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## 6. OTHER ENVIRONMENTAL CONSIDERATIONS

### 6.1 Significant Unavoidable Impacts

Section 15126.2(c) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including impacts that can be mitigated but not reduced to a less than significant level. Chapter 4 of this EIR provides detailed analyses of the environmental topics identified in the Initial Study, prepared in April 2019, as having the potential to result in significant impacts with implementation of the LAX Airfield and Terminal Modernization Project. The impacts that cannot be mitigated to a level that is less than significant are identified below. As discussed in Chapter 4, *Environmental Impact Analysis*, for most environmental topics evaluated in the EIR, an existing conditions baseline was used as a basis for determining Project impacts. As also discussed in Chapter 4, changes in future aircraft and passenger activity compared to existing baseline conditions are attributable to growth in activity anticipated to occur at LAX by 2028 with or without the proposed Project. Therefore, some of the significant unavoidable impacts associated with proposed Project operations identified below would occur, or would partially occur, even without Project implementation.

#### **Air Quality**

- Construction emissions (Project-related and cumulatively considerable contributions) of the following pollutants:
  - Carbon monoxide (CO) (for two 4.5-month periods)
  - Volatile organic compounds (VOC) (for two 4.5-month periods)
  - Nitrogen oxides (NO<sub>x</sub>)
  - Sulfur oxides (SO<sub>x</sub>) (for two 4.5-month periods)
- Operational emissions (Project-related and cumulatively considerable contributions) of the following pollutants:
  - NO<sub>x</sub>
  - SO<sub>x</sub>
  - Respirable particulate matter (PM<sub>10</sub>)
  - Fine particulate matter (PM<sub>2.5</sub>)
- Operational concentrations (Project-related and cumulatively considerable contributions) of the following pollutants:
  - PM<sub>10</sub>

#### **Greenhouse Gas Emissions**

- Net increase in GHG emissions from construction and operations, combined
- Cumulatively considerable contribution to GHG emissions
- Project-related inconsistency with plans/policies related to GHG emission reductions

**Noise**

- Aircraft Noise
  - Construction
    - Increased noise levels at exterior use areas of noise-sensitive uses to 65 CNEL or above (for two 4.5-month periods)
    - Temporary increase in aircraft noise levels of 1.5 dBA or more within the 65 CNEL contour compared to baseline conditions (for two 4.5-month periods)
  - Operations
    - Increased noise levels at exterior use areas of noise-sensitive uses to 65 CNEL or above

**Transportation**

- Passenger VMT
- Short-term and Long-term induced VMT
- Cumulatively considerable contribution to VMT impacts

## 6.2 Significant Irreversible Environmental Changes

According to the State CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes and any irretrievable commitment of resources that would be caused by implementation of the proposed project to assure consumption of such resources is justified. Specifically, as stated in CEQA Guidelines Section 15126.2(d):

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The proposed Project would result in the long-term commitment of land to airport uses. The vast majority of the land proposed to be used for the proposed Project is owned by LAWA and already dedicated to the operation of LAX. Several properties, totaling approximately 5 acres, would be acquired as part of the proposed Project. The properties to be acquired are currently developed parcels in an urban area immediately adjacent to airport property. Much of the area to be acquired is used primarily for airport-related public and private parking/commercial vehicle staging, with a portion of one property used for warehousing and educational purposes. The acquired properties would continue to be used for, or converted to, airport-related purposes under the proposed Project.

The proposed Project would necessarily consume slowly-renewable and non-renewable resources. Construction of the proposed Project would require a commitment of resources that would include building materials; fuel for construction equipment and machinery; fuel for the transportation of materials, construction workers, and vendors to and from the Project site; and water. Construction would require the consumption of resources that are non-replenishable or which may renew so slowly that they are considered to be non-renewable. These resources would include raw materials in steel, metals such

as copper and lead, aggregate materials such as sand and stone used in concrete and asphalt, petrochemical construction materials such as plastics, and water.

Operation of the proposed Project would similarly result in consumption of non-renewable resources including electricity, natural gas, transportation-related fuels, and water. This would represent a loss of non-renewable resources, which are generally not retrievable.

The proposed Project would comply with all regulatory requirements related to resource efficiency (fuels, electricity, natural gas, water) during construction and operation, such as Title 24 energy standards, the California Green Building Standards Code (CALGreen), and the City of Los Angeles Green Building Code. In addition, the Project would comply with the LAWA Sustainable Design and Construction Policy, which incorporates measures that can reduce consumption of non-renewable resources during both construction and operation.<sup>1</sup> For example, the Policy requires a minimum of LEED® Silver certification for eligible buildings, which, when applied to Concourse 0 and Terminal 9, would result in lower consumption of energy and water, among other benefits. As evaluated and discussed in Section 4.3, *Energy*, and Section 4.9.1, *Water Supply*, although the proposed Project would result in the consumption of energy and water during construction and operation, the Project's impacts on these resources would be less than significant.

