

# **Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project**

## **Statement of Overriding Considerations**

September 2021



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# 1. INTRODUCTION

Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Airfield and Terminal Modernization Project at Los Angeles International Airport (LAX or airport), pursuant to the California Environmental Quality Act (CEQA). On August 18, 2021, LAWA published the Final EIR for the LAX Airfield and Terminal Modernization Project.

LAWA proposes to implement the LAX Airfield and Terminal Modernization Project (“proposed Project”) as part of LAWA’s continuing commitment to maintain LAX as a world-class airport. The proposed Project consists of several elements, including airfield improvements to enhance safety and operational management within the north airfield, new concourse and terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of roadways to shift Central Terminal Area (CTA)-related traffic off of Sepulveda Boulevard, thereby reducing traffic congestion near the airport.

The LAX Airfield and Terminal Modernization Project consists of:

- Airfield Improvements (North Airfield): Airfield safety and operational management would be enhanced with the westerly extension of Taxiway D and relocation and reconfiguration of runway exits from the northernmost runway.
- New Terminal Facilities: Concourse 0 would be a new easterly extension of Terminal 1. Terminal 9 would be a new passenger terminal located southeast of the Sepulveda Boulevard/Century Boulevard intersection. Taxiways in both the north and south airfields would be modified to provide aircraft access to Concourse 0 and Terminal 9.
- Roadway Improvements: New arrival and departure roadways, primarily elevated above local streets, would improve access to and from the CTA while also reducing traffic congestion on Sepulveda Boulevard. Project-related roadway improvements would also provide access to the new Terminal 9 facility. Convenient access to Terminal 9 would be supported by a new station on the approved LAX Automated People Mover (APM) line with a pedestrian connection to Terminal 9, and a pedestrian connection to the APM system would also be provided for Concourse 0. Other landside improvements associated with Terminal 9 include a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard, and a parking facility.

The LAX Airfield and Terminal Modernization Project EIR identified significant adverse environmental impacts that would result from the implementation of the LAX Airfield and Terminal Modernization Project that cannot be mitigated to a level that is less than significant by the implementation of feasible mitigation measures or alternatives. The unavoidable significant impacts from the LAX Airfield and Terminal Modernization Project occur with respect to air quality, greenhouse gas (GHG) emissions, aircraft noise, and transportation.

The specific significant and unavoidable impacts of the proposed Project related to air quality are as follows: 1) construction emissions (Project-related and cumulatively considerable contributions) of the following pollutants: carbon monoxide (CO) (for two 4.5-month periods during temporary runway closures associated with construction of the north airfield improvements), volatile organic compounds (VOC) (for the same two 4.5-month periods), sulfur oxides (SO<sub>x</sub>) (for the same two 4.5-month periods), and nitrogen oxides (NO<sub>x</sub>); 2) operational emissions (Project-related and cumulatively considerable contributions) of the following pollutants: NO<sub>x</sub>, SO<sub>x</sub>, and respirable particulate matter (PM<sub>10</sub>); and 3) operational concentrations (Project-related and cumulatively considerable contributions) of the following pollutant: PM<sub>10</sub>.

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The specific significant and unavoidable impacts of the proposed Project related to GHG emissions are as follows: 1) net increase in GHG emissions from construction and operations, combined; 2) cumulatively considerable contribution to GHG emissions; and 3) Project-related inconsistency with plans/policies related to GHG emission reductions.

The specific significant and unavoidable impacts of the proposed Project related to noise are as follows: 1) aircraft noise during construction - increased noise levels at exterior use areas of noise-sensitive uses to 65 Community Noise Equivalent Level (CNEL) or above (for the two 4.5-month periods), and temporary increase in aircraft noise levels of 1.5 A-weighted Decibel (dBA) or more within the 65 CNEL contour compared to baseline conditions (for the two 4.5-month periods); and 2) aircraft noise during operations - increased noise levels at exterior use areas of noise-sensitive uses to 65 CNEL or above.

