



Los Angeles World Airports

RECOMMENDATION OF THE EXECUTIVE DIRECTOR

LAX PLAN COMPLIANCE REVIEW

Date: February 24, 2014

Project Name: Los Angeles International Airport (LAX) West Aircraft Maintenance Area (WAMA) Project

Case No.: 002-013LAXSP

Location: 6411 W. Imperial Hwy., Los Angeles Council District: **11th**

Project Description: See Attachment 1

Plan Area: LAX Plan

Plan Land Use: Airport Airside

Zone: LAX-A

**CEQA: Environmental Impact Report (EIR)
State Clearinghouse Number: 2012091037
City Clerk Number: EIR-13-013-AD**

SUBJECT: LAX Specific Plan Compliance Approval of the WAMA Project

LAX Specific Plan Section 7 (Ordinance No. 176,345 as amended by Ordinance No. 179,148 and Ordinance No. 182,542) mandates that the Executive Director recommend LAX Plan Compliance approval of all projects to the Board of Airport Commissioners (BOAC) and the City Council prior to construction and issuance of any grading permit, building permit, use of land permit, or initiation of construction of a project. This report addresses the proposed West Aircraft Maintenance Area Project (hereafter referred to as the proposed Project), including a project description, recommendation of approval, description, purpose and need, the requisite findings of fact, and the requisite reports received.

I. PROPOSED PROJECT DESCRIPTION:

Project Summary: The intent of the proposed Project is to consolidate, relocate, and modernize certain existing aircraft maintenance facilities at LAX, consistent with the LAX Master Plan. The proposed Project would allow for more efficient and effective maintenance of existing aircraft at the airport, including Aircraft Design Group (ADG) VI aircraft (Airbus A380s and Boeing 747-8s). The proposed Project would include aircraft parking and maintenance facilities, employee parking areas, and related storage, equipment and facilities. The proposed Project would be able to accommodate up to 10 ADG VI aircraft simultaneously or a mix of smaller aircraft on the site.

Specifically, the proposed Project would include:

- (1) Aircraft apron for ADG VI aircraft as well as smaller aircraft that may require Remain Overnight (RON) and Remain All-Day (RAD) parking, or those aircraft being serviced at the aircraft maintenance hangars;
- (2) Aircraft maintenance hangar(s), capable of accommodating a wide range of existing aircraft up to and including existing ADG VI aircraft, as well as a maintenance shop and supporting office space within the hangar;
- (3) Up to 300 employee parking spaces;
- (4) Ancillary facilities (e.g., ground service equipment [GSE] storage and maintenance areas/facilities; RON/RAD kits providing ground power, GSE charging stations, potable water, and pre-conditioned air; a wash rack for aircraft washing operations; necessary utilities and infrastructure; and possibly water storage tank(s) for fire protection);
- (5) A storm water detention/infiltration basin and connections to existing adjacent storm drains;
- (6) A temporary concrete batch plant and rock crusher would be installed on the site for construction of the proposed Project with removal planned after the final phase of construction (concrete batch plants are permitted on and have been operating on the site in recent years); and,
- (7) Extension of Taxiway B and Taxiway C (as Taxilane C) to provide ingress and egress to and from the Project area.
- (8) Existing contractor staging yards and associated equipment on the Project site would be phased out or relocated to existing LAX staging areas, such as those located to the south of Westchester Parkway and west of Lincoln Boulevard. Stockpiled materials (consisting of soil and construction rubble) currently existing within and immediately adjacent to the Project site would be re-used on-site as backfill material and/or exported for off-site reuse and/or disposal.

A detailed project description is provided in **Attachment 1**.

Location: LAX encompasses approximately 3,650 acres and is situated at the western edge of the City of Los Angeles. The Project site is located within the southwest portion of LAX immediately south of World Way West between Taxiway AA and Pershing Drive. Existing adjacent uses include the West Remote Pads/Gates and aircraft aprons to the north; an airport employee parking lot and vacant airport property to the south; Taxiway AA, an American Airlines employee parking lot and the United (formerly Continental) Airlines maintenance hangars to the east; and Pershing Drive followed by the Los Angeles/El Segundo Dunes to the west. The Los Angeles/El Segundo Dunes is a former residential area that consists of open space/coastal dunes, with navigational aids minor ancillary airport and utility improvements, abandoned residential streets, and the El Segundo Blue Butterfly Habitat Restoration Area. To the north of LAX is the community of Westchester (part of the City of Los Angeles), to the south is the City of El

Segundo, to the east are the City of Inglewood and the unincorporated Los Angeles County community of Lennox, and to the west is the Pacific Ocean.

