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# California Environmental Quality Act Findings

## LAX Terminals 2 and 3 Modernization Project

### 1. Project Description Summary

The Los Angeles International Airport (LAX) Terminals 2 and 3 (T2/T3) Modernization Project includes the modernization and revitalization of existing T2 and T3 in order to improve passenger level of service and amenities within the terminals; help meet federal security requirements (e.g., security screening), improve passenger and baggage processing and inspections; improve building systems; and modernize the interior and exterior of the terminals to benefit the overall appearance of the CTA.

The LAX T2/T3 Modernization Project includes:

- ◆ Upgrading the T2 concourse, including construction of additional floor area;
- ◆ Demolition and reconstruction of the T3 concourse building to provide additional concourse area, including a new operation control center; the demolition of the southern appendages of the T3 satellite;
- ◆ Reconfiguring existing passenger gate positions within the existing terminal linear frontage for a total of 27 passenger gate positions at T2/T3;
- ◆ Demolition and reconstruction of the passenger and baggage processing facilities (ticketing buildings – T2.5 and T3.5) associated with T2 and T3, including new facilities for passenger and baggage screening, ticketing, and baggage claim (which will reduce redundancies in passenger and baggage processing by providing facilities that support multiple terminals); and a secure connector (i.e., an enclosed/controlled passenger corridor) between T2 and T3; and
- ◆ Apron improvements, specifically the replacement/resurfacing, restriping, and relocation of fuel pits.

In total, approximately 832,000 square feet of new building space would be added to the two terminals, for a total square footage of approximately 1,620,010 square feet.

A benefit of the modernization would be to discontinue the current service model of having one terminal building with passenger and baggage processing that supports one associated concourse with aircraft gates (i.e., the passenger processing facilities currently within the T2 terminal are specific to the T2 concourse and associated T2 gates, and the same is true relative to the relationship between the existing T3 terminal, T3 concourse, and T3 gates), and instead, provide improvements and functions that can be shared between terminals, which, in turn, would improve operational efficiency and flexibility, as well as enhance the quality of customer service.

### 2. Project Objectives

The underlying purposes of improvements to the facilities at T2 and T3 are to provide improved security, passenger experience, operations, convenience, and quality of service. The specific objectives of the proposed project are to:

- ◆ Meet Transportation Security Administration (TSA) and U.S. Customs and Border Protection (CBP) requirements for security and customs screening and provide flexible space for next generation passenger and baggage security screening functions to improve safety and security;
- ◆ Modernize and revitalize existing T2 and T3 in order to improve passenger level of service and amenities within the terminals and improve building systems, as has been previously done for other terminals within the CTA;

- ◆ Coordinate improvements to the aircraft apron areas (e.g., aircraft parking positions, passenger boarding bridge locations, aircraft fueling system hydrant locations, ground support equipment parking locations) at T2 and T3 to be compatible with proposed changes to the T2 and T3 buildings and anticipated airline fleets and uses;
- ◆ Enhance the interior and exterior of the terminals to benefit the overall appearance of the CTA;
- ◆ Provide a secure connector between T2 and T3 to allow passengers to connect from one terminal to the other without having to exit to the non-secure side of the terminal, and only go through security once; and
- ◆ Provide for improvements within each terminal (T2 and T3) that are common to the functions and operations of both terminals and therefore can be shared between terminals, which, in turn, would improve operational efficiency and flexibility, as well as enhance the quality of customer service by reducing redundancies in passenger and baggage processing by providing facilities that support multiple terminals, when feasible.

### **3. Procedural History**

Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the proposed project pursuant to the California Environmental Quality Act (CEQA). A Notice of Preparation (NOP) for the Draft EIR, along with an Initial Study, was circulated for public review from August 11, 2016 to September 9, 2016. During the NOP/Initial Study public review period, LAWA held a public Scoping Meeting on August 24, 2016. On February 23, 2017, the City of Los Angeles published the Draft EIR for the proposed project. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period closing on April 10, 2017. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were also provided the opportunity to comment through April 10, 2017. A public meeting was held during the Draft EIR comment period on March 21, 2017. The City of Los Angeles published the Final EIR for the proposed project on June 28, 2017.

The Final EIR incorporates and responds to comments received on the Draft EIR, and includes corrections and additions to the Draft EIR. One project-specific mitigation measure and other mitigation measures that are LAWA LAX Standard Control Measures have been included in a Mitigation Monitoring and Reporting Program for the proposed project. LAWA, the Los Angeles Board of Airport Commissioners (BOAC), and other decision-makers will use the Final EIR to inform their decisions on the proposed project.

The findings herein have been prepared on the proposed project and its significant impacts, as amended in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR.

### **4. Environmental Impacts and Findings**

Pursuant to Public Resources Code Section 21081 and State CEQA Guidelines Section 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 avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- ◆ Such 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 provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final 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 Mitigation Monitoring and Reporting Program (State CEQA Guidelines Section 15097(a)) for the proposed project.

## **4.1 Findings on No Significant Impacts Identified in the Initial Study**

### **4.1.1 Description of Effects**

The Initial Study prepared for the proposed project in August 2016, included as Appendix A of the Draft EIR, evaluated potential impacts on a range of subjects listed in Appendix G of the State CEQA Guidelines. The analysis conducted for the Initial Study determined that the proposed project would have no impacts on the following resource areas: agriculture and forestry resources, biological resources, land use and planning, mineral resources, population and housing, and recreation; and less than significant impacts on the following resources areas: aesthetics, air quality (aircraft and transportation operations and odor), cultural resources (historic resources), geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services, transportation/traffic (operations), and utilities.

### **4.1.2 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 significant impacts for the proposed project would occur to aesthetics, agriculture and forestry resources, air quality (aircraft and transportation operations and odor), biological resources, cultural resources (historic resources), geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic (operations), and utilities and service systems.

## **4.2 Findings on Less than Significant Impacts**

### **4.2.1 Description of Effects**

Based on the issue area assessment in the EIR, the BOAC has determined that the proposed project (as described above) will have less than significant impacts in several categories as summarized in Table 1 below. For each of the impacts set forth below, the BOAC adopts and incorporates by reference the discussion of each of the impacts in the detailed issue area analyses in Chapter 4 of the Draft EIR and Chapter 3, *Corrections and Additions to the Draft EIR*, of Volume 4 of the Final EIR, as the rationale for the conclusion that there would be less than significant impacts.

### **4.2.2 Findings**

Based on substantial evidence in the administrative record, including Chapter 4 of the Draft EIR and Chapter 3 of the Final EIR, the BOAC hereby finds and determines that impacts associated with the proposed project as listed in Table 1 would be less than significant with respect to air quality (except for construction emissions of nitrogen oxides [NO<sub>x</sub>] and construction concentrations of nitrogen dioxide [NO<sub>2</sub>]), human health risk, cultural resources (tribal cultural resources and human remains), greenhouse gas emissions, construction surface transportation (direct but not cumulative), and energy impacts and conservation. The BOAC hereby adopts the conclusions regarding less than significant impacts on these environmental subject areas.

**Table 1**

**Less Than Significant Impacts of the Proposed Project**

<b>Resource Category</b>	<b>Proposed Project</b>
<b>Air Quality and Human Health Risk</b>	
Air Quality – Construction Regional emissions of CO, VOC, SO <sub>2</sub> , PM <sub>10</sub> , and PM <sub>2.5</sub>	Less than Significant
Air Quality – Construction Local concentrations of CO, SO <sub>2</sub> , PM <sub>10</sub> , and PM <sub>2.5</sub>	Less than Significant
Human Health Risk Assessment – Construction	Less than Significant
Air Quality – Operations (energy usage)	Less than Significant
<b>Cultural Resources</b>	
Tribal Cultural Resources	Less than Significant
Human Remains	Less than Significant
<b>Greenhouse Gas Emissions</b>	
Construction	Less than Significant
Operation (energy usage)	Less than Significant
<b>Construction Surface Transportation</b>	
Construction	Less than Significant
<b>Energy Impacts and Conservation (Construction and Operation)</b>	
Wasteful, Inefficient or Unnecessary Consumption	Less than Significant
Reliance on Fossil Fuels	Less than Significant

### **4.3 Findings on Significant Impacts that Will be Reduced to Below the Level of Significance with Mitigation**

#### **4.3.1 Air Quality**

##### **4.3.1.1 Impacts**

The South Coast Air Quality Management District (SCAQMD) has developed construction-related thresholds of significance for criteria pollutant concentration impacts from projects proposed in the South Coast Air Basin. These thresholds are summarized in Table 4.1.1.5 within Section 4.1.1, Air Quality, in Section 4.1, *Air Quality and Human Health Risk*, of the Draft EIR.

##### **4.3.1.2 Description of Effects**

As shown in Table 4.1.1-8, within Section 4.1.1, Air Quality, of the Draft EIR, emissions from project-related construction activities would result in exceedances of the localized concentration-based thresholds for NO<sub>2</sub>. Impacts would be significant. However, with incorporation of Standard Control Measure LAX-AQ-1, Construction-Related Air Quality Control Measures, and Mitigation Measure MM-AQ (T2/T3)-1, Preferential Use of Renewable Diesel Fuel, peak concentrations of NO<sub>2</sub> would be reduced to less than significant, as shown in Table 4.1.1-12 of the Draft EIR.

##### **4.3.1.3. Findings**

Based on substantial evidence in the administrative record, including Section 4.1.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with implementation of Standard Control Measure LAX-AQ-1 and Mitigation Measure MM-AQ (T2/T3)-1, significant construction

impacts to peak concentrations of NO<sub>2</sub> would be reduced to a level that is less than significant, and less than cumulatively considerable, through implementation of a number of specific measures that reduce NO<sub>2</sub> emissions. Beyond this standard control measure and mitigation measure, which will be included in the Mitigation Monitoring and Reporting Program for the proposed project, no other air quality mitigation measures would be required for this impact as it will be less than significant.

#### **4.3.2 Cultural Resources**

##### **4.3.2.1 Impacts**

A significant impact on archaeological and paleontological resources would occur if the proposed project would result in:

- ♦ A substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5.
- ♦ Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.