Based on the above, the use of non-renewable resources from construction and operation of the proposed Project would not result in irreversible significant effects on the environment.

## 6.3 Growth Inducing Impacts

Section 15126.2(e) of the State CEQA Guidelines requires an EIR to discuss the growth inducing impacts of the proposed project. An EIR must discuss the ways in which a project could directly or indirectly foster economic or population growth or the construction of additional housing in the surrounding environment. Growth inducing impacts include the removal of obstacles to population growth, and population growth that requires new community service facilities, the construction of which could cause significant environmental effects. Characteristics of a project that may encourage or facilitate other activities that could have a significant environmental effect either individually or cumulatively must also be discussed. Also, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

### 6.3.1 Population, Housing, and Employment Growth

As discussed in Section XIV, *Population and Housing*, of the Initial Study for the proposed Project (included as **Appendix A** of this EIR), the proposed Project would not include any temporary or permanent residential development that would induce population growth directly through the construction of housing.

As described in Chapter 2, *Description of the Proposed Project*, various roadway and utility improvements are proposed to support operations of the Project facilities and to provide efficient roadway circulation. Although the Project proposes roadway and utility improvements to existing roads and infrastructure, it would not involve the extension of roads or other infrastructure into undeveloped areas. Therefore, the proposed Project would not indirectly induce population growth through the extension of roads or other infrastructure into undeveloped areas.

<sup>1</sup> City of Los Angeles, Los Angeles World Airports, *LAWA Sustainable Design and Construction Policy*, September 7, 2017. Available: <https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-sustainable-design-and-construction-policy.ashx>.

Development of the proposed Project would generate construction jobs between years 2021 and 2028. LAWA's existing Project Labor Agreement (PLA)<sup>2</sup> provides a goal and framework for contractors to ensure that no less than 30 percent of the skilled construction laborers working on a project are qualified local persons residing within the project area. LAWA's construction contracts typically provide additional incentives for contractors to use local construction labor and to provide disadvantaged or unemployed local residents access to construction opportunities. Under LAWA'S PLA, local workers are defined as those who reside in the City of Los Angeles and in the adjacent communities of the Airport Impact Area (AIA). These adjacent communities include Inglewood, Lennox, Hawthorne, and El Segundo. As such, a substantial portion of construction workers would likely commute from the local area and would not require a relocation of their residency as a consequence of the construction job opportunities generated by the proposed Project. Composition of the construction workforce ultimately depends upon the local market availability of skilled construction labor and local contractors when the projects commence. LAWA is investing in workforce development programs, such as HireLAX,<sup>3</sup> to increase local worker availability. Notwithstanding the various programs and incentives to draw from local labor pools, it is anticipated that Project construction would also attract workers from other areas of southern California, as has been the case on other large construction projects completed at LAX over the past several years. In drawing from the larger existing regional labor pool, it is not anticipated that the construction worker needs of the Project would result in a notable growth in population, housing, and employment in southern California.

Although the proposed Project does not include any residential development, there exists the potential for indirect population growth as a result of the employment generated by operation of the proposed Project. As discussed in Section 4.8, *Transportation*, the proposed Project would generate approximately 4,700 permanent jobs. This represents less than 0.1 percent of the total employment in Los Angeles County.<sup>4</sup>

In summary, the proposed Project would not directly or indirectly induce population, housing, or employment growth.

### 6.3.2 Growth in LAX Passenger Activity Levels

As described in Chapter 2, *Description of the Proposed Project*, forecasts of future passenger activity at LAX include the draft regional aviation growth forecast recently completed by the Southern California Association of Governments (SCAG), which includes a passenger level forecast for LAX, as well as for other commercial airports in the region, and an aviation activity forecast specific to LAX that was completed for LAWA in 2019 by aviation experts Ricondo and Associates in conjunction with the planning for the proposed Project (see **Appendix B.1**).<sup>5</sup> Both of these forecasts project that future increases in passenger activity levels at LAX will occur with or without the proposed Project.

<sup>2</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles Department of Airports Construction Project Labor Agreement*, November 19, 1999, Extension: January 1, 2001, Updated to Reflect Changes (December 1, 2016). Available: <https://www.lawa.org/lawa-employment/lawa-hirelax/project-labor-agreement>.

