then converted into an annual percentage and applied accordingly to the existing traffic counts (2010).

As shown in Table 4.14-11 of the Draft EIR, Future with Project Conditions (Year 2022) Intersection Peak Hours Levels of Service, 84 of the 108 signalized intersections are projected to operate at LOS D or better during the morning and afternoon peak hours in 2022 without the proposed Project traffic. Traffic impacts would be less than significant at the following intersections: 1 (AM only), 2, 3, 4, 5, 6 (AM only), 7 (AM only), 8 (AM only), 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28 (AM only), 29 (AM only), 30 (AM only), 31, 32, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 48 (AM only), 49 (AM only), 50, 51, 52, 53, 54, 55, 56, 57 (AM only), 58 (AM only), 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, and 108. Ninety study intersections would not be significantly impacted during either peak hour.

Neighborhood Intrusion

The neighborhood intrusion impact analysis was conducted for the Future with Project (2022) conditions. City of Los Angeles Department of Transportation (LADOT) policy and the Los Angeles CEQA Thresholds Guide outline a procedure for assessing the potential for traffic from a project to intrude into residential neighborhoods by traveling through a neighborhood to avoid congestion on arterial streets. Under this procedure, analysis is required if the following three criteria are met:

- There must be 1,200 or more daily trips added by a project to an arterial corridor.

- There must be congestion on the arterial corridor (determined by intersections operating at LOS E or F)
- There must be parallel local residential streets providing a cut-through route.

These criteria are used to identify neighborhoods that could potentially be impacted.

Arterial Corridors Meeting Project Trip Threshold

Based on LADOT policy, any arterial corridor projected to increase by 1,200 or more daily trips from project traffic would meet the condition for assessing neighborhood intrusion impacts. This would represent 5.10 percent of the total daily traffic projected to be generated by the proposed Project. The six arterial corridors in the study area that would have 1,200 or more trips added by the proposed Project would include:

- Lincoln Boulevard between Mindanao Way & Sepulveda Boulevard;
- Sepulveda Boulevard between Howard Hughes Parkway & El Segundo Boulevard;
- La Tijera Boulevard between Westchester Parkway & La Cienega Boulevard;
- Manchester Avenue between Falmouth Avenue and I-405;
- Westchester Parkway between Pershing Drive and Inglewood Avenue; and
- Pershing Drive between Westchester Parkway and Imperial Highway.

Intersections Operating at LOS E or F along Affected Corridors

Several intersections along these corridors are projected to operate at LOS E or LOS F under Future with Project conditions. These intersections include:

30. Sepulveda Boulevard & Westchester Parkway;
33. Sepulveda Boulevard & I-105 westbound ramps north of Imperial Highway;
34. Sepulveda Boulevard & Imperial Highway;
36. Sepulveda Boulevard & Grand Avenue;
37. Sepulveda Boulevard & El Segundo Boulevard;
46. Airport Boulevard & Manchester Avenue; and
49. La Cienega Boulevard & Manchester Avenue.

Based on the locations of these intersections and LADOT policy, the potential for neighborhood intrusion impacts would be present along Sepulveda Boulevard and Manchester Avenue. As no intersections operating at LOS E or LOS F are projected on the remaining four corridors, the potential for neighborhood intrusion impacts along these corridors is not significant.

Availability of Parallel Local Streets

Finally, LADOT policy requires the identification of viable cut-through routes on local residential streets in order for a neighborhood intrusion impact to be identified. In accordance with this policy, the Sepulveda Boulevard and Manchester Avenue corridors were examined to identify the availability of parallel local streets that could be used as a cut-through route to avoid arterial congestion. Neither Sepulveda Boulevard nor Manchester Avenue has parallel local streets that would serve this purpose. Therefore, based on LADOT's standard criteria, no potential neighborhood intrusion impacts are identified.

CMP Network

The Congestion Management Program (CMP) requires that a Traffic Impact Analysis (TIA) be performed for all arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hour and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours. In addition, a review of the potential impact on transit capacity is required. Potential impacts on intersections and freeway segments in the CMP network and potential impact on transit service are each addressed below.

The CMP identifies 10 arterial monitoring intersections, which are also study intersections, and the proposed Project is expected to add more than 50 peak hour trips to these intersections. According to CMP criteria, a CMP arterial monitoring intersection must operate at LOS F before a significant impact can be identified.

The following CMP monitoring locations are projected to operate at LOS F during one or both peak hours under the Existing with Project conditions:

- 38. Sepulveda Boulevard & Rosecrans Avenue (afternoon peak hour); and
- 88. La Cienega Boulevard & Stocker Street (morning and afternoon peak hours).

Under CMP criteria, a significant impact would occur if the proposed Project would increase the volume to capacity (V/C) ratio by 0.020 or more at a monitoring location operating at LOS F. As shown in Table 4.14-10 of the Draft EIR, the addition of the proposed Project traffic does not increase the intersection V/C by 0.020 at these intersections during either peak hour. Therefore, the impact of the proposed Project is not significant under CMP criteria.

The proposed Project is projected to add 150 or more peak hour trips in either direction to the following freeway mainline monitoring locations:

- I-105 East of Sepulveda Boulevard; and
- I-405 North of Venice Boulevard.

Under Existing with Project Conditions, the freeway segment at the I-105 east of Sepulveda Boulevard is projected to operate at LOS B during both the morning and afternoon peak hours in the eastbound direction; LOS C during the morning peak hour; and LOS B during the afternoon peak hour in the westbound direction. The freeway segment does not operate at LOS F in either direction during either peak hour under Existing with Project Conditions. Under Future with Project Conditions the freeway segment at the I-105 east of Sepulveda Boulevard is projected to operate at LOS B during the morning peak hour; LOS C during the afternoon peak hour in the eastbound direction; LOS D during the morning peak hour; and LOS C during the afternoon peak hour in the westbound direction. The freeway segment does not operate at LOS F in either direction during either peak hour under Future with Project Conditions.

Under Existing with Project Conditions, the freeway segment at the I-405 north of Venice Boulevard is projected to operate at LOS D during the morning peak hour; LOS C during the afternoon peak hour in the northbound directions; LOS C during both the morning and afternoon peak hours in the southbound direction. The freeway segment does not operate at LOS F in either direction during either peak hour under Existing with Project Conditions. Under Future with Project Conditions the freeway segment at I-405 north of Venice Boulevard is projected to operate at LOS E during the morning peak hour; LOS D during the afternoon peak hour in the northbound direction; LOS C during the morning

peak hour; LOS D during the afternoon peak hour in the southbound direction. The freeway segment does not operate at LOS F in either direction during either peak hour under Future with Project conditions.

State Facilities

Of the 108 study intersections, a total of 34 are located on State of California highways or at freeway intersections and ramps. In addition, the Study Area contains freeways. The potential impact of the proposed Project on these state facilities was conducted in accordance with the methodologies in the Caltrans TIS Guidelines. Existing traffic volumes on freeway segments were obtained from Caltrans' Performance Measurement System (PeMS) database for 2012. Intersection volumes were the same as those used in the analysis of study intersections for local jurisdictions. Interchange ramp volumes were either computed from the intersection peak hour traffic counts or obtained from Caltrans. Traffic growth in the Study Area between 2012 and 2022, when full development of the proposed Project is expected, is based on the LAX Model.

The proposed Project traffic was added to the Existing (Year 2012), Future without Project (2022), and Future without Project (Year 2035) A.M. and P.M. peak hour traffic volumes on the following 25 freeway segments to consider the impact of the proposed Project in accordance with the Caltrans TIS Guidelines:

1. I-405 - South of I-10;
2. I-405 - South of Venice Boulevard;
3. I-405 - South of Culver Boulevard;
4. I-405 - South of Braddock Drive;
5. I-405 - South of SR-90;
6. I-405 - South of Centinela Avenue;
7. I-405 - South of Howard Hughes Parkway;
8. I-405 - South of La Tijera Boulevard;
9. I-405 - South of La Cienega Boulevard;
10. I-405 - South of Manchester Avenue;
11. I-405 - South of Century Boulevard;
12. I-405 - South of Imperial Highway;
13. I-405 - South of I-105;
14. I-405 - South of El Segundo Boulevard;
15. I-405 - South of Rosecrans Avenue;
16. I-105 - West of Hughes Way;
17. I-105 - West of Douglas Avenue;
18. I-105 - West of Imperial Highway;
19. I-105 - West of I-405;
20. I-105 - West of Hawthorne Avenue;
21. I-105 - West of Prairie Avenue;

22. SR-90 - West of Mindanao Way;
23. SR-90 - West of Culver Boulevard;
24. SR-90 - West of Centinela Avenue; and
25. SR-90 - West of I-405.

The proposed Project would not result in a significant impact on the existing or projected operating conditions on these freeway segments as the proposed Project traffic would not increase the freeway segment V/C ratio by 0.020 on any freeway segment currently operating at LOS F in 2012 or projected to operate at LOS F in 2022 or 2035.

All study intersections falling under Caltrans jurisdiction were analyzed for significant traffic impacts using the 2000 Highway Capacity Manual (Transportation Research Board, 2000) methodology specified by Caltrans and the CMP impact criteria. The following 34 intersections that fall under Caltrans jurisdiction were analyzed:

1. Lincoln Boulevard & Venice Boulevard;
2. Lincoln Boulevard & Washington Boulevard;
3. Lincoln Boulevard & Maxella Avenue;
4. Lincoln Boulevard & SR-90 ramps;
5. Lincoln Boulevard & Bali Way;
6. Lincoln Boulevard & Mindanao Way;
7. Lincoln Boulevard & Fiji Way;
8. Lincoln Boulevard & Jefferson Boulevard;
9. Lincoln Boulevard & Bluff Creek Drive;
10. Lincoln Boulevard & LMU Drive;
11. Lincoln Boulevard & 83rd Street;
12. Lincoln Boulevard & Manchester Avenue;
13. Lincoln Boulevard & La Tijera Boulevard;
31. Sepulveda Boulevard & Lincoln Boulevard;
32. Sepulveda Boulevard & Century Boulevard;
33. Sepulveda Boulevard & I-105 westbound ramps north of Imperial Highway;
34. Sepulveda Boulevard & Imperial Highway;
35. Sepulveda Boulevard & Mariposa Avenue;
36. Sepulveda Boulevard & Grand Avenue;
37. Sepulveda Boulevard & El Segundo Boulevard;
38. Sepulveda Boulevard & Rosecrans Avenue;
41. Southbound I-405 ramps & La Tijera Boulevard;
42. Northbound I-405 ramps & La Tijera Boulevard;
64. Northbound I-405 ramps & Century Boulevard;

- 74. Centinela Avenue & Sanford Street/SR-90 westbound on/off ramps;
- 75. Centinela Avenue & SR-90 eastbound on/off ramps;
- 81. I-405 Southbound ramps & Jefferson Boulevard;
- 82. I-405 Northbound ramps & Jefferson Boulevard;
- 93. Lincoln Boulevard & Loyola Boulevard;
- 103. Lincoln Boulevard & Rose Avenue;
- 104. Culver Boulevard & SR-90 westbound ramps;
- 105. Culver Boulevard & SR-90 eastbound ramps;
- 106. I-405 Southbound ramps & Howard Hughes Parkway; and
- 107. Center Drive & I-405 Northbound ramps/Howard Hughes Parkway.

The proposed Project would not result in a significant impact on the existing or projected operating conditions on these intersections as the addition of the proposed Project traffic would not increase the V/C ratio by 0.020 at any intersection currently operating at LOS F in 2012 or projected to operate at LOS F in 2022 or 2035.

Of these intersections, 14 are freeway ramp intersections under Caltrans jurisdiction. Based on Caltrans' policy, this analysis of potential impacts to these 14 intersections was also conducted for 2012 and 2022.

Based on on-ramp metering, Caltrans has established a default capacity of 900 vehicles per hour per lane (vphpl) for on-ramps. An on-ramp is considered to be "over-saturated" or failing if the existing or future peak hour traffic on the ramp exceeds 900 vphpl. This capacity was used to determine the significance of impacts on all on-ramps analyzed with the exception of the I-105 eastbound on-ramp from southbound Sepulveda Boulevard, which has a much higher capacity than a typical on-ramp. A typical freeway on-ramp funnels traffic onto the right side of an established freeway, either into an auxiliary lane from which that traffic merges left or directly into a merge situation. Such a ramp is often controlled by a signalized meter. This on-ramp is located at the western terminus of I-105, and no merge is required. It provides two full lanes of capacity, is not metered either by a signalized intersection or by ramp controls, and forms the two left lanes (of three, total) of I-105. Because of all of these factors, the default capacity of 900 vphpl used by Caltrans for typical freeway on-ramps is not directly applicable to this ramp. Instead, a capacity of 1,500 vphpl was applied at this on-ramp based on standards used in Caltrans District 12 for ramps with similar operational characteristics. The remaining on-ramps were analyzed using the standard Caltrans District 7 capacity of 900 vphpl.

The analysis completed for 2012 and 2022 determined each of the analyzed on-ramps operates below capacity under existing conditions and future conditions, before and after the addition of the proposed Project traffic. Therefore, the impact of the proposed Project on on-ramps is not significant.

For off-ramps, Caltrans considers an impact to be significant if the peak hour traffic queue length (85th percentile as determined by 2000 Highway Capacity Manual analysis methodology) on the ramp exceeds the available storage length. A Level 1 impact, which does not require mitigation, is identified if the queue length exceeds the storage length of any individual approach lane (e.g., left turn lane on the ramp). A Level 2 impact is

identified if the projected queue would result in stopped vehicles backing up onto the freeway mainline.

The analysis completed for 2012 and 2022 determined that none of the queue lengths at the off-ramps will exceed the available storage space under any of the analyzed conditions. Therefore, the proposed Project would not result in a significant impact to any off-ramp.

Public Transit

An analysis of the existing and future transit system was conducted based on the residual capacity and projected transit usage growth through 2022, when full development of the proposed Project is anticipated. The transit system in the Study Area is currently estimated to have a residual capacity of approximately 2,347 transit patrons during the morning peak hour and 2,416 transit patrons during the afternoon peak hour. The transit system is projected in 2022 to have residual capacity of 22,051 transit patrons during the morning peak hour and 2,111 transit patrons in the afternoon peak hour.

The proposed Project is estimated to add a total of 2,482 daily transit trips, including 211 morning peak hour trips and 267 afternoon peak hour trips, at full development. This estimate is less than the existing and projected future residual transit capacity, therefore, the proposed Project will not result in a significant impact on the regional transit system.

Access

The proposed Project identifies the following access locations for each Area:

- Area 1 would be accessed via driveways from Falmouth Avenue.
- Area 2 West would be accessed via one or more driveways from Westchester Parkway.
- Area 2 East would be accessed via driveways from Westchester Parkway and/or Loyola Boulevard.
- Area 3 would be accessed via driveways from Westchester Parkway and/or Loyola Boulevard.
- Area 4 would be accessed via driveways from Westchester Parkway at its intersection with Falmouth Avenue and/or from within the airfield (with airfield access taken from World Way West).
- Area 5 through Area 10 would be accessed via driveways from Westchester Parkway and/or from within the airfield (with airfield access taken from World Way West).
- Area 11 would be accessed via driveways on Westchester Parkway and/or La Tijera Boulevard and/or Sepulveda Westway.
- Area 12A West would be accessed via one or more driveways on Westchester Parkway.
- Area 12A East would be accessed via driveways on Westchester Parkway and/or La Tijera Boulevard.
- Area 12B would continue to be accessed via driveways on Manchester Avenue.
- Area 13 would continue to be accessed via driveways on Lincoln Boulevard.

In most cases, driveways would be side-street stop controlled. Two of the proposed driveways along Westchester Parkway, the primary entrances to Area 2 West and Area 2 East, would warrant installation of new signal controls.

An analysis of the projected operating conditions at these locations once the proposed Project is operational indicates that both would operate at LOS A during both the morning and afternoon peak hours. As each driveway will be sized to accommodate the appropriate level of traffic it is projected to serve, the proposed Project will have adequate access capacity.

According to the Los Angeles CEQA Thresholds Guide, a project would have a significant operational access impact if the study intersection(s) nearest the primary site access is/are projected to operate at LOS E or LOS F during the morning or afternoon peak hour, under existing plus proposed Project conditions or future plus proposed Project conditions. The Project site would have many access points and a number of nearby study intersections. The following study intersections were reviewed for LOS E or LOS F during the peak hours based on the Future with Project (2022) intersection operating conditions:

- 13. Lincoln Boulevard & La Tijera Boulevard (LOS A morning and afternoon);
- 17. Pershing Drive & Westchester Parkway (LOS A morning and afternoon);
- 92. Falmouth Avenue & Westchester Parkway (LOS A morning and afternoon);
- 94. Loyola Boulevard & Westchester Parkway (LOS A morning and afternoon);
- 95. McConnell Avenue & Westchester Parkway (LOS A morning and afternoon);
- 97. La Tijera Boulevard & Westchester Parkway (LOS A morning and afternoon);
- 98. Sepulveda Westway & La Tijera Boulevard (LOS A morning and afternoon); and
- 99. Sepulveda Boulevard & Westchester Parkway (LOS A morning and afternoon).

Because none of these nearby study intersections are expected to operate at LOS E or LOS F during either peak hour, no significant operational access impacts would occur.