##### **4.3.2.2 Description of Effects**

###### **4.3.2.2.1 Archaeological Resources**

As discussed in Section 4.3, *Cultural Resources*, of the Draft EIR, based on records searches and surveys, no archaeological resources (including historic or prehistoric archaeological resources) have been recorded at or within the vicinity of the proposed T2/3 project site. The project area (including the project site and construction staging and parking areas) is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities. Thus, surficial archaeological resources that may have existed at one time have likely been displaced by these disturbances. While discovery of archaeological resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could impact intact archaeological resources that have not been disturbed or displaced by previous development. Since the proposed project would include excavations of varying depths across portions of the project site, including excavations at depths where native soils would be encountered, the proposed project could impact previously unknown buried archaeological resources that fall within the definition of historical resources or unique archaeological resources. Thus, impacts to archaeological resources would be significant.

However, with implementation of Standard Control Measures LAX-AR-1, Conformance with LAWA's Archaeological Treatment Plan, and LAX-AR-2, Archaeological Resources Construction Personnel Briefing, significant impacts to archaeological resources that are historical resources or unique archaeological resources would be reduced to a level that is less than significant and the proposed project's contribution to significant cumulative impacts on archaeological resources would not be cumulatively considerable. These mitigation measures would ensure that construction contractors are aware of LAWA's Archaeological Treatment Plan and implement the procedures that need to be followed in the event of an unanticipated discovery.

###### **4.3.2.2.1 Paleontological Resources**

As discussed in Section 4.3, *Cultural Resources*, of the Draft EIR, the paleontological resources records search indicated that no previously recorded vertebrate fossil localities are located within the project area (including the project site and construction staging and parking areas). However, museum records indicated that one fossil locality (LACM 3264 – baby elephant) was recorded in the vicinity of the project site, near the Tom Bradley International Terminal. As mentioned previously, the project area is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities that have likely displaced surficial paleontological resources. While discovery of paleontological resources in artificial fill deposits within the project area is unlikely, proposed excavations at the project site that would occur below the fill levels could impact intact paleontological resources that

have not been disturbed or displaced by previous development. Since the proposed project would include excavations of varying depths across portions of the project site, including excavations at depths where native soils would be encountered, the proposed project could impact previously unknown buried unique paleontological resources. Thus, impacts to paleontological resources would be significant. With implementation of Standard Control Measures LAX-PR-1, Conformance with LAWA's Paleontological Management Treatment Plan (PMTP), and LAX-PR-2, Paleontological Resources Construction Personnel Briefing, significant impacts to paleontological resources would be reduced to a level that is less than significant and the proposed project's contribution to significant cumulative impacts on paleontological resources would not be cumulatively considerable. These mitigation measures would ensure that construction contractors are aware of LAWA's Paleontological Management Treatment Plan and implement the procedures that need to be followed in the event of an unanticipated discovery.

#### **4.3.2.3. Findings**

Based on substantial evidence in the administrative record, including Section 4.3, *Cultural Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with incorporation of the Standard Control Measures identified above, LAX-AR-1, LAX-AR-2, LAX-PR-1, and LAX-PR-2, the proposed project will not have significant impacts to paleontological or archaeological resources. These mitigation measures would ensure that construction contractors are aware of LAWA's Archaeological Treatment Plan and Paleontological Management Treatment Plan and implement the procedures that need to be followed in the event of an unanticipated discovery. Beyond these standard control measures, which will be included in the Mitigation Monitoring and Reporting Program for the proposed project, no other cultural resource mitigation measures would be required for these potential impacts as they will be less than significant.

Additionally, with the mitigation described above, the project's contribution to significant cumulative impacts to cultural resources will be less than cumulatively considerable.

### **4.4 Findings on Significant and Unavoidable Impacts**

#### **4.4.1 Air Quality**

##### **4.4.1.1 Impacts**

The SCAQMD has developed construction-related thresholds of significance for criteria pollutant emissions and concentration impacts from projects proposed in the South Coast Air Basin. These thresholds are summarized in Tables 4.1.1.4 and 4.1.1.5 within Section 4.1.1, Air Quality, in Section 4.1, *Air Quality and Human Health Risk*, of the Draft EIR.

##### **4.4.1.2 Description of Effects**

As shown in Table 4.1.1-6 within Section 4.1.1, *Air Quality*, of the Draft EIR, construction of the proposed project is predicted to result in maximum daily emissions that exceed the SCAQMD regional construction thresholds for NO<sub>x</sub>. LAWA is committed to mitigating temporary construction-related emissions to the extent feasible and has established some of the most aggressive construction emissions reduction measures in Southern California, particularly with regard to requiring construction equipment to be equipped with emissions control devices. With implementation of Standard Control Measure LAX-AQ-1, Construction-Related Air Quality Control Measures, and Mitigation Measure MM-AQ (T2/T3)-1, Preferential Use of Renewable Diesel Fuel, construction-related significant impacts associated with regional emissions would be reduced, but not to a level that would be less than significant or less than cumulatively considerable, specifically for NO<sub>x</sub> emissions. No other feasible mitigation measures have been identified at this time that would reduce impacts to air quality further. Therefore, impacts to regional air quality from project-related construction emissions would be significant and unavoidable.

#### **4.4.1.3 Findings**

Based on substantial evidence in the administrative record, including Section 4.1.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which lessen the significant environmental effects identified in the Final EIR; specifically, Standard Control Measure LAX-AQ-1 and Mitigation Measure MM-AQ (T2/T3)-1 reduce this impact. Even with incorporation of feasible construction-related standard control measures and a project-specific mitigation measure, the maximum peak daily construction-related regional mass emissions for NO<sub>x</sub> resulting from the proposed project would be significant and the project's contribution to cumulative construction-related NO<sub>x</sub> impacts would be cumulatively considerable. Because LAWA is requiring the most stringent technology available, there are not any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance.

Despite incorporation of these measures, the BOAC hereby finds the following impact significant and unavoidable: construction-related air quality impacts related to NO<sub>x</sub>. BOAC also hereby finds that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the proposed mitigation measures identified above, which will be included in the Mitigation Monitoring and Reporting Program for the proposed project, no other air quality mitigation measures are feasible that would mitigate project-specific and cumulative impacts to air quality during the construction period.

#### **4.4.2 Construction Surface Transportation**

##### **4.4.2.1 Impacts**

Study intersections were evaluated for potential significant construction-related traffic impacts based on the significant traffic impact criteria adopted and accepted by various jurisdictions that the study intersections lie in. Intersections lying on the boundary of multiple jurisdictions were evaluated using the more conservative criteria. Specific intersection criteria for jurisdictions within the study area are discussed in Section 4.4.4 in Section 4.4, *Construction Surface Transportation*, of the Draft EIR.

##### **4.4.2.2 Description of Effects**

As shown in Table 4.4-9 of the Draft EIR, 21 intersections would be significantly impacted during the cumulative peak construction period (November 2019) with staging occurring at the proposed primary construction staging area (an existing industrial parcel located on La Cienega Boulevard, just north of Imperial Highway). Furthermore, the proposed project's contribution to such significant cumulative impacts would be cumulatively considerable at two of the significantly impacted intersections: Century Boulevard and Sepulveda Boulevard (Intersection #5) and Imperial Highway and I-105 Ramp (Intersection #14). The cumulatively considerable impact at Century Boulevard and Sepulveda Boulevard (Intersection #5) would be generated by construction employees exiting the employee parking area via Avion Drive to westbound Century Boulevard and then southbound Sepulveda Boulevard. The cumulatively considerable impact at Imperial Highway and I-105 Ramp (Intersection #14) would be generated by haul truck traffic transferring materials to/from the proposed primary construction staging area via La Cienega Boulevard, Imperial Highway, Pershing Drive, and Westchester Parkway. Similarly, assuming construction staging occurs at the optional primary construction staging area (a portion of an existing LAWA-owned construction staging area along the south side of Westchester Parkway, east of the southern terminus of La Tijera Boulevard), as shown in Table 4.4-10 of the Draft EIR, 21 intersections would be significantly impacted during the cumulative peak construction period (November 2019); however, with the optional primary construction staging area, the proposed project's contribution to such significant cumulative impacts would be cumulatively considerable at only one of the significantly impacted intersections: Century Boulevard and Sepulveda Boulevard (Intersection #5), caused by construction employees exiting the employee parking area via Avion Drive to westbound Century Boulevard and then southbound Sepulveda Boulevard. Given that many construction projects are occurring at LAX,

multiple potential staging areas were assumed in the analysis in order to capture potential impacts of primary construction staging in two different areas within the study area. The decision of which of the two areas would be used for the proposed project's construction staging cannot reasonably be determined at this time and would be coordinated with LAWA during the bid and award process, taking into consideration the availability of the areas at the time.

Regarding mitigation of the cumulatively considerable construction traffic impact at Imperial Highway and I-105, due to the location of the entry/exit point along La Cienega Boulevard, haul trucks would be required to exit the proposed primary construction staging area via southbound La Cienega Boulevard, while exits via northbound La Cienega Boulevard would be prohibited (i.e., at the location of the proposed primary construction staging area, left turns onto La Cienega Boulevard are prohibited). Furthermore, considering the designated truck routes described in Section 4.4.8 of the Draft EIR, haul trucks transferring materials to/from the proposed primary construction staging area would be required to pass directly through the intersection of Imperial Highway and I-105 (Intersection #14). As such, no mitigation is feasible for the cumulatively considerable construction traffic impact at Imperial Highway and I-105 Ramp (Intersection #14).

