
LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project California Environmental Quality Act Findings

1. PROJECT DESCRIPTION SUMMARY

The United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at Los Angeles International Airport (LAX), which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Currently UAL performs maintenance in two areas at LAX: West Maintenance Facility (also known as the United Airlines Maintenance Facility, and formerly known as the Continental Airlines Aircraft Maintenance Hangar) and East Maintenance Facility (also known as the United Airlines Maintenance Operations Center or MOC). The West Maintenance Facility is located in the western portion of LAX, south of World Way West approximately 0.7 mile east of Pershing Drive, and the East Maintenance Facility is located south of Century Boulevard, approximately 0.45 mile east of Sepulveda Boulevard. The distance between the two maintenance facilities is approximately 1.6 miles. Both facilities have aircraft service areas, which include enclosed hangars at the West Maintenance Facility, aircraft parking spots, GSE bays and shops, maintenance and inspection rooms and functions, and office and storage space.

UAL proposes to redevelop its existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Following implementation of the proposed project, the West Maintenance Facility would remain vacant until such time as LAWA leases the facility to a tenant or proposes redevelopment of the site, which may be subject to its own environmental review and documentation, as appropriate under applicable law.

The proposed project would redevelop an approximately 35-acre site in the eastern portion of the airport operations area (AOA). With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. LAWA is planning to relocate the Quonset Hut. This relocation is planned as part of LAWA's ongoing management of historic resources at LAX. The relocation will occur independently of the proposed project.

The main elements of the proposed project are:

- Demolish the existing buildings associated with the East Maintenance Facility (including Hangars 1 and 2), with the exception of the Quonset Hut, which is planned for relocation by LAWA independent of the proposed project.
- Construct and operate a new aircraft and GSE maintenance facility, totaling approximately 411,000 square feet, and consisting of the following elements:
 - Two wide body aircraft hangar bays with approximately 160,000 square feet of floor area and a height of approximately 110 feet, able to serve both narrow-body and wide-body aircraft
 - Aircraft maintenance shops with approximately 74,000 square feet of floor area
 - Aircraft parts/supplies stores with approximately 60,000 to 75,000 square feet of floor area, and an associated storage yard
 - A GSE maintenance facility with approximately 45,000 to 50,500 square feet of floor area, 15 GSE bays, 2 paint bays, 1 wash bay, eGSE charging stations, and an associated storage yard

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- Facility maintenance area with approximately 2,000 square feet of floor area
 - Approximately 10,000 square feet of dock and skywalk support areas
 - Approximately 40,000 to 60,000 square feet of building circulation and support
 - Replace/resurface a portion of the apron area and restripe aircraft parking positions.
 - Reconfigure the apron and include aircraft parking positions in the hangar for a total of 22 aircraft parking positions on the leasehold, including 6 in the hangar, 6 on the south side of the project site, and 10 within the western portion of the leasehold.
 - Construct a jet blast deflector, also referred to as a blast fence, on the eastern portion of the project site for the purpose of conducting aircraft engine run-ups. With this blast fence, the proposed project would accommodate aircraft engine run-up activities that would be conducted at the East Aircraft Maintenance Facility approximately 90 percent of the time; the remaining run-ups would occur at other facilities within the airfield).
 - Relocate and/or remove utilities, including water and wastewater pipelines, storm drain facilities, clarifiers, fuel lines, and an onsite triturator.
 - Replace existing paint booths with a new spray booth that would be required to meet Best Available Control Technology (BACT).
 - Install a diesel-powered backup generator to provide emergency power, transformer equipment, and fire pumps on a small portion of the adjacent UAL cargo yard.
 - Vacate the east-west portion of Avion Drive that abuts Parking Lot H to the north, and relocate Avion Drive south of Parking Garage F, which is located north of the existing shared-ride van lot on the south side of Century Boulevard, as a one-way street with travel from east to west.
 - Relocate employee parking from Parking Lot H to Parking Garage F.

