
Statement of Overriding Considerations

The Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Los Angeles International Airport (LAX) Terminals 2 and 3 (T2/T3) Modernization Project at LAX (or Airport), pursuant to the California Environmental Quality Act (CEQA). On June 28, 2017, LAWA published the Final EIR for the LAX T2/T3 Modernization Project.

The LAX T2/T3 Modernization Project seeks to modernize existing Terminals 2 and 3 in order to improve passenger level of service and amenities within the terminals; help meet federal security requirements (e.g., security screening), improve passenger and baggage processing and inspections; improve building systems; and modernize the interior and exterior of the terminals to benefit the overall appearance of the CTA.

The LAX T2/T3 Modernization Project consists of:

- ◆ Upgrading the T2 concourse, including construction of additional floor area;
- ◆ Demolition and reconstruction of the T3 concourse building to provide additional concourse area, including a new operation control center; the demolition of the southern appendages of the T3 satellite;
- ◆ Reconfiguring existing passenger gate positions within the existing terminal linear frontage for a total of 27 passenger gate positions at T2/T3;
- ◆ Demolition and reconstruction of the passenger and baggage processing facilities (ticketing buildings – T2.5 and T3.5) associated with T2 and T3, including new facilities for passenger and baggage screening, ticketing, and baggage claim (which would reduce redundancies in passenger and baggage processing by providing facilities that support multiple terminals); and a secure connector (i.e., an enclosed/controlled passenger corridor) between T2 and T3; and
- ◆ Apron improvements, specifically the replacement/resurfacing, restriping, and relocation of fuel pits.

In total, approximately 832,000 square feet of new building space would be added to the two terminals, for a total square footage of approximately 1,620,010 square feet.

The LAX T2/T3 Modernization Project EIR identified significant adverse environmental impacts that would result from the implementation of the LAX T2/T3 Modernization Project that cannot be mitigated to a level that is less than significant by the implementation of feasible mitigation measures or alternatives. The unavoidable significant impacts from the LAX T2/T3 Modernization Project occur with respect to: construction-related regional air pollutant emissions for NO_x, which would also be cumulatively considerable; and, cumulatively considerable construction-related surface transportation impacts at two intersections: Imperial Highway and I-105 Ramp (Intersection #14) and Century Boulevard and Sepulveda Boulevard (Intersection #5), assuming construction staging occurs at the proposed primary construction staging area (an existing industrial parcel on La Cienega Boulevard, just north of Imperial Highway). Additional information and specific findings regarding those impacts are provided in the *California Environmental Quality Act Findings - LAX Terminals 2 and 3 Modernization Project*, as required by State CEQA Guidelines Section 15091.

State CEQA Guidelines Section 15093(b) provides that when a public agency approves a project that will result in significant impacts that are identified in the Final EIR but are not avoided or substantially lessened to a less than significant impact, the agency must state in writing the specific reasons to support its decision based on the Final EIR and/or other information in the whole administrative record. If the specific economic, legal, social, technological or other benefits of a proposed project outweigh its unavoidable adverse environmental impacts, the adverse effects may be considered “acceptable.” LAWA, as the Lead Agency for the LAX T2/T3 Modernization Project EIR, adopts the following Statement of Overriding Considerations.

Based on the substantial evidence in the whole of the administrative record for the LAX T2/T3 Modernization Project, the Board of Airport Commissioners hereby finds, concludes, and determines that the unavoidable significant adverse environmental impacts associated with the construction of the LAX

Statement of Overriding Considerations – T2/T3 Modernization Project

T2/T3 Modernization Project are acceptable in light of the following specific economic, operational, legal, technological or other project benefits. Each project benefit described below constitutes an overriding consideration warranting approval of the LAX T2/T3 Modernization Project, independent of other benefits, despite each and every significant unavoidable impact.

A. Economic, Revitalization, and Security Benefits Associated with Improvement and Modernization of Terminals 2 and 3 at LAX

Jobs and commerce are direct economic benefits attributable to LAX. As an international port for passengers, cargo, and freight, LAX provides a foundation for businesses that depend on passenger and cargo operations and logistics. In this regard, LAX is a vital component of the local, regional, and state economy. 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. Construction of the LAX T2/T3 Modernization Project would allow for modernization of existing Terminals 2 and 3 while maintaining daily operations at LAX, and thereby helping maintain the Airport's economic contribution in Southern California.

