
4. AFFECTED ENVIRONMENT, CONSEQUENCES, AND MITIGATION MEASURES

Introduction

This chapter presents an assessment of the environmental impacts of the Draft LAX Master Plan and Draft LAX Master Plan Addendum, specifically the No Action/No Project Alternative and the four build alternatives (A, B, C, and D) described in Chapter 3, *Alternatives*. This chapter describes the physical environment in the vicinity of LAX that may be affected by proposed airport development; the potential impacts to that physical environment; and the measures proposed to mitigate those impacts. Commitments proposed by LAWA as part of the Master Plan to reduce potential adverse impacts are provided, and cumulative impacts are discussed. The discussion of environmental impacts and mitigation measures has been prepared to comply with the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The various environmental disciplines examined in this chapter (and listed in the Table of Contents) are consistent with those identified in guidance pertaining to NEPA, CEQA, or both. The contents of this chapter are summarized in the Executive Summary.

Organization of the Chapter

Each of the 27 environmental disciplines addressed in this chapter is discussed in a separate section using a common organization. Sections are numbered 4.1 through 4.27. Several sections are divided into subsections to simplify and clarify the discussion. Additionally, Section 4.20, *Construction Impacts*, summarizes the construction impacts for all environmental disciplines, although a complete discussion of construction impacts is provided in each section.

The following subjects are addressed in each section:

- ◆ The **Introduction** briefly describes the issues addressed in the analysis and identifies related topics.
- ◆ The **General Approach and Methodology** describes how the issue was approached, including explanations of any assumptions, equations, or calculations; identification of information sources used for the analysis; and delineation of the study area considered for each environmental discipline. Instead of limiting the entire environmental analysis to a single study area, discrete study areas were sometimes used depending upon the extent of potential impacts associated with each individual discipline. For many of the environmental disciplines, however, a common study area was appropriate. This study area, referred to as the "Master Plan boundaries," includes the current airport property, and a composite of the area to be acquired under the Aircraft Noise Mitigation Program (ANMP) and the four build alternatives, including the LAX Expressway alignments for Alternatives A, B, and C. The Master Plan boundaries are depicted in **Figure F4-1**, Master Plan Boundaries. Figures or descriptions identifying the study areas used by other disciplines are provided in the individual sections, as appropriate.
- ◆ The **Affected Environment/Environmental Baseline** discusses the affected environment, or baseline conditions, for the environmental discipline in the study area, including relevant activities, facilities, and regulations. The environmental baseline is described below under *Analytical Framework*.
- ◆ The **Thresholds of Significance** are quantitative or qualitative measures used to determine whether a significant environmental impact would occur as a result of the project. This subsection includes an explanation of the thresholds of significance and their origins. Where possible, validation of the choice of thresholds is provided by federal, state, and local guidelines, particularly the *Guidelines for California Environmental Quality Act (State CEQA Guidelines)*⁴² and related guidance,⁴³ and the *Draft*

⁴² State of California, [Guidelines for California Environmental Quality Act \(State CEQA Guidelines\)](#), California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387.

⁴³ Governor's Office of Planning and Research, [THRESHOLDS OF SIGNIFICANCE: Criteria for Defining Environmental Significance](#), September 1994.

4. Affected Environment, Consequences, and Mitigation Measures

L.A. CEQA Thresholds Guide,⁴⁴ published by the City of Los Angeles Environmental Affairs Department. For environmental disciplines mandated solely by NEPA, thresholds of significance are not included, as they are not required by NEPA.⁴⁵ In lieu of federal thresholds, this section identifies federal standards that are relevant to the analysis. However, many of the environmental disciplines have no applicable federal standards.