Regarding mitigation of the cumulatively considerable construction traffic impact at Century Boulevard and Sepulveda Boulevard (Intersection #5), regardless of whether construction staging occurs at the proposed primary construction staging area or at the optional primary construction staging area, no feasible mitigation measures are available. The subject impact is anticipated to occur from construction employees finishing the swing shift (i.e., 11:00 p.m. to 7:00 a.m.) exiting the proposed construction employee parking area, specifically LAX Lot F near Avion Drive and Century Boulevard, that are likely to proceed westbound on Century Boulevard in order to get to southbound on Sepulveda Boulevard, which provides ready access to the nearby freeway system (I-105 and I-405). This travel route would require a left-turn at Sepulveda Boulevard from Century Boulevard, which causes the project's cumulatively considerable contribution to the significant impact at Intersection #5 during the AM peak hour. Although this cumulatively considerable impact could be reduced to less than cumulatively considerable by requiring those construction employees to only turn right onto eastbound Century Boulevard when exiting the subject parking area, thereby avoiding the left-turn movement at Intersection #5, it would not be feasible to implement, monitor, and enforce such a requirement. Various consideration related to the infeasibility of such a measure include: (1) the inability for LAWA to legally require contractor employees to turn one way or another onto a public roadway system when it is legally permissible for the public to turn left at this intersection; and, (2) the inability to monitor and enforce implementation of this requirement relative to distinguishing project-related contractor employee personal vehicles from all other vehicles travelling in the area during the AM peak hour in order to confirm that project-related employees are turning right from Avion Drive onto Century Boulevard instead of turning left, and, furthermore, trying to account for construction employees that exit the parking area and turn left from Avion Drive to Century Boulevard, but want to head northbound on Sepulveda Boulevard and would, therefore, not be turning left at Intersection #5. Also, the typical ways of mitigating such an intersection impact through means such as making changes in signal phasing, restriping the intersection to add another turn-lane, or physically widening the intersection to add a turn lane(s) are not considered feasible in this instance. More specifically, changing the signal timing to provide additional time for left turns from westbound Century Boulevard to southbound Sepulveda Boulevard would reduce the amount of time available for through traffic on Sepulveda Boulevard, which is the more important traffic movement at this intersection during the morning peak hour. Relative to restriping the intersection to provide an additional left turn lane, the east leg of the subject intersection currently has a dedicated left-turn lane and an adjacent optional left-turn or straight-thru lane (i.e., westbound drivers in that lane can either turn left onto southbound Sepulveda Boulevard or continue straight onto "Little Century" into the CTA); hence, adding an additional left turn lane would require shifting the optional left-turn/straight thru lane northward, in which case the straight-thru path of travel would no longer align with the receiving lane in the west leg of the intersection. Physically widening the subject intersection to accommodate the additional left turn lane is constrained on the south by the transition ramp from northbound Sepulveda Boulevard to eastbound Century Boulevard, and on



the north by the presence of the Hyatt Regency hotel. Any such modifications to the intersection, be it restriping or physical improvements, would require approval from Caltrans (i.e., Sepulveda Boulevard is a part of Highway 1 at that location). Notwithstanding the traffic operations issues, physical constraints, and regulatory agency approval need noted above, the long-term requirements for such intersection restriping or widening, or signal timing modification, measures are not considered to be proportional to nature of the short-term and occasional impact being mitigated; specifically, the subject impact would only occur when a swing-shift is needed during the construction program, at which timing, frequency, and duration of the need for swing-shifts, if any, is uncertain.

Therefore, for the reasons described above, no feasible mitigation measures were identified for the proposed project's contribution to the cumulatively considerable impacts at Intersection #5 and Intersection #14; therefore, these impacts would be significant and unavoidable. Although it was determined these impacts would be significant and unavoidable, LAWA would nonetheless implement Standard Control Measure LAX-ST-1, Construction Traffic Management Plan, which would serve to reduce construction impacts on study area intersections not significantly impacted.

#### **4.4.2.3 Findings**

Based on substantial evidence in the administrative record, including Section 4.4, *Construction Surface Transportation*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which reduce construction impacts on study area intersections not significantly impacted, specifically Standard Control Measure LAX-ST-1. The BOAC hereby further finds and determines that there are no other feasible mitigation measures that could be adopted at this time to reduce the cumulatively considerable construction traffic impacts at Century Boulevard and Sepulveda Boulevard (Intersection #5) and Imperial Highway and I-105 Ramp (Intersection #14). The BOAC also hereby finds that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible.

### **4.5 Findings on Other CEQA Considerations**

#### **4.5.1 Significant Irreversible Environmental Changes**

Section 6.2 of the Draft EIR identifies the significant and irreversible environmental changes associated with the proposed project. Such impacts will include commitment of various non-renewable resources. Construction of the proposed project would involve the consumption of building materials during construction, such as aggregate (sand and gravel), metals (e.g., steel, copper, lead), and petrochemical construction materials (e.g., plastics). This would represent the loss of non-renewable resources, which are generally not retrievable. Aggregate resources are locally constrained, but regionally available. Their use would not have a project-specific adverse effect upon the availability of these resources.

Construction and operation of the proposed project would require energy resources such as electricity, natural gas, and various transportation-related fuels. This would represent the loss of non-renewable resources, which are generally not retrievable. See Section 4.5.3 below for a discussion of energy impacts and conservation.

As described in Chapter 2, *Project Description*, of the Draft EIR, the proposed project would be designed and constructed to meet the City of Los Angeles Green Building Code (LAGBC) Tier 1 requirements. Certain measures of note that would reduce the use of non-renewable resources include: compliance with enhanced construction waste reduction goals; exceeding the California Energy Code requirements by 15 percent; use of plumbing fixtures and fixture fittings to reduce the overall use of potable water within the building by 20 percent; and providing readily accessible areas for the depositing, storage, and collection of non-hazardous materials for recycling. The proposed project would also comply with LAWA policies and programs related to sustainability, including LAWA's Sustainability Plan, which would reduce the use of non-renewable resources and

are implemented on a project-specific and on an airport-wide basis. Furthermore, energy and water conservation measures, recycling of non-hazardous materials, and other sustainable strategies would be implemented during operation of the proposed project, to the extent feasible. Therefore, the use of non-renewable resources from construction and operation of the proposed project would not result in significant irreversible changes to the environment.

#### **4.5.2 Growth Inducing Impacts**

Section 6.3 of the Draft EIR addresses the growth inducing impacts of the proposed project. As indicated therein, the proposed project would not directly or indirectly foster population growth or the construction of additional housing. Also, as discussed in Chapter 2, *Project Description*, of the Draft EIR, the proposed project would not alter the airspace traffic, runway operational characteristics, or the practical capacity of the airport; therefore, the proposed project would not increase the number of daily flights arriving and departing from LAX or the growth in aviation activity at LAX that is projected to occur in the future. Also, the proposed improvements to, and additional floor area proposed for, T2 and T3 would also not increase operations nor passenger volumes beyond what would occur without the project. In addition, the proposed project would not provide new access to an area that is undeveloped since the project site is located within an area of the airport, the CTA, that is in active use.

Construction activity associated with the proposed project would directly and indirectly foster economic growth over the multi-year construction period in terms of spending by workers and the provision of goods and services in support of construction; however, the construction employment would be temporary and transitory in nature, drawing from primarily from an existing local labor pool (i.e., construction workers already living in the greater Los Angeles area transitioning from one construction project to another). Operation of the proposed project would not induce economic growth beyond that projected to occur with natural growth in activity levels at LAX that will occur irrespective of the project. Additionally, increased employment within the Los Angeles area, inclusive of LAX, is accounted for in the employment projections of the Southern California Association of Governments, as is described in more detail in Chapter 4, *Environmental Impact Analysis*, of the Draft EIR.

#### **4.5.3 Energy Impacts and Conservation**

As discussed in Chapter 6, *Other Environmental Considerations*, specifically Section 6.5, of the Draft EIR, the proposed project would be located within an area that has existing energy and water available to serve the proposed project. It would comply with federal, state, and local regulations and policies reducing energy demand associated with building energy use, water demand, wastewater generation, vehicle fuels, and construction equipment. In addition, electricity supplied to the project would be required to comply with California's aggressive renewable portfolio standard. Therefore, the proposed project's construction and operation would not result in wasteful, inefficient, or unnecessary energy use; would not increase reliance on fossil fuels; and would incorporate renewable energy and energy efficiency measures. Since the proposed project's energy impacts would therefore be less than significant, no energy mitigation measures (e.g., additional energy conservation measures) are required. However, the proposed project's vehicle fuel use would be further reduced by implementation of Mitigation Measure LAX-AQ-1 (Construction-Related Air Quality Control Measures), and implementation of Mitigation Measure MM-AQ (T2/T3)-1 (Preferential Use of Renewable Diesel Fuel) which would further reduce the proposed project's reliance on fossil fuels.

### **4.6 Findings on Project Alternatives**

#### **4.6.1 Alternatives Considered and Rejected**

In addition to the three alternatives that were evaluated in detail in the Draft EIR, LAWA considered three additional alternatives, all of which were eliminated from detailed analysis in the Draft EIR either because they did not meet the basic project objectives, would fail to avoid or substantially

lessen the significant impacts, and/or were determined at the outset to be infeasible. These alternatives are discussed below.

#### **4.6.1.1 Construction Phasing Alternative**

This alternative is discussed in Draft EIR Section 5.4.1. In order to reduce construction-related air pollutant emissions to a less than significant level (i.e., reduce the proposed project's 257 pounds per day of peak daily construction-related NO<sub>x</sub> emissions, shown in Table 4.1.1-6 of the Draft EIR, to less than the significance threshold of 100 pounds per day), the phasing of the proposed project could be greatly extended from the currently proposed 76 months (six years, four months) to over 195 months (16+ years) by reducing the daily construction activity levels by a factor of more than 2.57 (i.e., reduce the typical 8-hour daily construction work shifts to approximately 3-hour daily work shifts) (Appendix B.3 of the Draft EIR). The extended phasing and construction approach was initially considered with regard to reducing short-term air quality impacts associated with the proposed project. While this alternative would reduce daily emissions, it would increase the overall duration of air pollutant emissions. Additionally, this alternative would have substantially increased costs and would substantially delay achievement of the project objectives and benefits.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not avoid or substantially reduce any of the significant effects of the project, and is infeasible from a practicality and logistical standpoint (i.e., limiting construction activities to approximately 3 hours a day over a construction period of over 16 years). In addition, the BOAC rejects this alternative on policy grounds because it would substantially delay achievement of the project objectives and benefits.

#### **4.6.1.2 Alternative Terminal Configuration**

This alternative is discussed in Draft EIR Section 5.4.2. This alternative considered consists of an alternative terminal configuration that would reduce the total duration of construction by approximately 12 months (one year) compared to that of the proposed project. As shown on Figure 5-1 of the Draft EIR, under this alternative configuration, the existing T3 terminal and concourse, including the satellite, would be demolished and not rebuilt. Instead, the existing T2 concourse would be demolished and rebuilt with an expanded footprint, extending westward to provide new terminal area, and a new linear concourse would be constructed at the north end, extending from the new T2 terminal west to where the T3 satellite concourse was formerly located. Overall, this alternative terminal configuration would have a smaller footprint than the existing T2 and T3. The new linear concourse would be parallel to Taxiway D with aircraft parking positions along the north side of the concourse being perpendicular to the Taxiway D.