<sup>3</sup> City of Los Angeles, Los Angeles World Airports, *HireLAX webpage*. Available: <https://www.lawa.org/en/lawa-employment/lawa-hirelax/hirelax>, accessed August 26, 2020.

<sup>4</sup> State of California, Employment Development Department, *Los Angeles-Long Beach-Glendale Metropolitan Division (Los Angeles County)*, March 27, 2020. Available: [https://www.labormarketinfo.edd.ca.gov/file/1fmonth/la\\$pd.pdf](https://www.labormarketinfo.edd.ca.gov/file/1fmonth/la$pd.pdf).

<sup>5</sup> As noted in Chapter 2, *Description of the Proposed Project*, Section 2.3.1.2, the regional aviation growth forecast prepared by SCAG and the aviation forecast specific to LAX prepared for LAWA were both completed in 2019, prior to the COVID-19 pandemic. SCAG adopted the regional aviation growth forecast as part of the 2020 Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS), also known as Connect SoCal, for the limited purpose of federal transportation conformity on May 7, 2020. Subsequently, SCAG conducted additional outreach with stakeholders to better understand how Connect SoCal could be affected by COVID-19. The SCAG Regional Council formally adopted Connect SoCal on September 3, 2020 (SCAG, *News Release: SCAG Regional Council formally adopts Connects SoCal*, September 3, 2020. Available: <http://scag.ca.gov/Documents/PR-SCAG-ConnectSoCal.pdf>). The outreach effort did not result in any revisions to the regional aviation growth forecast. While the pandemic has had a substantial effect on the aviation industry and air travel in general, it is too early (i.e., speculative) to assess the long-term consequences related to aviation forecasts. As such, the existing aviation forecasts for LAX represent the best forecast information currently available.

As described in Section 2.3.1.2, *Projected Future Growth at LAX*, and further detailed in **Appendix B.1** of this EIR, the aviation forecast developed in 2019 for LAX is based on a review of historical data and trends for aviation activity at LAX, as well as at other major commercial passenger airports in the greater Los Angeles Basin, and on the results of a regression analysis based on socioeconomic factors. LAWA's expert aviation forecast determined that annual passenger levels in 2028 (the planning horizon year for the analysis in this EIR) would be approximately 111 million annual passengers (MAP). This passenger activity level is anticipated to be realized with or without the proposed Project because the ability to accommodate the future aviation demand projected for LAX is not dependent on any of the improvements associated with the proposed Project. This projected increase in future passenger activity levels at LAX is within the forecasted growth for LAX presented in the adopted SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The adopted RTP/SCS projects that passenger activity at LAX will grow from 84.5 MAP in 2017 to 127 MAP in 2045.<sup>6</sup> Similar to the 2019 forecast, the activity growth projected for LAX in the RTP/SCS is not dependent on, or influenced by, the improvements associated with the proposed Project, but rather reflects future growth in air travel demand at LAX based on historical trends and socioeconomic factors independent of the Project, as well as forecasts prepared by the FAA.<sup>7</sup> Therefore, the proposed Project improvements, including the development of passenger gates at Concourse 0 and Terminal 9, are not anticipated to result in growth in LAX passenger activity levels beyond what is expected to occur without the proposed Project.

The growth estimated to occur at LAX by 2028, the horizon year assumed for buildout of the proposed Project, is projected to be “unconstrained,” meaning that the passenger and aircraft activity levels forecast occur by 2028 would not be constrained (i.e., could be accommodated) by LAX's existing and approved functional components. The key functional components of any airport, including LAX, include: the airfield (including runways and taxiways); the terminals (including terminal facilities and gates); and the landside component (including roadways and terminal roadway curbs). As described in Section 4, *Constrained Demand Scenario*, of **Appendix B.1** of this EIR, a technical analysis of LAX's ability to accommodate continued ongoing growth in future activity determined that the airfield component would become the first component to present potential constraints to such future growth. As the number of aircraft operations would continue to increase in the future, the limitations of the airfield component, defined in terms of the practical capacity of the airfield measured by the amount of annualized average all-weather delay (i.e., the amount of delay each flight operations would experience on an annual average all-weather basis), would start to constrain the growth in operations.<sup>8</sup> Increased airfield congestion would translate to an increase in airfield delays. Based on the number of annual aircraft operations estimated to occur each year up through 2045, it was projected that the potential effects of increasing airfield delays on airfield operations would start becoming evident around 2029, and airfield delays would become increasingly unacceptable around 2031 (as documented in **Appendix B.1** of this EIR) as LAX approaches its airfield practical capacity. While the overall operational capacity of an airport is influenced by each of the three key components – airfield, terminal, and landside – the capacity limit is set by whichever of the three component is the most constrained, which, in the case of LAX, is anticipated to be the airfield (due to limitations of the four-runway airfield system), and not the terminal or landside components. In summary, with our without the proposed Project, future activity levels at LAX are projected to grow

<sup>6</sup> Southern California Association of Governments, *Connect SoCal Technical Report: Transportation System - Aviation and Airport Ground Access*, p. 33, adopted September 3, 2020. Available: [https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal\\_Aviation-And-Airport-Ground-Access.pdf](https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal_Aviation-And-Airport-Ground-Access.pdf).