- ◆ **Master Plan Commitments** are specific procedures, plans, policies, or activities proposed to be implemented by LAWA in conjunction with implementation of any of the four build alternatives. These commitments are in addition to proposed mitigation measures, and are intended to reduce or avoid potential adverse impacts of the LAX Master Plan build alternatives. The funding and implementation of the Master Plan commitments, as well as mitigation measures, are subject to LAWA's ability to use airport revenue to the extent permissible under federal law and policies, or to develop other state or federal funding sources. A discussion of Master Plan commitments, and their relationship to proposed mitigation measures, is provided in *Analytical Framework* below.
- ◆ The **Environmental Consequences** subsection presents the analysis of impacts for the No Action/No Project Alternative and the four build alternatives for the horizon year 2015. Potential impacts were compared to the thresholds of significance to determine whether they would be, under CEQA, significant or less than significant. For purposes of determining significance, potential impacts were compared to environmental baseline or Adjusted Environmental Baseline conditions, in accordance with the *State CEQA Guidelines* and as previously described. Impacts of the action alternatives (Alternatives A, B, C, and D) were also compared to impacts associated with the No Action/No Project Alternative for disclosure purposes under CEQA, and for impacts analysis purposes and disclosure of environmental consequences under NEPA. Similarly, for sections mandated solely by NEPA, the impacts of the action alternatives were compared to the No Action/No Project Alternative to effectuate environmental consequences disclosure as mandated by NEPA.
- ◆ **Cumulative Impacts** are the impacts of the project in conjunction with past, present, and probable future projects (under CEQA), or reasonably foreseeable future projects (under NEPA), in or near the area. The environmental impacts of the project may be individually minor, but collectively significant when considered in conjunction with other projects or other environmental effects of the project. In accordance with the *State CEQA Guidelines*, the project's contributions to cumulative impacts for each environmental discipline were evaluated to determine if they would be significant. As discussed in Section 2.6, *Non-LAX Development Having Cumulative Impact*, the cumulative impacts analysis is based on applicable planning documents designed to evaluate regional and area-wide conditions, as well as an assessment of some 200 separate projects expected to occur in the LAX vicinity during the 2000 to 2015 planning period. Please see Section 2.6, *Non-LAX Development Having Cumulative Impact*, for further information on the approach to the cumulative impacts analysis and identification of projects closest (within 3 miles) to LAX.
- ◆ **Mitigation Measures** are specified procedures, plans, policies, or activities proposed for adoption by the lead agencies to lessen or avoid the significant impacts identified in the *Environmental Consequences* subsections. In some instances, the principal mitigation measure described is a Mitigation Plan that will be formulated with performance standards, lists of feasible Mitigation Measures, and commitments to implement the mitigation. As indicated above, the funding and implementation of mitigation measures are subject to LAWA's ability to use airport revenue to the extent permissible under federal law and policies, or to develop other state or federal funding sources. A summary list of all mitigation measures recommended to be adopted as part of Master Plan approval is provided in Chapter 5, *Environmental Action Plan*.

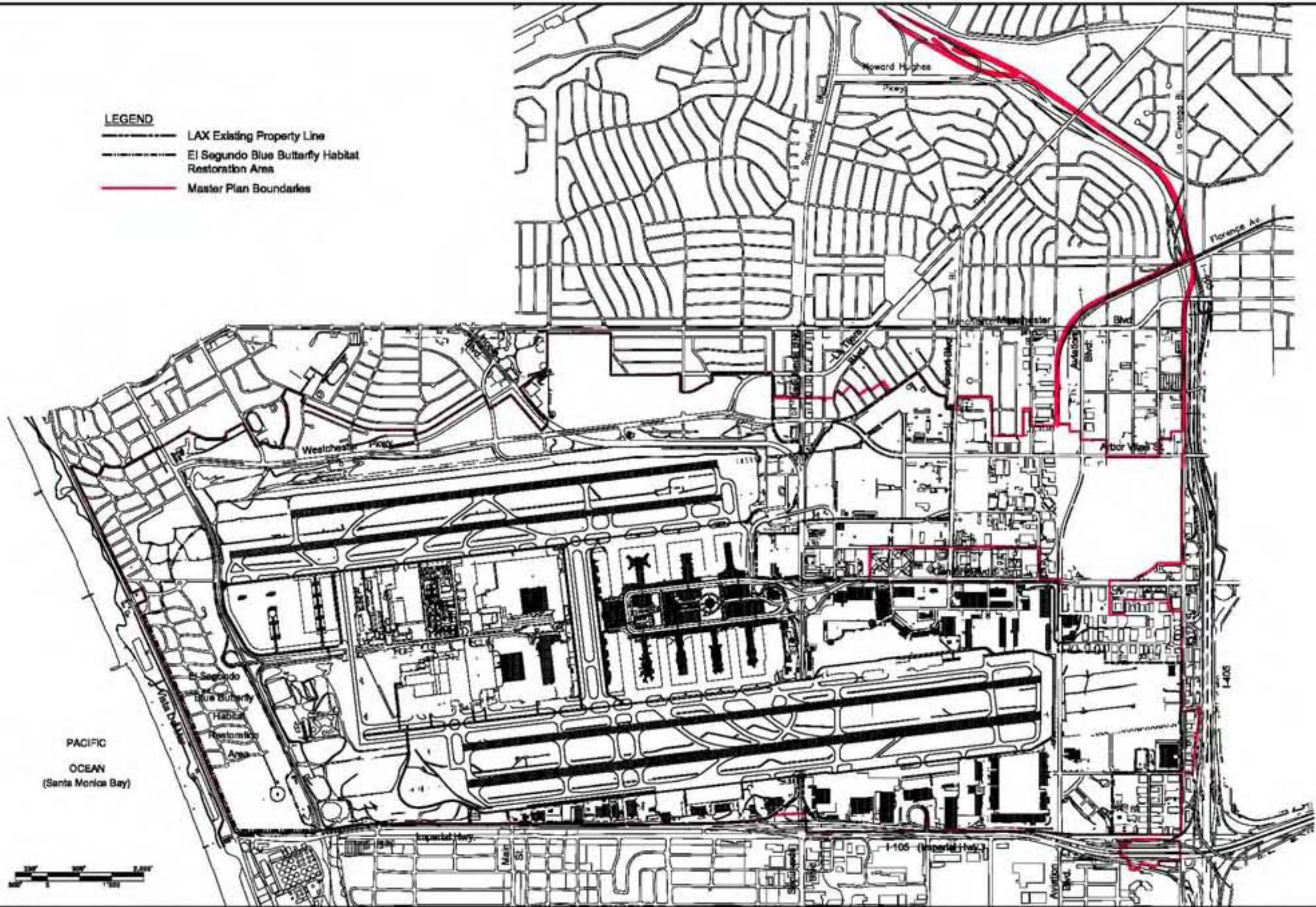
⁴⁴ City of Los Angeles, Environmental Affairs Department, Draft L.A. CEQA Thresholds Guide, May 14, 1998. Although not required by CEQA, the Draft L.A. CEQA Thresholds Guide was prepared by the City of Los Angeles to provide standards for the preparation of EIRs within the city. Although not formally adopted at the time of this writing, the recommended thresholds contained in the document were used as a basis for establishing CEQA thresholds of significance for this Final EIS/EIR.