Although the portion of UAL's current aircraft and GSE maintenance operations that occurs at the West Maintenance Facility would be consolidated with operations located on the east side of the airport, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. The consolidation would alter on- and off-airport vehicular movements, as well as aircraft movements on the airfield. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility, including Imperial Highway, Pershing Drive, and Westchester Parkway, would instead drive to the East Maintenance Facility, which would be accessed via Century Boulevard or a generally parallel network of side roads located south of Century Boulevard. Similarly, on the airfield, GSE and aircraft that currently travel on taxiways and taxilanes to access the West Maintenance Facility would instead travel to the East Maintenance Facility. The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways. Construction of the proposed project would be phased over approximately 22 months (one year and ten months), beginning with the demolition of existing facilities in the East Maintenance Facility lease area, projected to commence in the fourth quarter of 2018; new construction would extend to late 2020.

2. PROJECT OBJECTIVES

The proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Consolidation of the maintenance facilities on the proposed project site would eliminate duplicate maintenance facilities and operations and would place all of UAL's maintenance activities in closer proximity to its gates in Terminals 7 and 8. The proposed project would reduce the total

distance that UAL aircraft currently travel between the gates and the maintenance facilities and would eliminate vehicle trips between the two maintenance facilities.

The specific objectives of the proposed project are to:

- Consolidate/relocate UAL’s existing aircraft and GSE maintenance facilities at LAX in a single location to provide for more efficient and effective maintenance of UAL aircraft and equipment at the airport that eliminates duplicate facilities;
- Locate UAL’s aircraft and GSE maintenance facilities closer to UAL’s gates to increase efficiency by reducing the distance between the gates and maintenance area, consistent with the mission of LAX Airfield Operations of providing a safe and efficient airport operating environment;
- Modernize UAL’s maintenance facilities, which were constructed between the mid-1940s and early 1970s when aircraft and GSE equipment were much smaller than they are today, in a manner that is consistent with LAWA’s Sustainable Design and Construction Policy and that fulfills LAWA’s strategic goal of innovating to enhance efficiency and effectiveness;
- Provide sufficient enclosed aircraft maintenance space and remain over night/remain all day (RON/RAD) aircraft parking spaces on UAL’s leasehold to support routine servicing and maintenance of aircraft and meet overnight parking requirements;
- Provide facilities to support the maintenance requirements of UAL’s operations at LAX; and
- Fulfill LAWA’s strategic goal of sustaining a strong business that recognizes the fiscal impact the airport makes on the regional economy.

3. PROCEDURAL HISTORY

LAWA has prepared an environmental impact report (EIR) for the proposed project pursuant to the California Environmental Quality Act (CEQA). A Notice of Preparation (NOP) for the Draft EIR, along with an Initial Study, was circulated for public review from December 7, 2017 to January 8, 2018. During the NOP/Initial Study public review period, LAWA held a public Scoping Meeting on December 19, 2017. On June 28, 2018, LAWA published the Draft EIR for the proposed project. In accordance with CEQA, the Draft EIR was circulated for public review for a minimum of 45 days, with the review period closing on August 13, 2018. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were also provided the opportunity to comment through August 13, 2018. A public workshop was held during the Draft EIR comment period on July 31, 2018. LAWA published the Final EIR for the proposed project on October 19, 2018.

The Final EIR incorporates and responds to comments received on the Draft EIR, and includes corrections and additions to the Draft EIR. Two project-specific mitigation measures have been included in a Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. LAWA, the Los Angeles Board of Airport Commissioners (BOAC), and other decision-makers will use the Final EIR to inform their decisions on the proposed project.

The findings herein have been prepared on the proposed project and its significant impacts, as discussed in the Draft EIR and amended in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR.

4. ENVIRONMENTAL IMPACTS AND FINDINGS

Pursuant to Public Resources Code Section 21081 and State CEQA Guidelines Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out

unless the public agency makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR.

The BOAC has made one or more of these specific written findings regarding each significant impact associated with the proposed project. Those findings are presented below, along with a presentation of facts in support of the findings. Concurrent with the adoption of these findings, the BOAC adopts the MMRP (State CEQA Guidelines Section 15097(a)) for the proposed project; the MMRP sets forth the full text of each mitigation measure adopted in these findings.