The proposed Project's access driveways would be required to conform to City of Los Angeles standards and would be designed to provide adequate sight distance, crosswalks, and pedestrian movement controls as applicable that meet the City of Los Angeles' requirements to protect pedestrian safety. There are no sharp turns, steep grades, or other factors that could complicate driveway design. Therefore, the proposed Project would not increase hazards due to a design feature and impacts would be less than significant.

Emergency Access

The proposed Project would use the existing network of regional and local streets in the vicinity of the Project site. All development associated with the proposed Project would include the use of standard engineering practices to avoid design elements that would increase street hazards or inadequate emergency access. Moreover, the proposed Project would not result in land use incompatibilities that would lead to the creation of traffic hazards or emergency access.

The proposed Project has a high level of accessibility for emergency vehicles, both from a regional and a site perspective. The City of Los Angeles Fire Department Fire Station Number 5 is located within the Project site on Emerson Avenue. Emergency vehicles, such as police cars and ambulances, would be able to access all components of the proposed Project as necessary. As a result, proposed Project impacts on emergency vehicle access would be less than significant.

Pedestrian/Bicycle Facilities

There are currently dedicated bicycle lanes on Westchester Parkway and Pershing Drive adjacent to the Project site. Bicycle routes are proposed by the 2010 Bicycle Plan on Loyola Boulevard and Emerson Avenue adjacent to the Project site. All proposed streets have access to pedestrian sidewalks and street lighting. Currently, pedestrian and bicycle volumes on these streets are low but expected to increase with development of the proposed Project.

All proposed Project access driveways would be required to conform to City of Los Angeles standards to protect pedestrian safety. There are no sharp turns, steep grades, or other factors that could complicate driveway design.

The project will also comply with the City's bicycle parking ordinance and have sufficient parking supply for bicycles. In addition, the paseo included in the project is also designed to facilitate pedestrian activity and improve safety for pedestrians, bicyclists and motorists.

As a result of the design considerations and considering existing and proposed bicycle facilities, according to the Los Angeles CEQA Thresholds Guide, no access impacts related to safety will result due to the design or placement of the proposed Project access points. Therefore, the proposed Project would not conflict with adopted policies, plans or programs supporting alternative transportation and would result in less than significant impacts to bicycle, pedestrian, emergency access, and vehicular safety.

Parking

Parking requirements for the proposed Project were evaluated based on the conceptual land use program and LAMC parking standards. The LAMC does not contain parking requirements for some of the recreational components of the conceptual land use program. Based on the LAMC requirements and Parking Generation, 4th Edition, rates, the conceptual land use program would require up to 4,185 parking spaces. As individual development projects are proposed within the proposed Project the designs of these projects, including the amount of parking to be provided, will be reviewed by City of Los Angeles staff and subject to the applicable parking requirements at the time of development.

The commercial land uses anticipated for the proposed Project would provide the level of parking required by the LAMC. The Project will also comply with the City's bicycle parking ordinance and have sufficient parking supply for bicycles. The anticipated recreational uses would experience their peak demand at different times than the neighboring office and Research and Development uses. Therefore, the recreational land uses could make use of the office and Research and Development parking spaces that would otherwise be unused during the evenings and weekends. Because the amount of parking for the commercial land uses will meet or exceed the LAMC requirements, and the recreational land uses will be using the ample parking of the office and Research and Development uses, the proposed Project will not have any significant parking impacts.

Transfer/Equivalency Program

The transfer/equivalency program would allow for floor area reallocations between land uses and Areas within Districts, utilizing conversion factors that are based on the trip generation characteristics for the permitted uses. Specifically, transfers of floor area or equivalency exchanges are allowed within the LAX Northside Campus District (between Area 1 and Area 3), within the LAX Northside Center District (between Area 11 and Area 13), and within the Airport Support District (between Area 4 through Area 10). Transfers

or equivalency exchanges between the LAX Northside Districts would not be allowed. In no event would the total amount of development be permitted to exceed 2,320,000 square feet or the maximum numbers of trips generated exceed the 23,635 total daily vehicle trip maximum allowed by the LAX Specific Plan.

As this program would not allow transfers or equivalency exchanges between the LAX Northside, Campus, and Center Districts, and would control all transfers and equivalency exchanges based on trip generation, the total number of trips generated and the distribution of traffic would not differ substantially from the traffic impact analysis. Therefore, no additional significant traffic impacts would result for the proposed transfer/equivalency program.

Findings: Based on substantial evidence in the administrative record, including Section 4.14, Traffic, of the Draft EIR, the BOAC hereby finds and determines that impacts related to construction traffic; existing with project traffic conditions (at intersections 1, 2, 3, 4, 6 (AM only), 7, 8 (AM only), 9, 10, 11, 12 (AM only), 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, (AM only), 29 (AM only), 30 (AM only), 31, 32, 34 (AM only), 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46 (AM only), 47 (AM only), 48 (AM only), 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, and 108); future with project traffic conditions (1 (AM only), 2, 3, 4, 5, 6 (AM only), 7 (AM only), 8 (AM only), 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28 (AM only), 29 (AM only), 30 (AM only), 31, 32, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 48 (AM only), 49 (AM only), 50, 51, 52, 53, 54, 55, 56, 57 (AM only), 58 (AM only), 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, and 108); neighborhood intrusion; CMP network; state facilities; public transit; access; emergency access; pedestrian/bicycle facilities; and parking are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.14, Traffic, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

15. Utilities/Services

Description of Effects:

Utilities/services are analyzed in Section 4.15 of the Draft EIR.

Wastewater

Construction

During construction of the proposed Project, a negligible amount of wastewater would be generated by construction staff. It is anticipated that portable toilets would be provided by a private company and the waste disposed of off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to 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. Therefore, construction impacts related to wastewater would be less than significant.

Operation

Generation

The HTP has a design capacity of 450 mgd, and currently has an excess wastewater capacity of approximately 151 mgd. The NCOS has an effective capacity of 381 mgd and an excess wastewater capacity of approximately 252 mgd. The NORS has an effective capacity of 259 mgd and an excess wastewater capacity of approximately 39 mgd. These projected wastewater flows would be conveyed to the existing facilities operated by the LADPW and Los Angeles Bureau of Sanitation, which would serve the proposed Project's 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. With respect to the operation of uses proposed for the Project site, an estimated total of 269,580 gpd would be generated for all Areas within each District, as presented in Table 4.15-11 of the Draft EIR. Therefore, operational impacts related to wastewater would be less than significant.

Conveyance

The on-site and other local sewers would convey wastewater to the NCOS and NORS, which are projected to have substantial surplus capacity at proposed Project buildout. The estimated 269,580 gpd wastewater generation for the proposed Project, therefore, would use approximately 0.09 percent of the total available flow capacity (291 mgd) within the NCOS and NORS. As such, the projected flows would not cause the NCOS and NORS to become constrained.

The proposed Project would require new local wastewater collection infrastructure that would convey wastewater to the NCOS and NORS, but the construction of this new infrastructure would be incorporated into the proposed Project as part of LAX Master Plan Commitment PU-1. Furthermore, the proposed Project would allow the construction of subsurface parking, which would be approximately 20 feet deep and would potentially interfere with existing wastewater collection infrastructure. Based on preliminary engineering analysis, it appears that the NCOS and NORS could be affected by the construction of the proposed Project and may require relocation or modification. However, the proposed Project would be designed to provide the requisite wastewater infrastructure and to avoid any sewer conflicts that would require relocation or modification of sewer lines to the maximum extent possible. Under LAX Master Plan Commitment PU-1, Develop a Utility Relocation Program, a utility relocation program would be implemented during construction. The proposed Project is not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained, or that would cause a sewer's capacity to become constrained. Therefore, operational impacts related to wastewater conveyance would be less than significant.

Treatment

The Hyperion Treatment Plant (HTP) has a design capacity of 450 mgd, and currently has an excess wastewater capacity of approximately 151 mgd. The 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

269,580 gpd wastewater generation of the proposed Project would use only about 1.7 percent of the projected available flow capacity (15 mgd) of the HTP in 2020. If Alternative 1 of the IRP is implemented and the HTP design capacity is increased to 500 mgd, the proposed Project would use only about 0.4 percent of the projected available flow capacity (65 mgd) of the HTP in 2020. The proposed Project 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. Therefore, operational impacts related to wastewater treatment would be less than significant.

Water

Construction

During construction, water would be used for dust suppression, the mixing and pouring of concrete, and other construction-related activities. In addition, the proposed Project would require water for temporary irrigation during plant establishment. This temporary irrigation system would be designed to avoid over-irrigation. It is not possible to quantify the water usage attributable to development construction and plant establishment activities with any level of certainty. Water usage for such purposes would, however, be temporary in nature and would not exceed that of the completed development.

Reclaimed water may be used for dust suppression, temporary irrigation, and various construction-related activities, reducing the use of potable water. It is unlikely that such water use would exceed the available supply, given the current and planned utilization of recycled "product" water serving the proposed Project site and vicinity (i.e., recycled water customers currently consume only about 60 percent of the water treated at WBWRP, and planned expansions will meet, if not exceed projected demands). Therefore, construction impacts related to water use would be less than significant.

Operation

Usage

In 2010, the City of Los Angeles used 545,771 acre-feet of water. In 2020, water demand is projected to reach 622,732 AFY. In 2030, water demand is projected to reach 643,785 AFY. The Urban Water Management Plan (UWMP) does not provide a projected demand specific to 2022, which is the proposed Project buildout year, but an approximation using the 2020 and 2030 estimates indicate that the demand in 2022 would be 626,944 AFY. This would represent an 81,589 acre-feet per year, or 72.8 mgd, increase in water demand from 2010 to 2022. With respect to the operation of uses proposed for the Project site, an estimated total of 552,922 gpd of water would be consumed, as presented in Table 4.15-12 of the Draft EIR.

Supply

The water consumption associated with the proposed Project at the buildout year, which is 552,922 gpd, would represent approximately 0.75 percent of the projected increase in LADWP's water demand from 2010 to 2022, which is 72.8 mgd.

The planning for future water supplies to meet regional needs is based primarily on SCAG regional growth projections. The proposed Project is within the SCAG regional growth projections (see Section 4.11, Population/Housing, of the Draft EIR, for a discussion of applicable plans, projected growth, and the proposed Project's conformance with those projections). The water demand associated with development of

the proposed Project has been accounted for in existing water supply planning programs at the local and regional level. Specifically, 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. The proposed Project and the corresponding water demand does not exceed the prior approved WSA's water consumption and is already accounted for in LADWP's water supply plans for the Project site. The water consumption for the proposed Project would not exceed the available supply. Additionally, a Water Supply Assessment was conducted by LADWP's Water Executive for the proposed Project in August 2013 based on the most current water code procedures.

Based on the UWMP and the existing infrastructure, LADWP issued a Will Serve letter on May 22, 2013 which states that the Project can be supplied with water from the municipal system subject to the LADWP Water System's rules and conditions (Appendix N- Water Supply Assessment and Will Serve Letter, of the Draft EIR).

Furthermore, LAWA would implement the Project Design Features and LAX Master Plan Commitment W-1, Maximize Use of Reclaimed Water, 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 the proposed Project. LAWA would also implement LAX Master Plan Commitment W-2, Enhance Existing Water Conservation Program, to ensure the ongoing use of water conservation practices at LAX facilities, such as installing water-efficient fixtures. Additionally, the use of drought-tolerant plants will reduce the water demand of the proposed Project because drought-tolerant plants will require less water for maintenance. These LAX Master Plan Commitments and Project Design Features would reduce the water use impacts associated with the proposed Project.

As such, the total estimated water demand on the proposed Project at buildout would not exceed available supplies. Therefore, operational impacts related to water supply would be less than significant.

Infrastructure

The proposed Project will allow the construction of subsurface parking, which would be up to 20 feet deep and may interfere with existing water 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 construction-related impacts would be less than significant.

The proposed Project would require new water distribution infrastructure that connects to the water transmission lines that serve the LAX. 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. With implementation of water distribution system improvements currently planned by LADWP, the water service needs for the proposed Project 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 the proposed Project. Therefore, operational impacts related to water infrastructure would be less than significant.

Solid Waste*Construction*

Although no demolition of buildings will take place because the majority of the Project site is vacant, and existing structures will not be demolished as part of the proposed Project, 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 the proposed Project would be 397,778.2 tons, as presented in Table 4.15-13 of the Draft EIR. However, 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. Therefore, impacts related to solid waste would be less than significant.

*Operation*Waste Generation

The landfills that serve the City of Los Angeles have a remaining capacity of 93.07 million tons and the City of Los Angeles disposed approximately 3.86 million tons in 2000. Based on solid waste generation rates for the types of land uses in the proposed Project, approximately 44,799 pounds per day would be generated by the proposed Project, as presented in Table 4.15-14 of the Draft EIR.

Capacity

As of 2010, the landfills that serve the City of Los Angeles have a remaining capacity of approximately 93.07 million tons of solid waste. Based on the average 2000 disposal rate of approximately 3.86 million tons per year, this capacity will not be exhausted until about 2036. Moreover, based on the City of Los Angeles' 70 percent diversion goal, only 13,439 pounds of solid waste from the proposed Project would require disposal per day in 2022. This solid waste disposal, which would amount to 2,454 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, so the proposed Project would not require an additional solid waste recycling or disposal facility to adequately handle project-generated waste. Therefore, operational impacts related to solid waste capacity would be less than significant.

Collection

City-permitted private waste haulers are responsible for the collection of solid waste for non-residential areas. Implementation of the proposed Project would require additional solid waste collection routes to adequately handle Project-generated waste. However, the landfills that would be used for the proposed Project have a capacity of 93 million lbs/day while the proposed Project is expected to create 44,779 lbs/day. This equates to 0.05 percent of a capacity burden on the combined landfills. Development of the proposed Project would include completion of an internal roadway system that would provide on-site routes for waste collection/hauling vehicles. Furthermore, an extensive system of private solid waste collection already exists. There are 229 private waste haulers that have been approved by the City of Los Angeles Bureau of Sanitation to

provide solid waste collection services for nonresidential uses within the City of Los Angeles. Given the small increase in solid waste generated from the proposed Project, these City-permitted private waste haulers would be able to provide adequate solid waste collection services for the proposed Project. Therefore, operational impacts related to solid waste collection would be less than significant.

Consistency with Solid Waste Policies

The City of Los Angeles has set a waste diversion goal of 70 percent by year 2020. As discussed earlier, in 2000, the City of Los Angeles achieved an overall diversion rate of 59.7 percent. As the City of Los Angeles endeavors to meet the 70 percent diversion goal in the coming decade, solid waste from the proposed Project, as well as from other communities in the region, would be reduced to meet or exceed the City of Los Angeles' 2020 minimum diversion requirements in order to be in conformance with such policies.

Additionally, 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), City of Los Angeles 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. The proposed Project 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 proposed Project's 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. The proposed Project 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, the proposed Project would not conflict with solid waste policies and objectives intended to help achieve the requirements of AB 939. As such, the proposed Project 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. Therefore, operational impacts related to adopted solid waste diversion programs and policies would be less than significant.

Electricity

Construction

Construction of the proposed Project would only consume minimal quantities of electricity (i.e., temporary use for lighting, construction trailer office equipment, small power tools, etc.). Furthermore, existing lighting would further reduce electricity usage during construction. Although the Project site is primarily vacant and dimly lit, the Westchester Golf Course provides lighting for evening golf course use. Additionally, Westchester Parkway, which runs through the Project site, is lined with street lights. The

Project site is also bordered by residential uses to the north, and the LAX North Airfield to the south, which provide additional lighting.

As such, construction impacts would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities, so the construction of the proposed Project would not require new electricity supply facilities, distribution infrastructure, or capacity enhancing alterations to existing facilities. Therefore, construction impacts related to electricity use would be less than significant.

Operation

Usage

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, as discussed in Subsection 4.5.2.2, Existing Conditions of the Draft EIR. Operation of proposed uses would consume an estimated total of 34,626 MWh, or 35 GWh, of electricity per year, as presented in Table 4.15-15 of the Draft EIR.

Supply

The annual electricity demand of the proposed Project, which is 35 GWh per year, is approximately 0.12 percent of the total demand of the LADWP service area, which will be 28,333 GWh at project buildout, and is within the anticipated service capabilities of LADWP. Current transmission and distribution facilities for electricity are adequate to meet the demands of the proposed Project.

The estimated electricity usages of the proposed Project do not take into account the energy conservation measures included as Project Design Features. For example, the proposed Project will implement light-colored roofs, which will reflect more light than dark-colored roofs and reduce electricity usage by lowering cooling requirements. Additionally, in order to reduce electricity consumption, LAWA would implement Master Plan Commitment E-1 to maximize the energy efficiency of new facilities. 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 electricity that exceeds available supply infrastructure capabilities, so the operation of the proposed Project would not require new electricity supply facilities or capacity enhancing alterations to existing facilities. Therefore, operational impacts related to electricity supply would be less than significant.

Distribution Infrastructure

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 the proposed Project. 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.

The proposed Project will also allow the construction of subsurface parking, which would be approximately 20 feet deep and 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 construction-related impacts would be less than significant.