The Project is located entirely within the LAX Plan area and the LAX Specific Plan area of the City of Los Angeles. The LAX Plan, which is part of the General Plan of the City of Los Angeles, designates the land use for the Project site as "Airport Airside." The LAX Specific Plan, which establishes zoning and development regulations and standards consistent with the LAX Plan, designates the zoning for the Project site as Airport Airside (LAX-A Zone). The specific project area is shown on the Project Site Plan in **Attachment 2**.

Size: Approximately 68 acres of the 84-acre proposed Project site would be paved/developed, with the remaining 16 acres being unpaved islands adjacent to the proposed taxiways within the site. Approximately 29 acres will be for aircraft apron for aircraft requiring RON/RAD parking. The proposed hangar area, including employee parking and other associated paved areas, in addition to aircraft apron areas described previously that may overlap, is estimated to encompass approximately 19 acres of the Project site. Approximately 290,000 square feet of hangar bay space (floor area) with a maximum estimated height of up to approximately 150 feet could be accommodated on the Project site.

II. RECOMMENDATION:

Under the authority granted by Section 7C of the LAX Specific Plan and for the reasons set forth in this report, I recommend:

- A. That BOAC and the City Council grant the LAX Plan Compliance approval for the proposed Project based on the following findings:
 1. That the West Area Maintenance Area Project complies with the LAX Plan, any design guidelines required by the LAX Plan, and all applicable provisions of the LAX Specific Plan; and
 2. That the West Area Maintenance Area Project complies with the California Environmental Quality Act (CEQA).
- B. That BOAC make the above prescribed findings and recommend to City Council that it approve the request for LAX Plan Compliance.

III. DESCRIPTION, PURPOSE AND NEED

Existing and Proposed Use:

Purpose and Need:

Airlines routinely inspect and maintain their aircraft to ensure the safety of the traveling public, and each aircraft is on a stringent maintenance schedule based on its number of hours in operation.

The objectives of the proposed Project include the following:

- Consolidate, relocate, and modernize certain existing aircraft maintenance facilities at LAX consistent with the LAX Master Plan.
- Provide for more efficient and effective maintenance of existing aircraft at the airport, including ADG VI aircraft (i.e., Airbus A380 and Boeing 747-8).
- Provide aircraft maintenance hangars and aircraft parking areas that are all sized to accommodate ADG VI aircraft and other aircraft in one location.
- Provide an area for RON/RAD aircraft parking that can also support routine servicing and maintenance of aircraft.
- Support consistency with the LAX Master Plan by providing an aircraft maintenance area in the southwest portion of the airport.

As part of this regularly scheduled maintenance, the U.S. Department of Transportation Federal Aviation Administration (FAA) requires that aircraft engines be tested at various power levels to ensure proper operation. These tests are called engine run-ups and occur when aircraft are stationary; causing what can be a substantial amount of noise.

LAWA has eliminated placement of a ground run-up enclosure (GRE) at the Project site based on the results of a preliminary GRE noise analysis, which determined that development of the GRE at the Project site would provide only a minimal noise reduction benefit to sensitive receptors nearby. A separate airport-wide GRE siting study will be conducted.

Ownership: The proposed Project is located within LAWA-owned property.

Operational Efficiency: The proposed Project would consolidate, relocate, and modernize certain existing aircraft maintenance facilities at LAX and would allow for more efficient and effective maintenance of existing aircraft at the airport, including ADG VI aircraft. The proposed Project would not increase passenger or gate capacity and would not increase flights and/or aircraft operations at LAX. The proposed facilities are anticipated to serve aircraft that would be at LAX in conjunction with regularly scheduled flights or other business matters, whereby aircraft maintenance and/or parking would be ancillary to the primary reason why the aircraft is at the airport. Similarly, the proposed Project would consolidate functions and services that already occur elsewhere at the airport. This consolidation of existing RON/RAD and aircraft maintenance activities is not anticipated to result in an increase in such activities at LAX nor is it projected to result in an increased number of employees associated with such activities.