This alternative would meet all the project objectives and would take less time overall (approximately one year) to build. It is likely that the intensity of daily construction activities would be comparable to those of the proposed project, even though the overall duration of construction would be comparatively less; consequently, it is likely that this alternative would not avoid the significant daily air quality impact or the cumulatively considerable construction traffic impact that would occur with the proposed project. In addition, operation of this alternative terminal configuration would require aircraft departing from the north side of the new concourse to be pushed back onto Taxiway D, which would interfere with aircraft taxi flows in that area and could pose a line-of-sight problem for the Air Traffic Control Tower (ATCT), with the visibility of aircraft pushing back from the gates and aircraft movements along Taxiway D being blocked or obscured by the new T2 terminal building and/or the new T2 concourse structure. Preliminary discussions with FAA and the ATCT cited on Draft EIR page 5-3 determined that the potential impacts on aircraft taxi flows on Taxiway D and line-of-sight would be unacceptable, and make this alternative infeasible.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not

avoid or substantially reduce any of the significant effects of the project, and is operationally infeasible.

#### **4.6.1.3 Other LAX Sites**

This alternative is discussed in Draft EIR Section 5.4.3. In this alternative, construction of a new concourse, Concourse 0<sup>1</sup> for example, as an alternative to the proposed project was considered. Because it is likely that the intensity of daily construction activities would be comparable to those of the proposed project, this alternative would not avoid or substantially lessen the significant air quality impacts of the proposed project or avoid the cumulatively considerable significant construction traffic impact (i.e., construction of a new concourse would still involve major construction activities), nor would it meet any of the project objectives identified in Section 2 above. As no improvements would occur at T2 and T3 under this alternative, no flexible space for next generation passenger and baggage security screening functions to improve safety and security would be provided at T2 and T3, no modernization and revitalization of the existing T2 and T3 (including the apron area), or improvement of passenger level of service or amenities at T2 and T3 would occur, no secure corridor between T2 and T3 would be provided, and no operational efficiencies at T2 and T3 would occur.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not meet the objectives of the proposed project, and would not avoid or substantially reduce any of the significant effects of the project.

#### **4.6.2 Alternatives Carried Forward for Further Consideration**

Three alternatives to the proposed project were described in Section 5.5 of the Draft EIR and evaluated in detail in Section 5.6 of the Draft EIR. These alternatives are discussed below.

##### **4.6.2.1 Alternative 1: No Project – No Build**

Under Alternative 1, none of the proposed improvements under the proposed project would occur. The project site would retain the existing physical conditions and the existing terminals would continue to operate as they do today, with future projected passenger growth occurring. The project site is currently developed with approximately 788,018 square feet of existing structures (not including the apron area) which would remain. Further, under Alternative 1, no new infrastructure or other site improvements at T2 and T3 would occur.

###### **4.6.2.1.1 Description of Effects as Compared to Proposed Project's Significant Effects**

###### **Air Quality**

Under Alternative 1, no physical changes would occur at the project site and the current operation of the airline terminals would continue. With respect to construction air pollutant emissions, Alternative 1 would not involve any construction, and thus, it would avoid the significant unavoidable impact that would occur under the proposed project with respect to construction-related regional emissions of NO<sub>x</sub>. Because the proposed project includes an increase in operational square footage, operational energy-related air pollutant emissions were evaluated and impacts were determined to be less than significant. Under Alternative 1, there would be no replacement of older less energy efficient fixtures and appliances with those that are newer and more energy efficient; however, Alternative 1 would not increase the terminal square footage. Thus, operational air pollutant emissions under Alternative 1 would be less than operational air pollutant emissions under the proposed project. Therefore, Alternative 1 would avoid the significant unavoidable impact associated with construction air pollutant emissions that would occur under the proposed project

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<sup>1</sup> As described in Table 3-1 in Chapter 3, *Overview of Project Setting*, of the Draft EIR, Concourse 0 would be constructed to the east of Terminal 1, in the current location of the Park One surface parking lot. Concourse 0 would provide up to 660,000 square feet of floor space, including 11 aircraft gates.

and would have reduced operational air pollutant emissions, and thus, Alternative 1 would have less overall impact than the proposed project on air quality.

**Cultural Resources**

As discussed in Section 4.3, *Cultural Resources*, the proposed project would have a less than significant impact on archaeological resources and paleontological resources with incorporation of standard control measures as mitigation. Given that no construction would occur under Alternative 1, this alternative would avoid the proposed project's impacts on archaeological resources and paleontological resources. Therefore, Alternative 1 would have less impact on archaeological resources and paleontological resources than the proposed project.

**Construction Surface Transportation**

Alternative 1 would not involve any of the construction activities associated with the development of the proposed project. Construction traffic associated with demolition, construction of new facilities, delivery of materials and hauling, and employee trips that would be required for the construction of the proposed project would not occur. Thus, Alternative 1 would avoid the proposed project's cumulatively considerable significant construction traffic impacts at the Imperial Highway and I-105 Ramp (Intersection #14) and Century Boulevard and Sepulveda Boulevard (Intersection #5). Therefore, as Alternative 1 entirely avoids the proposed project's construction traffic impacts, it would have less impact than the proposed project on traffic conditions in the area.

**4.6.2.1.2 Findings**

Because this alternative would not meet any of the project objectives described in Section 2 above, the BOAC hereby rejects the Alternative 1 - No Project – No Build. While significant impacts would be avoided or substantially lessened for air quality, cultural resources, and construction surface transportation, this alternative would not result in the modernization of T2 and T3 and associated apron, thereby not improving security or the quality of service and customer experience provided to passengers. As no development would occur and the physical conditions associated with the site and its activities would remain essentially the same as under current conditions, Alternative 1 would not meet any of the proposed project's objectives listed in Section 2 above. Specifically, Alternative 1 would not meet the proposed project's objective to meet TSA and CBP requirements for security and customs screening or provide flexible space for next generation passenger and baggage security screening functions to improve safety and security. Further, Alternative 1 would not improve passenger level of service and amenities, or improve buildings systems and aircraft apron areas (e.g., aircraft parking positions, passenger boarding bridge locations, aircraft fueling system hydrant locations, ground support equipment parking locations), nor improve the interior and exterior appearance. It would not provide a secure connector between T2 and T3 or provide for the shared functions between terminals to improve efficiency, flexibility, and enhance customer service.

**4.6.2.2 Alternative 2: No Project – Limited Interior Improvements Only**

Under Alternative 2, the airline terminal operations would continue and T2 and T3 would undergo improvements reasonably expected to occur in the foreseeable future if the proposed project is not approved. Such improvements could include updating the interior infrastructure (i.e., minor amounts of interior and building system renovations) and tenant improvements (i.e., signage, wiring for technology, modifications to layout of holding areas, etc.), all within the existing building footprints. To the extent that remodeling of interior spaces could occur to accommodate changes in security requirements, this would be reasonably expected to occur under this alternative. The amount of square footage at the project site would remain at 788,018 square feet (not including the apron area).

4.6.2.2.1 Description of Effects as Compared to Proposed Project's Significant Effects

**Air Quality**

Under Alternative 2, only limited physical changes within the building footprint would occur at the project site and the current operation of the airline terminals would continue. With respect to construction air pollutant emissions, Alternative 2 would involve only interior construction within the building footprint. Given the limited amount of construction that would occur, which would primarily involve interior improvements that do not require much, if any, large heavy-duty diesel-powered construction equipment, Alternative 2 would avoid the significant unavoidable impact that would occur under the proposed project with respect to construction-related regional emissions of NOx. Relative to operations, no increase in square footage would occur under Alternative 2 and therefore, energy-related air pollutant emissions would be less than the proposed project. Further, the interior improvements would likely include replacement of older less energy efficient appliances and fixtures with those that are newer and more energy efficient. Thus, operational air pollutant emissions under Alternative 2 would be less than operational air pollutant emissions under the proposed project. Therefore, Alternative 2 would avoid the significant unavoidable impact that would occur under the proposed project associated with construction air pollutant emissions and would have reduced operational air pollutant emissions, and thus, Alternative 2 would have less overall impact than the proposed project on air quality.

**Cultural Resources**

As discussed in Section 4.3, *Cultural Resources*, the proposed project would have a less than significant impact on archaeological resources and paleontological resources with incorporation of standard control measures as mitigation. Given that only interior construction would occur under Alternative 2, this alternative would avoid the proposed project's impacts on archaeological resources and paleontological resources. Therefore, Alternative 2 would have less impact on archaeological resources and paleontological resources than the proposed project.

**Construction Surface Transportation**

Alternative 2 would involve only limited construction activities associated with interior improvements. Therefore, construction traffic would be greatly reduced as compared to the proposed project (i.e., traffic associated with demolition and construction of new square footage facilities would not occur, and the number of traffic trips for delivery of materials, hauling, and construction employee trips would be substantially reduced). Thus, Alternative 2 would avoid the proposed project's cumulatively considerable significant construction traffic impacts at the Imperial Highway and I-105 Ramp (Intersection #14) and Century Boulevard and Sepulveda Boulevard (Intersection #5). Therefore, as Alternative 2 would have reduced construction traffic impacts, it would have less impact than the proposed project on existing traffic conditions in the area.

4.6.2.2.2 Findings

Because this alternative would not meet any of the project objectives described in Section 2 above, the BOAC hereby rejects the Alternative 2 - No Project – Limited Interior Improvements Only. While significant impacts would be avoided or substantially lessened for air quality, cultural resources, and construction surface transportation, Alternative 2 would not result in improvements to safety and security to meet long-term TSA and CBP security and customs screening (such as space enough to provide next generation passenger and baggage security screening functions), nor the modernization of T2 and T3 and associated apron. Although limited interior improvements within existing footprints of T2 and T3 could provide minimal improvements in level of service, amenities, and building systems, these improvements would not be sufficient to significantly upgrade the building and building systems, both of which are at or beyond their useful lives. In addition, although limited interior improvements would occur, no improvements to the aircraft apron areas (e.g., aircraft parking positions, passenger boarding bridge locations, aircraft fueling system hydrant locations, ground support equipment parking locations) or exterior improvements would occur, and no benefit to the overall appearance of the CTA would occur. Finally, under Alternative 2 there

would be no opportunity to provide a secure connector between T2 and T3 nor would there be the opportunity for shared functions between the two terminals to improve efficiency, flexibility, and enhance customer service. Therefore, Alternative 2 would not meet the project objectives listed above under Section 2.