The specific significant and unavoidable impacts of the proposed Project related to transportation are as follows: 1) passenger vehicle miles traveled (VMT); 2) short-term and long-term induced VMT; and 3) cumulatively considerable contribution to VMT impacts.

State CEQA Guidelines Section 15093(b) provides that, when a public agency approves a project that will result in significant impacts that are identified in the Final EIR but are not avoided or substantially lessened to a less than significant level, the agency must state in writing the specific reasons to support its decision based on the Final EIR and/or other information in the whole administrative record. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh its unavoidable adverse environmental impacts, the adverse effects may be considered “acceptable.” LAWA, as the Lead Agency for the LAX Airfield and Terminal Modernization Project EIR, adopts the following Statement of Overriding Considerations.

Based on the substantial evidence in the whole of the administrative record for the LAX Airfield and Terminal Modernization Project, the Board of Airport Commissioners hereby finds, concludes, and determines that the unavoidable significant adverse environmental impacts associated with the construction and operation of the LAX Airfield and Terminal Modernization Project are acceptable in light of the following specific economic, operational, legal, technological, or other project benefits. Each Project benefit described below constitutes an overriding consideration warranting approval of the LAX Airfield and Terminal Modernization Project, independent of other benefits, despite the proposed Project’s significant unavoidable impacts. Even if, for any reason, one or more of the listed benefits were found to be insufficient or unsupported, the Board of Airport Commissioners would nevertheless adopt the following Statement of Overriding Considerations and approve the Project, notwithstanding its significant and unavoidable environmental effects, based on the listed benefit or those listed benefits that remain.

## 2. BENEFITS ASSOCIATED WITH THE LAX AIRFIELD AND TERMINAL MODERNIZATION PROJECT

The LAX Airfield and Terminal Modernization Project would support the ongoing modernization of LAX and support the economic growth and prosperity of the Los Angeles region. The proposed airfield, terminal, and landside improvements would continue the transformation of LAX by enhancing the safety and operational management of the airfield, particularly as related to runway exits; providing a new concourse and terminal to improve the quality of the passenger experience and efficiency of passenger processing; and improving the roadway system to better route airport-related traffic away from the public roads that serve the community. These improvements would help LAX to accommodate the continued aviation growth that is projected by LAWA, the Southern California Association of Governments (SCAG),

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and the Federal Aviation Administration (FAA) to occur at LAX over the next several decades. The level of aviation activity relative to annual aircraft operations and annual passengers estimated to occur at LAX by 2028, the anticipated buildout year for the LAX Airfield and Terminal Modernization Project, is projected to be the same with or without the Project improvements. The proposed Project would enable LAX to accommodate this growth in a way that enhances the passenger experience and would help LAWA achieve its vision of LAX as a “gold standard” airport as a safe and secure airport, with high-quality facilities and easy airport access via public or private transportation. In addition to better accommodating further growth at LAX,<sup>1</sup> the nature and timing of improvements included in the proposed Project are integral to Los Angeles’ plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal for athletes, dignitaries, and visitors from around the world.

## A. Enhanced Airfield Safety and Operational Management

Airfield improvements that would be implemented as part of the LAX Airfield and Terminal Modernization Project are proposed to enhance the safety and operational management of the airfield in order to provide world class service for travelers.

The existing taxiway system in the north airfield includes two exit taxiways from Runway 6L-24R that cross the inboard runway (Runway 6R-24L) in areas defined as “high-energy zones,” which is the portion of a runway where departing aircraft are still on the ground and moving at a high speed before lifting into the air. The taxiway intersections at Runway 6R-24L do not meet current FAA airport design standards and do not provide desirable lines-of-sight for pilots when crossing Runway 6R-24L.<sup>2,3</sup> The proposed Project includes the construction of new exit taxiways that would cross outside of the “high-energy zone,” enhancing the safety at the crossing points for taxiing aircraft, and the removal or decommissioning of the existing exit taxiways that cross the high energy zones (i.e., existing Taxiways Y and Z). These two exits from Runway 6L-24R also intersect with Runway 6R-24L at acute angles, which limits a pilot’s visibility to look down Runway 6R-24L for any departing aircraft. The proposed Project would reconfigure the runway exits to provide for more efficient crossings that are perpendicular to Runway 6R-24L and to provide better sight-lines for pilots, allowing them to look down Runway 6R-24L for possible departing aircraft. The reconfigured exit taxiways would meet current FAA airport design standards.