⁴⁵ FAA Order 5050.4A establishes thresholds for conditions or impacts that normally indicate that an environmental impact statement (as opposed to an environmental assessment) must be prepared for a federal action. As such, these "thresholds of significance" are distinct from, and serve a different purpose than, CEQA thresholds of significance, as they are used in this document.

DWG: FESL_04-01.dwg USER: mgreagall DATE: Mar 08, 2004 8:02pm

LEGEND

-  LAX Existing Property Line
-  El Segundo Blue Butterfly Habitat Restoration Area
-  Master Plan Boundaries



LAX Master Plan Final EIS/EIR

Master Plan Boundaries

Figure F4-1

4. Affected Environment, Consequences, and Mitigation Measures

4. Affected Environment, Consequences, and Mitigation Measures

- ◆ **Level of Significance After Mitigation** is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This subsection identifies any significant impacts that cannot be mitigated. These "significant unavoidable impacts" are also listed in Chapter 6, *Other NEPA/CEQA Topics*. The level of significance after mitigation is not included for those environmental topics where no significant impacts would occur and, as a result, where no mitigation measures are required.

Analytical Framework

Joint NEPA/CEQA Document

In order to address the necessary analysis required by both the federal and state laws, a joint EIS/EIR prepared by federal and state/local agencies may not necessarily follow precisely the same format used for an EIS or an EIR. This document notes where a subject is covered or a mode of analysis is used for the particular purposes of either NEPA or CEQA. The overall organization of the impacts evaluation and discussion of the LAX Master Plan alternatives in this document generally follows the FAA's standard format as set forth in Order 5050.4A, *Airport Environmental Handbook*. However, while NEPA and CEQA share many fundamental elements, such as the analysis of alternatives and the identification of mitigation, they differ in certain respects. For example, under CEQA public agencies commonly utilize thresholds of significance in order to assist them in determining the "significance" of a potential impact. The impacts of the proposed project or program are measured against a baseline (described in detail below) and a determination of significance is made. Furthermore, agencies have a legal duty under CEQA to formulate and implement mitigation measures that can mitigate or avoid "significant" impacts, and must reassess the impacts of the project or program after mitigation. There is no analogous "determination of significance" under NEPA, and a proposed project or program's impacts are assessed by comparing it with alternatives -- particularly the alternative of "no action." Therefore, within each impact category, the standard CEQA analysis is undertaken -- the "significance" thresholds are described, impacts are measured against a baseline to determine if they exceed these thresholds, potential mitigation measures are discussed, and any significant unavoidable impacts remaining after such mitigation are identified in accordance with the CEQA requirements. Although the analysis format used reflects the specific requirements of CEQA, it also serves to satisfy NEPA's requirements to evaluate the impacts of all reasonable alternatives and to identify mitigation measures. In addition to fulfilling the requirements of NEPA and CEQA, this joint EIS/EIR makes specific reference to other relevant state and federal laws and proceeds in accordance with the specified criteria and analysis of those laws.

Program Level vs. Project Level Environmental Entitlements and Analysis

As described in Chapter 2, *Purpose and Need for the Proposed Action*, consideration, approval and implementation of the LAX Master Plan will ultimately require a wide variety of federal and state/local approvals, permits and entitlements issued by numerous federal and state/local agencies. Initially, however, the LAX Master Plan will require what are commonly referred to as "program level" entitlements under state and local law and approval of an Airport Layout Plan (ALP) and related actions by the FAA.

At the local level, the LAX Master Plan alternative chosen will serve as the basis for preparing an amendment to the Los Angeles City general plan. Presently, the City's general plan includes, as its land use element, some 35 community plans plus the Harbor Plan and the 1981 LAX Interim Plan. The "program level" entitlements to be requested by LAWA will include a proposed amendment to the City's general plan that will replace the 1981 LAX Interim Plan, and, in accordance with state law requirements, a proposed rezoning designed to bring the applicable zoning for the airport into consistency with the new general plan amendment. These "program level" entitlements are sometimes referred to as "quasi-legislative" approvals, because they relate to basic policy decisions made by the City's chief legislative body.