#### **4.6.2.3 Alternative 3: Reduced-Scale Project**

Under Alternative 3, only certain elements of the proposed project would be implemented, resulting in a reduced-scale project. In particular, Alternative 3 would modernize T3, including updates to the interior and exterior of the terminal, the building systems, and some enhancements to amenities and operations within the terminal; however, only very limited improvements would be made at T2. The following elements that are included in the proposed project would be implemented under Alternative 3:

- ◆ The T3 existing ticketing building would be completely demolished and rebuilt. The new ticketing building would be constructed in the existing area of the T3 ticketing building, and would extend towards the Tom Bradley International Terminal (TBIT) in the paved open area to the southwest of T3. Additionally, the eastern portion of the existing T3 ticketing building would be extended into the western portion of the T2 existing ticketing building.
- ◆ The T3 existing concourse building would be completely demolished and rebuilt. The southern appendages to the T3 satellite would be demolished. The new T3 concourse would be wider than the existing concourse.
- ◆ The Security Screening Checkpoint (SSCP) at T3 would be reconfigured in the new space created by reconstructing the ticketing building and concourse.
- ◆ A Secure T2/T3 Connector would be built to connect the concourses; however, the design of this connector under Alternative 3 would eliminate the office level at the T2 ticketing building.
- ◆ The T2 Federal Inspection Station (FIS) would be renovated (interior renovation only).

As the Alternative 3 elements focus primarily on T3 (the oldest of the two terminals), as well as providing security and customs screening to improve safety and security, the elements that are included in the proposed project but would not be implemented under Alternative 3 are as follows:

- ◆ Demolishing and rebuilding the T2 ticketing building (and the associated additional square footage)
- ◆ T2 apron work and passenger boarding bridges
- ◆ T3 Control Center
- ◆ Consolidated Checked Baggage Inspection Systems (CBIS) for T2 and T3
- ◆ Consolidated SSCP for T2 and T3

The Reduced-Scale Project Alternative would include approximately 170,000 square feet of renovation to existing building area and the addition of approximately 400,000 square feet of new building area for a total of approximately 1,200,000 square feet of building area. This would represent a building area reduction of approximately 25 percent compared to the proposed project, which proposes a total of approximately 1,600,000 square feet of building area.

##### **4.6.2.3.1 Description of Effects as Compared to Proposed Project's Significant Effects**

#### **Air Quality**

Under Alternative 3, total construction air pollutant emissions and the duration of impacts associated with these emissions would be less than the proposed project given the reduced amount of demolition and construction that would occur. However, although implementation of Alternative 3 would result in less development, it is likely that this alternative would still result in similar maximum daily emissions given that the intensity of construction activity would likely remain the same (i.e., the reduced development could reduce the overall duration of development, but daily

activity levels would likely be similar to those of the proposed project). As stated in Section 4.1.1, Air Quality, the thresholds of significance are based on maximum daily emissions and the proposed project would have significant construction-related impacts with respect to maximum daily regional NO<sub>x</sub> emissions. As Alternative 3 would have a similar intensity of construction activity, this alternative would result in similar significant impacts with respect to maximum daily NO<sub>x</sub> emissions as compared to the proposed project. Construction air pollutant emissions from this alternative would still exceed the regional daily emissions significance threshold for NO<sub>x</sub> following implementation of the same standard control and mitigation measures implemented under the proposed project (see Section 4.1.1, Air Quality).

With regard to operational air pollutant emissions, Alternative 3 would have approximately 25 percent less total terminal square footage than the proposed project; therefore, energy-related operational air pollutant emissions would be less than the proposed project. Further, while fewer building renovations would be implemented under Alternative 3 as compared to the proposed project, the renovations that would occur would include replacement of many of the older less energy efficient appliances and fixtures with those that are newer and more energy efficient.

Therefore, under Alternative 3, total construction-related air pollutant emissions and the duration of emissions would be reduced as compared to the proposed project (due to reduced project size and shorter construction period, compared to the proposed project), although peak daily construction air pollutant emissions would be similar. Long-term operational-related air quality impacts would be reduced compared to the proposed project. Therefore, overall, this alternative would reduce air pollutant emissions as compared to the proposed project; however, peak construction air pollutant emissions from this alternative would still result in a significant and unavoidable impact as it would still exceed the daily regional significance threshold for NO<sub>x</sub> following implementation of standard control and mitigation measures.

#### **Cultural Resources**

Under Alternative 3, less demolition and construction would occur as compared to the proposed project, resulting in a smaller amount of ground disturbance and, thus, a lesser potential to encounter previously unknown archaeological and paleontological resources. However, as with the proposed project, since Alternative 3 would include excavations of varying depths across portions of the project site, including excavations at depths where native soils would be encountered, previously unknown buried archaeological resources and/or paleontological resources could be impacted. As with the proposed project, impacts to cultural resources would be less than significant with incorporation of standard control measures as mitigation.

#### **Construction Surface Transportation**

Similar to the proposed project, construction employee parking would occur just east of the CTA and material staging for deliveries associated with the construction of Alternative 3 would occur on either an existing industrial parcel located on La Cienega Boulevard, just north of Imperial Highway (proposed primary construction staging area) or on a portion of an existing LAWA-owned construction staging area along the south side of Westchester Parkway, east of the southern terminus of La Tijera Boulevard (optional primary construction staging area). Therefore, while there would be less construction traffic over the entire duration of construction, because Alternative 3 would involve less development, construction employee trips, material deliveries, and truck haul trips on a daily basis would likely be similar to those of the proposed project. As such, implementation of Alternative 3 would likely have a cumulatively considerable significant construction traffic impact at the Imperial Highway and I-105 Ramp (Intersection #14) and Century Boulevard and Sepulveda Boulevard (Intersection #5), similar to the proposed project.

#### **4.6.2.3.2 Relationship to Project Objectives**

Alternative 3 would result in some modernization of T2 and T3 and associated apron (at T3 only), thereby implementing some improvement in security and the quality of service and customer experience provided to passengers. However, the improvements would occur on a more limited



basis than the proposed project and would only partially meet the project objectives presented in Section 2. Specifically, Alternative 3 would include improvements to meet TSA and CBP requirements for security and customs screening to improve safety and security by reconfiguring the SSCP at T3 and making interior renovations to the T2 FIS. Safety and security improvements would not be made in T2 and the CBIS and SSCP would not be consolidated for the two terminals, thereby, reducing efficient use of limited space. Alternative 3 would make some improvements to passenger level of service and amenities, as well as some improvements to buildings systems, the aircraft apron area (e.g., aircraft parking positions, passenger boarding bridge locations, aircraft fueling system hydrant locations, ground support equipment parking locations) and the interior and exterior appearance at T3 only. Very limited improvements would occur at T2 which would greatly limit the opportunities and the space available for improvements to services and amenities between T2 and T3. As such, this alternative would not achieve the improvements in operational efficiency and flexibility that would occur with the proposed project, nor would it provide for the types of improvements that have been previously done for other terminals within the CTA. Alternative 3 would provide a secure connector between T2 and T3 and provide for some shared functions between terminals, however, there would not be adequate space or design to provide consolidated CBIS or SSCP for T2 and T3.

#### **4.6.2.3.3 Findings**

Of the alternatives other than Alternative 1: No Project-No Build, Alternative 3: Reduced Scale Project is the environmentally superior alternative, as discussed in Section 5.7 of the Draft EIR. For reasons discussed above and in Section 5.7 of the Draft EIR, the BOAC hereby rejects Alternative 3: Reduced-Scale Project. While Alternative 3 would lessen the significant air quality, cultural resources, and construction traffic impacts of the proposed project, it would not avoid the significant unavoidable impact that would occur under the proposed project with respect to construction-related regional NO<sub>x</sub> emissions and with respect to making a cumulatively considerable significant construction traffic impact.

In addition, BOAC hereby rejects Alternative 3 because it would not fully meet four of the five project objectives listed in Section 2 above. It would meet the objective to provide a secure connector between T2 and T3. It would partially meet the objective to provide for TSA and CBP requirements for security and customs screening and increase the amount of flexible space for next generation passenger and baggage security screening functions, as it would provide 45,000 square feet of SSCP/Office space for security in T3, as is also the case for the proposed project; however, the amount of SSCP/Office area for security in T2 would be over 70 percent less under Alternative 3 than it would be under the proposed project (i.e., 40,123 square feet compared to 145,000 square feet – see Tables 5-1 and 2-1, respectively) and the amount of FIS area in T2 would be approximately 13 percent less under Alternative 3 than it would be under the proposed project (i.e., 87,796 square feet compared to 101,000 square feet – see Tables 5-1 and 2-1, respectively). It would partially meet the objective to modernize and revitalize existing T2 and T3 to improve passenger level of service and amenities. Although Alternative 3 would improve the aircraft apron area at T3 to be compatible with proposed changes at the T3 building and anticipated airline fleets and uses, and enhance the interior and exterior of T3, it would only partially meet the objective to enhance the interior and exterior of the terminals to the benefit of the overall appearance of the CTA as the apron area and exterior of T2 would remain unimproved. It would not meet the fundamental objective to provide improvements and functions that can be shared between terminal to improve the operational efficiency and flexibility, as well as enhance customer service.

## **4.7 Findings on Suggestions Included in Comments on the Draft EIR**

Several comments on the Draft EIR suggested additional mitigation measures or changes to the mitigation measures identified in the Draft EIR and one commentor suggested a new project alternative. As explained in the responses to comments included in Chapter 2 of the Final EIR, these requests were declined for reasons explained in the responses to comments in the Final EIR.

The BOAC hereby adopts and incorporates by reference the specific reasons for declining such measures and the new alternative contained in the responses to comments in the Final EIR (Chapter 2). The BOAC finds that specific economic, legal, social, technological, or other considerations make infeasible or unnecessary the following mitigation measures or project alternatives identified in the Final EIR, for the reasons explained below and in responses to comments in the Final EIR.

Regarding suggested additional air quality mitigation measures by the South Coast Air Quality Management District (SCAQMD), as explained below the comments did not provide any evidence that the suggested additional mitigation measures would provide substantial additional reduction of significant construction-related air quality impacts beyond the reductions achieved by the Draft EIR's mitigation measures. However, other changes to the measures were included in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR. The revisions made to the mitigation measures removed statements that provided some extraneous technical information and did not change the effectiveness of the mitigation measures.