In addition to safety benefits, the proposed Project would improve the operational management of the airfield. Specifically, the taxiway system on the north airfield includes Taxiway E, which is immediately south of, and parallel to, Runway 6R-24L and extends along the full length of the runway; and Taxiway D, which is south of Taxiway E and is also parallel to Runway 6R-24L, but only extends along the eastern two-thirds of the runway. Arriving and departing aircraft that are taxiing in an east-west direction are

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<sup>1</sup> Although the COVID-19 pandemic had a substantial impact on activity levels at LAX, as well as around the world, it is anticipated that activity levels will recover over time and the eventual need for the proposed Project improvements still remains. Please see Final EIR, Topical Response TR-ATMP-G-1: Aviation Demand Forecast, for additional details on LAX’s expected recovery.

<sup>2</sup> Per FAA Advisory Circular (AC) 150/5300 13A, *Airport Design, Change 1*, paragraph 401(b)(5)(d), “Avoid ‘high energy’ intersections. These are intersections in the middle third of the runways. By limiting runway crossings to the outer thirds of the runway, the portion of the runway where a pilot can least maneuver to avoid a collision is kept clear.” U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular (AC) 150/5300 13A, *Airport Design, Change 1*, including errata, p. 117, July 24, 2019. Available: [https://www.faa.gov/airports/resources/advisory\\_circulars/index.cfm/go/document.information/documentID/1020359](https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/1020359).

<sup>3</sup> Per FAA AC 150/5300 13A, *Airport Design, Change 1*, paragraph 407(a), “Right-angle intersections are the standard for all runway/taxiway intersections, except where there is a need for high-speed exit taxiways and for taxiways parallel to crossing runways. Right-angle taxiways provide the best visual perspective to a pilot approaching an intersection with the runway to observe aircraft in both the left and right directions. They also provide the optimum orientation of the runway holding position signs so they are visible to pilots. FAA studies indicate the risk of a runway incursion increases exponentially on angled (less than 90 degrees) taxiways used for crossing the runway.” See U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular (AC) 150/5300 13A, *Airport Design, Change 1*, including errata, p. 140, July 24, 2019. Available: [https://www.faa.gov/airports/resources/advisory\\_circulars/index.cfm/go/document.information/documentID/1020359](https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/1020359).

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limited to a single taxiway (Taxiway E) while in the western portion of the airfield, which limits the ability to hold aircraft, reducing the operational flexibility to manage arrival and departure operations between Runways 6L-24R and 6R-24L and hindering the efficient movement of aircraft, particularly during peak times of aircraft activity. Situations where two aircraft are traveling in opposite directions on the single taxiway limit FAA air traffic controllers' ability to manage traffic and movement. In these situations, taxiing aircraft experience delays due to aircraft holding to wait for another aircraft on Taxiway E or longer taxi routing issued by FAA air traffic controllers to avoid conflicts. The proposed Project would address this issue by extending Taxiway D to the west, which would improve airfield operational management by segregating eastbound and westbound taxiing aircraft on Taxiways D and E. Additionally, Taxiway E is currently designed with a runway-to-taxiway separation that meets Airplane Design Group (ADG) V standards, which places operating restrictions on Runway 6L-24R when an ADG VI aircraft is on Taxiway E moving east after landing, effectively suspending all other aircraft operations on the runway, which could lead to longer departure queues for Runway 6R-24L, resulting in increased departure delays for departing aircraft using this runway. The westerly extension of Taxiway D would be designed to FAA design standards for ADG VI aircraft, which would avoid operational restrictions and facilitate taxiing operations of large aircraft in the north airfield. In addition to providing greater flexibility, the taxiway extension would also increase airfield efficiency, leading to less aircraft engine idling and thus producing lower air pollutant emissions (see additional discussion in the Sustainability and Environmental Benefits section below).