Without the proposed Project, there would be a serious constraint on the ability to provide adequate maintenance facilities at LAX to replace those that have been or are expected to be removed in the future. The RON/RAD areas at the subject maintenance areas are currently used on a regular basis by the tenant airlines/companies for aircraft cabin cleaning and light servicing/maintenance (i.e., "Level A checks"), the loss of those areas would mean that such aircraft servicing and light maintenance would need to be done while aircraft are at the gate, which would extend gate occupancy time and possibly delay other aircraft waiting to use the gate, or require additional stacking of aircraft at the remaining RON/RAD areas, which hinders the efficient management and movement of aircraft in those areas.

Economic Benefits: An important function of LAX is to sustain and support economic growth in the region. Although the proposed Project would not directly generate economic growth, would not increase passenger or gate capacity, would not increase flights and/or aircraft operations, or increase the number of permanent employees, it would generate short-term construction jobs and improve and modernize aircraft maintenance facilities at the airport to better accommodate newer generation aircraft, including ADG VI aircraft. The proposed Project would also combine aircraft maintenance hangars and aircraft parking areas within proximity on the same site, thereby supporting more efficient and effective use of the airport facilities. As such, the proposed Project would indirectly foster economic growth in the region through short-term construction jobs and more efficient maintenance and airfield activities.

Environment: LAWA, as the lead agency for the West Area Maintenance Area Project, has determined that this project has been adequately analyzed in compliance with CEQA for the reasons set forth in LAX West Area Maintenance Area Project Final Environmental Impact Report (**Attachment 3**).

IV. FINDINGS OF FACT

The following findings support the recommendation to grant LAX Plan Compliance:

(1). THE PROPOSED PROJECT COMPLIES WITH THE LAX PLAN, ANY DESIGN GUIDELINES REQUIRED BY THE LAX PLAN, AND ALL APPLICABLE PROVISIONS OF THE LAX SPECIFIC PLAN.

The LAX Plan designates the Project area with an Airport Airside land use. The LAX Specific Plan designates this area with an LAX-A Zone: Airport Airside sub-area. The proposed project is consistent with these designations. The site and surrounding areas have historically been used for airport related activities; therefore the proposed Project is compatible with airport development.

Applicable Objectives and Policies:

Compliance with Purpose of LAX Plan: The proposed Project complies with the proposed use and vision of the LAX Plan, as set forth in Section 1 of that Plan. The proposed Project responds to the development framework set forth in the LAX Master Plan and represents a refinement to the programmed development of hangar/maintenance facilities in the western portion of the airport property. Within the context of the regional framework, the proposed Project is in accordance with the vision to evolve LAX into a modern, safe and secure airport.

Compliance with Goals, Objectives and Policies of LAX Plan: The LAX Plan identifies six goals and 20 supporting objectives to expand on the intent of the LAX Plan vision and provide further direction for the development of the airport. It also identifies specific policies and programs that will be used to implement these goals and objectives. Goals 1 thru 5, along with select objectives, of the LAX Plan are deemed applicable to the various elements of the proposed Project. The proposed Project complies with the following, objectives and policies of the LAX Plan, as explained below:

Goal #1: Strengthen LAX's unique role within the regional airport network as the international gateway to the Southern California region.

Objective #1: Provide superior facilities, services, and operations to meet the position of LAX as the principal airport and international gateway to the region.

Objective #2: Improve airport facilities and operations in order to provide world-class service for travelers and other airport users (i.e., employees, public service personnel, etc.).

Objective #3: Provide and upgrade needed facilities to accommodate current and next-generation larger aircraft associated with international and long-haul domestic travel.

-- The proposed Project would be consistent with this goal and would meet objectives by providing new upgraded facilities designed to accommodate aircraft that currently are based out of at LAX. As previously indicated, the proposed Project would consolidate, relocate, and modernize some of the existing aircraft maintenance facilities at LAX and would allow for more efficient and effective maintenance of existing aircraft at the airport, including ADG VI aircraft.

