
6.0 OTHER ENVIRONMENTAL CONSIDERATIONS

6.1 Significant Unavoidable Impacts

Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (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 February 2013, as having the potential to result in significant impacts with implementation of the proposed MSC North Project and future phase(s) of the MSC Program. The following identifies the impacts that cannot be mitigated to a level that is less than significant.

Air Quality

- MSC North Project construction-related regional emissions of carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_x), respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}).
- Cumulatively considerable contribution to significant cumulative construction-related air quality impacts, based on significant construction-related MSC North Project impacts.

Greenhouse Gases

- GHG emissions associated with construction and operation of the MSC North Project and the future phase(s) of the MSC Program.
- Cumulatively considerable contribution to significant cumulative GHG emissions for the MSC North Project and the future phase(s) of the MSC Program.

Human Health Risk Assessment

- Increased incremental acute non-cancer health hazards for acrolein to people living at or near the fence-line from operations of the MSC North Project and the future phase(s) of the MSC Program.
- Cumulatively considerable contribution to acute non-cancer hazards for acrolein for the MSC North Project and the future phase(s) of the MSC Program.

Construction Surface Transportation

- Cumulatively considerable contribution to MSC North Project construction-related impacts to two intersections.

In addition to identifying the significant unavoidable impacts of the proposed Project, Section 15126.2(b) of the CEQA Guidelines also requires a description of the reasons why the Project is being proposed, notwithstanding the significant unavoidable impacts associated with the Project. As discussed in Chapter 2, *Project Description*, the proposed MSC North Project would provide LAWA with the flexibility to accommodate existing demand for aircraft gates while modernizing other terminals at LAX and reducing reliance on the West Remote Gates/Pads. The MSC North Project would allow LAWA to modernize their existing facilities more effectively by providing gate flexibility to offset the operational impacts of other improvement and maintenance projects in the CTA. The new concourse facility would be designed to serve both

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domestic and international traffic and to accommodate all sizes of aircraft and would allow LAWA to close gates for renovation without reducing the number of existing gates.

The MSC North Project would provide hold room and concession facilities for passengers and improve the overall passenger experience at LAX, since it would reduce reliance on the West Remote Gates/Pads which have no passenger amenities. The MSC North Project is an element of the approved LAX Master Plan, and would facilitate the systematic implementation of the LAX Master Plan by providing terminal facilities that can be utilized while other terminal facilities are modernized in accordance with the approved Master Plan.

6.2 Irreversible Environmental Changes

According to the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed MSC North Project or future phase(s) of the MSC Program. Specifically, as stated in CEQA Guidelines Section 15126.2(c):

“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. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.”

The land proposed to be used for the MSC North Project and future phase(s) of the MSC Program is already dedicated to airport uses. However, construction of the proposed MSC North Project and any future phase(s) of the MSC Program would involve consumption of renewable and non-renewable resources for building materials, including: 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.

Construction and operation of the MSC North Project and future phase(s) of the MSC Program would require energy resources such as electricity, natural gas, and various transportation-related fuels (fuel for construction equipment and machinery, and transportation fuel for construction workers and vendor deliveries). This would represent a loss of non-renewable resources, which are generally not retrievable.

The proposed MSC North Project and future phase(s) of the MSC Program would comply with the City of Los Angeles Green Building Code (LAGBC) Tier 1 requirements. Certain measures of note that would reduce the use of non-renewable resources include: compliance with enhanced construction waste reduction goals; exceeding the California Energy Code requirements by 15 percent; use of plumbing fixtures and fixture fittings to reduce the overall use of potable water within the building by 20 percent; and providing readily accessible areas for the depositing, storage, and collection of non-hazardous materials for recycling. The proposed Project would also comply with the Los Angeles World Airports (LAWA) policies and programs related to sustainability, which would reduce the use of non-renewable resources and are implemented on a project-specific and on an airport-wide basis. In addition, the LAGBC Tier 1 standards, which are applicable to all projects with a Los Angeles Department of Building and

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Safety permit-valuation over \$200,000, require the proposed MSC North Project and the future phase(s) of the MSC Program to implement a number of measures that would reduce criteria pollutant and greenhouse gas emissions. These include measures such as: further reduce vehicle and equipment idling times; comply with Tier 4 emission standards for non-road diesel equipment; retrofit existing diesel equipment with particulate filters and oxidation catalysts; replace aging equipment with new low-emission models; and consider the use of alternative fuels for construction equipment. LAWA will include in bid documents for the MSC North Project language specifying that contractors should use equipment on the MSC North Project that meets the most stringent emission requirements.