As discussed under Section 15146(b) of the *State CEQA Guidelines*, an EIR prepared for "program level" entitlements, such as the adoption of a general plan amendment or a related zoning amendment, "need not be as detailed as an EIR on the specific construction projects that might follow." This CEQA guideline incorporates the "rule of reason" and counsels public agencies to avoid "speculative analysis of environmental consequences for future and unspecified development" that has not yet been formulated at

4. Affected Environment, Consequences, and Mitigation Measures

greater levels of detail. Furthermore, in such situations, the decision-makers and the public normally have the opportunity to review later environmental documents that will provide additional analysis when more specific plans, such as construction plans, are available.

Under Section 1508.28 of NEPA, environmental review may be "tiered" by first preparing a programmatic EIS covering broad programs or policy statements, followed by a more narrowly focused or site-specific analysis. FAA Order 5050.4A identifies approvals of new or revised ALPs as subject to tiering, which may result in either an unconditional or a conditional approval, depending on the scope and depth of the environmental analysis. A conditional approval may require subsequent environmental analysis for the projects depicted on the ALP. Where appropriate analyses have been completed for all of the development shown on an ALP, the FAA may unconditionally approve the ALP. Any further federal actions required to implement development shown on the ALP would be subject to a written reevaluation and potentially a supplemental EIS.

Consequently, this Final EIS/EIR has been prepared to address the more general level of detail that is required for "program level" entitlements under CEQA, and to serve as the basis for an unconditional approval by the FAA of a revised ALP for LAX. It is anticipated that subsequent environmental documents will address various environmental issues at more specific levels of detail as necessary and appropriate. Due to the overall size and complexity of the LAX Master Plan, and in an effort to be as comprehensive and thorough as is feasible at this point in the process, this Final EIS/EIR contains considerable analysis that is beyond the general level of detail normally found in a "program level" environmental document.

In order to provide a basis for analysis of certain aspects of the LAX Master Plan, conceptual acquisition and construction phasing plans have been prepared. These conceptual plans are based on a reasonable scenario of how the various project components and features of the LAX Master Plan can be feasibly built in accordance with such factors as the amount of land that must be acquired for development; the time needed for demolition and relocation of existing uses; the need to maintain on-going airport operations; the timing and sequencing of construction of certain key airport and ground access improvements; and the quantity, location and type of projected construction requirements (e.g., amount of cement, type of construction equipment).

Development of these conceptual phasing plans allows for the analysis of the various impacts that are described in this document. It does not represent a final construction plan for each component of the various alternatives. More detailed acquisition and construction phasing information may be developed should a build alternative be selected and approved. For example, a more detailed construction plan would need to be developed as part of the Project Study Report (PSR) that Caltrans would consider in connection with such major ground access improvements as the LAX Expressway for Alternatives A, B, and C, or the improvements at I-105 and I-405 recommended as mitigation measures under Alternative D. (The PSR is further discussed later in this introduction.) As the need to modify the conceptual plan becomes apparent, further analysis will be undertaken where appropriate and necessary under NEPA and CEQA.

Basis for Determining Impacts

In accordance with Section 15125 of the *State CEQA Guidelines*, the affected environment (referred to in the Guidelines as the "environmental setting") constitutes the baseline physical conditions by which it was determined whether an impact would be significant. Two baseline conditions were used in this analysis, as described in Chapter 3, *Alternatives (Including Proposed Action)*. These include the environmental baseline, or the physical conditions that existed at the time the Notice of Preparation was published (in this case, physical conditions as of mid-1997 and aviation activities from the most recent, previous year, or 1996), and the Adjusted Environmental Baseline, which reflects environmental baseline conditions on the airport, and future conditions (allowing for regional growth) off-airport.

By contract, the NEPA environmental impact analysis focuses on comparing the impacts of the action alternatives (here, Alternatives A, B, C, and D), with the impacts of the No Action alternative. Comparison to the CEQA baseline or to the adjusted environmental baseline is not required by NEPA, and no NEPA provisions or guidelines address these baseline issues. Thus, CEQA and NEPA mandate distinct methods for analysis of the impacts of a proposed action and the alternatives to that action. To satisfy the requirements of the two statutes, both methods are undertaken in this document.

The Environmental Baseline (CEQA)

Under the 1998 revisions to the *State CEQA Guidelines*, an EIR must describe the physical environmental conditions in the vicinity of a proposed project "as they exist at the time the notice of preparation is published...." Furthermore, Section 15125(a) of the 1998 revised *State CEQA Guidelines* states that "[t]his environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."

In accordance with these directives, the Draft EIS/EIR, which provides the foundation for this Final EIS/EIR, normally used the date of July 1997, the date on which the Notice of Preparation (NOP) was published, as the baseline date for its environmental analysis. When a full year's worth of data was appropriate for describing the existing environmental setting, data was normally used from 1996 - the last full year before the date of the July 1997 NOP. In certain instances, data from earlier years was used when that was the only available data. In other instances, data from later years (e.g., 1999 or 2000) was used when it was considered to be appropriate to use more recent data.