4.1 Findings on No Impacts and Less Than Significant Impacts Identified in the Initial Study

4.1.1 Description of Effects

The Initial Study prepared for the proposed project in December 2017, included as Appendix A of the Draft EIR, evaluated potential impacts on a range of subjects listed in Appendix G of the State CEQA Guidelines. The analysis conducted for the Initial Study determined that the proposed project would have no impacts or less than significant impacts on the following resource areas: aesthetics, agriculture and forestry resources, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, and utilities and service systems.

4.1.2 Findings

Based on substantial evidence in the administrative record, including the Initial Study, provided as Appendix A of the Draft EIR, the BOAC hereby finds and determines that no impacts or less-than-significant impacts for the proposed project would occur to aesthetics, agriculture and forestry resources, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, tribal cultural resources, and utilities and service systems.

4.2 Findings on Less than Significant Impacts Identified in the EIR

4.2.1 Description of Effects

Based on the issue area assessment in the EIR, the BOAC has determined that the proposed project (as described above) will have less than significant impacts in several categories as summarized in **Table 1** below. For each of the impacts set forth below, the BOAC adopts and incorporates by reference the discussion of each of the impacts in the detailed issue area analyses in Chapter 4, *Environmental Impact Analysis*, and Section 6.5, *Energy Impacts and Conservation*, of the Draft EIR as the rationale for the conclusion that there would be less than significant impacts.

Table 1 Less Than Significant Impacts of the Proposed Project	
Resource Category	Proposed Project
Air Quality and Human Health Risk	
Air Quality – Construction: Regional emissions of CO, VOC, SO ₂ , PM ₁₀ , and PM _{2.5}	Less than Significant
Air Quality – Cumulative Construction: Regional emissions of CO, VOC, SO ₂ , PM ₁₀ , and PM _{2.5}	Less than Significant
Air Quality – Construction: Localized emissions of NO _x , CO	Less than Significant
Air Quality – Cumulative Construction: Localized emissions of NO _x , CO	Less than Significant
Air Quality – Operations	Less than Significant
Air Quality – Cumulative Operations	Less than Significant
Human Health Risk Assessment – Construction	Less than Significant
Human Health Risk Assessment – Cumulative Construction	Less than Significant
Human Health Risk Assessment – Operations	Less than Significant
Human Health Risk Assessment – Cumulative Operations	Less than Significant
Cultural Resources	
Archaeological Resources	Less than Significant ¹
Paleontological Resources	Less than Significant ¹
Historical Resources - Cumulative	Less than Significant
Greenhouse Gas Emissions	
Construction plus Operations	Less than Significant
Transportation/Traffic	
Construction Transportation/Traffic	Less than Significant
Operational Transportation/Traffic	Less than Significant
Operational Transportation/Traffic - Cumulative	Less than Significant
Tribal Cultural Resources	
Tribal Cultural Resources	Less than Significant ¹
Energy Impacts and Conservation (Construction and Operation)	
Wasteful, Inefficient or Unnecessary Consumption	Less than Significant
Reliance on Fossil Fuels	Less than Significant
Comply with State or Local Plan for Renewable Energy or Energy Efficiency	Less than Significant
Notes: CO = carbon monoxide SO ₂ = sulfur dioxide VOC = volatile organic compounds PM ₁₀ = particulate matter up to 10 micrometers in size PM _{2.5} = particulate matter up to 2.5 micrometers in size, also known as fine particulate matter ¹ The Initial Study identified impacts to archaeological, paleontological, and tribal cultural resources as impacts that would be potentially significant unless mitigation was incorporated. The Initial Study further identified measures that would address these impacts. These measures reflect plans, policies, and procedures that have been adopted by LAWA and that apply to all construction projects at LAX. Therefore, these measures are not mitigation measures as defined by CEQA. Nevertheless, the plans, policies, and procedures would be implemented during construction as required. In consideration of the fact that these plans, policies, and procedures would be required to be implemented as part of the proposed project, the Draft EIR concluded that impacts to archaeological, paleontological, and tribal cultural resources would be less than significant and no mitigation is required.	