#### **4.7.1 Suggested Mitigation Measures**

- Comments from SCAQMD (T2/3-AR00001-10 and T2/3 – AR00001-11) on the Draft EIR recommended that LAWA make changes to existing mitigation measure LAX AQ-1, specifically 1q, by requiring a review and implementation of new, feasible lower-emission technologies every two years and include it as a new mitigation measure in the Final EIR. For the reason discussed in Response to Comment T2/3-AR00001-10, the construction emission mitigation requirements under Mitigation Measure LAX-AQ-1 collectively achieve the same objective and similar emissions reductions as SCAQMD's proposed modification of LAX-AQ-1q. The proposed modifications by SCAQMD to LAWA's obligations are not required because LAWA's "independent research" encompasses "technology review," and "from time to time" provides more flexibility to respond to real-time technology changes than an inflexible two-year review schedule. In addition, SCAQMD suggested adding text regarding obtaining written approval by the lead agency to add to the measures enforceability. LAWA is required to adopt a Mitigation Monitoring and Reporting Program to ensure that Mitigation Measure LAX-AQ-1q is implemented (i.e., to enforce implementation). (State CEQA Guidelines Section 15097(a).) For these reasons, Mitigation Measure LAX-AQ-1q is "fully enforceable." Additionally, LAWA is the Lead Agency for the proposed project and, as noted above, is responsible for ensuring that the mitigation measure is implemented; hence, it is not necessary to add the suggest language to obtain "written approval from the Lead Agency."
- Comment from SCAQMD (T2/3-AR00001-13) on the Draft EIR recommended that LAWA "[i]nclude in all construction contracts the requirement to use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements." As discussed in Response to Comment T2/3-AR00001-13, Standard Control Measure (Mitigation Measure) LAX-AQ-1 measures 1e and 1o require the best available control technology to be used for all construction-related equipment, both on- and off- road. LAX-AQ-1 measure 1q specifies the use of 2010 or newer diesel haul trucks and details a "step-down" methodology to be followed if such equipment cannot be obtained, including the provision of documentation in the event a step-down in control is warranted. The effect of these requirements is to ensure that contractors have exercised due diligence in supplying the cleanest fleet available. These requirements will be included in the construction contract(s) for the project. For the reasons discussed in Response to Comment T2/3-AR00001-13, the EIR already includes measures (measures 1e, 1o,

and 1q of Standard Control Measure (Mitigation Measure) LAX-AQ-1) that are substantially equivalent to and achieve the same ends as the ones suggested by SCAQMD; therefore, no additional measures are required.

- Comment from SCAQMD (T2/3-AR00001-14) on the Draft EIR recommended that LAWA “[i]nclude in all construction contracts the requirement that all off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emission standards at a minimum. In addition, if not already supplied with a factory-equipped diesel particulate filter, 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. In addition, construction equipment shall incorporate, where feasible, emissions savings technology such as hybrid drives and specific fuel economy standards. In the event that any equipment required under this mitigation measure is not available, provide documentation as information becomes available. A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment shall be provided. Encourage construction contractors to apply for SCAQMD “SOON” funding incentives to help accelerate the clean-up of off-road diesel vehicles, such as heavy duty construction equipment.”

As discussed in Response to Comment T2/3-AR00001-14, Standard Control Measure (Mitigation Measure) LAX-AQ-1 measure 1e requires the best available control technology to be used for all construction-related equipment, both on- and off- road. Measures 1p and 1q specify the use of Tier 4 (final) off-road equipment and details a “step-down” methodology to be followed if such equipment cannot be obtained, including the provision of documentation in the event a step-down in control is warranted. LAWA will require through contract requirements that contractors provide to LAWA documentation as to the engine tier level for all construction equipment over 50 horsepower and, if equipped with best available control technologies (BACT), such as diesel particulate filters, the contractor is also required to provide to LAWA evidence that the subject BACT is CARB-certified. While LAWA will continue to encourage construction contractors to pursue SOON funding incentives, LAWA cannot make that a construction contract requirement (i.e., cannot require a contractor to participate in a voluntary funding incentive program). Moreover, encouraging contractors to seek SCAQMD “SOON” funding incentives does not actually mitigate an impact. The mitigation measure includes specific emission Tiers (with Tier 4 being required if available). The mandatory Tier level sets the allowable emission rate that must be met. It would not be cost-effective for LAWA to mandate specific technologies (e.g., hybrid drives) to meet that allowable emission rate performance standard. That is the function of the equipment manufacturer, to design engines that meet the standards, so that contractors can then select equipment that complies with the mitigation measure. For the reasons discussed in Response to Comment T2/3-AR00001-14, the general types of measures suggested in this comment are already reflected in Standard Control Measure (Mitigation Measure) LAX-AQ-1 or are otherwise implemented by LAWA as a standard practice on LAX construction projects; therefore, no additional measures are required.

- Comment from SCAQMD (T2/3-AR00001-15) on the Draft EIR recommended that LAWA “[e]nter into a contract that notifies all vendors and construction contractors that vehicle and construction equipment idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB’s Airborne Toxic Control Measure to Limit Diesel-Fueled

Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle and construction equipment idling requirement, post signs at each facility entry gates stating idling longer than five minutes is not permitted." As discussed in Response to Comment T2/3-AR00001-15, measure 1d of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that idling in excess of five minutes be prohibited by diesel-fueled vehicles except in the case of safety-related or operational reasons, as defined by CARB or as approved by LAWA. As part of all construction contracts for the proposed project, LAWA will require that construction contractors comply with all applicable laws and regulations as well as the standard control measures adopted as part of the project. For the reasons discussed in Response to Comment T2/3-AR00001-15, the substance of this suggested measure is already included in Standard Control Measure (Mitigation Measure) LAX-AQ-1, and no additional measures regarding idling are required.

- Comment from SCAQMD (T2/3-AR00001-16) on the Draft EIR recommended that LAWA "[e]mploy on-road heavy-duty diesel trucks or equipment with a gross vehicle weight rating (GVWR) of 19,500 pounds or greater that complies with EPA 2007 on-road emission standards for PM and NOx (0.01 gram per brake horsepower - hour (g/bhp-hr) and at least 0.2 g/bhp-hr, respectively)." As discussed in Response to Comment T2/3-AR00001-16, measure 1o of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that vehicles of 14,001 pounds and higher be required to meet more strict requirements. In the event that such equipment is not obtainable, measure 1q details a 'step-down' methodology to require the cleanest obtainable alternative. For the reasons discussed in Response to Comment T2/3-AR00001-16, no additional measures regarding on-road heavy-duty vehicles are required.
- Comment from SCAQMD (T2/3-AR00001-17) on the Draft EIR recommended that LAWA "[m]aintain vehicle and equipment maintenance records for the construction portion of the proposed project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. The Lead Agency will maintain their construction equipment and the construction contractor will be responsible for maintaining their equipment and maintenance records. All maintenance records for each facility and their construction contractor(s) will remain on-site for a period of at least two years from completion of construction." As discussed in Response to Comment T2/3-AR00001-17, LAWA's standard construction contracts include, among the many requirements pertaining to reducing construction-related emissions, a requirement that contractors shall ensure that equipment is in proper working order so as to minimize harmful emissions. LAWA's Construction Inspection Division and on-site mitigation monitors have the authority to follow-up (and do so if the matter arises) with contractors if improperly operating equipment is observed on-site (i.e., observing excess black exhaust emissions from operating equipment, which is typically a sign of engine problems), through "job memos" (i.e., written warning to the contractor) and/or a "Notice of Non-Compliance" (i.e., formal notice of non-compliance with contract requirements). In light of the fact that there are several hundred construction vehicles and pieces of construction equipment in operation at LAX at any given time, with numerous vehicles and equipment being brought to the airport or taken away as each construction project begins and ends, it is not practical to require all contractors to provide maintenance records for their vehicles and equipment, which would need to also include such records from the equipment rental/leasing companies that the contractors use, and retain those records on-site for

at least two years after completion of the projects, especially given that obtaining and storing maintenance records for any amount of time does not mitigate any air quality impact. For the reasons discussed in Response to Comment T2/3-AR00001-17, LAWA's ability to observe construction vehicles and equipment being utilized on-site, and to note and address operational problems that occur at the time, is a more efficient and practical means to meet the intent of the recommended measure by SCAQMD.

- Comment from SCAQMD (T2/3-AR00001-18) on the Draft EIR recommended that LAWA "[c]onduct a survey of the proposed project construction area(s) to assess whether the existing infrastructure can provide access to electricity, as available, within the facility or construction site, in order to operate electric on-site mobile equipment. For example, each project applicant, project sponsor, or public agency and/or their construction contractor(s) will assess the number of electrical welding receptacles available. Construction areas within the facility or construction site where electricity is and is not available must be clearly identified on a site plan. The use of non-electric onsite mobile equipment shall be prohibited in areas of the facility that are shown to have access to electricity. The use of electric on-site mobile equipment within these identified areas of the facility or construction site will be allowed. Include in all construction contracts the requirement that the use of non-electric on-site mobile equipment is prohibited in certain portions of the facility as identified on the site plan. Maintain records that indicate the location within the facility or construction site where all electric and non-electric on-site mobile equipment are operated, if at all, for a period of at least two years from completion of construction." As discussed in Response to Comment T2/3-AR00001-18, measure 1j of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that "Every effort shall be made to utilize grid-based electric power at any construction site, where feasible." This requirement to use grid-based power is similar to SCAQMD's suggestion and meets the basic intent of the suggestion, but allows for exception when necessary for safety or operational purposes. For the reasons discussed in Response to Comment T2/3-AR00001-18, because the requirement to use electric power where feasible is already included in Mitigation Measure LAX-AQ-1, no additional measures regarding electrical power use are required.
- Comment from SCAQMD (T2/3-AR00001-19) on the Draft EIR recommended that LAWA provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow. As discussed in Response to Comment T2/3-AR00001-19, LAWA would implement Standard Control Measure LAX-ST-1, Construction Traffic Management Plan (CTMP), which would serve to reduce congestion on area roadways during construction of the proposed project. The details of the CTMP would include provisions for temporary traffic controls, such as a flag person, where warranted. For the reasons discussed in Response to Comment T2/3-AR00001-19, the suggested measure is essentially equal to the standard control measure included in the Draft EIR and no additional measures regarding temporary traffic controls are required.
- Comment from SCAQMD (T2/3-AR00001-20) on the Draft EIR recommended that LAWA provide dedicated turn lanes for the movement of construction trucks and equipment on- and off-site. As discussed in Response to Comment T2/3-AR00001-20, primary truck access to and from the project site would occur on the airside (i.e., airport operations area) adjacent to the site, within which there is no public traffic and no need for dedicated left turn lanes. The truck haul routes proposed for project construction consist of improved highways/roadways that already have dedicated left turn lanes along the subject routes. In addition, LAWA has established the Coordination and Logistic Management (CALM) Team, which provides means and mechanisms that

have been deemed to be successful on prior projects to assist in maintaining traffic flows and minimizing disruptions during LAWA construction activities. For the reasons discussed in Response to Comment T2/3-AR00001-20, the suggested measure is not required.