In the preparation of the Supplement to the Draft EIS/EIR, published in July 2003, the environmental baseline conditions used in the Draft EIS/EIR analysis were evaluated to determine whether the more current physical environmental conditions were notably different from those of the January 2001 Draft EIS/EIR, and whether those changes, if any, would have a material effect on the Draft EIS/EIR analysis and conclusions. For updated comparative purposes, the Supplement to the Draft EIS/EIR included a description of the more current physical environmental conditions in the vicinity of the proposed project. The physical conditions occurring at, and around, the LAX Master Plan study area in the Year 2000 represented the most current environmental conditions that are meaningful and relevant to the analysis of the LAX Master Plan. The Year 2000 conditions used within the Supplement to the Draft EIS/EIR provided for a full year's worth of data for environmental conditions, including as influenced by existing airport operations, as they existed prior to the terrorists' attacks of September 11, 2001. Given that the events of September 11th substantially altered the nature and characteristics of operations at LAX, a description of existing environmental conditions that includes the period after that date is not considered to be representative of typical conditions.

The use of Year 2000 conditions within the Supplement to the Draft EIS/EIR is also included in this Final EIS/EIR for updated comparative purposes. The environmental baseline conditions described in the Draft EIS/EIR, which provide the primary basis for the evaluation of CEQA impacts in this Final EIS/EIR, are referred to as the "1996 baseline" conditions to help more readily distinguish from references to Year 2000 conditions. For certain environmental disciplines, an "adjusted environmental baseline" serves as the basis for determining the significance of impacts. In instances where the environmental setting under Year 2000 conditions are materially different from that of 1996 baseline conditions, such differences are described in this Final EIS/EIR, as are also any material differences in the impacts that would result by using the Year 2000 conditions compared to the 1996 baseline conditions. To reiterate, however, conclusions regarding the significance of impacts for any, and all, build alternatives are based on the 1996 baseline or, for certain environmental disciplines, the adjusted environmental baseline.

Using existing baseline conditions as the measuring point for determining the CEQA "significance" of impacts from the LAX Master Plan build alternatives is not necessarily the most realistic assessment of project impacts, even though the 1998 revisions to the *State CEQA Guidelines* provide that normally this is the appropriate comparison. This is because, under the federal statutory scheme that controls aviation, the key decisions that affect aircraft activity levels are made by the airlines as they seek to meet passenger and cargo demand, and LAWA is unable to simply "freeze" or cap activity at existing levels. Thus, decision-makers who must decide whether or not to approve the LAX Master Plan do not have a realistic option of leaving in place the conditions described by the environmental baseline. Nevertheless, this Final EIS/EIR uses an existing baseline for CEQA purposes, resulting in a highly conservative "significance" analysis and a mitigation program that seeks to mitigate the impacts of the LAX Master Plan build alternatives to levels that are less than significant as compared to the environmental baseline.

The Adjusted Environmental Baseline (CEQA)

As described above, the environmental setting that normally constitutes the baseline physical conditions by which a lead agency determines whether an impact is "significant" is defined under the CEQA Guidelines as normally that which exists at the time the NOP is published. There are, however, certain

4. Affected Environment, Consequences, and Mitigation Measures

environmental impact analysis disciplines that have developed highly sophisticated methods by which to analyze potential future project-related impacts, including use of computer hardware and software models that analyze substantial amounts of data and information about the potential construction and operation impacts of a proposed project. The ability to successfully manage and properly understand substantial amounts of data can be especially challenging when a proposed project may have potential impacts that, in and of themselves, may be large, but that may still be dwarfed by potential changes in the background environment. Thus, in evaluating environmental impacts related to traffic, air quality, and noise, the analysis necessarily focuses on the potential project's cumulative impacts, because the incremental impacts from the project itself are meaningful principally in the context of those cumulative impacts.

CEQA provides specific guidance for this type of cumulative impact analysis. Section 15130 of the CEQA Guidelines, for example, states that an EIR shall discuss a project's cumulative impacts when the project's incremental effects are "cumulatively considerable," meaning that those incremental effects are considerable "when viewed in connection with the effects of past projects, the effects of other current projects and the effects of probable future projects." See Section 15065(c). In evaluating the pertinent cumulative impacts, the lead agency may consult either a "list of past, present and probable future projects producing related or cumulative impacts" or a "summary of projections" contained in adopted plans or certified environmental documents. See Section 15130(b)(1). The lead agency must then determine whether a proposed project's "contribution" to a "significant cumulative impact" can be rendered "less than cumulatively considerable" and thus "not significant."