Implementation of the LAX T2/T3 Modernization Project would modernize and revitalize the existing Terminals 2 and 3 facilities at LAX. Upon completion of modernizing Terminals 2 and 3, functions to improve safety and security would be enhanced to meet Transportation Security Administration (TSA) and U.S. Customs and Border Protection (CBP) requirements for security and customs screening, as well as provide a secure connector between T2 and T3 to allow passengers to connect from one terminal to the other without having to exit to the non-secure side of the terminal, and only go through security once. Other improvements include providing flexible space for next generation passenger and baggage screening, and improvements to the aircraft apron area (e.g., aircraft parking positions, passenger boarding bridge locations, aircraft fueling system hydrant locations, ground support equipment parking locations) to be compatible with the proposed changes to the Terminals 2 and 3 buildings and anticipated airline fleets and uses. This modernization would revitalize the existing Terminals 2 and 3, which would improve passenger level of service and amenities within the terminals and improve building systems, as has been previously done for other terminals within the Central Terminal Area (CTA), and improve passenger safety and security.

B. Improved Passenger Experience at LAX

LAX is well recognized as one of the world's leading commercial airports and is an integral part of Southern California. Although it has functioned as an airport since 1928, the main terminal complex at LAX was constructed in 1961. Over the last six years, several projects have been completed or are in process of being completed or planned at LAX (see Table 3-1 in Chapter 3, *Overview of Project Setting*, of the Draft EIR for a list of projects) that are aimed at modernizing LAX and making the facilities more efficient, thereby improving passenger level of service and amenities. As discussed in Chapter 2, *Project Description*, of the Draft EIR, both Terminals 2 and 3 were originally constructed in 1961, with Terminal 2 completely reconstructed in place in 1988. Other than minor modifications over the years, there has been no substantial exterior modernization or addition of building space at Terminals 2 or 3 since the late 1980s. In addition, the building systems (including heating, ventilation, air conditioning systems, plumbing, electrical, passenger boarding bridges and their support systems) associated with Terminals 2 and 3 have not been significantly upgraded, are inefficient, and are at or beyond their useful lives. The LAX T2/T3 Modernization Project would continue to advance and transform LAX to ensure that LAX remains a world class airport. The LAX T2/T3 Modernization Project would improve security and safety, update inefficient building and operating systems, update Terminals 2 and 3 to be compatible with current and anticipated airline fleets and uses, and add new contemporary amenities, all of which would enhance the travel experience for passengers at LAX, and in particular, within the northern portion of the CTA. During construction of the project, LAWA would ensure continued operations and minimal conflicts with

Statement of Overriding Considerations – T2/T3 Modernization Project

terminal activities through monitoring of flight schedules and close coordination with terminal operations on a daily basis. The proposed modernization would deliver world class terminal facilities with concessions, holdrooms, and passenger services.

C. Sustainability

The LAX T2/T3 Modernization Project provides important sustainability benefits through conserving energy and water. The project would be designed and constructed in accordance with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code (CALGreen), and would achieve, at a minimum, LAGBC Tier-1 conformance through environmentally-sensitive features including, but not limited to, the types described below. In addition, U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Silver level of sustainability measures would be implemented under the project: these measures include the incorporation of energy saving measures such as installation of high efficiency fixtures and lighting and incorporation of energy saving design elements such as natural daylighting and naturally ventilated and unconditioned spaces.

The project would be required to use recycled building materials in the new/modernized facilities, and to recycle a minimum of 75 percent of construction and demolition debris. Recycling programs would also be employed during operations. Recyclable materials would be collected in the terminals, and tenants operating in the terminals, including concessionaires and restaurant management companies, would be required to have their own recycling and waste reduction programs. The modernized terminals would include efficient lighting fixtures and controls with occupancy sensors to reduce energy consumption during off-peak hours, and the terminals' heating, ventilation, and air conditioning controls would be designed to reset temperatures to maximum efficiency without sacrificing occupant comfort. Where possible, coated glass that minimizes heat gain would be used on exterior walls, and building materials and furnishings would be made of recycled content, and would consist of low volatile organic compound-emitting paints, adhesives, carpets, and sealants, where feasible. To conserve potable water, bathrooms in the modernized terminals would be designed with low- and ultra-low-flow systems and recycled water would be used for construction-related dust control and construction equipment washing when feasible.

D. Job Creation

LAX is a major employer on both a local level and a regional level. In addition to providing permanent positions at the Airport, LAX is also a major provider of construction jobs. The project would foster additional employment opportunities and economic activity that would benefit the communities located around LAX and the City of Los Angeles.

Construction and operation of the LAX T2/T3 Modernization Project would be over a billion-dollar investment to improve passenger level of service and amenities within the terminals and modernize the interior and exterior of the terminals to benefit the overall appearance of the CTA, and thereby helping maintain the Airport's economic contribution in Southern California. The project is estimated to cost approximately \$1.4 billion to construct, and would generate more than 10,000 jobs in Los Angeles County, including indirect and induced effects of construction spending on the project.

Construction activity associated with the project would also support the economy over the multi-year construction period due to the number of construction workers, anticipated spending by these workers, and the provision of goods and services in support of construction.

Statement of Overriding Considerations – T2/T3 Modernization Project

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