In addition to the operational management improvements that are directly associated with the westerly extension of Taxiway D, the extension would also result in indirect improvements to operational management of the airfield. Specifically, the westerly extension of Taxiway D would result in the removal of nine of the West Remote Gates. Also proposed as part of the LAX Airfield and Terminal Modernization Project is the decommissioning of another six of the West Remote Gates, which would result in a total of 15 of the 18 West Remote Gates being removed/decommissioned. Those gates would be replaced by the new gates proposed for Concourse 0 and Terminal 9. Replacing the majority of the West Remote Gates with contact gates in the CTA would reduce busing operations associated with the West Remote Gates, which would provide operational management benefits to airfield operations (i.e., reduced vehicle activity on the Airport Operations Area [AOA] where aircraft movements/taxiing occurs) as well as benefits to passenger processing (see additional discussion below).

The proposed Project also includes airfield improvements in conjunction with the development of Concourse 0 and Terminal 9. The Concourse 0 improvements include the easterly extensions of Taxiways D and E, which would provide access to that facility and provide simultaneous unrestricted aircraft movement in this portion of the airfield. Additional paved area at the eastern ends of Taxiways D and E would provide additional queue space at the departure end of Runway 6R-24L. In addition, the proposed easterly extension of Taxiway C to the end of Runway 7L-25R would improve the operational management of aircraft movements in the south airfield. The extension of proposed Taxiway C would improve airport operational management by segregating eastbound and westbound taxiing aircraft on Taxiway C and Taxiway B and increasing the taxiway-to-taxiway separation between the two taxiways.

## B. Improved Passenger Experience

The LAX Airfield and Terminal Modernization Project proposes to develop new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels at LAX and do so in a manner that offers high-quality passenger service and operational flexibility.

The proposed Project would replace 15 of the 18 West Remote Gates with “contact” gates located at the new Concourse 0 and Terminal 9. Under current operations, LAX relies on 18 West Remote Gates for

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regularly-scheduled passenger service. Amenities are very limited in the West Remote Gate area, and busing passengers to and from the west end to the CTA is inconvenient and inefficient. Concourse 0 and Terminal 9 would provide amenities such as retail and food for passengers, and would reduce the need for busing passengers to and from the West Remote Gates. Eliminating busing would reduce passenger transit times, and would provide a more pleasant passenger experience.

The development of Concourse 0 and Terminal 9 would also provide new facilities with direct access to passenger processing capabilities. Current international processing facilities experience high demand during peak periods, increasing passenger processing time, and resulting in a poor passenger experience. Existing terminal design and capability provides limited adaptability to changing air service characteristics and has resulted in an imbalance of international passenger activity throughout the CTA complex. Current passenger gate and processing capabilities do not provide the flexibility to serve both domestic and international flights using a wide range of aircraft, and options for international processing are not sufficiently distributed throughout the CTA. The proposed addition of domestic and international processing facilities in the eastern portion of the CTA, which would connect to existing passenger processing facilities as well as the previously-approved APM system, would improve distributed international passenger processing and connectivity capabilities throughout the CTA with access to more than one mode of transportation. The terminal improvements would also improve immigration and customs processes for international passengers arriving at LAX by using the most efficient airport security systems available and feasible; moreover, these systems would provide multiple layers of security. Overall, the new terminal facilities would provide a high-quality of passenger service, which the West Remote Gates do not provide.