- Comment from SCAQMD (T2/3-AR00001-21) on the Draft EIR recommended that LAWA re-route construction trucks away from congested streets or sensitive receptor areas. As discussed in Response to Comment T2/3-AR00001-21, the truck haul routes proposed for project construction were specifically selected to avoid project-related construction truck traffic on congested streets or near sensitive receptors around the airport. Additionally, LAWA would implement Standard Control Measure LAX-ST-1, Construction Traffic Management Plan (CTMP), which includes the requirement that designated truck routes shall be limited to freeways and non-residential streets, away from sensitive receptors (see item d. Designated Truck Routes). The CTMP that would be implemented for the proposed project, as well as CTMPs that are currently being/will be implemented for the other on-going and future projects at LAX, would reduce congestion on area roadways during construction. For the reasons discussed in Response to Comment T2/3-AR00001-21, the suggested measure is already incorporated into the proposed project haul route and included in LAWA Standard Control Measure LAX-ST-1 and no additional measures regarding re-routing of construction trucks away from congested streets or sensitive receptor areas are required.
- Comment from SCAQMD (T2/3-AR00001-22) on the Draft EIR recommended that LAWA coordinate with the local city to improve traffic flow by signal synchronization in the area near the construction site. As discussed in Response to Comment T2/3-AR00001-22, LAWA maintains communication and coordination with the Los Angeles Department of Transportation and the transportation departments of other local jurisdictions around the airport regarding traffic signal timing and synchronization, as well as other measures to improve traffic flows in the local area, including areas that may be affected by project-related construction traffic. For the reasons discussed in Response to Comment T2/3-AR00001-22, the substance of this suggested measure is already standard LAWA practice and no additional measures regarding signal synchronization are required.
- Comment from SCAQMD (T2/3-AR00001-23) on the Draft EIR recommended that LAWA “[e]nsure that drivers understand that traffic speeds on all unpaved roads will be limited to 15 mph or less. In addition, post signs on all unpaved roads indicating a speed limit of 15 mph or less.” As discussed in Response to Comment T2/3-AR00001-23, the T2/T3 Modernization Project site is completely paved, as are also the surrounding area and all of the site access and haul routes. No unpaved roads would be used by, or created by, project construction. For the reasons discussed in Response to Comment T2/3-AR00001-23, this measure is not applicable for the proposed project.
- Comment from SCAQMD (T2/3-AR00001-24) on the Draft EIR recommended that LAWA schedule construction activities that affect traffic flow on the arterial system to occur during off-peak hours to the greatest extent practicable. As discussed in Response to Comment T2/3-AR00001-24, measure 1g of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that to the extent feasible, construction employee commutes be scheduled as to occur on off-peak hours for the purposes of minimizing interference with roadway traffic. In addition, LAWA would implement Standard Control Measure LAX-ST-1, Construction Traffic Management Plan (CTMP),

which includes the requirement that to the extent possible, truck deliveries of bulk materials such as aggregate, bulk cement, dirt, etc. to the project site, and hauling of material from the project site, shall be scheduled during off-peak hours to avoid the peak commuter and Airport traffic periods on designated haul routes (see item b. Designated Truck Delivery Hours). For the reasons discussed in Response to Comment T2/3-AR00001-24, the suggested measure is already included in standard control measures that would be implemented during construction of the proposed project and no additional measures regarding construction scheduling are required.

- Comment from SCAQMD (T2/3-AR00001-25) on the Draft EIR recommended that if and when winds speeds exceed 25 mph, LAWA suspend all excavating and grading activities and record the date and time when the use of construction equipment associated with these construction activities are suspended. SCAQMD further recommended that this log shall be maintained on-site for a period of at least two years from completion of construction. As discussed in Response to Comment T2/3-AR00001-25, potential dust emissions at the project site would be effectively controlled during construction through compliance with SCAQMD Rule 403, which includes the requirement for site watering at least three times per day, and implementation of Standard Control Measure (Mitigation Measure) LAX-AQ-1 (specifically measures 1a through 1c), along with LAWA standard construction contract requirements (i.e., Section 01 35 43 Dust Control Environmental Procedures of LAWA Standards for the Construction Contract, which set forth dust control requirements such as site watering, Rule 403 compliance, covering of truck loads and freeboard requirements, and vehicle speed limits on unpaved areas) for dust control during construction. Stringent dust control during construction of the proposed project would not only occur relative to the protection of air quality, but also relative to avoiding potential damage to aircraft engines for airfield operations that would continue to occur at and around the T2/T3 area. In addition, the proposed project's PM10 and PM2.5 construction emissions would not exceed SCAQMD significance thresholds (Draft EIR Tables 4.1.1-6 and 4.1.1-8), and thus no mitigation measures are required (State CEQA Guidelines Section 15126.4(a)(3).) For the reasons discussed in Response to Comment T2/3-AR00001-25, potential dust impacts associated with the proposed project are sufficiently reduced and no additional measures regarding dust control are required.
- Comment from SCAQMD (T2/3-AR00001-26) on the Draft EIR recommended that if and when any first stage smog alert occurs, LAWA record the date and time of each alert, suspend all construction activities that generate emissions, and record the date and time when the use of construction equipment and construction activities are suspended. SCAQMD further recommended that this log shall be maintained on-site for a period of at least two years from completion of construction. A first stage smog alert has not occurred within the South Coast Air Basin for almost 30 years, the last one being in 1988. For the reason discussed in Response to Comment T2/3-AR00001-26, the addition of this requirement as a mitigation measure is not warranted.
- Comment from SCAQMD (T2/3-AR00001-27) on the Draft EIR recommended that LAWA coordinate with the construction contractor to site parking areas to minimize interference with roadway traffic. As discussed in Response to Comment T2/3-AR00001-27, LAWA would implement Standard Control Measure LAX-ST-1 item g, as revised in Chapter 3, Corrections and Additions to the Draft EIR, of the Final EIR, which states that if parking for construction employees is not located on, or in proximity to, the work site, shuttle buses shall be used to transport employees to and from the construction areas. This measure would minimize interference to roadway traffic. For the reasons discussed in Response to Comment T2/3-AR00001-27, the suggested measure is already included in standard control measures that would be implemented

during construction of the proposed project and no additional measures regarding construction contractor parking are required.

- Comment from SCAQMD (T2/3-AR00001-28) on the Draft EIR recommended that LAWA “[e]valuate the use of alternate fuels for on-site mobile construction equipment prior to the commencement of construction activities, provided that suitable equipment is available for the activity. Equipment vendors shall be contacted to determine the commercial availability of alternate-fueled construction equipment. Priority should be given during the bidding process for contractors committing to use alternate-fueled construction equipment.” As discussed in Response to Comment T2/3-AR00001-28, Mitigation Measure MM-AQ (T2/T3)-1 requires that all construction contractors be required to utilize renewable diesel fuel for at least 90 percent of diesel fuel demand, which provides for pollutant emissions reductions. For the reason discussed in Response to Comment T2/3-AR00001-28, the project’s mitigation measure, Mitigation Measure MM-AQ (T2/T3)-1, effectively provides for alternative fuels, which meets the basic intent of the suggested measure and no additional measures regarding alternative fuels are required.
- Comment from SCAQMD (T2/3-AR00001-29) on the Draft EIR recommended that LAWA include in all construction contracts the requirement to cover all haul trucks delivering or hauling away dirt, sand, soil, or other loose materials. As discussed in Response to Comment T2/3-AR00001-29, as part of Contingency Control Measure for Large Operations 1E from SCAQMD Rule 403, this is already required. As part of all construction contracts for the proposed project, LAWA will require that construction contractors comply with all applicable laws and regulations, including SCAQMD Rule 403. For the reasons discussed in Response to Comment T2/3-AR00001-29, no additional measures regarding covering of haul trucks are required.
- Comment from SCAQMD (T2/3-AR00001-30) on the Draft EIR recommended that LAWA require the construction contractor to install and use wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site for each trip to prevent drag-out. As discussed in Response to Comment T2/3-AR00001-30, the suggested measure is not directly applicable as it is designed for construction sites which are not paved; the construction site of the proposed project is a paved area. SCAQMD Rule 403 requires in measure (d)(5) that either wheel washing or paving of the surface would be appropriate mitigation to reduce drag-out while importing and exporting soil. Measure 1c of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that all paving be completed as soon as practical to support the mitigation of drag-out. For the reasons discussed in Response to Comment T2/3-AR00001-30, no additional measures regarding drag-out are required.
- Comment from SCAQMD (T2/3-AR00001-31) on the Draft EIR recommended that LAWA require the construction contractor to apply non-toxic soil stabilizers according to manufacturers’ specifications to all inactive construction areas (e.g., previously graded areas inactive for ten days or more). As discussed in Response to Comment T2/3-AR00001-31, measure 1b of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that contractors demonstrate that all ground surfaces of the project be covered or treated sufficiently to minimize fugitive dust emissions. This measure encompasses the SCAQMD’s suggestion with no revisions needed. For the reasons discussed in Response to Comment T2/3-AR00001-31, no additional measures regarding soil stabilizers are required.