Operational impacts would not result in an increase in demand for electricity that exceed available distribution infrastructure capabilities, so the operation of the proposed Project would not require new distribution infrastructure or capacity enhancing alterations to existing facilities. Therefore, operational impacts related to electricity distribution infrastructure would be less than significant.

Natural Gas

Construction

The construction of the proposed Project would not consume natural gas, and thereby would not require new natural gas supply facilities, distribution infrastructure, or capacity enhancing alterations to existing facilities. Therefore, the proposed Project would not have construction impacts related to natural gas.

Operation

Usage

The 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 the proposed Project would consume an estimated total of 25 million cubic feet of natural gas per month, or 300 million cubic feet of natural gas per year, as presented in Table 4.15-16 of the Draft EIR.

Supply

The annual natural gas demand of the proposed Project, which is 300 million cubic feet per year, is approximately 0.03 percent of the projected total demand of the SCGC service area at proposed Project buildout, which is 948.64 billion cubic feet, and is within the anticipated service capabilities of SCGC. Current transmission and distribution facilities for natural gas are adequate to meet the demands of the proposed Project.

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 the proposed Project would not require new natural gas supply facilities or capacity enhancing alterations to existing facilities. Therefore, operational impacts related to natural gas supply would be less than significant.

Infrastructure

It is not anticipated that the proposed Project would require new natural gas supply facilities, distribution infrastructure, or capacity enhancing alterations to existing facilities.

However, the proposed Project will allow the construction of subsurface parking, which would be up to 20 feet deep and may interfere with existing natural gas 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 construction-related impacts would be less than significant.

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

Operational impacts would not result in an increase in demand for natural gas that exceeds available distribution infrastructure capabilities, so the operation of the proposed Project would not require new natural gas distribution facilities or capacity enhancing alterations to existing facilities. Therefore, operational impacts related to natural gas distribution infrastructure would be less than significant.

Transfer/Equivalency Program

The proposed Project would include flexibility to allow for transfers of floor area and equivalency exchanges. While transfers of floor area or equivalency exchanges within Districts would be permitted, the maximum proposed Project total of 2,320,000 square feet may not be exceeded. Floor area transfers or equivalency exchanges would not result in new impacts with regard to wastewater, water use, solid waste, and energy. Floor area transfers or equivalency exchanges would not result in any new land use types that are not analyzed herein or in additional development above the maximum proposed Project total of 2,320,000 square feet. Thus, floor area transfers or equivalency exchanges would not change the approximately 269,580 gpd of wastewater, 552,922 gpd of water, 44,799 lbs/day of solid waste, 34,625,600 kWh/year of electricity, and 25,244,050 cubic feet/month of natural gas that was calculated for the proposed Project. Therefore, as wastewater, water use, solid waste, and energy would not be substantially changed as a result of floor area transfers or equivalency exchanges, floor area transfers or equivalency exchanges would not alter the conclusions with regard to utility services. Should transfers or equivalency exchanges occur, the resulting impacts would be similar to those evaluated for the proposed Project.

Cumulative Impacts

Wastewater

Conveyance

Related new development projects occurring in the Project site vicinity would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit (S-Permit) prior to connection to the sewer system. Additionally, in order to connect to the sewer system, related projects in the City of Los Angeles would be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by future growth. Therefore, cumulative impacts on wastewater conveyance systems would be less than significant.

Treatment

The buildout year for the proposed Project is 2022. Therefore, cumulative impacts on wastewater facilities are analyzed relative to 2022 growth projected in the Hyperion Safety Area (HSA). The 2022 growth projections are based on the Southern California Association of Government's 2008 Regional Transportation Plan. As indicated in Section

3.0, Environmental Setting of the Draft EIR, the growth associated with the identified related projects are within the 2022 SCAG growth forecasts.

The Integrated Resources Plan (IRP) projects ADWF and wastewater treatment capacity through 2020. Projected year 2020 Average Daily Water Flows (ADWF) for the HSA is 511 mgd. With future improvements identified in the IRP the total effective capacity of the HSA in 2020 would be approximately 570 mgd. ADWF for the HSA in 2030 is expected to be 381 mgd. Based on the projected capacity and projected ADWF, the HSA would have an available capacity of 189 mgd in 2030. The proposed Project would generate a net increase of 269,580 gpd in average daily flows. The proposed Project, combined with the forecasted 2030 ADWF would result in a total cumulative wastewater flow of approximately 381.3 mgd, which is within the projected capacity of the HSA. Therefore, cumulative impacts on wastewater treatment would be less than significant.

Water

Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area, i.e., the City of Los Angeles. LADWP is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The 2010 UWMP prepared by LADWP accounts for existing development within the City of Los Angeles, as well as projected growth through 2035.

In 2010, the City of Los Angeles used 545,771 acre-feet of water. In 2020, water demand is projected to reach 622,732 AFY. In 2030, water demand is projected to reach 643,785 AFY. The UWMP does not provide a projected demand specific to 2022, which is the proposed Project buildout year, but an approximation using the 2020 and 2030 estimates indicate that the demand in 2022 would be 626,944 AFY. This would represent an 81,589 acre-feet per year, or 72.8 mgd, increase in water demand from 2010 to 2022. With respect to the operation of uses proposed for the Project site, an estimated total of 552,922 gpd of water would be consumed.

Section 3.0, Environmental Setting, of the Draft EIR identifies 35 related projects anticipated to be developed within the City of Los Angeles. The estimated water demand of the related projects is shown in Table 4.15-17 of the Draft EIR. As shown, the related projects would have an average daily water demand of approximately 2,599,310 gpd, or 2,913.59 AF annually. Therefore, the proposed Project in conjunction with the 35 related projects would yield a total average daily water demand of approximately 3,152,232 gpd, or 3,533.37 AF annually. As previously stated, LADWP's 2010 UWMP projected that water demand within the LADWP service area would reach approximately 626,732 AF annually by 2022. Thus, the total annual cumulative water demand of approximately 3,533.37 AF associated with the proposed Project and the related projects would fall within the available and projected water demand of the LADWP's 2010 UWMP. Therefore, cumulative impacts on water supply would be less than significant.

Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the Project site vicinity. Development of the proposed Project and future new development in the Project site vicinity would cumulatively increase demand on the existing water infrastructure system. However, new development projects would be subject to discretionary review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP, Los Angeles Department of Public Works, and the City of Los Angeles Fire Department

would conduct ongoing evaluations to ensure facilities are adequate. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

Solid Waste

Construction

Construction of the proposed Project and forecasted 2022 growth in the County of Los Angeles (inclusive of the related projects identified in Section 3.0, Environmental Setting of the Draft EIR) would generate construction and demolition waste and thus, would cumulatively increase the need for waste disposal at the County of Los Angeles' unclassified landfills. As shown in Table 4.15-13 of the Draft EIR, the proposed Project would generate a total of approximately 397,778 tons of construction and demolition waste. 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. It is anticipated that future cumulative development would also implement similar measures to divert construction and demolition waste from landfill disposal. Furthermore, unclassified landfills generally do not face capacity issues and would be expected to have sufficient capacity to accommodate cumulative demand. Thus, cumulative construction impacts on unclassified landfills would be less than significant.

Operation

Operation of the proposed Project in conjunction with forecasted 2022 growth in the County of Los Angeles (inclusive of related projects) would generate municipal solid waste and thus, would cumulatively increase the need for waste disposal at landfills. The buildout year for the proposed Project is 2022. Therefore, cumulative impacts on solid waste facilities and services were analyzed relative to 2022 growth projected in the County of Los Angeles. The 2022 growth projections are based on the Southern California Association of Governments' (SCAG) 2008 Regional Transportation Plan. As indicated in Section 3.0, Environmental Setting of the Draft EIR, the growth associated with all identified related projects is within SCAG growth forecasts. Proposed Project growth in conjunction with all identified related projects would also be within SCAG growth forecasts. Therefore, the analysis does consider the effects of cumulative growth.

The demand for landfill capacity is continually evaluated by the County of Los Angeles through preparation of the Los Angeles County Integrated Waste Management Plan (IWMP) annual reports. Each annual IWMP report assesses future landfill disposal needs over a 15 year planning horizon. As such, the most recent 2010 IWMP annual report only projects out waste generation and available landfill capacity through 2025. Per the 2010 IWMP annual report, the forecasted 2022 waste generation for the County is approximately 26 million tons. The estimated proposed Project generation of approximately 4,905 tons per year would represent only a small percentage (approximately 0.02 percent) of the County's cumulative waste generation in 2022 and is within projected cumulative waste generation. Thus, the proposed Project's contribution to the County's cumulative waste stream would not be substantial.

As indicated in the 2010 IWMP annual report, the County would meet the disposal capacity requirements of AB 939 by a combination of permitting and developing all proposed in-County landfills, and developing conversion and other alternative technologies. Additionally, by continuing to enhance its diversion programs and

increasing the Countywide diversion rate, the County may further ensure adequate disposal capacity is available through the planning period. The proposed Project's contribution to the County's cumulative waste stream would be accommodated by the disposal capacity. Therefore, cumulative impacts to solid waste would be less than significant.

Electricity

The geographic context for the cumulative impact analysis on electricity is the service area of LADWP. Operation of the proposed Project in conjunction with forecasted 2022 growth in LADWP's service area would increase electricity consumption and thus, would cumulatively increase the need for additional electricity supplies and infrastructure capacity.

The annual electricity demand of the proposed Project, which is 35 GWh per year, is approximately 0.12 percent of the total demand of the LADWP service area, which will be 28,333 GWh at project buildout, and is within the anticipated service capabilities of LADWP.

As previously analyzed, LADWP forecasts that by 2022, electricity consumption within its service area would increase to 28,333 GWh per year. Future 2022 cumulative growth within LADWP's service area is accounted for in this forecast. Thus, the proposed Project related annual electricity consumption of approximately 35 GWh would represent approximately 0.12 percent of the forecasted cumulative energy consumption in 2022. Based on this small percentage, the proposed Project's contribution to the cumulative electricity demand would not be substantial. The annual electricity demand attributable to the related projects in LADWP's service area identified in Section 3.0, Environmental Setting, of the Draft EIR is shown in Table 4.15-18 of the Draft EIR. Three related projects do not currently have known square footages and are therefore excluded from the analysis as insufficient information exists to calculate electricity usage. Sixteen of the related projects would remove existing uses that currently consume electricity. The cumulative analysis considers gross new uses and does not exclude current uses that would be removed, presenting a conservative analysis. As indicated, these related projects would result in an estimated electricity demand of 24,018 MWh per year, or approximately 24.02 GWh per year. Therefore, the electricity demand attributable to these related projects is within LADWP's 2022 electricity demand and capacity forecasts. Additionally, these related projects and other future development projects through 2022 would be subject to Title 24, the CalGreen Code, which are updated periodically to incorporate new technologies and methods that achieve greater energy efficiency. Thus, cumulative impacts on electricity would be less than significant.

Natural Gas

The geographic context for the cumulative impact analysis on natural gas is the service area of The Gas Company. Operation of the proposed Project in conjunction with forecasted 2022 growth in The Gas Company's service area would increase natural gas consumption and thus, would cumulatively increase the need for additional natural gas supplies and infrastructure capacity. As previously analyzed, The Gas Company forecasts that by 2020, natural gas consumption within its service area would increase to 948.64 billion cubic feet per year. Future cumulative growth within The Gas Company's service area is accounted for in this forecast. Thus, the proposed Project-related annual natural gas consumption (300 million cubic feet per year) would represent approximately 0.03 percent of the forecasted cumulative natural gas consumption in 2022. Based on

this small percentage, the proposed Project's contribution to the cumulative natural gas demand would not be substantial.

The annual natural gas demand attributable to the 115 related projects in the Gas Company's service area identified in Section 3.0, Environmental Setting, of the Draft EIR is shown in Table 4.15-19 of the Draft EIR. Nine related projects do not currently have known square footages and are therefore excluded from the analysis as insufficient information exists to calculate natural gas usage. Thirty of the related projects would remove existing uses that currently consume natural gas. The cumulative analysis considers gross new uses and does not exclude current uses that would be removed, presenting a conservative analysis. As indicated, these related projects would result in an estimated natural gas demand of 27,195,056 kscf per month, or 326 million cubic feet per year. Therefore, the natural gas demand attributable to these related projects is within The Gas Company's 2020 natural gas demand and capacity forecasts. Additionally, these related projects and other future development projects through 2022 would be subject to Title 24, CalGreen Code, which are updated periodically to incorporate new technologies and methods that achieve greater energy efficiency. Thus, cumulative impacts on natural gas would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.15, Utilities and Services, of the Draft EIR, the BOAC hereby finds and determines that impacts related to utilities and services are less than significant. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures and the Project Design Features in Section 4.15, Utilities and Services, of the Draft EIR, is not required to address the less than significant impacts. Applicable LAX Master Plan Mitigation Measures and project-specific Project Design Features will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that these impacts would be less than significant. No further mitigation measures are required.

C. Findings on Impacts that Will be Reduced to Below the Level of Significance with Project-Specific Mitigation

1. Noise

Description of Effects: As analyzed in Section 4.10 Noise of the Draft EIR, construction of the proposed Project would result in significant temporary noise impacts.

On-Site Construction Activities

As described in Section 4.10.2.6.1 Construction in Section 4.10 Noise of the Draft EIR, noise impacts from construction activities occurring within the Project site would be a function of the noise generated by construction equipment, the equipment location, the timing and duration of the noise-generating activities, and the relative distance to noise sensitive receptors. Development of the proposed Project would include grading, clear and grub, installation of utilities, building foundations, building construction, architectural coating, and paving. Each one of these activities would include a mix of light and heavy equipment types such as tractors, forklifts, rollers, air compressors, and dozers. In addition to the equipment used on-site, trucks would be used to deliver equipment and building materials, and to haul away waste materials. Smaller equipment would also be used throughout the site during the construction phases, such as saws, hammers, and jackhammers. Construction equipment would generate both steady state and episodic noise that would be heard both on and off the Project site.

Table 4.10-12 and Table 4.10-13 of the Draft EIR depict the noise levels and change in hourly noise level at the representative sensitive receptor locations that are located in close proximity to the Project site. Significant temporary construction related impacts would occur in Area 3.

Noise Mitigation Measures and Project Design Features

LAWA is committed to mitigating temporary construction-related noise to the extent feasible and has established Project Design Features and Mitigation Measures to reduce temporary noise impacts. As discussed in Section 4.10 Noise of the Draft EIR, LAX Master Plan Mitigation Measures that pertain to noise and that are applicable to the proposed Project include MM-N-7: Construction Noise Control Plan; MM-N-8: Construction Staging; MM-N-9: Equipment Replacement, MM-N-10: Construction Scheduling; and ST-16: Designated Haul Routes. The proposed Project also includes Project Design Features intended to reduce or avoid noise impacts, PDF N-1 through PDF N-15. Finally, the proposed Project includes the following project-specific mitigation measures related to noise:

- **MM-N (NSP)-1:** A temporary, continuous and impermeable minimum ten-foot high sound barrier wall shall be erected between the proposed Project construction area and adjacent off-site sensitive noise receptors wherever construction activities are within 250 feet of the noise sensitive receptors and there are no intervening buildings or existing sound walls between the construction area and the noise sensitive receptors.
- **MM-N (NSP)-2:** Construction equipment shall be shut off during idling within 250 feet of noise sensitive receptors.
- **MM-N (NSP)-3:** Power construction equipment shall be equipped with noise shielding and muffling devices that achieve a minimum 5 dBA reduction in construction equipment related noise. All equipment shall be properly maintained to assure that no additional noise due to worn or improperly maintained parts would be generated.
- **MM-N (NSP)-4:** Stationary source equipment that is flexible with regard to relocation (such as generators and compressors) shall be located at the greatest distance possible from sensitive land uses and unnecessary idling of equipment shall be prohibited.
- **MM-N (NSP)-5:** Loading and unloading of heavy construction materials shall be located on-site and away from noise-sensitive uses, to the extent feasible.

Findings: Implementation of these mitigation measures is estimated to reduce noise levels from construction activities by 5.0 dBA to 12 dBA depending on specific location and construction activity. Construction activities result in noise increases over ambient conditions from 4 dBA to 9 dBA in Area 3. Therefore, assuming the most conservative (minimum) reduction of 5 dBA from implementation of the mitigation measures, construction noise impacts would be reduced to less than significant levels during all construction phases in Area 3.

2. Traffic

Description of Effects: As analyzed in Section 4.14 Traffic of the Draft EIR, operation of the proposed Project would result in significant intersection traffic impacts under Existing with Project and Future with Project conditions.

Existing with Project (2012 Conditions)

The impact of the proposed Project on existing traffic conditions was evaluated by adding the traffic that would be generated by the proposed Project to the intersection configurations that exist in 2012. The Existing 2012 with Project Conditions was compared to the Existing 2012 Conditions to determine the impact of the proposed Project at each study intersection based on the significance criteria defined by each jurisdiction in the Study Area. In each jurisdiction minimum allowable increase in the V/C ratio attributable to a project decreases as the LOS worsens.