<sup>7</sup> Southern California Association of Governments, *Connect SoCal Technical Report: Transportation System - Aviation and Airport Ground Access*, p. 32, adopted September 3, 2020. Available: [https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal\\_Aviation-And-Airport-Ground-Access.pdf](https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal_Aviation-And-Airport-Ground-Access.pdf).

<sup>8</sup> As described in **Appendix B.1**, the practical capacity of the LAX airfield is defined as the annualized number of aircraft operations that the airfield can accommodate resulting in 15 minutes of annualized average all-weather delay. Consistent with FAA guidance, LAWA selected 15 minutes of annual average all-weather delay per aircraft operation as an indicator beyond which airfield delay may be increasingly unacceptable to airport management and airlines/operators.

unconstrained through the 2028 horizon year for the proposed Project; however, subsequent growth would be constrained by the limitations of LAX's four-runway airfield system.

As described in Chapter 2, *Description of the Proposed Project*, the proposed Project includes roadway improvements that would provide access to Terminal 9 and also serve to reduce congestion on Sepulveda Boulevard by placing airport-related traffic onto new roadways that are exclusive to CTA access (which would prevent CTA-related traffic from backing up onto Sepulveda Boulevard by moving CTA access points on Sepulveda Boulevard away from areas of congestion and by providing more queueing space on new roadway segments separate from Sepulveda Boulevard). Although these improvements would provide landside access to the new Terminal 9, they are not required to provide access to and from the CTA, as such access would still be available with the existing roadways and via the ground transportation system improvements associated with the approved LAX Landside Access Modernization Program. The proposed roadway improvements would not induce growth in airport activity at LAX.

In summary, the forecasted passenger growth is projected to occur with or without the proposed Project and the proposed Project would not directly or indirectly induce LAX passenger growth.

### 6.3.3 Economic Growth

The proposed airfield, terminal, and landside improvements would support the ongoing modernization of LAX, by enhancing the safety and operational management of the airfield; 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 off of, and away from, the public roads that serve the community - all of which would help LAX to prepare early for the continued aviation growth that is projected by LAWA, SCAG, and the FAA to occur at LAX over the next several decades. Additionally, 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. Accordingly, implementation of the proposed Project would be likely to stimulate economic growth in the region. As noted in Section 6.3.2 above, the increased passenger level activity projected to occur in 2028 will occur with or without the proposed Project; therefore, the proposed Project would not induce economic growth relative to the volume of passengers traveling through LAX. However, the additional new concessions and additional jobs associated with development and operation of Concourse 0 and Terminal 9 would support economic growth associated with new jobs and business opportunities.

Construction activity associated with development of 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. Economic growth resulting from Project-related construction could result in environmental impacts related to increased vehicle travel, increased demands for public services and utilities, and impacts associated with the manufacturing/production of materials. Given the highly urbanized setting of the area around LAX, as well as throughout much of Southern California, and the diverse nature of the improvements to be constructed under the proposed Project, it is not expected that the environmental impacts associated with construction-related economic growth would occur in any one area. In addition, given the regional nature of the LAX service area, it is likely that secondary effects of such economic growth would occur within the frameworks of the general plans of the jurisdictions that comprise the SCAG region. Therefore, impacts associated with economic growth under the proposed Project are expected to be less than significant.

## 6.4 Less Than Significant Effects

Section 15128 of the State CEQA Guidelines requires that an EIR briefly indicate the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Table 1-2 in Chapter 1, *Introduction and Executive Summary*, identifies the effects of the proposed Project that were determined to be less than significant, based on analysis in this EIR. The Initial Study for the proposed Project, included as **Appendix A** of this EIR, also determined, for the reasons explained therein, that additional effects, including effects on the following resource areas, would result in no impact, or less than significant impacts: aesthetics, agricultural and forestry resources, biological resources, geology and soils, hydrology and water quality, mineral resources, population and housing, public services, recreation, tribal cultural resources, and wildfire.

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