Locating the new replacement gates within a new concourse or terminal that is connected to other existing terminals at LAX would also allow passengers with connecting flights to more easily and more quickly move between gates. More specifically, Concourse 0 would connect directly with Terminal 1, which, in turn, will connect with Terminal 2 as part of a previously-approved, future fully-linked terminal system within the CTA. Similarly, Terminal 9 would connect with Terminal 8 via the proposed pedestrian corridor over Sepulveda Boulevard. Terminal 8 currently connects directly with Terminal 7 as part of a connected terminal system on the south side of the CTA (i.e., a continuous passenger corridor between Terminal 8 and the Tom Bradley International Terminal). Providing connections to adjacent terminals would allow passengers to move between terminals without having to go back through security screening, and would enable passengers to travel between facilities by foot, which would reduce busing between terminals and reduce traffic congestion.

## C. Landside Improvement Benefits

The proposed Project includes the construction of the landside (roadway) improvements, which aim to improve overall access to and from the CTA, and provide access to the new Terminal 9 and parking facility, with a combination of segments that are elevated or at-grade with connecting ramps. These improvements would refine the landside improvements already approved as part of the LAX Landside Access Modernization Program,<sup>4</sup> which did not contemplate Terminal 9. The new, comprehensive network of roadways would simplify and facilitate driver wayfinding, and would increase queuing

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<sup>4</sup> The LAX Landside Access Modernization Program, approved by the Los Angeles City Council in June 2017, consists of two phases. Phase 1, currently under construction, includes development of the APM operating system and fixed facilities, the Consolidated Rental Car Facility (ConRAC), the Intermodal Transportation Facility (ITF) West and ITF East, and a portion of the approved roadway improvements. Phase 2 consists of the remainder of the roadway improvements, located near the entrance to the CTA at/near Sepulveda Boulevard and Century Boulevard. Additional description of the LAX Landside Access Modernization Program, including Phase 1 and Phase 2 roadway improvements, is provided in Chapter 2, Description of the Proposed Project, of the LAX Landside Access Modernization Program EIR available online at: <https://www.lawa.org/en/connectinglax/automated-people-mover/documents>.

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capacity, thereby helping to alleviate airport-related congestion on public roadways surrounding LAX by separating and removing airport-related traffic from the local roadway system. The proposed access improvements would help keep airport-related traffic congestion and back-ups off public streets, thereby facilitating the flow of non-airport traffic on main public roadways in the general vicinity of the CTA, which would reduce negative effects to the surrounding community. Because these improvements would reduce traffic congestion on surrounding roadways, security and emergency access to LAX would also be improved. The roadway system improvements would also support access to the ITF West that is linked with the APM system, which would encourage use of that facility and potentially reduce vehicle miles traveled.

The proposed Project also includes the construction of a new parking facility and APM station near Terminal 9, providing an alternative means for passengers and employees to safely enter and exit the airport. The new station would provide a public benefit by facilitating passenger and employee connections from the new terminal to the other terminals in the CTA; access to the previously-approved ITF West and ConRAC; as well as access to the regional ground transportation network, including the Metro Crenshaw/LAX light rail line located at the Airport Metro Connector Transit Station. A new parking facility located near Terminal 9 would facilitate passenger parking near the new Terminal 9 and the new APM station.

Overall, the proposed landside improvements would contribute to a secure and efficient airport ground connection system to the regional ground transportation network, and would enhance the passenger experience by providing new access options, including a direct connection to transit.

## D. Economic Benefits and Job Creation

LAX serves as a fundamental underpinning in the region's economy. Central to that economic importance is LAX's position as the international gateway to the western United States. As the international gateway to the western United States, LAX has long been a major supporter of the Southern California economy through employment and generation of taxes and other revenue, and by facilitating the efficient movement of people, goods, and services. In this regard, LAX is a vital component of the local, regional, and state economy.