Over time, certain environmental impact analysis disciplines have developed standardized approaches toward how they determine which "probable future projects" and background growth trends and projections should be taken into account and how the cumulative environmental impacts of the proposed project and this other growth should be evaluated. The traffic engineering profession, for example, has developed specific standards and criteria relating to how the capacity of an off-site intersection should be measured, now and in the future, in order to determine the "significance" of a project's added incremental traffic impacts. Any particular intersection in a proposed project's vicinity, of course, may be impacted in the future by the project's incremental impacts, by the cumulative impacts of other projects and background growth, or by a combination of both. In undertaking their analysis, traffic engineers typically use the time horizon for buildout of the proposed project as the appropriate date for determining what future traffic growth will be taken into account in measuring off-site traffic impacts. Thus, for example, where the time horizon for the LAX Master Plan is 2015, the traffic analysts use the same 2015 date in determining what non-project-related traffic growth will be considered in projecting the future cumulative impacts of any given intersection. Once these cumulative impacts are calculated, the traffic analysts quantify which portion of those total future cumulative impacts are due to the proposed project's incremental impacts. By then adjusting the off-site baseline for non-project-related traffic activity to this same projected 2015 background traffic activity level, the non-project-related cumulative traffic impacts are effectively cancelled out, so that only the project's incremental impacts remain to be mitigated and the project's "fair share" of proposed mitigation is thereby established. This analytical method of evaluating these cumulative environmental impacts is commonly referred to as using an "adjusted baseline" approach.

Notably, the "adjusted baseline" methodology is applicable only to off-site conditions, where the extensive cumulative impacts of other future projects are expected to occur. Because any on-site traffic would be generated principally by project-related incremental growth, the "normal" current conditions baseline analysis is used to measure the "significant" on-site traffic impacts. This results in a highly conservative analysis because it assumes that all future on-site traffic activity levels and their impacts are project-caused impacts, even though a measurable portion of such on-site traffic growth over time would doubtless be caused by background growth and other non-project related factors. Because all such future impacts are effectively deemed to be incremental project-related growth, the LAX Master Plan must mitigate all such on-site traffic impacts, not just its arguable "fair share" of such cumulative impacts.

Similar procedures to isolate incremental traffic growth due to the project from all other traffic growth have been in use for many years. Traffic impact analysis policies and guidelines for both the City of Los Angeles and the County of Los Angeles require this "adjusted baseline" approach. Within both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, which provide the basis for this Final EIS/EIR, the noise analysis (Section 4.1) and the air quality analysis (Section 4.6) build upon the cumulative impacts traffic analysis contained in the off-site surface traffic impacts analysis (Section 4.3.2). Consequently, those sections, too, are based on that "adjusted baseline" methodology.

Formulation of Master Plan Commitments and Mitigation Measures

Section 15126.4 of the *State CEQA Guidelines* requires that an EIR "shall describe feasible measures that could minimize significant adverse impacts." Mitigation measures are not required for effects that are not found to be significant. In accordance with this provision, mitigation measures have been developed to address significant impacts. Due to the programmatic nature of the Final EIS/EIR, in some cases, specific mitigation features cannot be identified until additional design is conducted. In these cases, performance standards are specified, and a range of options for meeting the standard is provided.

In addition to the proposed mitigation measures, Master Plan commitments were formulated where mitigation measures would not be appropriate. Master Plan commitments were determined to be more appropriate than mitigation measures in some cases for the following reasons: (1) where standards and regulations exist with which compliance is already required by the applicable regulating agency; (2) where impacts would be adverse but not significant; and (3) where design refinements could be incorporated into the project to reduce or avoid potential impacts.

In accordance with the requirements of CEQA, a mitigation monitoring and reporting plan will be adopted as part of project approvals, to ensure that implementation of mitigation measures is properly monitored and documented. During the formulation of the Mitigation Monitoring and Reporting Program for the LAX Master Plan, refinements were made to certain Master Plan commitments and mitigation measures previously presented in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR in order to clarify the purpose, intent, and application of those commitments and measures. Additionally, refinements were also made based on comments received during the public review periods for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

No Action/No Project Alternative

The NEPA "No Action" Alternative

NEPA regulations require that the alternative of "no action" be considered in an EIS. In the case of an EIS for a revised land use plan or similar plan, where ongoing programs initiated under existing legislation and regulations will continue even as new plans are developed, "no action" means "no change" from current management plans. According to guidance interpreting NEPA, "the 'no action' alternative might be thought of in terms of continuing with the present course of action until that action is changed. . .".⁴⁶ This definition of a "no action" alternative is fully consistent with the *State CEQA Guidelines* for a "no project" alternative described below.

The CEQA "No Project" Alternative

The 1998 revisions to the *State CEQA Guidelines* provide further definition and clarity to the so-called "no project" alternative which must be included in all EIRs. According to Section 15126.6(e)(1) of the *State CEQA Guidelines*, the "no project" alternative analysis "is *not* the baseline for determining whether the proposed project's environmental impacts may be significant...". Rather, the "no project" alternative analysis is included "to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project."

According to Section 15126.6(e) of the *State CEQA Guidelines*, the "no project" alternative should describe the existing conditions, as modified by "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Where the revision of an existing land use or regulatory plan is involved, the "no project" alternative "will be the continuation of the existing plan, policy or operation into the future." In this situation, "typically, other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan...would be compared to the impacts that would occur under the existing plan."