4.2.2 Findings

Based on substantial evidence in the administrative record, including Chapter 4, *Environmental Impact Analysis*, and Section 6.5, *Energy Impacts and Conservation*, of the Draft EIR, the BOAC hereby finds and determines that impacts associated with the proposed project as listed in Table 1 would be less than

significant with respect to air quality (except for regional construction emissions of nitrogen oxides [NO_x] and localized construction emissions of PM₁₀ and PM_{2.5}), human health risk, cultural resources (archaeological resource, paleontological resources, and cumulative historical resources impacts but not project-specific historical resources impacts), greenhouse gas (GHG) emissions, construction transportation/traffic (project-specific impacts but not cumulative impacts), and energy impacts and conservation. The BOAC hereby adopts the conclusions regarding less-than-significant impacts on these environmental subject areas.

4.3 Findings on Significant Impacts Identified in the EIR that Will be Reduced to Below the Level of Significance with Mitigation

4.3.1 Air Quality – Construction Emissions

4.3.1.1 Impacts

The South Coast Air Quality Management District (SCAQMD) has developed construction-related thresholds of significance for criteria pollutant concentration impacts from projects proposed in the South Coast Air Basin. In addition, the SCAQMD has developed emission thresholds for local air quality impacts from construction activities, referred to as localized significance thresholds. These thresholds are provided in Section 4.1.1.4 within Section 4.1.1, *Air Quality*, in Section 4.1, *Air Quality and Human Health Risk*, of the Draft EIR.

4.3.1.2 Description of Effects

As shown in Table 4.1.1-7 in Section 4.1.1, *Air Quality*, of the Draft EIR, unmitigated emissions from project-related construction activities would result in an exceedance of the localized concentration emissions thresholds for NO_x. The impact would be significant. However, with incorporation of Mitigation Measure MM-AQ (UAL)-1, Construction-Related Air Quality Mitigation Measures, localized construction emissions of NO_x would be reduced to a level that is less than significant, as shown in Table 4.1.1-14 of the Draft EIR.

4.3.1.3 Findings

Based on substantial evidence in the administrative record, including Section 4.1.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the EIR. Specifically, Mitigation Measure MM-AQ (UAL)-1, Construction-Related Air Quality Mitigation Measures, which will be required as a condition of project approval and included in the MMRP for the proposed project, will reduce the impact to less than significant.

4.3.2 Transportation/Traffic – Cumulative Construction

4.3.2.1 Impacts

Study intersections were evaluated for potential significant construction-related traffic impacts based on the traffic impact criteria adopted and accepted by various jurisdictions that the study intersections lie in. Intersections lying on the boundary of multiple jurisdictions were evaluated using the more conservative criteria. Specific intersection criteria for jurisdictions within the study area are discussed in Section 4.4.1.6 in Section 4.4.1, *Construction Transportation/Traffic*, of the Draft EIR.

4.3.2.2 Description of Effects

As shown in Table 4.4.1-8 in Section 4.4.1, *Construction Transportation/Traffic*, of the Draft EIR, five intersections would be significantly impacted during the cumulative peak construction period (October 2019), and the proposed project's contribution to such significant cumulative impacts would be cumulatively considerable at three of the significantly impacted intersections: Aviation Boulevard and Century Boulevard (Intersection #1), Imperial Highway and Aviation Boulevard (Intersection #2), and Imperial Highway and I-105 Ramp (Intersection #4). The proposed project's contribution to significant cumulative impacts generated at each of these intersections would be due to haul truck traffic transferring materials to and from the project site during the a.m. and p.m. peak hours. With incorporation of Mitigation Measure MM-ST (UAL)-1, Designated Truck Delivery Hours, the proposed project's contribution to impacts at each intersection (Intersections #1, #2 and #4) would be reduced to a level that is less than cumulatively considerable, as shown in Table 4.4.1-9 of the Draft EIR.