As identified in Table 4.14-9 and summarized in Table 4.14-10, Existing With Project Conditions (Year 2012) Significant Impact Analysis Summary of the Draft EIR, the proposed Project is projected to significantly impact one study intersection during the morning peak hour and 11 intersections during the afternoon peak hour when compared to existing conditions. During the morning peak hour, the impact would occur at an intersection operating at LOS E. During the afternoon peak hour, four impacts would occur at intersections operating at LOS C, four impacts would occur at intersections operating at LOS D, two impacts would occur at intersections operating at LOS E, and one impact would occur at intersections operating at LOS F. In total, 11 study intersections would be impacted under either the morning or afternoon peak hour. The intersections projected to be impacted with the addition of traffic from the proposed Project to existing conditions are:

6. Lincoln Boulevard & Mindanao Way;
8. Lincoln Boulevard & Jefferson Boulevard;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;
29. Sepulveda Boulevard & La Tijera Boulevard;
30. Sepulveda Boulevard & Westchester Parkway;
33. Sepulveda Boulevard & I-105 westbound ramps north of Imperial Highway;
34. Sepulveda Boulevard & Imperial Highway;
46. Airport Boulevard & Manchester Avenue;
47. Aviation Boulevard/Florence Avenue & Manchester Avenue; and
48. La Cienega Boulevard & Florence Avenue.

Future with Project (2022 Conditions)

The Future 2022 with Project conditions were compared to the Future 2022 without Project conditions to determine the impact of the proposed Project at each study intersection based on the significance criteria defined by each jurisdiction in the Study Area.

The Future without Project conditions analysis projects the intersection operating conditions as a result of regional growth and related project traffic in the vicinity of the Project site based on the traffic volumes, streets, and intersection configurations projected to exist in 2022. The growth rate used was determined by averaging the overall growth within the SCAG model for the Study Area between the SCAG baseline year (2003) and the SCAG future year (2035). This overall growth was evaluated to ensure that the relevant trip generation information contained in the LAX Master Plan

Final EIR/EIS was included in the SCAG model and then converted into an annual percentage and applied accordingly to the existing traffic counts (2010).

As shown in Table 4.14-11, Future with Project Conditions (Year 2022) Intersection Peak Hours Levels of Service of the Draft EIR, 84 of the 108 signalized intersections are projected to operate at LOS D or better during the morning and afternoon peak hours in 2022 without the proposed Project traffic. The remaining 24 intersections would operate at LOS E or F during at least one of the analyzed peak hours.

As identified in Table 4.14-11, and summarized in Table 4.14-12, Future with Project Conditions (Year 2022) Intersection Peak Hours Levels of Service Impact Summary Future With Project Conditions (Year 2022) Significant Impact Analysis of the Draft EIR, the proposed Project is projected to significantly impact seven study intersections during the morning peak hour and 16 study intersections during the afternoon peak hour when compared to the Future (2022) environment.

During the morning peak hour, three impacts would occur at intersections operating at LOS C, one impact would occur at an intersection operating at LOS D, and three impacts would occur at intersections operating at LOS E.

During the afternoon peak hour, five impacts would occur at intersections operating at LOS C, four impacts would occur at intersections operating at LOS D, four impacts would occur at intersections operating at LOS E, and three impacts would occur at intersections operating at LOS F.

In total, 18 study intersections would be impacted under either the morning or afternoon peak hour. The remaining 90 study intersections would not be significantly impacted during either peak hour.

The intersections projected to be impacted with the addition of traffic from the proposed Project are:

1. Lincoln Boulevard & Venice Boulevard;
6. Lincoln Boulevard & Mindanao Way;
7. Lincoln Boulevard & Fiji Way;
8. Lincoln Boulevard & Jefferson Boulevard;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;
29. Sepulveda Boulevard & La Tijera Boulevard;
30. Sepulveda Boulevard & Westchester Parkway;
33. Sepulveda Boulevard & I-105 westbound ramps north of Imperial Highway;
34. Sepulveda Boulevard & Imperial Highway;
46. Airport Boulevard & Manchester Avenue;
47. Aviation Boulevard/Florence Avenue & Manchester Avenue;
48. La Cienega Boulevard & Florence Avenue;
49. La Cienega Boulevard & Manchester Avenue;
57. Aviation Boulevard & Arbor Vitae Street;

- 58. La Cienega Boulevard & Arbor Vitae Street;
- 62. Aviation Boulevard & Century Boulevard; and
- 89. La Cienega Boulevard Southbound ramp & Slauson Avenue.

In addition to the 18 significantly impacted study intersections identified above under Future with Project conditions, an analysis of the intersections within Culver City using Culver City Staff's requested criteria (City of Los Angeles impact criteria) identified one intersection which exceeded the criteria requested by Culver City staff. Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street traffic would exceed Culver City staff's requested criteria during the afternoon peak hour. This would not constitute a significant impact, but is provided as supplemental information. Further, an improvement to Intersection #86 is offered as a proposed Project condition of approval, described in Section 4.14.3.3.2, Project Design Features of Section 4.14 Traffic of the Draft EIR. The analysis of Culver City intersections using Los Angeles impact criteria is summarized in more detail in Appendix C of the Transportation Study in Appendix E of the Draft EIR.

Transportation Mitigation Measures and Project Design Features

LAWA is committed to mitigating traffic impacts to the extent feasible and has established Project Design Features and Mitigation Measures to reduce traffic impacts. As discussed in Section 4.14 Traffic of the Draft EIR, LAX Master Plan Mitigation Measures that pertain to traffic and that are applicable to the proposed Project include ST-9: Construction Deliveries, ST-12: Designated Truck Delivery Hours, ST-14: Construction Employee Shift Hours; ST-16: Designated Haul Routes, ST-17: Maintenance of Haul Routes, ST-19: Closure Restrictions of Existing Roadways, ST-20: Stockpile Locations, ST- 21: Construction Employee Parking Locations; ST-22: Designated Truck Routes. The proposed Project also includes Project Design Features intended to reduce or avoid traffic impacts. These include:

- **PDF Traffic (T)-1:** Area 1 would be accessed via driveways from Falmouth Avenue.
- **PDF T-2:** Area 2-West would be accessed via one or more driveways from Westchester Parkway.
- **PDF T-3:** Area 2-East would be accessed via driveways from Westchester Parkway and/or Loyola Boulevard.
- **PDF T-4:** Area 3 would be accessed via driveways from Westchester Parkway and/or Loyola Boulevard.
- **PDF T-5:** Area 4 would be accessed via driveways from Westchester Parkway at its intersection with Falmouth Avenue and/or from within the airfield (with airfield access taken from World Way West).
- **PDF T-6:** Areas 5 through 10 would be accessed via driveways from Westchester Parkway and/or from within the airfield (with airfield access taken from World Way West).
- **PDF T-7:** Area 11 would be accessed via driveways on Westchester Parkway and/or La Tijera Boulevard and/or Sepulveda Westway.
- **PDF T-8:** Area 12A-West would be accessed via one or more driveways on Westchester Parkway.
- **PDF T-9:** Area 12A-East would be accessed via driveways on Westchester Parkway and/or La Tijera Boulevard.

- **PDF T-10:** Area 12B would continue to be accessed via driveways on Manchester Avenue.
- **PDF T-11:** Area 13 would continue to be accessed via driveways on Lincoln Boulevard.
- **PDF T-12:** The proposed Project would not introduce new streets.
- **PDF T-13:** Grading schedules for the proposed Project Areas requiring export and those requiring import will coincide, when feasible, in order to minimize haul trips to off-site disposal areas.
- **PDF T-14:** The proposed Project allows transfers of floor area between uses within Districts. Transfers are restricted based on vehicle trip equivalencies. Additionally, in no event shall the maximum number of trips generated by the LAX Northside exceed 23,635 total daily vehicle trips.
- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a parking study to evaluate potential parking impacts of the proposed Project. Should significant parking impacts be found at that time, LAWA will mitigate them to a level less than significant.
- **PDF T-16:** The Project would require the installation of a crosswalk across Loyola Boulevard at 91st Street or a roundabout at the intersection of Loyola Boulevard and La Tijera Boulevard if a land use is put into the Project side of the street that requires or encourages pedestrians to cross from the Project Site to the other side of Loyola Boulevard.
- **PDF T-17:** When 50% of the Project is built on the basis of afternoon peak hour trip generation, the Project will form a Transportation Management Organization (TMO) which qualifying Project businesses would be required to join and other area businesses and residences would have the option to join. The TMO would take over the implementation, operation, and expansion of the TDM program and could seek to implement transportation improvements too large for individual businesses to implement.
- **PDF T-18:** The Applicant would work with Metro and LADOT during Project design to identify a suitable location on the Project site which will be dedicated for potential future development of a transit station. Prior to any development on the Project site, LAWA would work with Metro and LADOT to identify a suitable location for a potential transit station. That land would be preserved for that use by LAWA for a period of up to 10 years, after which, should Metro determine that it does not need to develop a transit station at that location, the site would become available for Project development.
- **PDF T-19:** The Project Applicant will notify any affected transit operators at least one week in advance any time that construction activities will hinder normal operation of a regularly scheduled transit route. Activities warranting notification could include closure of a sidewalk in the vicinity of a transit stop, closure of a bus stop, lane closures, road closures, and heavy truck activity along a transit route.
- **PDF T-20:** Upon completion of 55% of Project development, or 1,400 afternoon peak hour trips, the Project would complete or have completed the following improvement to Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street: Add a third eastbound left-turn lane, along with associated signage and traffic signal

improvements. After implementation of the improvement, this intersection would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction.

Finally, the proposed Project includes project-specific mitigation measures related to traffic as follows:

- **MM-T (NSP)-1: Transportation Demand Management.** The TDM program would implement a number of programs for employers and employees including education and awareness programs promoting TDM programs, Project Design Features to promote bicycling and walking, ridesharing services and transportation assurance programs, and incentives for using alternative modes of travel. In total, it is expected that the TDM program would reduce trip generation for the office and Research and Development uses by ten percent.

A key component of the TDM program is to make employers and employees at the Project site aware of the various programs offered. To this end, a Transportation Management Coordination Program (TMCP) would reach out both to employers and employees directly to promote the benefits of TDM. The TMCP would also be responsible for maintaining a website which would offer ridematching services, transit information, and serve as a passive source of information for those interested in TDM. A Transportation Information Center (TIC) would also be maintained on the Project site. A TIC is a centrally-located commuter information center where the Project employers and employees can obtain information regarding commute programs and real-time information for planning travel without using an automobile.

- **MM-T (NSP)-2: Transportation Systems Management Improvements:** As part of the mitigation program, the Project would implement TSM improvements recommended by LADOT and the City of Inglewood within the Study Area. These TSM improvements include the installation of vehicle detection systems, signal controller upgrades, traffic monitoring cameras, and signal timing coordination systems. LADOT and the City of Inglewood have each determined that the TSM improvements described below would result in a 1% increase in intersection capacity along the affected corridors.

City of Los Angeles TSM Improvements

The Project will pay for right-turn detection systems at a number of key intersections within the Study Area. These systems, working in conjunction with existing loop detection systems in through lanes and left-turn pockets, will allow LADOT to collect real-time traffic volume data for all intersection turning movements. These improvements would be installed, as feasible, at the following intersections:

1. Lincoln Boulevard & Venice Boulevard;
2. Lincoln Boulevard & Washington Boulevard;
6. Lincoln Boulevard & Mindanao Way;
7. Lincoln Boulevard & Fiji Way;
8. Lincoln Boulevard & Jefferson Boulevard;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;

- 29. Sepulveda Boulevard & La Tijera Boulevard;
- 30. Sepulveda Boulevard & Westchester Parkway;
- 46. Airport Boulevard & Manchester Avenue;
- 57. Aviation Boulevard & Arbor Vitae Street;
- 62. Aviation Boulevard & Century Boulevard; and
- 101. Aviation Boulevard & Imperial Highway.

In addition or as an alternative to the right-turn detection systems at the intersections identified above, LADOT may choose to use the funds to upgrade signal controllers or install CCTV cameras or advance vehicle detection loops for signal control purposes along the identified corridors.

The Project shall install or pay LADOT a fixed fee based on cost estimates provided by LADOT to provide for design and installation of these TSM improvements. These TSM improvements would be implemented by the City of Los Angeles' Bureau of Engineering.

City of Inglewood TSM Improvements

The City of Inglewood is currently working to implement Phase IV of its TSM program. The TSM program will connect traffic signals along major corridors throughout the City of Inglewood to a central traffic management center, which will allow for real time updating of signal timings to address traffic congestion in real-time. The program will also install new signal controllers, loops, and CCTV cameras to improve monitoring and operation of the signals.

The proposed Project would contribute a fixed amount toward the implementation of the City of Inglewood's TSM program along Manchester Boulevard and Florence Avenue based on discussions with Inglewood staff.

- **MM-T (NSP)-3: Transit System Improvements.** The proposed Project would help to improve the transit system in the Study Area and beyond by providing additional buses along a key existing bus route.

Buses

In order to bolster transit capacity and LOS in the Study Area, the proposed Project proposes to mitigate impacts along Manchester Boulevard (Intersections 12, 28, 46, 47, and 49) by providing two additional transit buses for Metro Route 115. Each bus provides a seated capacity of 40 people and a standing capacity of 50 people and will supplement the existing bus service along Manchester Boulevard during peak hours.

- **MM-T (NSP)-4: Specific Intersection Improvements.** Intersection improvements designed to mitigate the significant impacts of the proposed Project consist of physical improvements and signal phasing enhancements. The specific mitigation measures developed for the significantly impacted intersections are provided below. Specific physical intersection improvements such as adding turn lanes were identified at seven study intersections:

- **Intersection #12 – Lincoln Boulevard & Manchester Avenue (City of Los Angeles).** Add a second left-turn lane for the eastbound and westbound approaches. This could be accomplished by restriping the eastbound and westbound approaches to provide a second left-turn lane in each direction. After the mitigation, the eastbound and westbound approaches would provide two left-turn lanes, two through lanes, and one right-turn lane. This improvement could be completed within the existing right-of-way. This improvement was originally proposed in the LAX Specific Plan Amendment Study (SPAS), and credit for its implementation would be shared with the proposed Project.
- **Intersection #28 – Sepulveda Boulevard & Manchester Avenue (City of Los Angeles).** Add a westbound right-turn lane and a westbound left-turn lane. The right-turn lane could be implemented by removing parking on the north side of Manchester Avenue to accommodate the lane in the existing right-of-way. The left-turn lane could be striped in alongside the existing left-turn lane without affecting any other lanes. After the mitigation, the westbound approach would provide two left-turn lanes, two through lanes, and one right-turn lane.
- **Intersection #29 – Sepulveda Boulevard & La Tijera Boulevard (City of Los Angeles).** Add a second westbound left-turn lane. This could be accomplished by removing parking on the north side of La Tijera Boulevard between Sepulveda Boulevard and Sepulveda Eastway. The existing through lane and shared through/right-turn lane could then be shifted to the north to accommodate the second westbound left-turn lane. After the mitigation, the westbound approach would provide two left-turn lanes, one through lane, and one shared through/right-turn lane. This mitigation could be completed within the existing right-of-way. This improvement was originally proposed for the Thomas Bradley International Terminal project, and credit for its implementation would be shared with the proposed Project.
- **Intersection #34 – Sepulveda Boulevard & Imperial Highway (City of Los Angeles).** Add a second westbound right-turn lane. This would involve restriping the westbound approach to convert an existing through lane to a right-turn lane. After the mitigation, the westbound approach would provide two left-turn lanes, two through lanes, and two right-turn lanes. This improvement could be completed in the existing right-of-way.
- **Intersection #46 – Airport Boulevard & Manchester Avenue (City of Los Angeles).** Add a second eastbound and westbound left-turn lane, and a southbound right-turn lane. Adding the eastbound and westbound left-turn lanes would involve restriping the eastbound and westbound approaches to provide a second left-turn lane in each direction. In order to maintain at least 26 feet of receiving width for the new double left-turn lanes, the northbound and southbound lanes would need to be shifted and reconfigured as well. Adding the southbound right-turn lane would involve widening the southbound approach and shifting the sidewalk to the west. After the mitigation, the eastbound and westbound approaches would provide two left-turn lanes, one through lane, and one shared through/right-turn lane. The southbound approach would provide one left-turn lane, two through lanes, and one right-turn lane. The eastbound and westbound left-turn lanes could be added within the existing right-of-way. The southbound right-turn lane would require widening the roadway by approximately eight feet to accommodate the additional lane.

- **Intersection #57 – Aviation Boulevard & Arbor Vitae Street (City of Los Angeles).** Add an eastbound right-turn lane. This could be accomplished by reducing the width of the sidewalk to accommodate the additional lane. The eastbound approach would then provide one left-turn lane, two through lanes, and one right-turn lane. This improvement was originally proposed for the Thomas Bradley International Terminal project, and credit for its implementation would be shared with the proposed Project.
- **Intersection #58 – La Cienega Boulevard & Arbor Vitae Street (City of Los Angeles).** Add an eastbound right-turn lane. This could be accomplished by reducing the width of the sidewalk or by the provision of additional right-of-way from the adjacent LAWA-owned property to accommodate the additional lane. The eastbound approach would then provide one left-turn lane, two through lanes, and one right-turn lane.
- **MM-T (NSP)-5: Traffic Mitigation Phasing.** The proposed Project would be developed in phases over a period of several years. As various components of the proposed Project will be developed at different times, the trips generated and the corresponding impacts would not all occur immediately. Therefore, a mitigation phasing program was developed to link the various features of the mitigation program to specific development milestones, based on the number of afternoon peak hour vehicle trips anticipated to be generated by the proposed Project at various levels of development.