Analysis of the Impacts from the No Action/No Project Alternative

This Final EIS/EIR combines the CEQA "no project" alternative with the "no action" alternative required under NEPA. Both the *State CEQA Guidelines'* definition and the NEPA regulations and guidance were

⁴⁶ 46 Fed. Reg. 18026, *Forty Most Asked Questions Concerning CEQ's NEPA Regulations*. (Question 3), March, 23, 1981.

4. Affected Environment, Consequences, and Mitigation Measures

used to identify the various components and features of the No Action/No Project Alternative. In general, this alternative is based on the current physical structures and infrastructure at LAX with the exception of a few modifications that were previously approved and underway when this analysis was undertaken. The No Action/No Project Alternative is also based on reasonable projections of future activity levels that are anticipated to occur as airlines seek to meet increasing passenger and cargo demand at LAX. In the absence of any Master Plan improvements, for example, the airlines are expected to modify their fleet mix by scheduling more larger aircraft that can accommodate more passengers and cargo. Additionally, the No Action/No Project Alternative includes the contemplated development of the Continental City and LAX Northside projects, both of which have fully vested entitlements (an approved development agreement and an approved final subdivision map, respectively) that have been the subject of previous EIR evaluation and that are consistent with existing plans, policies and operations.

This Final EIS/EIR analyzes the impacts of the No Action/No Project Alternative using the same methodology and at the same level of detail used to analyze the other LAX Master Plan alternatives. However, while CEQA requires that the impacts of the "build alternatives" be evaluated with a view to determining whether or not they would be "significant," this procedural requirement does not apply to the evaluation of the "no project" alternative. Determining the "significance" of impacts associated with continuing with existing plans, policies and projects and evaluating mitigation measures to address these impacts are not a part of the "no project" alternative analysis, particularly where these plans, policies or projects have previously been evaluated in EIRs. For example, as noted above, EIRs have previously been prepared and certified for both the Continental City and LAX Northside projects, and appropriate mitigation measures have been adopted for those projects. These projects, along with their previously-adopted mitigation measures, are considered by this Final EIS/EIR to be a part of the No Action/No Project Alternative.

Definition of the "Build" Project Alternatives

Chapter 3, *Alternatives*, describes the process used to identify and evaluate reasonable alternatives that could address the needs and meet the purpose and objectives of the LAX Master Plan. The environmental impacts of each of the "build" alternatives found to meet the Master Plan's purpose and objectives are analyzed in detail in this chapter. The components of Alternatives A, B, and C are described in detail in Chapter 3, *Alternatives*, and in Chapter V, *Concept Development*, of the Draft LAX Master Plan, and a detailed description of the components of Alternative D are provided in Chapter 3 of this Final EIS/EIR and Chapter 2, *Alternative D Development and Refinement*, of the Draft LAX Master Plan Addendum.

LAWA anticipates utilizing the procedures of the *State CEQA Guidelines*, including Section 15225, when it processes the state and local approvals based on the joint EIS/EIR. LAWA further anticipates that a general plan amendment and specific plan - to be called the LAX Plan and LAX Specific Plan, respectively - that ultimately replace the 1981 LAX Interim Plan will include a phasing plan, as well as appropriate performance standards and mitigation measures, including various mitigation measures that are identified and evaluated in this chapter. As indicated previously, during the formulation of the Mitigation Monitoring and Reporting Program by LAWA, it will be determined which Master Plan commitments and mitigation measures described in this chapter should appropriately be included within the parameters of the LAX Plan and/or LAX Specific Plan, which should be included in other formats that can nonetheless ensure that those measures will be fully enforceable.

The project boundaries of the LAX Master Plan encompass all of the current boundaries of the 1981 LAX Interim Plan as modified to take into account the proposed acquisition areas that are part of each Master Plan build alternative.

- ◆ With respect to the portion of the LAX Master Plan boundaries that lie within the coastal zone, none of the Master Plan build alternatives proposes construction within the Los Angeles/El Segundo Dunes. Rather, under the Master Plan alternatives, all existing policies and ordinances that currently apply to the Los Angeles/El Segundo Dunes would be retained and continue to be implemented within those areas. Under all of the build alternatives, a small amount of disruption within the Los Angeles/El Segundo Dunes would occur as the result of relocating certain navigation aids. Also, under Alternatives A, B, and C, certain ring road-related improvements would be made to the eastern edge of Pershing Drive, which constitutes the eastern boundary of the coastal zone. These improvements

4. Affected Environment, Consequences, and Mitigation Measures

would not intrude into the Los Angeles/El Segundo Dunes. Alternative D does not include a ring road.