LAX generates at least 600,000 jobs in Southern California, with labor income of well over \$30 billion and economic output (business revenues) of more than \$125 billion, according to an economic study based on 2014 operations. The study also reported that LAX's ongoing capital improvement program creates an additional 120,000 annual jobs with labor income exceeding \$7 billion and economic output of more than \$20 billion.<sup>5</sup> Given the continued growth projected to occur at LAX with or without the Project, LAX must be able to safely and effectively accommodate the growth to maintain the significant regional economic benefits LAX provides and leverages.

Implementation of the proposed Project would support economic growth in the region. The new concourse and terminal would include facilities for processing international flights, a key and growing element of tourism in the Los Angeles region. The proposed Project would also foster additional employment opportunities at Concourse 0 and Terminal 9, and economic activity at new concessions within the facilities that would benefit the communities located around LAX and the City of Los Angeles.

LAX is a major employer at both the local and regional level, and a major provider of permanent positions as well as a major provider of construction jobs. The proposed Project would continue to support the

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<sup>5</sup> LAWA Public Relations, "LAX at a Glance," February 2021. Available: [https://www.flylax.com/-/media/flylax/media-center/pdfs/fs--at-a-glance-feb\\_2021](https://www.flylax.com/-/media/flylax/media-center/pdfs/fs--at-a-glance-feb_2021).

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long-term economic growth and prosperity at the local and regional level with the creation of new jobs during both construction and operations of the new facilities.

The construction and operation of the LAX Airfield and Terminal Modernization Project would be a multi-billion dollar investment to improve LAX's airfield, terminal, and landside features while maintaining daily operations at LAX, and thereby helping to better accommodate future growth at LAX and maintain the airport's economic contribution to the region. Development of the proposed Project is estimated to cost over \$6 billion to construct, which would generate thousands of annual construction jobs between 2022 and 2028. Construction activity associated with development of the proposed Project would directly and indirectly foster economic growth over the multi-year construction period through the creation of construction jobs, the provision of goods and services in support of construction, and spending by workers.

Further, the addition of Concourse 0 and Terminal 9 would increase long-term employment opportunities for airport personnel, maintenance and janitorial staff, concessionaires, etc. As discussed in Section 6.3.1, *Population, Housing, and Employment Growth*, of the EIR, the Project would generate approximately 4,700 new permanent LAX jobs, which would directly and indirectly support the economy and employment of the region.

Pursuant to Los Angeles Administrative Code, Division 10, Chapter 1, Article 11, Section 10.37 et seq., contractors and subcontractors who have agreements with the City, including those associated with LAX, must comply with all applicable provisions of the Living Wage Ordinance, including paying their employees a minimum "living wage" that generally includes health benefits (or an increased cash wage if benefits are not included) and provides compensated days off, which would bolster the economic impact of the proposed Project.<sup>6</sup> In addition, LAWA has other employment programs that would increase the economic benefits of the proposed Project to the surrounding communities. Pursuant to LAWA's First Source Hiring Program (FSHP) Policy, any contracts awarded in association with the proposed Project would be subject to the applicable provisions of the FSHP for LAX airport jobs.<sup>7</sup> This program targets local residents for early access to available LAX airport jobs. LAX employers receive prompt, cost-free referrals of qualified applicants. To provide local residents with access to well-paying construction careers, LAWA established the HireLAX Apprenticeship Readiness Program (HireLAX).<sup>8</sup> About 80 percent of HireLAX graduates work in construction. Finally, in accordance with the Board of Airport Commissioners' Resolution 23437, all concessionaires associated with Concourse 0 and Terminal 9 would be subject to LAWA's Labor Peace Agreement requirements.<sup>9</sup>

## E. Sustainability and Environmental Benefits

The LAX Airfield and Terminal Modernization Project would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy, which requires that new buildings be designed to achieve a minimum of the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED®) Silver certification. LEED® Silver certification requires a project to be designed in a manner to save energy, water, and other resources, and to generate less waste and support human health. The LEED® Silver certification requirement would apply to Concourse 0 and Terminal 9. In addition, Concourse 0 and Terminal 9 would be required to be constructed in accordance with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code

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<sup>6</sup> City of Los Angeles Department of Public Works, Bureau of Contract Administration, *Living Wage Ordinance (LWO)*. Available: <https://bca.lacity.org/living-wages-ordinance-lwo>; accessed July 10, 2021.