The mitigation measures would be implemented in three phases tied to the total amount of development. Phase 1, which would be implemented upon completion of 25 percent of development or generation of 636 afternoon peak hour trips, would include implementation of the TDM program and physical improvements at Intersections #12, #28, #29, and #46. Phase 2, which would be implemented upon completion of 55 percent of development or generation of 1,400 afternoon peak hour trips, would include implementation of the TSM program and implementation of the physical improvements proposed at Intersections #34 and #57. Phase 3, which would be implemented upon completion of 75 percent of development or generation of 1,907 afternoon peak hour trips, would include provision of the two buses on Metro Route 115 and implementation of the physical improvement proposed at Intersection #58.

LADOT is responsible for overseeing the implementation of the proposed Project mitigation measures and has the flexibility to substitute equivalent mitigation measures in response to the needs of the transportation network in and around the Study Area.

Findings:

Existing with Project with Mitigation

As shown in Table 4.14-14 of the Draft EIR, with mitigation, 94 of the 108 study intersections are projected to operate at LOS D or better during both the morning and afternoon peak hours. Four of the study intersections in the morning peak hour and 13 of the study intersection in the afternoon peak hour are projected to operate at LOS E or LOS F.

The analysis shows that for the Existing with Project with Mitigation conditions, the proposed mitigation program would mitigate eight of the 12 peak hour impacted

intersections. The following intersections would be mitigated to less than significant levels with implementation of the transportation mitigation program:

6. Lincoln Boulevard & Mindanao Way;
8. Lincoln Boulevard & Jefferson Boulevard;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;
34. Sepulveda Boulevard & Imperial Highway;
46. Airport Boulevard & Manchester Avenue;
47. Aviation Boulevard/Florence Avenue & Manchester Avenue; and
48. La Cienega Boulevard & Florence Avenue.

Future with Project with Mitigation

As shown in Table 4.14-15 of the Draft EIR, 84 of the 108 study intersections are projected to operate at LOS D or better during both the morning and afternoon peak hours. Seven of the study intersections in the morning peak hour and 24 of the study intersection in the afternoon peak hour are projected to operate at LOS E or LOS F.

The proposed mitigation program would mitigate 14 of the 18 impacted intersections to below a level of significance. The following intersections would be mitigated to less than significant levels with implementation of the transportation mitigation program:

1. Lincoln Boulevard & Venice Boulevard;
6. Lincoln Boulevard & Mindanao Way;
7. Lincoln Boulevard & Fiji Way;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;
34. Sepulveda Boulevard & Imperial Highway;
46. Airport Boulevard & Manchester Avenue;
47. Aviation Boulevard/Florence Avenue & Manchester Avenue;
48. La Cienega Boulevard & Florence Avenue;
49. La Cienega Boulevard & Manchester Avenue;
57. Aviation Boulevard & Arbor Vitae Street;
58. La Cienega Boulevard & Arbor Vitae Street;
62. Aviation Boulevard & Century Boulevard; and
89. La Cienega Boulevard Southbound ramp & Slauson Avenue.

D. Findings on Significant and Unavoidable Impacts

1. Air Quality

Description of Effects: As analyzed in Section 4.2 Air Quality of the Draft EIR, the proposed Project would generate air pollutant emissions during construction and operation of the proposed Project

Construction Emissions*Regional VOC Emissions*

The peak daily emission estimates, resulting from the construction of the proposed Project, is summarized in Table 4.2-8 of Section 4.2 Air Quality of the Draft EIR. The emissions shown for each pollutant may occur on different days during construction. The emissions reported are from onsite sources such as construction equipment, fugitive dust and architectural coating, and off-site sources including on-road and off-road mobile sources. The mitigation measures incorporated into the analyses include the use of Tier 4 construction equipment, use of 2007 or newer model year haul trucks and watering for fugitive dust control. The estimated construction emissions show that the regional daily emissions for construction are greater than the SCAQMD mass daily significance thresholds for VOC. The primary source of peak daily VOC construction emissions is architectural coatings. These calculations include compliance with SCAQMD Rule 1113 that limits the amount of VOCs from architectural coatings.

Operational Emissions*Regional VOC and NOx Emissions*

The regional daily emissions estimated due to proposed Project operations are summarized in Table 4.2-9 of Section 4.2 Air Quality of the Draft EIR. The estimated emissions include onsite emissions from stationary sources, and off-site emissions from on-road/mobile sources. The estimated emissions show that the regional daily emissions for operations are greater than the significance thresholds for VOC and NOx. The primary source of VOC and NOx emissions is the operation of motor vehicles by employees and visitors to the Project site. These emission estimates incorporate the implementation of a TDM program that reduces the trips associated with office and research and development land uses by 5%. Area sources such as architectural coatings and consumer products are also a significant contributor to the VOC emissions. The analysis incorporates compliance with SCAQMD Rule 1113 that limits the amount of VOCs from architectural coatings and consumer products.

Air Quality Mitigation Measures and Project Design Features

LAWA is committed to mitigating air quality impacts to the extent feasible and has established Project Design Features and Mitigation Measures to reduce air quality impacts. As discussed in Section 4.2 Air Quality of the Draft EIR, LAX Master Plan Mitigation Measures that pertain to air quality, and that are applicable to the proposed Project include MM-AQ-1: LAX Master Plan- Mitigation Plan for Air Quality; MM-AQ-2: Construction Related Measure; MM-AQ-3: Transportation-Related Measure; and MM-AQ-4: Operations-Related Mitigation Measure. The proposed Project also includes Project Design Features intended to reduce or avoid air quality impacts, PDF AQ-1 through PDF AQ-2.

Based on discussions with the South Coast Air Quality Management District (SCAQMD), subsequent to the circulation of the Draft EIR, LAWA agreed to add additional Project Design Features that would be incorporated into bid documents for this proposed Project specifying that contractors should use equipment on the proposed Project that meets the most stringent emission requirements. LAWA will require contractors to use equipment that meets stricter standards if available. The following Project Design Features have been added to address air quality:

- **PDF AQ-4:** Provide a minimum number of electric vehicle charging stations, which is equal to 5% of the total number of parking spaces.
- **PDF AQ-5:** Provide necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment.
- **PDF AQ-6:** Watering three times daily to reduce fugitive dust emissions.
- **PDF AQ-7:** On-road trucks used on LAX construction projects with a gross vehicle weight rating of at least 19,500 pounds shall, at a minimum, comply with USEPA 2010 on-road emission standards for Particulate Matter less than 10 microns in diameter (PM₁₀) and Oxides of nitrogen (NO_x). Contractor requirements to utilize such on-road haul trucks or the next cleanest vehicle available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures).
- **PDF AQ-8:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, US EPA Tier 3 off-road emission standards. In addition, all off-road diesel powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. Wherever feasible, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting the Tier 4 off-road emission standards and is already supplied with a factory-equipped diesels particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures). LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.
- **PDF AQ-9:** LAWA will provide informational materials to developers regarding building materials that do not require painting.

Findings: The proposed Project will be developed in compliance with all statutory requirements to preclude significant impacts on air quality to the extent feasible. The proposed Project already incorporates all technical feasible air quality mitigation measures as a part of the LAX Master Plan Commitments LAX-AQ-1, LAX-AQ-2, LAX-AQ-3 and LAX-AQ-4 and the Project Design Features to reduce construction and operational related VOC and NO_x emissions, which include use of Tier 4 engines in construction equipment, compliance with SCAQMD Rule 1113 to limits VOC emissions from architectural coatings and consumer products, and the implementation of a TDM program to reduce trips and promote non-auto travel.

Despite incorporation of these measures, the BOAC hereby finds that construction VOC emissions, operational VOC emissions, and operational NO_x emissions would remain significant and unavoidable and that specific economic, legal, social, technological, or

other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measure and Project Design Features identified above, which will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project, no other mitigation measures are feasible that would mitigate Project-specific impacts to construction VOC emissions, operational VOC emissions, and operational NOx emissions to a less than significant level.

2. Noise

Description of Effects: As analyzed in Section 4.10 Noise of the Draft EIR, construction of the proposed Project would result in significant temporary noise impacts.

On-Site Construction Noise

As described in Section 4.10.2.6.1 Construction in Section 4.10 Noise of the Draft EIR, noise impacts from construction activities occurring within the Project site would be a function of the noise generated by construction equipment, the equipment location, the timing and duration of the noise-generating activities, and the relative distance to noise sensitive receptors. Development of the proposed Project would include grading, clear and grub, installation of utilities, building foundations, building construction, architectural coating, and paving. Each one of these activities would include a mix of light and heavy equipment types such as tractors, forklifts, rollers, air compressors, and dozers. In addition to the equipment used on-site, trucks would be used to deliver equipment and building materials, and to haul away waste materials. Smaller equipment would also be used throughout the site during the construction phases, such as saws, hammers, and jackhammers. Construction equipment would generate both steady state and episodic noise that would be heard both on and off the Project site.

Table 4.10-12 and Table 4.10-13 of the Draft EIR depict the noise levels and change in hourly noise level at the representative sensitive receptor locations that are located in close proximity to the Project site. Significant temporary construction noise impacts would occur in Area 12A East and Area 13.

Noise Mitigation Measures and Project Design Features

LAWA is committed to mitigating temporary construction-related noise to the extent feasible and has established Project Design Features and Mitigation Measures to reduce temporary noise impacts. As discussed in Section 4.10 Noise of the Draft EIR, LAX Master Plan Mitigation Measures that pertain to noise and that are applicable to the proposed Project include MM-N-7: Construction Noise Control Plan; MM-N-8: Construction Staging; MM-N-9: Equipment Replacement; MM-N-10: Construction Scheduling; and ST-16: Designated Haul Routes. The proposed Project also includes Project Design Features intended to reduce or avoid noise impacts, PDF N-1 through PDF N-15. Finally, the proposed Project includes the following Project-specific mitigation measures related to noise:

- **MM-N (NSP)-1:** A temporary, continuous and impermeable minimum ten-foot high sound barrier wall shall be erected between the proposed Project construction area and adjacent off-site sensitive noise receptors wherever construction activities are within 250 feet of the noise sensitive receptors and there are no intervening buildings or existing sound walls between the construction area and the noise sensitive receptors.

- **MM-N (NSP)-2:** Construction equipment shall be shut off during idling within 250 feet of noise sensitive receptors.
- **MM-N (NSP)-3:** Power construction equipment shall be equipped with noise shielding and muffling devices that achieve a minimum 5 dBA reduction in construction equipment related noise. All equipment shall be properly maintained to assure that no additional noise due to worn or improperly maintained parts would be generated.
- **MM-N (NSP)-4:** Stationary source equipment that is flexible with regard to relocation (such as generators and compressors) shall be located at the greatest distance possible from sensitive land uses and unnecessary idling of equipment shall be prohibited.
- **MM-N (NSP)-5:** Loading and unloading of heavy construction materials shall be located on-site and away from noise-sensitive uses, to the extent feasible.

Findings: Implementation of these mitigation measures is estimated to reduce noise levels from construction activities by 5.0 dBA to 12 dBA depending on specific location and construction activity. Construction activities result in noise increases over ambient conditions from 7 dBA to 10 dBA in Area 12A East and 4 dBA to 19 dBA in Area 13. Therefore, assuming the most conservative (minimum) reduction of 5 dBA from implementation of the mitigation measures, construction noise impacts would remain in Area 12A East and Area 13 even after implementation of all feasible mitigation measures. No further feasible mitigation measures under LAWA's control are available.

Despite incorporation of these measures, the BOAC hereby finds that temporary construction-related noise impacts in Area 12A East and 13 would remain significant and unavoidable and that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measure and Project-Specific Mitigation Measure identified above, which will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project, no other noise mitigation measures are feasible that would mitigate Project-specific impacts to noise during the construction period to a less than significant level.

3. Traffic

Description of Effects: As analyzed in Section 4.14 Traffic of the Draft EIR, operation of the proposed Project would result in significant intersection traffic impacts under Existing with Project and Future with Project conditions.

Existing with Project (2012 Conditions)

The impact of the proposed Project on existing traffic conditions was evaluated by adding the traffic that would be generated by the proposed Project to the intersection configurations that exist in 2012. The Existing 2012 with Project Conditions was compared to the Existing 2012 Conditions to determine the impact of the proposed Project at each study intersection based on the applicable significance criteria for each jurisdiction in the Study Area. In each jurisdiction, the minimum allowable increase in the V/C ratio attributable to a project decreases as the LOS worsens.

As identified in Table 4.14-9 and summarized in Table 4.14-10, Existing With Project Conditions (Year 2012) Significant Impact Analysis Summary of the Draft EIR, the proposed Project is projected to significantly impact one study intersection during the morning peak hour and 11 intersections during the afternoon peak hour when compared

to existing conditions. During the morning peak hour, the impact would occur at an intersection operating at LOS E. During the afternoon peak hour, four impacts would occur at intersections operating at LOS C, four impacts would occur at intersections operating at LOS D, two impacts would occur at intersections operating at LOS E, and one impact would occur at intersections operating at LOS F. In total, 11 study intersections would be significantly impacted under either the morning or afternoon peak hour. The intersections projected to be significantly impacted with the addition of traffic from the proposed Project to existing conditions are:

6. Lincoln Boulevard & Mindanao Way;
8. Lincoln Boulevard & Jefferson Boulevard;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;
29. Sepulveda Boulevard & La Tijera Boulevard;
30. Sepulveda Boulevard & Westchester Parkway;
33. Sepulveda Boulevard & I-105 westbound ramps north of Imperial Highway;
34. Sepulveda Boulevard & Imperial Highway;
46. Airport Boulevard & Manchester Avenue;
47. Aviation Boulevard/Florence Avenue & Manchester Avenue; and
48. La Cienega Boulevard & Florence Avenue.

Future with Project (2022 Conditions)

The Future 2022 with Project conditions were compared to the Future 2022 without Project conditions to determine the impact of the proposed Project at each study intersection based on the applicable significance criteria for each jurisdiction in the Study Area.

The Future without Project conditions analysis projects the intersection operating conditions as a result of regional growth and related project traffic in the vicinity of the Project site based on the traffic volumes, streets, and intersection configurations projected to exist in 2022. The growth rate used was determined by averaging the overall growth within the SCAG model for the Study Area between the SCAG baseline year (2003) and the SCAG future year (2035). This overall growth was evaluated to ensure that the relevant trip generation information contained in the LAX Master Plan Final EIR/EIS was included in the SCAG model and then converted into an annual percentage and applied accordingly to the existing traffic counts (2010).

As shown in Table 4.14-11, Future with Project Conditions (Year 2022) Intersection Peak Hours Levels of Service of the Draft EIR, 84 of the 108 signalized intersections are projected to operate at LOS D or better during the morning and afternoon peak hours in 2022 without the proposed Project traffic. The remaining 24 intersections would operate at LOS E or F during at least one of the analyzed peak hours.

As identified in Table 4.14-11, and summarized in Table 4.14-12, Future with Project Conditions (Year 2022) Intersection Peak Hours Levels of Service Impact Summary Future With Project Conditions (Year 2022) Significant Impact Analysis of the Draft EIR, the proposed Project is projected to significantly impact seven study intersections during

the morning peak hour and 16 study intersections during the afternoon peak hour when compared to the Future (2022) environment.

During the morning peak hour, three impacts would occur at intersections operating at LOS C, one impact would occur at an intersection operating at LOS D, and three impacts would occur at intersections operating at LOS E.

During the afternoon peak hour, five impacts would occur at intersections operating at LOS C, four impacts would occur at intersections operating at LOS D, four impacts would occur at intersections operating at LOS E, and three impacts would occur at intersections operating at LOS F.

In total, 18 study intersections would be significantly impacted under either the morning or afternoon peak hour. The remaining 90 study intersections would not be significantly impacted during either peak hour.

The intersections projected to be significantly impacted with the addition of traffic from the proposed Project are:

1. Lincoln Boulevard & Venice Boulevard;
6. Lincoln Boulevard & Mindanao Way;
7. Lincoln Boulevard & Fiji Way;
8. Lincoln Boulevard & Jefferson Boulevard;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;
29. Sepulveda Boulevard & La Tijera Boulevard;
30. Sepulveda Boulevard & Westchester Parkway;
33. Sepulveda Boulevard & I-105 westbound ramps north of Imperial Highway;
34. Sepulveda Boulevard & Imperial Highway;
46. Airport Boulevard & Manchester Avenue;
47. Aviation Boulevard/Florence Avenue & Manchester Avenue;
48. La Cienega Boulevard & Florence Avenue;
49. La Cienega Boulevard & Manchester Avenue;
57. Aviation Boulevard & Arbor Vitae Street;
58. La Cienega Boulevard & Arbor Vitae Street;
62. Aviation Boulevard & Century Boulevard; and
89. La Cienega Boulevard Southbound ramp & Slauson Avenue.