4.3.2.3 Findings

Based on substantial evidence in the administrative record, including Section 4.4.1, *Construction Transportation/Traffic*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the EIR. Specifically, Mitigation Measure MM-ST (UAL)-1, Designated Truck Delivery Hours, which will be required as a condition of project approval and included in the MMRP for the proposed project, will reduce the impact to less than significant.

4.4 Findings on Significant and Unavoidable Impacts Identified in the EIR

4.4.1 Air Quality – Construction Emissions

4.4.1.1 Impacts

SCAQMD has developed construction-related thresholds of significance for criteria pollutant concentration impacts from projects proposed in the South Coast Air Basin. In addition, the SCAQMD has developed emission thresholds for local air quality impacts from construction activities, referred to as localized significance thresholds. These thresholds are provided in Section 4.1.1.4 within Section 4.1.1, *Air Quality*, in Section 4.1, *Air Quality and Human Health Risk*, of the Draft EIR.

4.4.1.2 Description of Effects

As shown in Table 4.1.1-6 in Section 4.1.1, *Air Quality*, of the Draft EIR, construction of the proposed project is predicted to result in maximum daily emissions that exceed the SCAQMD regional construction thresholds for NO_x. The impact would be significant. The significant regional emissions of NO_x would result from heavy-duty on-site construction equipment and trucks. Unmitigated daily NO_x emissions would exceed the SCAQMD threshold of significance for approximately 7 months of the 22-month construction period. The peak daily NO_x emissions would potentially occur for only one month. As shown in Table 4.1.1-13, with implementation of Mitigation Measure MM-AQ (UAL)-1, Construction-Related Air Quality Mitigation Measures, construction-related significant impacts associated with regional emissions of NO_x would be reduced, but not to a level that would be less than significant or less than cumulatively considerable. With Mitigation Measure MM-AQ (UAL)-1, daily NO_x emissions would exceed the SCAQMD threshold of significance for approximately 3 months of the 22-month construction period, down from 7 months in the unmitigated scenario. No other feasible mitigation measures have been identified that

would further reduce NO_x impacts. Therefore, impacts to regional air quality from project-related construction NO_x emissions would remain significant and unavoidable.

As shown in Table 4.1.1-7 in Section 4.1.1, *Air Quality*, of the Draft EIR, unmitigated emissions from project-related construction activities would result in an exceedance of the localized concentration emissions thresholds for NO_x, PM₁₀, and PM_{2.5}. The impacts would be significant. As shown in Table 4.1.1-14 of the Draft EIR, with implementation of Mitigation Measure MM-AQ (UAL)-1, Construction-Related Air Quality Mitigation Measures, localized construction emissions would be reduced to a level that is less than significant for NO_x, but would remain significant and cumulatively considerable for PM₁₀ and PM_{2.5}. Therefore, localized construction emissions relative to PM₁₀ and PM_{2.5} would remain significant and unavoidable.

4.4.1.3 Findings

Based on substantial evidence in the administrative record, including Section 4.1.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which lessen the significant environmental effects identified in the EIR. Specifically, Mitigation Measure MM-AQ (UAL)-1, Construction-Related Air Quality Mitigation Measures, will be required as a condition of project approval and included in the MMRP for the proposed project. However, even with incorporation of Mitigation Measure MM-AQ (UAL)-1, significant and cumulatively considerable construction-related impacts from regional emissions of NO_x and localized construction emissions of PM₁₀ and PM_{2.5} would occur. No other feasible mitigation measures have been identified that would further reduce these impacts. Therefore, impacts to regional air quality from construction-related NO_x emissions and impacts to localized air quality from construction-related PM₁₀ and PM_{2.5} emissions would remain significant and unavoidable.

BOAC also hereby finds that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the mitigation measure identified above, no other air quality mitigation measures have been identified that would mitigate project-specific and cumulative impacts to air quality during the construction period.