The intent of the proposed Project is to improve and modernize maintenance facilities at LAX to more efficiently and effectively accommodate current aircraft as well as the growing need for larger, next generation ADG VI aircraft. As such, the proposed Project would enhance and support the efficient operation of aircraft at LAX and ensure that LAX remains competitive as a world class airport, particularly with respect to the accommodation of modern airplane types.

Goal #4: Recognize the responsibility to minimize intrusions on the physical environment.

Objective #3: Incorporate mitigation measures and master plan commitments from LAX Master Plan environmental analyses into project design and operation.

-- The proposed Project responds to the development framework set forth for LAX in the Master Plan with incorporation of certain refinements reflected in the engineering, design, and construction specifications. The LAX Master Plan allowed for the replacement of existing hangars through the construction of three hangar/maintenance facilities dispersed in the southwest portion of the airport. The proposed Project represents refinement of the programmed development of hangar/maintenance facilities in the western portion of the airport property. Specifically, the proposed Project would exchange locations identified for aircraft apron and maintenance on the east side of Taxiway AA with an area identified for employee parking (West Employee Parking) on the west side of Taxiway AA. Both facilities are proposed for the southwest portion of the airport property, south of World Way West as proposed under the LAX Master Plan, with access routes to and from each facility remaining essentially unchanged. Neither these refinements nor construction of the proposed Project as a whole, would affect the number of aircraft operations at LAX, which is determined by market demand and supply considerations. The proposed Project would allow for more efficient and effective maintenance of aircraft while at LAX.

The LAX Master Plan Final EIR contains Master Plan commitments and mitigation measures that apply to the LAX property, including the Project site. Therefore, LAWA would implement applicable commitments and mitigation measures identified in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) as part of the proposed Project. The LAX Master Plan commitments and mitigation measures

proposed to be implemented as part of the proposed Project are identified in Chapter 4 of the proposed Project's Draft EIR and in individual technical sections along with new Project-specific mitigation measures that are proposed to reduce or avoid environmental impacts associated with the proposed Project.

The proposed Project also includes design features that would reduce potential intrusions on the physical environment. These features include development of on-site water quality improvements (e.g., oil-water separator, use of porous pavement or media filters, etc.) to reduce urban pollutants in dry weather and stormwater runoff; and water conservation measures such as a wash rack recycling system. In addition, a combination of diesel-fueled and alternative fuels such as CNG or LNG would fuel cars, trucks and related equipment in use on the site. A Project-specific mitigation measures would also be implemented to reduce impacts related hazards/hazardous materials, as further described in Section 4.3 of this Draft EIR.

Subsequent to circulation of the Draft EIR, refinement to Project-specific mitigation and the addition of Project elements (i.e., Project Design Features) that LAWA has voluntarily chosen to include have been included in Chapter 3 of the proposed Project's Final EIR and the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program associated with the Project.

Goal #5: Acknowledge neighborhood context and promote compatibility between LAX and the surrounding neighborhoods.

Objective #1: Minimize negative impacts to surrounding residential land uses.

Objective #2: Maximize the public benefits of airport development, particularly to adjacent land uses.

Objective #3: Provide opportunities for community participation in Master Plan Program decisions that could affect stakeholders by consultation with an LAX Master Plan Stakeholder Liaison who will communicate with stakeholders, including: adjacent residential and business communities; airline representatives; airport concessionaires; cargo and freight forwarders; labor representatives; business organizations and neighborhood councils.

-- The proposed Project would be consistent with the land use designations within applicable on-Airport Land Use Plans including the LAX Plan, LAX Specific Plan, and LAX Master Plan and Airport Layout Plan. The proposed Project would also incorporate LAX Master Plan commitments, LAX Master Plan mitigation measures, and Project-specific mitigation measures to reduce impacts to the surrounding communities and environment. LAWA has also voluntarily chosen to include Project Design Features to address community concerns and are not triggered or warranted by any significant impacts of the proposed Project (i.e., are not mitigation measures).

LAWA has eliminated placement of a GRE at the Project site to minimizing potentially adverse effects to nearby residential land uses. As a result, LAWA has committed to conducting a separate airport-wide GRE siting study.

