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## Statement of Overriding Considerations West Aircraft Maintenance Area Project

The Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project (proposed Project) pursuant to the California Environmental Quality Act (CEQA). In February 2014, LAWA published the Final EIR for the proposed Project.

The intent of the proposed Project is to consolidate, relocate, and modernize certain existing aircraft maintenance facilities at LAX consistent with the LAX Master Plan. The consolidation, relocation, and modernization of these facilities would allow for more efficient and effective maintenance of existing aircraft at the airport, including Airplane Design Group (ADG) VI aircraft (Airbus A380s and Boeing 747-8s). The proposed Project would also include the provision of aircraft parking positions adjacent to the new aircraft maintenance facilities and apron space for remain overnight/remain all day (RON/RAD) aircraft parking, which provides extended layover space for aircraft that cannot be remain parked at terminal area contact gates for extended periods of time. The proposed Project would be able to accommodate up to 10 ADG VI aircraft, or a mix of smaller aircraft on the site. The proposed Project would not increase passenger or gate capacity and would not increase flights and/or aircraft operations at LAX. As described in Section 4.1, *Air Quality*, of the Draft EIR, the proposed Project would result in a net increase in temporary emissions of criteria air pollutants associated with construction-related activities that represents a significant and unavoidable impact, even with implementation of LAX Master Plan Commitments and Mitigation Measures and a Project-specific Mitigation Measure (*MM-AQ (WAMA)-1*) that supersedes one of the construction-related air quality control measures under LAX Master Plan Mitigation Measure *LAX-AQ-2, LAX Master Plan - Mitigation Plan for Air Quality; Construction-Related Measures*, which will further reduce emissions of nitrogen oxides (NO<sub>x</sub>). No other feasible mitigation measures were identified. All other CEQA impacts would be less than significant.

CEQA Guideline 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, 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 of the administrative record. If the specific economic, legal, social, technological or other benefits of a proposed project outweigh its unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." LAWA as the Lead Agency for the West Aircraft Maintenance Area Project EIR adopts the following Statement of Overriding Considerations.

As described below, improvements proposed under the proposed Project will bring substantial benefits to the airport, including improved service, more modern facilities, reliability, and economic benefits.

Based on the substantial evidence in the whole of the administrative record for the proposed Project, the Board of Airport Commissioners hereby finds, concludes and determines that the unavoidable significant adverse environmental impact associated with the construction of the proposed 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 proposed Project, independent of the other benefits, despite the significant and unavoidable air quality impact associated with regional NO<sub>x</sub> emissions during construction.

### **A. Economic and Operational Benefits Associated with the Improvement and Modernization of Maintenance Facilities at LAX, including, but not limited to, Accommodation of ADG VI Aircraft**

Jobs and commerce are direct economic benefits attributable to LAX. As an international port for cargo and freight, LAX provides a foundation for businesses that depend on cargo operations and logistics. In this regard, LAX is a vital component of the local, regional, and state economy. Failure to modernize LAX

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would impede the ability to meet airport users' future needs and could threaten the airport's position as one of the nation's premiere airports, thereby limiting the region's future economic vitality. The proposed Project would enhance and support the efficient operation of aircraft at LAX and ensure that LAX remains competitive as a world class airport, particularly with respect to the accommodation of modern airplane types. Routine aircraft maintenance and RON/RAD aircraft parking are regular functions at a major airport such as LAX. Currently these functions occur in multiple areas of the airport where routine aircraft maintenance can be performed, including low power engine run-up testing, when required. As aviation activity levels continue to increase at LAX, particularly as related to long-distance international flights, there is an increasing presence of large aircraft, including ADG V and ADG VI, operating at the airport. Commencement of ADG VI aircraft service at LAX initiated in October 2008, and has created a need for several enhancement projects to ensure the airport suitably accommodates large aircraft including, but not limited to, the Airbus A380 and the Boeing 747-8. Based on the operational activity characteristics of large aircraft (ADG V and VI) at LAX over the past several years, there is now greater awareness of the need to provide for both RON areas and maintenance areas for these aircraft at LAX. One of the key issues regarding effective maintenance of ADG aircraft is that there is sometimes a substantial period of time between when passenger flights arrive at LAX and when that same aircraft departs on the return flight. To avoid tying up a terminal gate during this period, aircraft are typically towed to a remain overnight (i.e., RON) parking position away from the main terminal area given the size of ADG V and ADG VI aircraft, a large apron area is required. Additionally, when such extended ground times occur between flights, it provides a good opportunity to complete routine servicing and maintenance activities on the aircraft without interrupting flight schedules. That ability to provide aircraft maintenance hangars and aircraft parking areas sized for ADG V and ADG VI aircraft located in close proximity to one another is not afforded through existing aircraft maintenance facilities.

The proposed Project would improve and modernize maintenance facilities at LAX to more efficiently and effectively accommodate all existing aircraft, including larger ADG VI aircraft. The proposed Project would include maintenance hangar space that are able to fully accommodate/enclose three ADG VI aircraft (i.e., could handle multiple large aircraft in the event one or more such aircraft encounter an unanticipated extended period of maintenance or grounding), plus approximately 29 acres of apron area to park large aircraft and accommodate a blast fence for ground run-up activities, which would be located in proximity to the hangars where engine maintenance on aircraft would occur and require follow-up engine testing.

As such, the proposed Project would combine aircraft maintenance hangars and aircraft parking areas within close proximity on the same site, thereby supporting more efficient and effective use of airport facilities. Furthermore, the proposed Project would modernize and upgrade aircraft maintenance facilities at LAX, including new facilities for the maintenance of newer generation aircraft such as ADG VI aircraft.