4.4.2 Cultural Resources - Historical Resources

4.4.2.1 Impacts

A significant impact on historical resources would occur if the proposed project would result in:

- A substantial adverse change in the significance of an “historical resource” as defined by State CEQA Guidelines Section 15064.5(a). Substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the National Register, California Register, and/or local register.

In addition, the following thresholds related to historical resources from the L.A. CEQA Thresholds Guide are applicable to the proposed project:

- A project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance would occur if the project would involve:
 - Demolition of a significant resource;

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- Relocation that does not maintain the integrity and [historical/architectural] significance of a significant resource;
 - Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
 - Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

4.4.2.2 Description of Effects

As discussed in Section 4.2, *Cultural Resources*, of the Draft EIR, the proposed project would involve demolition of 6000-6016 and 6020-6024 Avion Drive, which together have been found to be eligible for listing in the California Register and for designation as a Los Angeles Historic-Cultural Monument. Demolition of 6000-6016 and 6020-6024 Avion Drive would result in a significant impact to an historical resource.

Demolition of an historical resource cannot be mitigated to a less-than-significant level. (Public Resources Code [PRC] Section 15126.4(b)(2)) However, pursuant to the PRC, documentation of an historical resource, by way of historic narrative, photographs, or architectural drawings, can serve to reduce the effect of demolition of the resources, even though such documentation will not mitigate the effects to a point where clearly no significant effect on the environment would occur. According to the California Office of Historic Preservation, "CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of significance. In this context, recordation serves a legitimate archival purpose." When data recovery is the only feasible mitigation, studies shall be deposited with the California Historical Resources Regional Information Center.

The LAX Preservation Plan specifies the procedures to be followed in the event of demolition of an historical resource. Specifically, demolition of a historic resource will require notification to the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR), including submittal of a documentation plan that fully documents the historic resource prior to demolition. OHR is required to review the documentation plan and submit any written comments within 15 working days from the date the documents are received. LAWA will comply with the procedures outlined in the adopted LAX Preservation Plan. Nevertheless, even with compliance with these procedures, the impact of the proposed project on historical resources would remain significant. No feasible mitigation measures are available that would reduce impacts to 6000-6016 and 6020-6024 Avion Drive beyond compliance with the LAX Preservation Plan. Therefore, impacts to historical resources from the proposed project would be significant and unavoidable.

4.4.2.3 Findings

Based on substantial evidence in the administrative record, including Section 4.2, *Cultural Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which lessen the significant environmental effects identified in the EIR. Specifically, LAWA will comply with the procedures prescribed by the LAX Preservation Plan. However, even with compliance with these procedures, impacts of the project to 6000-6016 and 6020-6024 Avion Drive, which together have been found to be eligible for listing in the California Register and for designation as a Los Angeles Historic-Cultural Monument, would not be reduced to a level that is less than significant. No feasible mitigation measures are available that would further reduce impacts to 6000-6016 and 6020-6024 Avion Drive. Therefore, impacts to historical resources from the proposed project would be significant and unavoidable.

BOAC hereby finds that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond compliance with the LAX Preservation Plan, no mitigation measures are available that would mitigate the historical resources impacts of the proposed project.

4.5 Findings on Other CEQA Considerations

4.5.1 Significant Irreversible Environmental Changes

Section 6.2 of the Draft EIR identifies the significant and irreversible environmental changes associated with the proposed project. Irreversible impacts would include commitment of various non-renewable resources. Construction of the proposed project would involve the consumption of building materials during construction, such as aggregate (sand and gravel), metals (e.g., steel, copper, lead), petrochemical construction materials (e.g., plastics), and water. This would represent the loss of non-renewable resources, which are generally not retrievable. Aggregate resources are locally constrained, but regionally available. Their use would not have a project-specific adverse effect upon the availability of these resources.

Construction of the proposed project would also result in the consumption of energy resources, including electricity, diesel, and various transportation-related fuels. This would represent the loss of non-renewable resources, which are generally not retrievable. Long-term project-related energy demand that would result from operation of the proposed project would be less than the operational energy demand under either existing conditions or future without project conditions; therefore, operation of the proposed project would not result in an increase in the consumption of nonrenewable resources. (See Section 4.5.3 below for a discussion of energy impacts and conservation.)