Transportation Mitigation Measures and Project Design Features

LAWA is committed to mitigating traffic impacts to the extent feasible and has established Project Design Features and Mitigation Measures to reduce traffic impacts. As discussed in Section 4.14 Traffic of the Draft EIR, LAX Master Plan Mitigation Measures that pertain to traffic and that are applicable to the proposed Project include ST-9: Construction Deliveries, ST-12: Designated Truck Delivery Hours, ST-14: Construction Employee Shift Hours; ST-16: Designated Haul Routes, ST-17:

Maintenance of Haul Routes, ST-19: Closure Restrictions of Existing Roadways, ST-20: Stockpile Locations, ST- 21: Construction Employee Parking Locations; ST-22: Designated Truck Routes. The proposed Project also includes Project Design Features intended to reduce or avoid traffic impacts. These include:

- **PDF Traffic (T)-1:** Area 1 would be accessed via driveways from Falmouth Avenue.
- **PDF T-2:** Area 2-West would be accessed via one or more driveways from Westchester Parkway.
- **PDF T-3:** Area 2-East would be accessed via driveways from Westchester Parkway and/or Loyola Boulevard.
- **PDF T-4:** Area 3 would be accessed via driveways from Westchester Parkway and/or Loyola Boulevard.
- **PDF T-5:** Area 4 would be accessed via driveways from Westchester Parkway at its intersection with Falmouth Avenue and/or from within the airfield (with airfield access taken from World Way West).
- **PDF T-6:** Areas 5 through 10 would be accessed via driveways from Westchester Parkway and/or from within the airfield (with airfield access taken from World Way West).
- **PDF T-7:** Area 11 would be accessed via driveways on Westchester Parkway and/or La Tijera Boulevard and/or Sepulveda Westway.
- **PDF T-8:** Area 12A-West would be accessed via one or more driveways on Westchester Parkway.
- **PDF T-9:** Area 12A-East would be accessed via driveways on Westchester Parkway and/or La Tijera Boulevard.
- **PDF T-10:** Area 12B would continue to be accessed via driveways on Manchester Avenue.
- **PDF T-11:** Area 13 would continue to be accessed via driveways on Lincoln Boulevard.
- **PDF T-12:** The proposed Project would not introduce new streets.
- **PDF T-13:** Grading schedules for the proposed Project Areas requiring export and those requiring import will coincide, when feasible, in order to minimize haul trips to off-site disposal areas.
- **PDF T-14:** The proposed Project allows transfers of floor area between uses within Districts. Transfers are restricted based on vehicle trip equivalencies. Additionally, in no event shall the maximum number of trips generated by the LAX Northside exceed 23,635 total daily vehicle trips.
- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a supplemental parking study to evaluate potential off-site parking related to the proposed Project. parking impacts of the proposed Project.
- **PDF T-16:** The Project would require the installation of a crosswalk across Loyola Boulevard at 91st Street or a roundabout at the intersection of Loyola Boulevard and La Tijera Boulevard if a land use is put into the Project side of the street that requires

or encourages pedestrians to cross from the Project Site to the other side of Loyola Boulevard.

- **PDF T-17:** When 50% of the Project is built on the basis of afternoon peak hour trip generation, the Project will form a Transportation Management Organization (TMO) which qualifying Project businesses would be required to join and other area businesses and residences would have the option to join. The TMO would take over the implementation, operation, and expansion of the TDM program and could seek to implement transportation improvements too large for individual businesses to implement.
- **PDF T-18:** The Applicant would work with Metro and LADOT during Project design to identify a suitable location on the Project site which will be dedicated for potential future development of a transit station. Prior to any development on the Project site, LAWA would work with Metro and LADOT to identify a suitable location for a potential transit station. That land would be preserved for that use by LAWA for a period of up to 10 years, after which, should Metro determine that it does not need to develop a transit station at that location, the site would become available for Project development.
- **PDF T-19:** The Project Applicant will notify any affected transit operators at least one week in advance any time that construction activities will hinder normal operation of a regularly scheduled transit route. Activities warranting notification could include closure of a sidewalk in the vicinity of a transit stop, closure of a bus stop, lane closures, road closures, and heavy truck activity along a transit route.
- **PDF T-20:** Upon completion of 55% of Project development, or 1,400 afternoon peak hour trips, the Project would complete or have completed the following improvement to Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street: Add a third eastbound left-turn lane, along with associated signage and traffic signal improvements. After implementation of the improvement, this intersection would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction.

Finally, the proposed Project includes project-specific mitigation measures related to traffic as follows:

- **MM-T (NSP)-1: Transportation Demand Management.** The TDM program would implement a number of programs for employers and employees including education and awareness programs promoting TDM programs, Project Design Features to promote bicycling and walking, ridesharing services and transportation assurance programs, and incentives for using alternative modes of travel. In total, it is expected that the TDM program would reduce trip generation for the office and Research and Development uses by ten percent.

A key component of the TDM program is to make employers and employees at the Project site aware of the various programs offered. To this end, a Transportation Management Coordination Program (TMCP) would reach out both to employers and employees directly to promote the benefits of TDM. The TMCP would also be responsible for maintaining a website which would offer ridematching services, transit information, and serve as a passive source of information for those interested in TDM. A Transportation Information Center (TIC) would also be maintained on the Project site. A TIC is a centrally-located commuter information center where the

Project employers and employees can obtain information regarding commute programs and real-time information for planning travel without using an automobile.

- **MM-T (NSP)-2: Transportation Systems Management Improvements:** As part of the mitigation program, the Project would implement TSM improvements recommended by LADOT and the City of Inglewood within the Study Area. These TSM improvements include the installation of vehicle detection systems, signal controller upgrades, traffic monitoring cameras, and signal timing coordination systems. LADOT and the City of Inglewood have each determined that the TSM improvements described below would result in a 1% increase in intersection capacity along the affected corridors.

City of Los Angeles TSM Improvements

The Project will pay for right-turn detection systems at a number of key intersections within the Study Area. These systems, working in conjunction with existing loop detection systems in through lanes and left-turn pockets, will allow LADOT to collect real-time traffic volume data for all intersection turning movements. These improvements would be installed, as feasible, at the following intersections:

1. Lincoln Boulevard & Venice Boulevard;
2. Lincoln Boulevard & Washington Boulevard;
6. Lincoln Boulevard & Mindanao Way;
7. Lincoln Boulevard & Fiji Way;
8. Lincoln Boulevard & Jefferson Boulevard;
12. Lincoln Boulevard & Manchester Avenue;
28. Sepulveda Boulevard & Manchester Avenue;
29. Sepulveda Boulevard & La Tijera Boulevard;
30. Sepulveda Boulevard & Westchester Parkway;
46. Airport Boulevard & Manchester Avenue;
57. Aviation Boulevard & Arbor Vitae Street;
62. Aviation Boulevard & Century Boulevard; and
101. Aviation Boulevard & Imperial Highway.

In addition or as an alternative to the right-turn detection systems at the intersections identified above, LADOT may choose to use the funds to upgrade signal controllers or install CCTV cameras or advance vehicle detection loops for signal control purposes along the identified corridors.

The Project shall install or pay LADOT a fixed fee based on cost estimates provided by LADOT to provide for design and installation of these TSM improvements. These TSM improvements would be implemented by the City of Los Angeles' Bureau of Engineering.

City of Inglewood TSM Improvements

The City of Inglewood is currently working to implement Phase IV of its TSM program. The TSM program will connect traffic signals along major corridors throughout the City of Inglewood to a central traffic management center, which will allow for real time updating of signal timings to address traffic congestion in real-time. The program will also install new signal controllers, loops, and CCTV cameras to improve monitoring and operation of the signals.

The proposed Project would contribute a fixed amount toward the implementation of the City of Inglewood's TSM program along Manchester Boulevard and Florence Avenue based on discussions with Inglewood staff.

- **MM-T (NSP)-3: Transit System Improvements.** The proposed Project would help to improve the transit system in the Study Area and beyond by providing additional buses along a key existing bus route.

Buses

In order to bolster transit capacity and LOS in the Study Area, the proposed Project proposes to mitigate impacts along Manchester Boulevard by providing two additional transit buses for Metro Route 115. Each bus provides a seated capacity of 40 people and a standing capacity of 50 people and will supplement the existing bus service along Manchester Boulevard during peak hours.

- **MM-T (NSP)-4: Specific Intersection Improvements.** Intersection improvements designed to mitigate the significant impacts of the proposed Project consist of physical improvements and signal phasing enhancements. The specific mitigation measures developed for the significantly impacted intersections are provided below. Specific physical intersection improvements such as adding turn lanes were identified at seven study intersections:
 - **Intersection #12 – Lincoln Boulevard & Manchester Avenue (City of Los Angeles).** Add a second left-turn lane for the eastbound and westbound approaches. This could be accomplished by restriping the eastbound and westbound approaches to provide a second left-turn lane in each direction. After the mitigation, the eastbound and westbound approaches would provide two left-turn lanes, two through lanes, and one right-turn lane. This improvement could be completed within the existing right-of-way. This improvement was originally proposed in the LAX Specific Plan Amendment Study (SPAS), and credit for its implementation would be shared with the proposed Project.
 - **Intersection #28 – Sepulveda Boulevard & Manchester Avenue (City of Los Angeles).** Add a westbound right-turn lane and a westbound left-turn lane. The right-turn lane could be implemented by removing parking on the north side of Manchester Avenue to accommodate the lane in the existing right-of-way. The left-turn lane could be striped in alongside the existing left-turn lane without affecting any other lanes. After the mitigation, the westbound approach would provide two left-turn lanes, two through lanes, and one right-turn lane.
 - **Intersection #29 – Sepulveda Boulevard & La Tijera Boulevard (City of Los Angeles).** Add a second westbound left-turn lane. This could be accomplished by removing parking on the north side of La Tijera Boulevard between Sepulveda Boulevard and Sepulveda Eastway. The existing through lane and shared through/right-turn lane could then be shifted to the north to accommodate the

second westbound left-turn lane. After the mitigation, the westbound approach would provide two left-turn lanes, one through lane, and one shared through/right-turn lane. This mitigation could be completed within the existing right-of-way. This improvement was originally proposed for the Thomas Bradley International Terminal project, and credit for its implementation would be shared with the proposed Project.

- **Intersection #34 – Sepulveda Boulevard & Imperial Highway (City of Los Angeles).** Add a second westbound right-turn lane. This would involve restriping the westbound approach to convert an existing through lane to a right-turn lane. After the mitigation, the westbound approach would provide two left-turn lanes, two through lanes, and two right-turn lanes. This improvement could be completed in the existing right-of-way.
- **Intersection #46 – Airport Boulevard & Manchester Avenue (City of Los Angeles).** Add a second eastbound and westbound left-turn lane, and a southbound right-turn lane. Adding the eastbound and westbound left-turn lanes would involve restriping the eastbound and westbound approaches to provide a second left-turn lane in each direction. In order to maintain at least 26 feet of receiving width for the new double left-turn lanes, the northbound and southbound lanes would need to be shifted and reconfigured as well. Adding the southbound right-turn lane would involve widening the southbound approach and shifting the sidewalk to the west. After the mitigation, the eastbound and westbound approaches would provide two left-turn lanes, one through lane, and one shared through/right-turn lane. The southbound approach would provide one left-turn lane, two through lanes, and one right-turn lane. The eastbound and westbound left-turn lanes could be added within the existing right-of-way. The southbound right-turn lane would require widening the roadway by approximately eight feet to accommodate the additional lane.
- **Intersection #57 – Aviation Boulevard & Arbor Vitae Street (City of Los Angeles).** Add an eastbound right-turn lane. This could be accomplished by reducing the width of the sidewalk to accommodate the additional lane. The eastbound approach would then provide one left-turn lane, two through lanes, and one right-turn lane. This improvement was originally proposed for the Thomas Bradley International Terminal project, and credit for its implementation would be shared with the proposed Project.
- **Intersection #58 – La Cienega Boulevard & Arbor Vitae Street (City of Los Angeles).** Add an eastbound right-turn lane. This could be accomplished by reducing the width of the sidewalk or by the provision of additional right-of-way from the adjacent LAWA-owned property to accommodate the additional lane. The eastbound approach would then provide one left-turn lane, two through lanes, and one right-turn lane.
- **MM-T (NSP)-5: Traffic Mitigation Phasing.** The proposed Project would be developed in phases over a period of several years. As various components of the proposed Project will be developed at different times, the trips generated and the corresponding impacts would not all occur immediately. Therefore, a mitigation phasing program was developed to link the various features of the mitigation program to specific development milestones, based on the number of afternoon peak hour vehicle trips anticipated to be generated by the proposed Project at various levels of development.

The mitigation measures would be implemented in three phases tied to the total amount of development. Phase 1, which would be implemented upon completion of 25 percent of development or generation of 636 afternoon peak hour trips, would include implementation of the TDM program and physical improvements at Intersections #12, #28, #29, and #46. Phase 2, which would be implemented upon completion of 55 percent of development or generation of 1,400 afternoon peak hour trips, would include implementation of the TSM program and implementation of the physical improvements proposed at Intersections #34 and #57. Phase 3, which would be implemented upon completion of 75 percent of development or generation of 1,907 afternoon peak hour trips, would include provision of the two buses on Metro Route 115 and implementation of the physical improvement proposed at Intersection #58.

LADOT is responsible for overseeing the implementation of the proposed Project mitigation measures and has the flexibility to substitute equivalent mitigation measures in response to the needs of the transportation network in and around the Study Area.

Findings: Even with incorporation of the proposed Project Mitigation Program and Project Design Features, the proposed Project would significantly impact between 11 and 18 intersections before mitigation, depending on analysis year, when compared to Existing or Future without Project Conditions. The proposed mitigation program would reduce all impacts below the threshold of significance with three exceptions under 2012 conditions and four exceptions under 2022 conditions. Additionally, the intersection of Sepulveda Boulevard and La Tijera Boulevard would remain impacted under the 2012 analysis should credit for the physical improvement proposed at that location be shared with the Thomas Bradley International Terminal project. No other feasible mitigation measures are available to reduce the impacts at these four intersections as discussed below:

- **Intersection #8 – Lincoln Boulevard & Jefferson Boulevard (Year 2022).** The significant impact at this location remains during the afternoon peak hour in 2022. This intersection is partially mitigated by the TDM program and the additional bus service on Big Blue Bus Line 3 or Rapid 3, which travels on Lincoln Boulevard. As this intersection is bordered on the west by protected wetlands, there is no further space for expansion to the roadway. It should be noted that this intersection will still operate at LOS C under Future with Project conditions, which is generally considered very good for urban areas.
- **Intersection #29 – Sepulveda Boulevard & La Tijera Boulevard (Years 2012 & 2022).** The proposed physical improvement at this location is sufficient to mitigate the impact of the proposed Project alone below the level of significance during the afternoon peak hour in 2012. However, should the improvement be shared between the Thomas Bradley International Terminal project and the proposed Project, the V/C credit it provides would not be sufficient to mitigate the impacts of both developments and thus a significant impact at this location would remain during the afternoon peak hour in 2012. The physical improvement is insufficient to mitigate the proposed Project impact during the afternoon peak hour in 2022. There is no further space for expansion of the roadway.
- **Intersection #30 – Sepulveda Boulevard & Westchester Parkway (Years 2012 & 2022).** The significant impact at this location remains during the afternoon peak hour

in 2012 and 2022. This intersection is partially mitigated by the TDM program. As there are existing structures built up to the property lines on all four corners, there is no further right of way for expansion of the roadway.

- **Intersection #33 – Sepulveda Boulevard & I-105 westbound ramps north of Imperial Highway (Years 2012 & 2022).** The significant impact at this location remains during the morning and afternoon peak hours in 2012 and 2022. This intersection is partially mitigated by the TDM program. The freeway off-ramp from I-105 westbound to Sepulveda Boulevard northbound was widened from two lanes to three lanes in year 2010. There is no further space for expansion of the roadway due to the proximity to I-105, LAX, and the Sepulveda Boulevard tunnel.

Despite incorporation of Mitigation Measures and Project Design Features, the BOAC hereby finds that four intersection traffic impacts would remain significant and unavoidable and that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measures, Project Design Features, and Project-Specific Mitigation Measure identified above, which will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project, no other traffic mitigation measures are feasible that would mitigate Project-specific impacts to intersections to a less than significant level.

E. Findings on Other CEQA Considerations

1. Significant Irreversible Environmental Changes

Section 5.0, Other CEQA Considerations, of the Draft EIR evaluates irreversible environmental changes. Construction of the proposed Project would involve consumption of renewable and non-renewable resources for building materials. Irreversible adverse environmental changes would occur upon implementation of the proposed Project. Construction and operation of the proposed Project would require energy resources such as electricity, natural gas, and various transportation related fuels (fuels for construction equipment and machinery, and transportation fuel for construction workers) including the supply of electricity during construction as well as new lighting during the life of the proposed Project. This would represent a loss of non-renewable resources, which are generally not retrievable.

2. Growth Inducing Impacts

Section 5.0, Other CEQA Considerations, of the Draft EIR evaluates growth inducing impacts. The Project site vicinity is already developed with an airport, and residential, commercial, industrial, community-serving, and airport support uses. In addition, the Project site was previously developed and contains pre-existing infrastructure such as roads, electricity, and sewage lines. New infrastructure developed as part of the proposed Project would serve the Project site exclusively, and would not remove impediments to growth. Therefore, the proposed Project would not remove obstacles to population growth.