The proposed Project's EIR was made available on the LAWA website providing opportunity for review and comment. Agencies, organizations and other interested parties in proximity were notified of the Project through mailings along with notification in the Los Angeles Times newspaper. An email address was established specifically for this project on the LAWA website by which comments and suggestions could be

submitted. Comments were received by the public during the comment period. LAWA's Stakeholder Liaison's Office (SLO) also conducted separate notifications to over 11,000 stakeholders within a 500 foot radius of the Project site and stakeholders who have registered online at www.ourlax.org of the proposed Project through the mailer to further complement this outreach effort. Two separate comments were received by the SLO related to this Project. One comment from the County of Los Angeles, Regional Planning Commission, Airport Land Use Commission (ALUC) determined that the proposed Project is an implementation of the LAX Master Plan and is not a type of land use action requiring ALUC review. The second comment received was in response to the Draft EIR for the proposed Project from the U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA) Region IX noting National Floodplain Insurance Program management building requirements. SLO did not receive responses for the LAX Plan Compliance supporting or noting concerns related to the proposed Project.

LAX Plan Policies and Programs:

The following policies and programs have been developed to implement the LAX Plan goals and objectives to guide airport development and are applicable to the proposed Project. These policies and programs are organized into topics that address functional and operational aspects of the airport and potential impacts to adjacent land uses. Applicable topics to the Project are related to security and land use.

Safety

Airfield safety is the primary concern to the City of Los Angeles, the U.S. Department of Transportation and FAA. Enhanced airfield safety can be achieved through airfield facility modifications. Runways will be reconfigured to accommodate new larger airplanes, thereby reducing delays and enhancing the safety of passengers. New taxiways will be added and existing taxiways reconfigured to improve taxiing and reduce the potential for runway incursions.

The following relevant policy and program has been established:

Policy and Program #8: Prohibit uses within a designated Runway Protection Zone (RPZ) that will create safety hazards.

-- No structure or aircraft apron area would be located within the Runway 7L RPZ. A portion of the western extension of Taxiway C and Taxiway B would be within the Runway 7L RPZ. This area would be restricted from incompatible objects and activities pursuant to FAA requirements. The FAA recommends clearing of all above-ground objects and incompatible activities within the restricted development area associated with the RPZ; therefore, the overlap of the RPZ on taxiways, which is only used for circulation of aircraft, is permissible. The proposed Project was modified and reconfigured to ensure the RPZ will be clear.

Land Use

The Airport Airside area includes those aspects of passenger and cargo movement that area associated with aircraft operating under power and related airfield support services. Uses may include four runways, taxiways, aircraft gates, maintenance areas, airfield operation areas, air cargo areas, passenger handling facilities, fire protection facilities, and other ancillary airport facilities.

Development of Airport Airside Area shall be governed by the following relevant policies and programs:

Policy and Program #1: Develop a balanced airfield to provide for more efficient and effective use of airport facilities.

Policy and Program #2: Limit airport capacity by restricting the number of gates (including remote gates) to no more than 153 at LAX Master Plan build-out.

Policy and Program #3: Expand and improve employee parking.

Policy and Program #4: Locate airport uses and activities with the potential to adversely affect nearby residential land uses through noise, light spillover, odor, vibration, and other consequences of airport operations and development, as far from them as feasible.

-- The Project is located entirely within the LAX Plan area and the LAX Specific Plan area of the City of Los Angeles. The LAX Plan, which is part of the General Plan of the City of Los Angeles, designates the land use for the Project site as "Airport Airside." The LAX Specific Plan, which establishes zoning and development regulations and standards consistent with the LAX Plan, designates the zoning for the Project site as Airport Airside (LAX-A Zone).

One of the main objectives of the proposed Project is to improve the operation and efficiency of aircraft maintenance facilities. The proposed Project would combine aircraft maintenance hangars and aircraft parking areas within close proximity on the same site, thereby supporting more efficient and effective use of airport facilities.

As a facility that would consolidate existing maintenance activities, the proposed Project would not increase gate capacity, passengers, flights, and/or aircraft operations at LAX compared to existing airfield conditions.

The proposed Project would expand and improve employee parking at LAX, specifically in the western portion of the airport. The proposed Project includes construction of employee parking lots to accommodate aircraft maintenance technicians and management staff. Such parking is planned to occur immediately north of the hangar area and would provide approximately 300 parking spaces. Furthermore, the proposed Project would not constrain plans to develop additional employee parking in the area as envisioned in the LAX Master Plan Program.