- Comment from SCAQMD (T2/3-AR00001-32) on the Draft EIR recommended that LAWA require the construction contractor to replace ground cover in disturbed areas as quickly as possible to minimize dust. As discussed in Response to Comment T2/3-AR00001-32, measure 1b of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that contractors demonstrate that all ground surfaces of the project be covered or treated sufficiently to minimize fugitive dust emissions. Measure 1c of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that any paving activities be performed as quickly as practical and that areas of the construction site to undergo grading be mitigated as soon as practical after grading. For the reasons discussed in Response to Comment T2/3-AR00001-32, the suggested measure is already included in standard control measures that would be implemented during construction of the proposed project and no additional measures regarding ground cover are required.
- Comment from SCAQMD (T2/3-AR00001-33) on the Draft EIR recommended that LAWA require the construction contractor to pave road and road shoulders. As discussed in Response to Comment T2/3-AR00001-33, although the construction site is already a paved area, measure 1c of Standard Control Measure (Mitigation Measure) LAX-AQ-1 requires that any paving be completed as quickly as practical. Measure 1c, combined with the state of the project site, mean that the suggestion is not applicable to the proposed project. For the reasons discussed in Response to Comment T2/3-AR00001-33, no additional measures regarding paving are required.
- Comment from SCAQMD (T2/3-AR00001-34) on the Draft EIR recommended that LAWA “[r]equire the construction contractor to sweep streets at the end of the day using SCAQMD Rule 1186 and 1186.1 compliant sweepers if visible soil is carried onto adjacent public paved roads. In the event that water sweepers are used, recommend the use of reclaimed water by construction contractor.” As discussed in Response to Comment T2/3-AR00001-34, the project site is located on the airport operations area (AOA), which is well removed from public paved roads and it is not anticipated that project construction-related soils would be carried onto any such roads. Notwithstanding, project construction would include sweeping around the project site, especially at the location(s) where construction vehicles exit the site and move onto the AOA in the vicinity of where aircraft currently operate. LAWA’s standard construction contract requirements include the requirement that sweepers be alternative fuel powered (typically compressed natural gas/liquefied natural gas [CNG/LNG]), which is compliant with SCAQMD Rules 1186 and 1186.1. Construction projects are required to use reclaimed water, as feasible, for dust control, which would include in sweepers. For the reasons discussed in Response to Comment T2/3-AR00001-34, no additional mitigation measures regarding street sweeping are required.
- Comments from Shute Mihaly & Weinberger LLP on behalf of the City of El Segundo (T2/3-AL00001-16 and T2/3-AL00001-45) on the Draft EIR recommended that LAWA provide additional mitigation requiring that LAWA commit to the complete reconstruction (base and surface) of this roadway. Following reconstruction, LAWA must commit to regular resurfacing as needed to ensure that the Pavement Condition Index remains in the good (A-rated) range. For the reason discussed in Responses to Comments T2/3-AL00001-16 and T2/3-AL00001-45, as identified on Figure 4.4-3 in Section 4.4.3.7 of the Draft EIR, all of the haul truck volumes are conservatively assumed (i.e., worst-case) to utilize Imperial Highway regardless of which construction staging area is assumed (proposed primary or optional primary). Also, as indicated on page 8 in Appendix D.2 of the Draft EIR, estimated 2019 intersection volumes at

Imperial Highway and Pershing Drive (westbound on Imperial Highway turning right on Pershing) is 1,994 during the a.m. peak hour. Thus, the additional six (6) construction truck trips associated with the proposed project would represent less than one (1) percent of the total vehicles turning at this intersection during the morning peak hour (6 of 1,994 total vehicles). LAX Master Plan Commitment ST-17, Maintenance of Haul Routes, provide that haul routes on off-airport roadways will be maintained and comply with City of Los Angeles and other appropriate jurisdictional requirements for maintenance. As noted on page 30 of the LAWA's LAX Master Plan Mitigation Monitoring and Reporting Program 2015 Annual Progress Report, this is an ongoing effort and continues to be implemented. LAWA will continue to consult with the agencies responsible for maintenance of Imperial Highway and other roadways to identify any issues during construction with the condition of the haul routes. For the reasons discussed in Response to Comment T2/3-AL00001-16 and because the proposed project's minor pavement impacts will be effectively addressed, no additional mitigation is required to reduce pavement impacts.

- Comment from Shute Mihaly & Weinberger LLP on behalf of the City of El Segundo (T2/3-AL00001-18) on the Draft EIR recommended that in order to reduce cumulative construction-related traffic impacts, LAWA, as the lead agency and sponsor of a number of the cumulative development projects at LAX, eliminate certain projects or, at a minimum, stagger their implementation. As described in Section 4.4.5 of the Draft EIR and reiterated in Sections 4.4.6 and 4.4.7, the proposed project's contribution would be cumulatively considerable at two significantly impacted intersections (Century Boulevard and Sepulveda Boulevard [Intersection #5] and Imperial Highway and I-105 Ramp [Intersection #14]), and the factors related to that cumulatively considerable contribution are particular to the T2/T3 Modernization Project. More specifically, the project's cumulatively considerable contribution to the impact at the intersection of Century Boulevard/Sepulveda Boulevard would occur in the AM peak-hour and would only occur if/when project construction requires a swing-shift (11:00 p.m. to 7:00 a.m.). The suggestion that LAWA "eliminate certain projects or, at a minimum, stagger their implementation" in order to avoid this significant cumulative impact is not feasible, especially given that there would still be future background traffic growth at that intersection regardless of LAWA's other projects and the timing and even the certainty of the subject impact occurring is unknown (i.e., impact would only occur if/when a swing-shift is needed). With regard to the project's cumulatively considerable contribution to the impact at the intersection of Imperial Highway/I-105 Ramp, this impact is specific to the current restrictions on vehicles exiting the potential staging area on La Cienega Boulevard. Vehicles exiting the subject staging area can only turn right onto La Cienega Boulevard, which for trucks seeking freeway access, forces them to proceed south on La Cienega Boulevard and then west on Imperial Highway to the I-105 ramp at Imperial Highway. This truck travel path, which leads to the significant cumulative impact at the intersection of Imperial Highway/I-105 Ramp, is particular to characteristics (restrictions) of the project staging area. As future traffic volumes increase at this intersection even with growth in background traffic alone, the project-related traffic would still impact the intersection.

Additionally, with regard to staggering LAWA projects in order to avoid significant cumulative traffic impacts, Figure 4.4-4 in the Draft EIR provides a bar chart of the estimated construction worker hours for the various projects considered in the cumulative construction traffic analysis. The bar chart illustrates the complexity of how the anticipated construction schedules for the various projects overlap. Trying to now shift those construction schedules to address the construction peak identified for November 2019, when the project's significant cumulative impacts are anticipated to occur, is not only infeasible, but is likely to simply shift the cumulative construction

peak to a different time, providing no assurance that the currently projected significant cumulative impact would be avoided (i.e., the aforementioned unique aspects of the project's contribution to cumulative construction traffic impacts would still be the same no matter when the cumulative peak occurs).

Also, postponing implementation of the proposed project in an attempt to avoid the cumulative traffic peak period would delay and hinder the ability to meet the objectives of the project, presented in Section 2 above, including those that are time sensitive and needed now. These include meeting TSA and CBP requirements for security and customs screening, modernizing and revitalizing existing T2 and T3 in order to improve passenger service, and providing improvements within each terminal in order to share functions and operations thereby improving efficiency and flexibility. CEQA defines "feasibility" in terms of "capable of being accomplished in a successful manner within a reasonable period of time." (CEQA Guidelines Section 21061.1). As shown in Figure 4.4-4 of the Draft EIR, in order for implementation of the proposed project to clearly avoid the construction traffic peak period during which the cumulatively considerable (significant) construction traffic impacts occur, the start of construction for the proposed project would need to be delayed until early- to mid-2021, which is not considered to be feasible. For the reasons discussed in Response to Comment T2/3-AL00001-18, eliminating certain projects at LAX or staggering their implementation is not considered feasible.

- Comment from Shute Mihaly & Weinberger LLP on behalf of the City of El Segundo (T2/3-AL00001-19) on the Draft EIR recommended that LAWA provide additional mitigation regarding preparation of a construction traffic management plan prior to initiation of construction, as well as other actions that LAWA should undertake to manage the disruptions that would occur during that project's construction. LAWA would implement Standard Control Measure LAX-ST-1 (described in Section 4.4.8, as revised in Chapter 3, Corrections and Additions to the Draft EIR, of the Final EIR) to reduce construction impacts on study area intersections. Among other things, this measure includes provisions for detours, limitations on roadway closures, construction traffic management plans, including signage, noticing, flaggers, and sequencing limits. The same types of measures have been successfully implemented on numerous LAX projects to mitigate construction traffic impacts. For the reasons discussed in Responses to Comments T2/3-AL00001-14 and T2/3-AL00001-19, and because Standard Control Measure LAX-ST-1 effectively reduces this impact, no modifications to LAWA's proposed measure are required.
- Comment from California Department of Transportation (Caltrans) (T2/3-AS00001-3) on the Draft EIR recommended that LAWA incorporate as mitigation that all vehicle loads be contained and avoid any tracking of materials, which may fall or blow onto Caltrans roadways or facilities during construction. For the reason discussed in Response to Comment T2/3-AS00001-3, LAWA would implement Standard Control Measure LAX-ST-1 (as revised in Chapter 3, Corrections and Additions to the Draft EIR, of the Final EIR), which requires contractors to complete a Construction Traffic Management Plan, which includes the requirement that to the extent possible, truck deliveries of bulk materials such as aggregate, bulk cement, dirt, etc. to the project site, and hauling of material from the project site, shall be scheduled during off-peak hours to avoid the peak commuter and Airport traffic periods on designated haul routes (see item b. Designated Truck Delivery Hours); therefore because Standard Control Measure LAX-ST-1 effectively reduces this impact, no modifications to LAWA's proposed measure are required.

#### **4.7.2 Suggested Alternatives**

- Comment from Shute Mihaly & Weinberger LLP on behalf of the City of El Segundo (T2/3-AL00001-32) on the Draft EIR recommended that the Draft EIR should include an analysis of an alternative that does not change the number or configuration of passenger gates. Regarding the commentor's request that the Draft EIR evaluate a "no new gates" alternative, the Draft EIR already includes three such alternatives. Neither Alternative 1: No Project – No Build, Alternative 2: No Project – Limited Interior Improvements Only, or Alternative 3: Reduced-Scale Project; none of these alternatives proposes additional gates. An EIR need not consider multiple variations of alternatives. (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022.) Also, an EIR need not consider alternatives to individual components of larger project, e.g., the number of gates for a larger terminal improvement project. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.) For these reasons and the reasons discussed in Response to Comment T2/3-AL00001-32, no revisions to the Draft EIR are required that would add another "no new gates" alternative.

#### **4.8 Findings on Comments on the Draft EIR, Responses to Comments, and Revisions Made in the Final EIR**

Comments made on the Draft EIR, responses to those comments, and revisions made in the Final EIR merely clarify and amplify the analysis presented in the document and do not amount to significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that LAWA has declined to implement. Therefore, the BOAC finds that recirculation of the LAX T2/T3 Modernization Project Draft EIR is not required pursuant to State CEQA Guidelines Section 15088.5(b).

#### **4.9 Location of Custodian Records**

The documents and other materials that constitute the administrative record for LAWA's actions related to the LAX T2/T3 Modernization Project are located at LAWA, One World Way, 2nd Floor, Los Angeles, CA 90045. The LAWA Environmental Programs Group is the custodian of the administrative record for the project.