As analyzed in Section 4.11, Population, Housing, and Employment of the Draft EIR, the proposed Project would generate direct employment on the Project site. The sum of direct employment generated by the proposed Project at buildout is approximately 7,111 net new employees. Based on projections maintained by the Southern California Association of Governments (SCAG), this increase in net new employees represents 0.37 percent of the projected total employment in the City of Los Angeles. As a result, the proposed Project's total employment impact falls within the projected employment for

the City of Los Angeles. It is also within the forecasted employment growth over the 2010-2022 period for the City of Los Angeles (88,552). The proposed Project's total employment accounts for eight percent of the 2010-2022 employment growth forecast in the Subregion and cumulative employment represents five percent of the 2022 employment in the Subregion. Although the proposed Project would foster economic growth, this growth is within projected employment for the region.

The proposed Project does not include housing. No direct population or housing would be generated as a result of the proposed Project and therefore no direct population or housing impacts would occur. The proposed Project is not anticipated to foster additional housing indirectly in the surrounding environment. The sum of direct employment generated by the proposed Project at buildout is approximately 7,111 net new employees. According to the 2012 US Census American Community Survey, the City of Los Angeles had a total of 96,846 vacant housing units, of which 37,694 were available for rent and 7,084 were available for sale in 2012. Using a conservative estimate that all of the 7,111 net new employees would be moving into the Project site vicinity (as opposed to living there already), the City of Los Angeles has sufficient housing for rent and sale to accommodate the proposed Project employees. Additionally, as analyzed in Sections 4.12, Public Services, and 4.15, Utilities and Services, of the Draft EIR the proposed Project would not induce population or employment growth that would tax existing public services and utilities or require construction of new facilities. The proposed Project would therefore not induce indirect housing growth or increase the population in the Project site vicinity such that existing community service facilities are taxed, requiring construction of new facilities that could cause significant environmental effects.

F. Findings on Project Alternatives

1. Alternatives Considered and Rejected

Description:

Section 6.0 of the Draft EIR evaluated project alternatives. 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 changes the 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.

Findings: The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of the Open Space Alternative, Big Box Retail Alternative, Parking Alternative, and Alternative Locations infeasible and rejects these alternatives because they would not meet the objectives of the project and would not respond to the basic purpose of the LAX Northside Plan Update.

2. Alternatives Carried Forward for Full Evaluation

No Project- Existing Conditions Alternative

Description:

The No Project- Existing Conditions Alternative is analyzed in Section 6.0 of the Draft EIR. 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 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).

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.

Findings: In light of the analysis in the LAX Northside Plan Update Final EIR and substantial evidence in the administrative record, the BOAC hereby rejects Alternative 1 as infeasible for the specific economic, legal, social, technological, or other considerations discussed above, and because, as compared to the proposed Project, it is not as responsive to meeting the proposed Project objectives.

No Project- Planned Development Alternative

Description:

The No Project-Planned Development Alternative is analyzed in Section 6.0 of the Draft EIR. 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.

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.

Findings: In light of the analysis in the LAX Northside Plan Update Final EIR and substantial evidence in the administrative record, the BOAC hereby rejects Alternative 2

as infeasible for the specific economic, legal, social, technological, or other considerations discussed above, and because, as compared to the proposed Project, it is not as responsive to meeting the project objectives, will not effectively avoid the significant effects of the proposed Project, and has greater impacts for some environmental issues.

Reduced Density Alternative

Description:

The Reduced Density Alternative is analyzed in Section 6.0 of the Draft EIR. 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.

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.

Findings: In light of the analysis in the LAX Northside Plan Update Final EIR and substantial evidence in the administrative record, the BOAC hereby rejects Alternative 3 as infeasible for the specific economic, legal, social, technological, or other considerations discussed above, and because, as compared to the proposed Project, it

is not as responsive to meeting the project objectives and will not effectively r avoid the significant effects of the proposed Project.

Reduced Retail Alternative

Description:

The Reduced Retail Alternative is analyzed in Section 6.0 of the Draft EIR. 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.

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.

Findings: In light of the analysis in the LAX Northside Plan Update Final EIR and substantial evidence in the administrative record, the BOAC hereby rejects Alternative 4

as infeasible for the specific economic, legal, social, technological, or other considerations discussed above, and because, as compared to the proposed Project, it is not as responsive to meeting the project objectives and will not effectively avoid the significant effects of the proposed Project.

Cargo Alternative

Description:

The Cargo Alternative is analyzed in Section 6.0 of the Draft EIR. 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.

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.

Findings: In light of the analysis in the LAX Northside Plan Update Final EIR and substantial evidence in the administrative record, the BOAC hereby rejects Alternative 5 as infeasible for the specific economic, legal, social, technological, or other considerations discussed above, and because, as compared to the proposed Project, it is not as responsive to meeting the project objectives, will not effectively avoid the significant effects of the proposed Project, and has greater impacts for some environmental issues.

G. Findings on Suggestions Included in Comments on the LAX Northside Plan Update Draft EIR

1. Comment LAXN-AR02-5

Suggestion: The commentor suggests that LAWA notify Metro of construction activities.

Response: In response to this comment LAWA is voluntarily adding the following Project Design Feature:

- **PDF T-19:** The Project Applicant will notify any affected transit operators at least one week in advance any time that construction activities will hinder normal operation of a regularly scheduled transit route. Activities warranting notification could include closure of a sidewalk in the vicinity of a transit stop, closure of a bus stop, lane closures, road closures, and heavy truck activity along a transit route.

2. Comment LAXN-AR02-6

Suggestion: The commentor suggests that the City should consider requesting the installation of bus shelters, benches and other amenities that improve the transit rider experience as part of the development of the site.

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As the Project is developed, it will include development of a transportation demand management (TDM) program and the eventual founding of an areawide transportation management organization (TMO) (see response to Comment LAXN-AL06-8 for more information on the TMO). The areawide TMO funded by participating local businesses, including those operating at the Project site, may serve as a catalyst for enhancing transit service in the area. Should new transit lines be implemented serving the Project site, the TMO would work with Metro to implement transit shelters at stops within the Project vicinity once ridership levels meet Metro's criteria for installing shelters.

3. Comment LAXN-AR03-10

Suggestion: The commentor suggests that LAWA provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

- a) Provide actual electric vehicle charging stations (not just wiring infrastructure).
- b) Provide incentives to encourage public transportation.
- c) Create local "light vehicle" networks, such as neighborhood electric vehicle systems.
- d) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Energy Efficiency

- e) Maximize the use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility (not just wiring infrastructure).
- f) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- g) Maximize the planting of trees in landscaping and parking lots.
- h) Use light colored paving and roofing materials.
- i) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- k) Install light colored “cool” roofs and cool pavements.
- l) Limit the use of outdoor lighting to only that needed for safety and security purposes.

Other

- m) Require use of electric lawn mowers and leaf blowers.
- n) Require use of electric or alternatively fueled sweepers with HEPA filters.
- o) Require use of water-based or low VOC cleaning products.

Response: The comment identifies additional operational mitigation measures for consideration. The Draft EIR has identified feasible mitigation measures as listed in Section 4.2.3.3 LAX Master Plan Commitments and Project Design Features of the Draft EIR and on Page 4.6-12 of the Draft EIR under Los Angeles World Airports Sustainability Plan. The feasibility and applicability of the mitigation measures listed in the comment are discussed below:

- a) The proposed Project Design Features (PDF AQ-4 and PDF GHG-4 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR) have been modified to include electric charging stations equal to 5% of the total number of parking spaces (not just wiring infrastructure as required by the City of LA Green Building Code Tier 1 A5.106.5.3.2, shown in Table 4.6-2 on DEIR p. 4.6-14) consistent with the comment.
- b) The proposed Project includes a Transportation Demand Management Program (TDM) that would implement a number of programs for employers and employees including education and awareness programs promoting TDM programs, Project Design Features to promote bicycling and walking, ridesharing services and transportation assurance programs, and incentives for using alternative modes of travel (DEIR p. 4.14-92). The TDM program is intended to reduce trip generation for the office and research and development uses by a minimum of ten percent. The existing TDM program meets the recommendation as listed in the comment to provide incentives to encourage public transportation.

In addition to the TDM program, the Project Applicant has voluntarily committed to forming a transportation management organization (TMO) to expand the function and effectiveness of the TDM program. A TMO provides TDM features to the whole

- area, rather than individual TDM programs for each employer or building within the Project. Further, the TMO can be opened to residents and businesses beyond the Project. The more participants a TMO has, the more effective it can be as it becomes easier to match people together for carpools or vanpools. Because the TMO requires a critical mass of participants before it can be successful, it would be formed beginning when 55% of the Project was constructed, per the mitigation phasing program described on page 4.14-106 of the Draft EIR. Response to Comment LAXN-AL06-8 provides more detail about the formation and organization of the TMO.
- c) The creation of a local “light vehicle” network with the proposed Project is not feasible based on the broader integration required over a much larger geographic area to ensure that a viable network is created. Note that the proposed Project does have components of such a network including a TDM program and the formation of a TMO to promote the use alternate modes of travel such as ridesharing services, bicycling, and walking as described in Response to Comment LAXN-AR03-10 (b). The proposed Project also includes the installation of electric charging stations in parking lots (PDF AQ-4 and PDF GHG-4 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR) to encourage the use of low emission vehicles.
 - d) LAWA does not have the jurisdiction over on-road vehicular emissions, including emissions from trucks used by future tenants or third-party vendors on the Project Site, therefore it is not feasible to implement this mitigation measure. California Air Resources Board, which does have jurisdiction, is currently implementing the Truck and Bus Regulation in a phased manner to reduce emissions from trucks (<http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>).
 - e) The proposed Project includes prewiring of buildings for future solar installation (as required by the City of LA Green Building Code Tier 1 A5.211.4, shown in Table 4.6-2 on DEIR p. 4.6-15) and installation of solar panels on parking structures where feasible (LAX Master Plan EIR/EIS Commitments MM AQ-3 on DEIR p. 4.2-35). LAWA is currently evaluating campus wide opportunities for solar panels and is in the process of identifying the optimum locations for solar panel placement. The proposed Project is designed to not preclude solar panel installation. However, at this time specific building locations and designs for the proposed Project and the most effective locations for solar panel placement within the LAWA campus are not known. Therefore, although installation of solar panels is a goal of LAWA’s, further specific requirements for solar panel installation at the Project site cannot be made at this time.
 - f) The proposed Project will exceed the 2008 energy efficiency standards as defined in the California Energy Code Title-24 Part 6 by 15% (PDF GHG-3 on DEIR p. 4.6-41). In order to achieve this, building lighting shall incorporate current energy efficient fixtures and technology (PDF U-20 on DEIR p. 4.15-43, PDF E-1 on DEIR p. 4.15-38, and LAX Northside Plan Design Guidelines and Standards 06.6 on p. 79) which is consistent with SCAQMD’s proposed measure that requires the use of energy efficient light fixtures. The proposed Project GHG emissions are less than significant and therefore no further mitigation measures like solar powered lighting are required. Furthermore, street lights are under the jurisdiction of the City of Los Angeles (i.e., the Bureau of Street Lighting in the Department of Public Works). The Bureau of Street Lighting has made the use of LED street lights standard practice.

- g) The proposed Project already incorporates this mitigation measure as part of the LAX Northside Plan Design Guidelines and Standards that include the following standards for parking lots (Design Guideline/Standard number 05.2H on p. 72):
- A minimum of one tree for every four parking spaces shall be provided. Trees should be sized at 24-inch box or larger at the time of installation and remaining landscaped area shall contain understory planting.
 - Any portion of the parking area not used for parking, loading drive aisles, or pedestrian connectivity shall be landscaped.

The existing mitigation measure meets the recommendation as listed in the comment to maximize the planting of trees in landscaping and parking lots.

- h) The proposed Project includes light colored roofing materials (PDF U-19 on DEIR p. 4.15-43) and porous paving materials (LAX Northside Plan Design Guidelines and Standards 05.2H on p. 72). The proposed Project GHG emissions are less than significant and therefore no further mitigation measures are required.
- i) The proposed Project will comply with the LAX Master Plan EIS/EIR Commitments that require installation of solar panels on parking structures where feasible to supply electricity or hot water (LAX Master Plan EIR/EIS Commitments MM AQ-3 on DEIR p. 4.2-35). As discussed in the response to comment LAXN-AR-03, Comment No. 10 g), any portion of the parking area not used for parking, loading drive aisles, or pedestrian connectivity shall be landscaped; thereby reducing areas covered by pavement and increasing shaded areas. The proposed Project GHG emissions are less than significant and therefore no further mitigation measures are required. The proposed project will comply with the LAWA Sustainability Plan which requires compliance with the Tier 1 standards of the California Green (CalGreen) Building Code 2010 (Table 4.6-2 DEIR p.4.6-13). Compliance with CalGreen Tier 1 standards requires attainment of an energy efficiency that exceeds 2008 California Energy Code efficiency standards by 15% and the use of energy star equipment/appliances; it does not have specific requirements with regard to the use of passive heating or natural cooling. j) As discussed in the response to comment LAXN-AR03 10 f), the proposed Project includes the use of current energy efficient light fixtures and lighting technology (PDF U-20 on DEIR p. 4.15-43, PDF E-1 on DEIR p. 4.15-38, and LAX Northside Plan Design Guidelines and Standards 06.6). The proposed Project also requires all appliances to meet Energy Star requirements, if an Energy Star designation is applicable for the appliance (as required by the City of LA Green Building Code A.5.210.1, seen in Table 4.6-2 on DEIR p. 4.6-15 and PDF U-17 on p. 4.15-42). The existing mitigation measure meets the recommendation as listed in the comment to utilize energy star heating, cooling, and lighting devices and appliances.
- k) As described under the response to comment LAXN-AR-03, Comment No. 10 h), the proposed Project includes light colored roofing materials (PDF U-10 on DEIR p. 4.15-43) and porous paving materials (LAX Northside Plan Design Guidelines and Standards 05.2H). The proposed Project GHG emissions are less than significant and therefore no further mitigation measures are required.
- l) The LAX Northside Design Guidelines and Standards (Design Guideline/Standard number 05.2K on p. 73 and 06.6 on p. 79) provide specific standards for site (outdoor) and building (indoor) lighting. These standards ensure that lighting is designed to provide ambiance, safety and security without unnecessary spillover or

glare onto adjacent properties. The existing standards meet the recommendation as listed in the comment to limit the use of outdoor lighting.

- m) LAWA does not have jurisdiction over the equipment used by commercial landscapers employed by future tenants on the proposed Project site; therefore it is not feasible to implement this mitigation measure. However, as described in LAX Master Plan EIR/EIS Commitments MM AQ-4 on DEIR p. 4.2-36, LAWA will educate and encourage future tenants to contract with commercial landscapers who operate lowest emitting equipment. Further, LAWA will provide the necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment (PDF AQ-5 and PDF GHG-5 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR).
- n) Street sweepers are typically operated by the City of Los Angeles and are not within LAWA's jurisdiction for this Project. The Project does not anticipate the use of street sweepers as part of operations.
- o) The proposed Project will meet the SCAQMD requirements for water-based or low-VOC cleaning products as listed in SCAQMD Rule 1143.

4. Comment LAXN-AR03-11

Suggestion: The commentor suggests that LAWA provide the following additional mitigation measure pursuant to CEQA Guidelines Section 15126.4.

- a) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- b) Construct or build with materials that do not require painting.

Further, based on page 4.2-49 of the Draft EIR it appears that the Lead Agency is committed to including Tier 4 engines during construction, however, SCAQMD staff recommends that the Lead Agency provide additional discussion that explicitly identifies this mitigation measure. Specifically, the SCAQMD staff recommends that the Lead Agency include the following:

- c) During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
 - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any

emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:

<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

Response: The comment identifies additional construction mitigation measures for consideration. The Draft EIR has identified feasible mitigation measures as listed in Section 4.2.3.3 LAX Master Plan Commitments and Project Design Features of the Draft EIR. Detailed responses regarding specific mitigation measures are provided below:

- a) LAWA has committed to a mitigation measure consistent with the comments. The Project mitigation measure commits to using trucks that meet the United States Environmental Protection Agency 2010 standards for on-road heavy-duty trucks (DEIR p. 4.2-18).
- b) The proposed Project will use low VOC architectural coatings that are compliant with SCAQMD's Rule 1113, in order to reduce the VOC emissions from this source. LAWA will provide informational materials to developers regarding building materials that do not require painting (PDF AQ-9 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR)
- c) The proposed Project includes a Project Design Feature to use Tier 4 engines during construction. This commitment is shown in PDF AQ-8 and PDF GHG-6 included in Chapter 3.0 Corrections and Additions to the Draft EIR.

5. Comment LAXN-AL04-8

Suggestion: The commentor suggests that that there is further opportunity to refine the proposed Project to include requirements for mature foliage in the buffer zones (Area 2B in particular) and potentially to create a running or bicycling path in these areas and would encourage this as a part of final designs consistent with the proposed "pedestrian access paseo."