The Project site is located within the western portion of the LAX property, within an area well removed from existing noise-sensitive uses (e.g., residential, schools, churches, etc.). The site is bounded by airport property to the north, south and east and by undeveloped land to the west. The nearest residential uses are located approximately 1,550 feet (0.55 miles) to the south in El Segundo and approximately 0.97 miles to the north in Westchester. As a result the proposed Project would not have significant impacts on residential uses due to light spillover, odor and vibration.

LAWA has eliminated placement of a GRE at the Project site to minimizing potentially adverse effects to nearby residential land uses. A separate airport-wide GRE siting study will be conducted.

Land Use – Open Space

The Los Angeles/El Segundo Dunes area comprises the open space land use within the LAX Plan. Formerly part of the Westchester-Playa Del Rey Community Plan, it is now incorporated into the LAX Plan. Development within the Los Angeles/El Segundo Dunes is limited to existing and relocated Navigational Aids, restoration and maintenance of the Dunes Habitat Preserve, a park, and other ancillary facilities, per the adopted Los Angeles El Segundo Dunes Specific Plan.

Development in the Open Space area shall be governed by the following relevant policy and program:

Policy and Program #1: Protect existing state-designated sensitive habitat areas.

-- The proposed Project would not include construction activities within the Los Angeles El Segundo Dunes Specific Plan Area, including the Dunes Habitat Preserve area. As further described in the Initial Study, included in Appendix A of the Draft EIR, while the proposed Project would include construction and operational activities that could result in indirect impacts to habitat areas, these effects would be less than significant with incorporation of LAX Master Plan commitments and mitigation measures which would minimize dust, light/glare and other potential effects of the proposed Project.

Economic Benefits

Jobs and commerce are direct economic benefits attributable to LAX. Approximately 425,000 jobs in the region and \$65 billion in yearly economic activity were generated by the airport in year 2000 (LAX Master Plan Supplemental to the Draft EIS/EIR, July 2003 – Section 4.4.1.3). As an international port for cargo and freight, LAX provides a foundation for businesses that depend on cargo operations and logistics. In this regard, LAX is a vital component of the local, regional, and state economy. Failure to modernize LAX would impede the ability to meet airport users' future needs and could threaten the airport's position as one of the nation's premiere airports, thereby limiting the region's future economic vitality.

The following relevant policy and program has been established:

Policy and Program #2: Modernize, upgrade, and improve LAX in order to sustain the airport's economic benefits.

-- The proposed Project would improve and modernize aircraft maintenance facilities at the airport and assist in accommodating newer generation aircraft. The proposed Project would also combine aircraft maintenance hangars and aircraft parking areas within proximity on the same site, thereby supporting more efficient and effective use of airport facilities. As such, the proposed Project would help sustain the airport's economic benefits.

Noise

Noise control is one of the most important environmental considerations in airport planning. LAX has a long history of addressing aircraft noise impacts through noise source control and noise mitigation for certain land uses (residences, schools, hospitals, churches, and libraries) that are rendered incompatible due to airport noise impacts. Also, LAX enjoys the unique advantage of being located adjacent to the Pacific Ocean,

benefiting from the ability to conduct operations over the ocean, greatly reducing take-off noise impacts on residential communities.

The following relevant policies and programs shall be implemented to limit the noise impacts that result from LAX operations, including noise from aircraft, roadways, and construction:

Policy and Program #2: Update facilities, gates, and runways, to accommodate the New Large Aircraft (NLA) and the next generation of quieter jets.

Policy and Program #4: Move nighttime noise-creating activities to the interior of the airfield and away from noise-sensitive areas situated north and south of the airport.

Policy and Program #9: Locate airport uses and activities with the potential for noise impacts as far from adjacent residential neighborhoods as feasible.

Policy and Program #10: Require new uses to adhere to applicable state airport land use compatibility regulations.

-- The proposed Project would consolidate, modernize, and upgrade certain air maintenance facilities at LAX, including facilities for the maintenance of newer generation aircraft such as ADG VI aircraft.

As previously stated, the Project site is located within the western portion of the LAX property, within an area well removed from existing noise-sensitive uses with the nearest residential uses located approximately 0.55 miles to the south.