### **B. Support Consistency with the Land Use Plans**

The applicable land use plans associated with the proposed Project include: LAX Master Plan, LAX Plan, LAX Specific Plan, and Airport Layout Plan. Construction of the proposed Project at LAX responds to the development framework set forth for LAX in the Master Plan, with incorporation of certain refinements reflected in the detailed engineering, design, and construction specifications for the Project. Development of the proposed Project would provide the opportunity to accommodate the aircraft maintenance facilities and associated RON/RAD parking that will be displaced by various LAX Master Plan improvements including, but not limited to, the Midfield Satellite Concourse Project. The need for maintenance facilities removed by past and pending projects as contemplated under the LAX Master Plan would be accommodated to the extent feasible at various maintenance facilities already in use on the airport, with potential for some maintenance having to be accommodated at other airports. The other existing aircraft maintenance facilities at LAX are currently used on a regular basis by the tenant airlines/companies, and it is unlikely existing facilities could accommodate the aircraft maintenance needs. This is especially true relative to the ability to accommodate the existing RON/RAD areas associated with the removal of aircraft maintenance hangars that would be removed. There are already substantial demands on existing RON/RAD areas at LAX and the loss of RON/RAD spaces would exacerbate that problem. Given that

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the RON/RAD areas at the subject maintenance areas are used for aircraft cabin cleaning and light servicing/maintenance (i.e., “Level A checks”), the loss of those areas would mean that such aircraft servicing and light maintenance would need to be done while aircraft are at the gate, which would extend gate occupancy time and possibly delay other aircraft waiting to use the gate, or require additional stacking of aircraft at the remaining RON/RAD areas, which hinders the efficient management and movement of aircraft in those areas.

The need to implement the proposed Project in a manner which warrants the refinements to the LAX Master Plan Program is based in part on LAWA’s determination that the original maintenance area configuration identified in the LAX Master Plan and Airport Layout Plan would be less effective and efficient than the configuration now proposed. The ability to provide aircraft maintenance hangars and aircraft parking areas sized for large (ADG V and ADG VI) aircraft and located in proximity to each other is not afforded through the aircraft maintenance facilities layout currently reflected in the LAX Master Plan. Specifically, the 2004 LAX Master Plan proposed to help offset the loss of existing aircraft maintenance facilities through the construction of three smaller hangar/maintenance facilities dispersed in the southwest portion of the airport as proposed in the No Project-Existing LAX Master Plan Alternative. Only one of those facilities, the hangar proposed on the east side of Taxiway AA, would be able to accommodate large aircraft such as ADG V and ADG VI aircraft. However, due to the relatively small/narrow apron area proposed in front of that hangar, encompassing only about 10 acres, this site would substantially limit the ability to safely park multiple large aircraft (i.e., possibly allowing only two ADG VI aircraft within the hangar and two ADG VI aircraft parked on the apron outside the hangar). In contrast, the proposed Project would be able to accommodate up to 10 ADG VI aircraft, or a mix of smaller aircraft on the site. In addition, the original maintenance area identified in the LAX Master Plan is currently subject to ongoing groundwater remediation, which substantially limits the use of that site in relation to the immediate need for the proposed Project to accommodate maintenance associated with previously removed facilities and pending projects.

In addition to consistency with the LAX Master Plan and Airport Layout Plan (as amended), by upgrading, consolidating, and modernizing certain maintenance facilities, allowing for more efficient aircraft maintenance operations at LAX, the proposed Project supports relevant LAX Plan goals, policies and programs related to the efficient and effective use of airport facilities. The proposed aircraft parking and maintenance facilities, employee parking areas, and related storage, equipment and facilities under the proposed Project are also consistent with the corresponding LAX-A Zone: Airport Airside Sub-Area as shown on the LAX Specific Plan.

Therefore, the proposed Project supports consistency and is compatible with the applicable land use plans while responding to the need for refinements at LAX to provide much needed aircraft maintenance and RON/RAD area in the southwest portion of the airport that is within the development framework of the Master Plan and would not result in a change or otherwise constrain future development as envisioned in the LAX Master Plan Program.

### **C. Promote Job Creation**

Operating and continuing to develop LAX will provide increased employment benefits to the Los Angeles region. According to a 2012 Report by the Los Angeles Economic Development Corporation (LAEDC)<sup>1</sup> that examined the economic contributions of LAX in 2011, the economic activity at LAX, including both capital spending and visitor spending, can be credited with generating 294,400 jobs in Los Angeles County with a labor income of \$13.6 billion.

The construction of the proposed Project will provide employment benefits to the Los Angeles region. It is estimated that the proposed Project would provide construction-related employment opportunities for over 185 workers per day during a peak month over the first development phase, which is expected to take

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<sup>1</sup> Los Angeles Economic Development Corporation, “The Economic Activity Dependent on Overseas Flights at LAX”, available online at: <http://www.laedc.org/reports/LAXEconomicImpactofOverseasFlights.pdf>.

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approximately 18 to 20 months. The proposed Project is estimated to cost approximately \$175 million to construct, which would generate approximately 417,700 construction employee hours.<sup>2</sup>

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<sup>2</sup> Construction employee hours for West Aircraft Maintenance Area Project were based on the ratio of construction cost compared to the February 2014 Statement of Overriding Considerations for the Runway 7L/25R RSA and Associated Improvements Project (the RSA project is estimated to cost \$106 million with 253,000 construction employee hours; this ratio was used to estimate construction employee hours for the proposed Project based on the estimated construction cost of \$175 million).

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