- ◆ With respect to the existing Manchester Square residential neighborhood, in July 2000, LAWA approved implementation of a voluntary acquisition and relocation program that is not a part of the LAX Master Plan and that will proceed to completion irrespective of whether any Master Plan build alternative is chosen. The Final EIS/EIR assumes that, as to all Master Plan alternatives (including the No Action/No Project Alternative), this voluntary program will continue to be implemented and that the area in question will be fully acquired and the existing residential uses fully demolished. The No Action/No Project Alternative assumes that the area will remain vacant through 2015, since it would require a change in land use policy to re-plan and re-zone the area to uses other than the existing residential uses. (Under the 1998 revised *State CEQA Guidelines*, the "no project" alternative must assume that "current" plans and policies continue into the future.) One of the Master Plan build alternatives, Alternative A, reasonably projects that under a separate entitlement process, by the year 2015, the Manchester Square area would recycle into light industrial uses, a use for which there would be considerable demand by that year, and analyzes that use in its cumulative impacts analysis. The remaining three Master Plan build alternatives, Alternatives B, C, and D, would incorporate the Master Plan area into the airport boundaries and utilize it as the site for various Master Plan uses.
- ◆ With respect to the area that is presently planned and approved for the LAX Northside development, Master Plan Alternatives A, B, and C include a substantially down-sized and modified development proposal, renamed "Westchester Southside." The approximately 4.5 million square feet of mixed uses currently approved as part of LAX Northside would be scaled down to approximately 2.5 million square feet of uses, including some LAWA administrative offices, light industrial uses acquired and relocated as part of the Master Plan, and other retail, commercial and hotel related uses. Alternative D retains the existing LAX Northside land use designations, but proposes a reduction to the existing trip cap in order to reduce the daily peak hour trip generation to a level comparable to that of the Westchester Southside project.

Relationship of the Final EIS/EIR and Master Plan to Other Documents and Processes

Accompanying this Final EIS/EIR is a series of Appendices and Technical Reports. Also included as part of this Final EIS/EIR are the comments received by LAWA and the FAA on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, and the written responses to those comments. These documents include information that has been considered in and relied upon in preparing this Final EIS/EIR and they are incorporated by reference. This Final EIS/EIR has been developed by the FAA and the City of Los Angeles as a joint NEPA/CEQA document, and the processing and review of the document has occurred jointly, with the respective NEPA and CEQA processing requirements occurring concurrently.

As the environmental review and decision-making processes defined under CEQA and NEPA are completed, a sequence of events will occur and documents will be produced. The CEQA process and related City decision-making process will finish prior to the NEPA process and federal decision-making being completed. For the CEQA process, the City of Los Angeles decision-making body must first certify that the information contained within, and associated with, this Final EIS/EIR satisfies the requirements of CEQA. Next, the City must make certain CEQA findings regarding the significant environmental impacts associated with the project, and must adopt a Mitigation Monitoring and Reporting Program for the mitigation measures that are required as part of project approval.

Subsequent to the City's decision-making process, the FAA will complete the NEPA-related decision-making process. As part of completing the Final EIS/EIR, the FAA will add certain documents and make certain determinations that are specific to NEPA and other federal environmental statutes. For example, under the federal Clean Air Act, the FAA must make a determination that the LAX Master Plan conforms to the State Implementation Plan (the so-called "General Conformity" determination). The FAA will complete, and include with the Final EIS/EIR, the Final General Conformity Determination. To the extent necessary, the Final EIS/EIR will be modified to incorporate the results and findings of the Final General Conformity Determination. This and other similar types of federal documents and determinations are not required under CEQA nor are they required for the City's decision-making process. As such, it is anticipated that they will be integrated by the FAA into the Final EIS/EIR subsequent to the City's certification of the document. The FAA may also make other modifications to the Final EIS/EIR as

4. Affected Environment, Consequences, and Mitigation Measures

determined necessary and appropriate to meet federal requirements. The inclusion of such federally-required information within, and possible modification of, the Final EIS/EIR for the purpose of satisfying NEPA and other federal requirements does not require the approval of the City nor does it affect the City's prior certification of the Final EIS/EIR relative to CEQA. Additional documents, based on the analysis within the EIS/EIR, will be prepared to support the CEQA determination once the preferred alternative is selected and prior to FAA's approval of the ALP. This approval, along with all requisite FAA findings and determinations, will be documented in a Record of Decision.

As indicated previously, a Project Study Report (PSR) and other documentation would need to be completed for use by Caltrans in its detailed evaluation of the LAX Expressway and other ground access components of the LAX Master Plan that are within the jurisdiction of state and federal transportation agencies, should the selected alternative include such improvements. Alternatives A, B, and C include the LAX Expressway, and development of that transportation improvement project, should one of those alternatives be selected, would required the completion of a PSR and associated NEPA review. Should Alternative D be approved and the mitigation measures calling for improvements related to the I-105 and I-405 be included in the project approval, a PSR and associated NEPA review would need to be completed in order for those improvements to be constructed. The federal lead agency for such improvements is the U.S. Department of Transportation, Federal Highway Administration (FHWA). A preliminary environmental evaluation has been prepared addressing potential impacts associated with the LAX Expressway roadway improvements and is incorporated by reference into the Final EIS/EIR. The subject evaluation is provided in Appendix K, *Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements*.