Operational activities associated with the proposed MSC North Project and future phase(s) of the MSC Program are not expected to increase the number or type of flights and/or aircraft operations at LAX. Furthermore, the proposed MSC North Project and future phase(s) of the MSC Program would also implement energy and water conservation measures, recycling of non-hazardous materials, and other sustainable strategies to the extent feasible. Therefore, the use of non-renewable resources would not result in significant irreversible changes to the environment.

6.3 Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires an EIR to discuss the ways the proposed Project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth, and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

6.3.1 Project Characteristics

The proposed MSC North Project would provide LAWA with the flexibility to accommodate existing demand for aircraft gates while implementing maintenance and/or enhancement/modernization activities at other terminals at LAX and reducing reliance on the West Remote Gates/Pads. The proposed MSC North Project would not change the number or type of flights and/or aircraft operations at LAX.

6.3.2 Economic Growth

Implementation of the MSC North Project and the future phase(s) of the MSC Program may directly or indirectly foster economic growth. 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. As the MSC North building and the facilities associated with the future phase(s) of the MSC Program would increase the building square footage within LAX, it may provide a modest increase in long-term employment opportunities for airline personnel, maintenance and janitorial staff, concessionaires, and bus operators, as well as security screening, and baggage claim or ticketing/check-in agents.

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Construction activity associated with the MSC North Project and the future phase(s) of the MSC Program would also directly and indirectly foster economic growth over the multi-year construction period in terms of temporary construction workers, spending by workers, and the provision of goods and services in support of construction.

6.3.3 Removal of an Impediment to Growth

The proposed MSC North Project and the future phase(s) of the MSC Program would not increase the number or type of flights and/or aircraft operations, and would not cause LAX to grow beyond what has been evaluated and approved under the LAX Master Plan. In addition, the proposed MSC North Project and future phase(s) of the MSC Program would not provide new access to an area that is undeveloped since the site is located within an area of the airport that is in active use, including use as a staging area for airport construction projects. Furthermore, the Project is located within the originally designated areas for the “West Satellite Concourse” pursuant to the LAX Master Plan.

6.3.4 Development or Encroachment into an Isolated Open Space

Development can be considered growth inducing when it is not contiguous to existing urban development and introduces development into open space areas. The proposed MSC North Project site is situated within the western portion of LAX immediately west of the Tom Bradley International Terminal (TBIT). The future phase(s) of the MSC Program is located on the same project site, and within the Central Terminal Area (CTA). The Project and Program sites are within the LAX airport boundary and currently used exclusively for airport uses. Therefore, development of the proposed MSC North Project and future phase(s) of the MSC Program would occur in an existing developed area and would not introduce new development into an undeveloped or open space area.

6.3.5 Precedent Setting Action

The proposed MSC North Project would relocate where existing passengers board/deboard at LAX. The proposed MSC North Project would not encourage or facilitate new activities that do not already occur at the airport, or that have not been anticipated and accounted for under the LAX Master Plan. The proposed MSC North Project would not cause population growth or construction of new housing. Therefore, it would not establish a precedent for unanticipated growth.

6.4 Less Than Significant Effects

This EIR concludes that construction-related air quality impacts associated with localized emissions, odors, and operational air quality impacts would be less than significant. In addition, construction and operational impacts on noise, public services – fire protection services, and on-airport surface transportation would be less than significant, as documented in Chapter 4, *Environmental Impact Analysis*.

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In addition, an Initial Study (IS) was prepared for the proposed MSC North Project and future phase(s) of the MSC Program. Based on the analysis contained in the IS, LAWA determined that the proposed MSC North Project and future phase(s) of the MSC Program would result in “not significant” or “less than significant” environmental impacts in the following subject areas:

- Aesthetics;
- Agricultural Resources;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Recreation;
- Public Services – police protection, schools, parks, and other public facilities ; and
- Utilities.

Since the impacts of the proposed MSC North Project and the future phase(s) of the MSC Program with respect to these subject areas were determined to be either “not significant” or “less than significant,” these environmental topics were not evaluated further in this Draft EIR. This methodology is consistent with CEQA Guidelines Section 15063(c)(3). Pursuant to *CEQA Guidelines* Section 15128, the various possible Project and Program effects found not to be significant are discussed in the Initial Study, attached to this EIR as Appendix A. During the NOP public comment period, LAWA received a request to analyze the potential impacts of aircraft noise from changes to taxi routes that would occur as a result of the proposed MSC North Project; thus, taxiway noise is also evaluated in this Draft EIR. No additional potentially significant impacts were identified during the circulation of the Notice of Preparation (NOP) for public and agency comments.

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