The proposed Project would not increase the existing gate capacity, passengers, flights, and/or aircraft operations at LAX. The proposed Project would also avoid safety hazards that could result in incompatible land uses through compliance with FAA regulations. Therefore, the proposed Project would be consistent with the noise and airspace protection objectives of the Caltrans California Airport Land Use Planning Handbook.

As previously indicated, LAWA has eliminated placement of a GRE at the Project site to minimizing potentially adverse noise effects to nearby residential land uses. A separate airport-wide GRE siting study will be conducted.

Air Quality

Currently, LAWA implements Air Quality Mitigation Programs that contain measures to reduce air pollutant emissions from airport operations. In developing the LAX Plan, consideration was given to maintain or improve air quality using all reasonably available control measures.

The following relevant policy and program has been established:

Policy and Program #7: Encourage and facilitate the conversion of ground support equipment to extremely low emission technology, such as electric power or fuel cells.

-- A combination of diesel-fueled and alternative fuels such as compressed natural gas (CNG) or liquefied natural gas (LNG) would fuel cars, trucks and related equipment and the electrical infrastructure for the Project site will be designed to accommodate charging stations for use by electric GSE, which is consistent with sustainability objectives set

forth in the *LAWA Sustainability Performance Improvement Management System (SPIMS)*.

Hazardous Waste

Hazardous materials generated and used at LAX include substances such as motor oil, cleaning solvents, and wastes from spills and leaks. LAX will comply with regulations and procedures for handling and storage of hazardous materials, including adhering to local, state, and federal standards.

The following program shall be established:

Program #1: Implement a program for handling of contaminated materials encountered during construction.

-- As discussed in Chapter 4.3, *Hazards & Hazardous Materials*, of the Draft EIR, the stockpiled materials on the Project site do not contain concentrations of contaminants that qualify them as Class I hazardous materials. If previously undiscovered hazardous materials are encountered during stockpile removal or other portions of construction, they would be conducted in accordance with applicable federal, state, and local regulations, including LAWA's Procedure, which was prepared in accordance with LAX Master Plan Commitment HM-2, and BMPs. Any hazardous materials found at the Project site that would be transported off-site would be done by licensed operators in accordance with all applicable federal, state, and local regulations. As a result, the removal of stockpiled soils or previously undiscovered hazardous materials would result in a less than significant impact. In addition, construction activities could encounter previously abandoned oil wells, resulting in a potentially significant release of hazardous materials. The Project-specific Mitigation Measure MM-HAZ (WAMA)-1 would ensure proper confirmation and proper abandonment of any oil wells discovered. With implementation of Mitigation Measure MM-HAZ (WAMA)-1, impacts with regard to encountering abandoned oils wells would be reduced to a less than significant level.

(2). *THE ENVIRONMENTAL CLEARANCE FOR THE PROPOSED PROJECT COMPLIES WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)*.

The proposed project has been analyzed in compliance with CEQA. The documentation of the EIR is set forth in detail in **Attachment 3**.

V. REPORTS RECEIVED

The LAX Specific Plan requires that the Executive Director's Office, in making its recommendations, consider input generated from a number of sources. These include the SLO, the Annual Aviation Activity Report, the Annual Traffic Generation Report and comments and recommendations received from the General Manager of the Department of Transportation (DOT) and the City Engineer.

LAX Master Plan Stakeholder Liaison Report

Notice of the request for LAX Plan Compliance was posted in accordance with Section 7.F.2 of the LAX Specific Plan. Notice of the proposed project was posted on the LAWA website on May 15, 2013. The public comment period began on October 11, 2013 and

closed on December 2, 2013. The Stakeholder Liaison's Report was received by LAWA and describes the outreach efforts of the SLO and details the comments received from stakeholders.

Agencies, organizations and other interested parties in proximity were notified of the project through mailings along with notification in the Los Angeles Times newspaper. An email address was established specifically for this project on the LAWA website by which comments and suggestions could be submitted. Comments were received by the public during the comment period. LAWA's SLO also conducted separate notifications to over 11,000 stakeholders within a 500 foot radius of the project site and stakeholders who have registered online at www.ourlax.org of the proposed Project through the mailer to further complement this outreach effort. Two separate comments were received by SLO the Stakeholders Liaison's Office related to this project. One comment from the County of Los Angeles, Regional Planning Commission, ALUC determined that the proposed Project is an implementation of the LAX Master Plan and is not a type of land use action requiring ALUC review. The second comment received was in response to the Draft EIR for the proposed Project from the U.S. Department of Homeland Security, FEMA Region IX noting National Floodplain Insurance Program management building requirements. The SLO did not receive responses for the LAX Plan Compliance supporting or noting concerns related to the proposed Project.