Response: The proposed Project includes measures to preserve existing mature trees, as feasible. As noted in the Draft EIR Section 4.1.3.3.1 LAX Master Plan EIS/EIR Commitments of the Draft EIR, the proposed Project will comply with LAX Master Plan mitigation measure (MM) Biotic Communities MM-BC-3: Conservation of Floral Resources – Mature Tree Replacement. This measure requires LAWA or its designee to prepare and implement a plan to compensate at a ratio of 2:1 the loss of mature trees that would occur as a result of implementation of the LAX Northside project and that replacement trees be at least a 15-gallon or larger specimen. Additionally, PDF Biological Resources (B)-11 and PDF Recreation (R)- 3 require that existing trees in the Landscape Buffer be preserved when compatible with the proposed Project's landscape

material palettes. The proposed Project tree palette reflects compliance with FAA safety requirements for landscaping near an active airport (which restricts trees that form thick canopies or attract birds), as well as input and acceptance from the LAWA Maintenance Services, City of Los Angeles Bureau of Street Services, and US Fish and Wildlife Services.

A series of design charrettes, open houses, and community leaders meetings were held in 2012 and 2013 to define the uses allowed in each area within the Project site in collaboration with community stakeholders. Early design concept included inclusion of pedestrian pathways and bicycle routes in the Landscape Buffer area, however concerns were expressed by residents to the north of the Landscape Buffer area regarding security and privacy. As a response to these concerns, the LAX Northside Design Guidelines and Standards were refined to include a pedestrian accessible paseo along the north side of Westchester Parkway, to preserve the existing bike route on Westchester Parkway, and to include native landscaping and no active recreational uses in the Landscape Buffer area. The proposed design and distribution of uses in the proposed LAX Northside Design Guidelines and Standards reflects community input.

6. Comment LAXN-AL04-9

Suggestion: The commentor suggests that “Northside Center” retail establishments should be limited to nothing in excess of 50,000 square feet.

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section 2.4.1.2 Proposed Land Uses and Illustrative Site Plan of the Draft EIR, the proposed Project Mixed-Use Commercial land use category excludes big box retail stores over 100,000 square feet. The proposed Project allowed and excluded land uses were developed through a series of design charrettes, open houses, and community leaders meetings held in 2012 and 2013 with community stakeholders. Through community input and independent retail and market analysis conducted by LAWA, the 100,000 square foot maximum building size was determined as appropriate to prevent incompatibly sized uses, while meeting the proposed Project objectives. As noted in Section 2.6 of the Draft EIR, the proposed Project objectives related to economic development include:

- Ensure that Project site development achieves fair market value.
- 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.

Furthermore, the proposed Project objectives related to community compatibility, urban design guidelines, and sustainability include:

- Establish an appropriate scale for development.
- 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.

- Reflect current community and stakeholder interests for additional open space, research and development, recreation, security, community-serving uses, and economic development.

As noted in section 4.9.2.1.1 of the Draft EIR, the proposed Project must also comply with FAA requirements to rent or use the property that achieves fair market value.

Consistent with the proposed Project objectives and FAA fair market requirements, the proposed Project enables development of the LAX Northside Center District that will achieve fair market value, be compatible with the surrounding community, support economic vitality, be appropriately scaled, be flexible, and reflects interests for economic development. The proposed Project's development standards, including but not limited to height limits, setback requirements, stepback requirements, landscaping and buffer requirements provide for development that is appropriately scaled. Further limiting the total square footage of uses in the LAX Northside Center District would not change the environmental impacts as analyzed in the Draft EIR, however it would limit the proposed Project's flexibility to accommodate future market demands.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

7. Comment LAXN-AL04-10

Suggestion: The commentor suggests that "chain stores" comprise no more than 50% of the overall development.

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Please see response to comment LAXN-AL04-9 above. Restricting retailers in the LAX Northside Center District to no more than 50% "chain stores" would not meet the proposed Project objectives to allow flexibility to respond to future market demands. As the specific retail tenant mix for future development is not known at this time, such a restriction could prevent economic development of the LAX Northside Center District, which could hinder the proposed Project from meeting FAA fair market value requirements. Furthermore, the proposed Project LAX Northside Design Guidelines and standards are structured so that any retail tenant, whether a "chain store" or not, would be compatible with and in character with surrounding uses through development standards, including but not limited to height limits, setback requirements, stepback requirements, landscaping and buffer requirements.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

8. Comment LAXN-AL06-8

Suggestion: The commentor suggests that the EIR include a proposed consolidated transportation management organization ("TMO").

Response: LAWA has voluntarily committed to the formation of a Transportation Management Organization (TMO) as an integral part of its TDM Program. Project Design Feature T-17 is added as follows:

- **PDF T-17:** When 50% of the Project is built on the basis of afternoon peak hour trip generation, the Project will form a Transportation Management Organization (TMO) which qualifying Project businesses would be required to join and other area businesses and residences would have the option to join. The TMO would take over the implementation, operation, and expansion of the TDM program and could seek to implement transportation improvements too large for individual businesses to implement.

9. Comment LAXN-AL06-10

Suggestion: The commentor suggests that the Westchester Golf Course be upgraded to a regulation par 72 course

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Although the proposed Project does not preclude it, upgrading of the Westchester Golf Course is not part of the proposed Project.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

10. Comment LAXN-AL06-11

Suggestion: The commentor suggests that should the neighborhood north of the project to Manchester, between Sepulveda Westway and McConnell choose to seek permit parking due to parking issues created by the project, the study necessary to obtain the parking permits would be paid for by LAWA.

Response: Although the proposed Project does not have significant impacts on parking, LAWA will make the following additional project commitment as a Project Design Feature:

- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a parking study to evaluate potential parking impacts of the proposed Project. Should significant parking impacts be found at that time, LAWA will mitigate them to a level less than significant.

11. Comment LAXN-PC06-1

Suggestion: The commentor suggests that a roundabout be installed on Loyola Street between Lincoln & Westchester Parkway and that a crosswalk be installed on Loyola Street and La Tijera.

Response: LAWA has voluntarily committed to the following Project Design Feature:

- **PDF T-16:** The Project would require the installation of a crosswalk across Loyola Boulevard at 91st Street or a roundabout at the intersection of Loyola Boulevard and La Tijera Boulevard if a land use is put into the Project side of the street that requires or encourages pedestrians to cross from the Project Site to the other side of Loyola Boulevard.

12. Comment LAXN-PC12-1

Suggestion: The commentor suggests including pony rides and additional uses in Area 1 of the Project site.

Response: This comment regarding potential inclusion of pony rides and additional uses in Area 1 of the Project site is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project allows open space and recreational facilities on Area 1, in conjunction with other uses that achieve fair market value. As noted in Table 2-2 of the Draft EIR, the Open Space and Recreation land use category allows active and passive recreation, including but not limited to golf course, play fields, soccer fields, baseball and softball fields, dog parks; buffer areas; below-grade stormwater treatment facilities; and parking (above and below ground). Animal boarding or petting zoos are not allowed by-right in this area as permanent housing for animals would have additional environmental impacts that were not disclosed or evaluated in the Draft EIR. Should a private entity wish to pursue establishment of a use such as a petting zoo or pony ride in Area 1, a Conditional Use Permit with additional review and environmental analysis would have to be requested.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

13. Comment LAXN-PC19-5

Suggestion: The commentor suggests that additional measures be implemented to control rodents and pests during construction.

Response: LAWA has voluntarily committed to the following Project Design Feature:

- **PDF B-18:** The proposed Project contractor shall utilize integrated pest/rodent management measures wherever feasible during construction in the LAX Northside Campus District, including efforts such as using pest-resistant or well-adapted native plant varieties; removing weeds by hand and avoiding the use of chemical pesticides, herbicides, and fertilizers; and maintaining the construction site free of unsealed food or open trash that could attract rodents.

14. Comment LAXN-PC21-19

Suggestion: The commentor suggests that further density limitations must be studied.

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Section 6.0 of the Draft EIR evaluates project alternatives, including Alternative 3, the Reduced Density Alternative.

Alternative 3 represents a development only two thirds the size of the proposed Project, consisting of up to 1,546,667 square feet of a similar mixture of land uses as the Project. As described in Section 6.9.2.14 on pages 6-69 and 6-70, Alternative 3 would result in significant traffic impacts, before mitigation, to six intersections in either the morning or afternoon peak hours under Existing with Project Conditions (year 2012) and eleven intersections under Future with Project Conditions (year 2022). With the implementation of the proposed traffic mitigation program, Alternative 3 would result in one significant impact under both Existing with Project with Mitigation Conditions (year 2012) and Future with Project with Mitigation Conditions (year 2022), at Intersection #33, Sepulveda Boulevard & I-105 Westbound Ramps. This Alternative resulted in a reduction of 2 significant traffic impacts under Existing with Project with Mitigation Conditions (year 2012) and 3 significant impacts under Future with Project with Mitigation Conditions (year 2022) as compared to the Project analysis. However, as described in Section 6.9.3 on pages 6-76 and 6-77, Alternative 3 would be limited in

overall square footage, would reduce but not eliminate all significant transportation impacts, and would not achieve the economic objectives of the Project.

15. Comment LAXN-PC23-6

Suggestion: The commentor suggests that the proposed Project not include soccer fields.

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is further noticed that a series of design charrettes, open houses, and community leaders meetings were held in 2012 and 2013 to define the uses allowed in each area within the Project site in collaboration with community stakeholders. Support for inclusion of open space and recreational facilities, which could include soccer fields, was expressed during outreach conducted for the proposed Project.

16. Comment LAXN-PC24-7

Suggestion: The commentor suggests that a transportation center be integrated into the proposed Project.

Response: The proposed Project would set aside space – to be identified in conversations with Metro and the Los Angeles Department of Transportation (LADOT) – for a future transit station to serve buses, a potential new light rail train, or other modes. As this space is chosen and eventually developed, it will be integrated as fully as possible into the transit system that exists at that time, including all reasonable attempts to connect Big Blue Bus Route 3, the Metro Green Line light rail, and the Intermodal Transportation Facility. LAWA has voluntarily committed to the following Project Design Feature:

- **PDF T-18:** The Applicant would work with Metro and LADOT during Project design to identify a suitable location on the Project site which will be dedicated for potential future development of a transit station.¹ Prior to any development on the Project site, LAWA would work with Metro and LADOT to identify a suitable location for a potential transit station. That land would be preserved for that use by LAWA for a period of up to 10 years, after which, should Metro determine that it does not need to develop a transit station at that location, the site would become available for Project development.

17. Comment LAXN-PC25-3

Suggestion: The commentor suggests that existing bicycle facilities and bikeway improvements be provided.

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is important to note that the Draft EIR does not identify any significant impact with respect to the 2010 Bicycle Plan, and therefore there is no nexus to requiring Project mitigation or improvement for the 2010 Bicycle Plan.

The Paseo is intended to be an off-street pathway for all forms of non-motorized access. It would consist of the existing 10-foot sidewalk on the north side of Westchester Parkway and an additional 12-foot pathway paved with decomposed granite. Additionally, Westchester Parkway has – and would continue to have – on-street bicycle lanes. Therefore, bicyclists with the skill to ride in the on-street bicycle lanes next to

¹ To be conservative, no additional transit credit, trip reduction, or capacity increase was assumed in this the transportation impact analysis related to this Project Design Feature.

traffic would have the ability to travel in that corridor. Those that prefer a more comfortable and leisurely ride could remain on the decomposed granite Paseo. Wheelchairs, strollers, skaters, and scooters could ride on the sidewalk or on the pathway as preferred by each individual. The sidewalk would meet Americans with Disabilities Act (ADA) guidelines.

There are existing bicycle lanes on Westchester Parkway, Pershing Drive south of Westchester Parkway, and Manchester Avenue between Lincoln Boulevard and La Tijera Boulevard. According to the 2010 Bicycle Plan, (Los Angeles Department of City Planning, March 2011), bicycle lanes are eventually proposed pursuant to the City of Los Angeles Bicycle Plan for the remainder of Pershing Drive and Manchester Avenue, Lincoln Boulevard, La Tijera Boulevard, and Sepulveda Boulevard, and Loyola Boulevard and Emerson Avenue are slated to become Bicycle Friendly Streets. Most if not all of the bicycle lanes proposed in this area pursuant to the City of Los Angeles Bicycle Plan will require the removal of on-street parking or the removal of a vehicular travel lane in order to provide sufficient physical space for the bicycle lane. While these lanes would provide benefits to the people who would take advantage of additional bicycle connectivity in the area, the reduction in either on-street parking capacity or vehicular travel capacity would result in transportation changes that would have to be weighed by City Council at the time of bicycle lane implementation.

The Project supports bicycle connectivity within the area, including the implementation of the 2010 Bicycle Plan by the City. However, any such implementation is beyond the scope of the proposed Project and is not warranted by proposed Project impacts.

18. Comment LAXN-PC25-7

Suggestion: The commentor suggests that the proposed Project incorporate additional sustainability measures.

Response: This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project includes multiple sustainability features, including but not limited to the following:

- The proposed landscape design guidelines address sustainability by requiring the use of native plant species in all landscape areas. In the required 100-foot buffer on the northern edge of Area 2 and the 20-foot buffer on the northern edge of Area 1, 100% native plant species will be used. In all recreation and airport support areas, 80% of all plant species will be required to be native. In all development and parking areas, 60% of all landscaping will be required to be native. All landscaped setback areas would be required to contain 50% native species and the paseo along Westchester Parkway would be required to contain 30% native species (Draft EIR Section 2.4.1.5).
- The proposed Project would comply with the mandatory requirements for nonresidential buildings including Tier 1 conformance of the City of Los Angeles Green Building Code (Draft EIR Table 4.6-2). These include providing bicycle parking and changing rooms, short- and long-term bicycle parking, electric vehicle wiring, light pollution reduction, energy efficiency requirements (including appliances), solar installation wiring, water efficiency measures, and air quality and indoor air quality control.
- The proposed Project requires permeable pavers and porous paving materials in parking stalls (PDF HW-14), as well as bioswales (PDF HW-10).
- LAX Master Plan EIR/EIS Commitments apply to the proposed Project, including E-1: Energy Conservation and Efficiency Program; E-2: Coordination with Utility

Providers; SW-1 Implement an Enhanced Recycling Program; SW-2: Requirements for the Use of Recycled Materials during Construction; SW-3; Requirements for the Recycling of Construction and Demolition Waste; W-1: Maximize Use of Reclaimed Water, and W-2: Enhance Existing Water Conservation Program (Draft EIR Section 4.15.3.3).

- The proposed Project includes Project Design Features to further sustainability, including but not limited to: PDF U-1 through PDF U-17 that promote water use reduction and wastewater reduction and PDF U-19 and PDF U-20 that require light roofs and energy efficient lighting (Draft EIR Section 4.14-3).

The proposed Project lacks significant impacts that warrant additional sustainability requirements.

While the proposed Project accommodates vehicles, it also supports multiple modes of transportation and is not automobile-dependent. As shown in Table 2-2 LAX Northside Plan Update Land Use Categories of the Draft EIR, the proposed Project Mixed Use-Commercial land use category would allow a transit station. As noted in section 4.14.4.1 Transportation Mitigation Program of the Draft EIR, LAWA would work with Metro and LADOT during project design to identify a suitable location on the Project site which would be dedicated for potential future development of a transit site. Per PDF LU-19, the proposed Project would encourage multiple modes of transportation by reserving a location for a potential light-rail station in the LAX Northside Center District, enhancing pedestrian connections, and including bicycle facilities such as lockers and showers. Bike racks shall be located adjacent to walkways, near building entrances, intersections, transit stations, bus shelters, and any other pedestrian gathering areas. Spacing shall be at a maximum distance of one thousand (1,000) feet and in clusters of three (3). The proposed Project also includes a Transportation Demand Management Program (TDM) as noted in Section 4.14.4.1 of the Draft EIR. The TDM program would implement a number of programs for employers and employees including education and awareness of travel options, promoting biking and walking, providing ridesharing services and transportation assurance programs, and providing incentives for using alternative modes of travel.

The proposed Project is more accurately described as “infill” development, rather than suburban development. The Project site is surrounded by heavily urbanized industrial and commercial uses to the east and south at LAX, as well as densely developed residential areas to the north. Additionally, the proposed Project Design Features seek to concentrate development along Westchester Parkway and near the existing Westchester Business District rather than allowing it to be spread throughout the site in a more suburban design scheme. For example, in the largest portion of the Project site (Area 2), the proposed Project requires that a minimum of 65 percent of the ground floor building square footage be located within 250 feet of the Westchester Parkway Property Line, per Project Design Feature (PDF) Land Use (LU)-52. Clustering development in this fashion will allow more of the Project site to be landscaped as opposed to developed with buildings.

As the proposed Project may be developed by multiple or a single developer, requiring LEED Neighborhood Development certification would be an inflexible requirement. As noted by the United States Green Building Council in LEED 2009 for Neighborhood Development “the owner or owners applying for certification should already own, have title to, or have significant control over a majority of the land within the project boundary and the plan for new construction or major renovation for the majority of the project’s area.” Whether the Project site will be developed by a single or multiple parties is

unknown at this time. However, as described above the proposed Project includes many sustainability features and does not preclude project developers from applying for and achieving LEED ND certification.

H. Findings on Responses to Comments on the Draft EIR and Corrections and Additions to the Draft EIR

Responses to comments made on the Draft EIR and revisions made in the Final EIR merely clarify and amplify the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines Section 15088.5(b).

I. Location and Custodian of Records

The documents and other materials that constitute the administrative record for LAWA's actions related to the proposed Project are located at LAWA, One World Way, 2nd floor, Los Angeles, CA 90045. The LAWA Capital Programming and Planning Division is the custodian of the administrative record for the proposed Project