<sup>7</sup> City of Los Angeles, Los Angeles World Airports, *First Source Hiring Program Policy*, February 27, 2020.

<sup>8</sup> City of Los Angeles, Los Angeles World Airports, *HireLAX*. Available: <https://www.lawa.org/lawa-employment/lawa-hirelax/hirelax>; accessed July 10, 2021.

<sup>9</sup> City of Los Angeles, Los Angeles World Airports, *Labor Peace Agreements*. Available: <https://www.lawa.org/lawa-businesses/lawa-administrative-requirements/labor-peace-agreement>; accessed July 10, 2021.

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(CALGreen). The Project would also comply with LAWA’s Design and Construction Handbook (DCH), which includes policies and requirements aimed at reducing environmental impacts associated with construction projects at LAX, including air pollutant emissions, noise, and potable water use, among others. Furthermore, 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, requiring most construction equipment to be equipped with engines with advanced emission control technologies that meet U.S. Environmental Protection Agency (USEPA) emission standards. In addition, the LAGBC Tier 1 standards, which are applicable to all projects with a Los Angeles Department of Building and Safety permit-valuation over \$200,000, require the proposed Project to implement sustainability measures that would reduce criteria pollutant emissions.

Project-specific mitigation measures would be implemented as part of the proposed Project and are identified in the Mitigation Monitoring and Reporting Program (MMRP) in addition to the requirements and sustainability Project features already being implemented. The mitigation measures identified in the MMRP address environmental impacts to air quality, greenhouse gas emissions, aircraft noise, construction noise, and transportation. The proposed Project would also incorporate measures that would further state and local efforts to increase use of renewable energy and improve energy efficiency, including building core and shell energy efficiency, smart energy meters, energy-efficient appliances, parking spaces for electric and alternative fuel vehicles, and additional mandatory and voluntary measures under the LAGBC and LEED®. Energy efficiency and conservation measures implemented as part of the proposed Project, or required as mitigation measures, would reduce energy use associated with the new facilities and contribute to the ongoing efforts to increase energy efficiency at LAX.

The LAX Airfield and Terminal Modernization Project would also implement a vehicle miles traveled (VMT) Reduction Program that would include a variety of VMT reduction strategies to help mitigate impacts from the proposed Project. These measures would promote fuel conservation and improve sustainability performance associated with airport-related trips. Several of the possible reduction strategies would integrate sustainable practices into internal policies, business processes, and written agreements. Implementation of these strategies would be anticipated to reduce airport-wide employment VMT, translating into a reduction of carbon dioxide equivalent (CO<sub>2</sub>e) emissions of approximately 1,506 metric tons per year.

## F. Summary of Project Benefits

In summary, the LAX Airfield and Modernization Project would support the ongoing modernization of LAX, contribute to the economic growth and prosperity of the Los Angeles region, and help LAX to accommodate continued growth that is projected to occur. The Project would enable LAX to accommodate expected growth in a way that enhances the passenger experience and would help LAWA achieve its vision of LAX as a “gold standard” airport as a safe and secure airport, with high-quality facilities and easy airport access via public or private transportation. The Project would provide thousands of new construction jobs as well as long-term employment opportunities that would bring economic activity to surrounding communities and to the City of Los Angeles. The Project would also incorporate sustainability features that would reduce the Project’s environmental impacts. Having considered these benefits, the Board of Airport Commissioners finds, concludes, and determines that the benefits of the LAX Airfield and Terminal Modernization Project outweigh the unavoidable adverse environmental effects, and that the adverse environmental effects are, therefore, acceptable.