The Stakeholder Liaison's Report is included as **Attachment 4**.

Traffic Generation Report

The Annual Traffic Generation Report was prepared pursuant to the LAX Specific Plan, Section G by the Ground Transportation Section of the Capital Programming and Planning Group (CPPG) at LAWA, and is included as **Attachment 5**. It is used to determine if projects will generate trips beyond a threshold established in the LAX Specific Plan. If that threshold is reached, then a Specific Plan Amendment Study will be triggered. The Report identifies the number of trips currently being generated by LAX, the number of trips anticipated to be generated at the completion of the project and the number of trips anticipated to be developed at the completion of the LAX Master Plan.

The EIR for the LAX Master Plan forecasts 8,236 net new trips during the airport peak hour at full build-out and after implementation of mitigation measures. If the annual Traffic Generation Report shows that the number of new airport peak-hour trips is likely to be exceeded, a Specific Plan Amendment Study is required.

The analysis shows that current trips are lower than the vehicles estimated for the base year for the Master Plan. Trips for the peak hour in the LAX Master Plan base year (1996) were 17,725; the current peak hour trip count for 2013 is 14,403. Therefore, the trip generation total for the airport peak hour does not trigger the preparation of a Specific Plan Amendment Study.

Aviation Activity Analysis

LAWA is required to prepare and submit an annual Aviation Activity Analysis Report to BOAC, the Department of City Planning, Los Angeles DOT, and the City Council

pursuant the LAX Specific Plan per Section 7.G.1.b, Monitoring and Reporting. It is provided as **Attachment 6**. This report includes the latest analysis that identifies the current number of passengers, volume of air cargo and aircraft operations served at LAX.

The report states that, in 2012, LAWA had an increase of 2.95% in passenger volumes and an increase of 5% in cargo volumes compared to the previous year. However, several factors have affected growth at LAX, preventing it from reaching million annual passenger (MAP) and million annual ton (MAT) levels similar to those prior to the terrorist attacks of 2001. Extreme fuel price increases, a poor global economic environment, the introduction of new large aircraft, and a reduction in number of flights and the number of markets they serve have all contributed to the reduced activity levels at LAX. The report concludes that LAX remains the primary airport for the region.

Department of Transportation

In accordance with the LAX Specific Plan, Section 7.F.2.a, LAWA transmitted a written description of the proposed Project to the General Manager of DOT. A written response was received from DOT dated November 6, 2013, concluding that "there is no new project traffic anticipated to be generated other than temporary construction traffic. The review of the construction traffic has concluded that there are not significant impacts that would need to be addressed and thus there are no project specific mitigation measures required for the project. However, as stated in the Draft EIR, the project is responsible for adhering to all applicable LAX Master Plan commitments and mitigation measures and has identified each of these measures in Section 4.7.7 of the report." The correspondence received from DOT is included as **Attachment 7**.

Department of Public Works - Bureau of Engineering

In accordance with the LAX Specific Plan, Section 7.F.2.a, LAWA transmitted a written description of the proposed Project to the City Engineer, Bureau of Engineering. A written response was received from the Bureau of Engineering stating that no current Public Works project would be affected by the construction of the proposed Project. A list of seven (7) items was provided in the response letter highlighting areas that would require review from their department during the design/construction phase. The correspondence received from the Bureau of Engineering is included as **Attachment 8**. The Bureau of Engineering letter was also submitted as part of the public review of the Draft EIR; therefore, responses to the comments are provided in Chapter 2 of the Final EIR.


Copies of the transmittal letters to the Office of Council District 11, DOT, Department of Public Works – Bureau of Engineering and SLO requesting Executive Director's Review are attached for reference as **Attachment 9**.

Sincerely,


Gina Marie Lindsey
Executive Director

Date: 3/4/14

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Attachments
LT:eq