As described in Chapter 2, *Project Description*, of the Draft EIR, the proposed project would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy, which requires that the proposed facility be designed to achieve the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED®) Silver certification. LEED® Silver certification requires a project to be designed in a manner to save energy, water, and other resources, and to generate less waste. In addition, the proposed project would comply with current state water and energy efficiency standards and regulations pursuant to the California Building Code (CBC), California Green Building Standards Code (CALGreen), and Los Angeles Green Building Code (LAGBC) that would reduce long-term energy demand. Compliance with these requirements would reduce wasteful, inefficient, and unnecessary consumption of energy. Therefore, the use of non-renewable resources from construction of the proposed project would not result in significant irreversible changes to the environment.

4.5.2 Growth Inducing Impacts

Section 6.3 of the Draft EIR addresses the growth inducing impacts of the proposed project. As indicated therein, the proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Although the portion of UAL's current aircraft and GSE maintenance operations that occurs at the West Maintenance Facility would be consolidated with operations located on the east side of the airport, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the proposed project would simply combine/consolidate existing maintenance operations from two areas into one. The resulting reduction in the total building square footage and leasehold acreage associated with the proposed project would not alter the nature and type of aircraft maintenance, or the number of aircraft undergoing maintenance, at LAX. Rather, the consolidation would increase operational efficiency and would "right-size" the space to match the

business operations. The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways.

As described in Chapter 3, *Overview of Project Setting*, of the Draft EIR, the proposed project is one of many past and present changes to aircraft and GSE maintenance facilities at LAX that have occurred since initiation of the LAX modernization program, which have resulted in a net decrease in square footage of facilities dedicated to aircraft and GSE maintenance at the airport. Following project implementation, it is reasonably foreseeable that UAL's West Maintenance Facility would continue to be used for aircraft and/or GSE maintenance by another airline currently conducting such activities at LAX in constrained or reduced facilities, and would not represent a new use or an increase in such activity.

4.5.2.1 Economic Growth

Construction activity associated with the proposed project would directly and indirectly foster economic growth over the approximately 22-month (one year and ten months) construction period in terms of spending by workers and the provision of goods and services in support of construction. As stated in Chapter 2, *Project Description*, of the Draft EIR, it is estimated that the proposed project would require a maximum of 278 construction employees during the peak month of construction. However, the construction employment would be temporary and transitory in nature, drawing from an existing local labor pool (i.e., construction workers already living in the greater Los Angeles area transitioning from one construction project to another). As such, construction workers would not relocate to the region as a consequence of the construction job opportunities generated by the proposed project.

The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways. Operation of the proposed project would not increase the number of employees associated with UAL aircraft and GSE maintenance or the long-term employment opportunities at LAX associated with UAL's operations. As described above, vacation of the West Maintenance Facility by UAL would not represent an increase in the area at LAX available to another entity for aircraft and/or GSE maintenance over historical levels; rather, as discussed in Chapter 3, *Overview of Project Setting*, of the Draft EIR, the overall square footage of facilities dedicated to aircraft and GSE maintenance at the airport has declined since initiation of the LAX modernization program.

For these reasons, the proposed project would not induce economic growth beyond that projected to occur with natural growth in activity levels at LAX that will occur irrespective of the proposed project.

4.5.2.2 Removal of an Obstacle to Growth

As described in Chapter 2, *Project Description*, of the Draft EIR, the proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways. In addition, the proposed project would not provide new access to an area that is undeveloped since the proposed project would be located on an on-airport site that is in active use. Existing adjacent uses include the LAWA Records Building and American Eagle commuter facility to the west; air cargo facilities and Delta Air Lines aircraft maintenance facility¹ to the northwest; a shared-ride vehicle holding lot used by Super Shuttle² and an employee parking structure (referred to as Parking Garage F) to the north; the UAL Cargo building to the

¹ The Delta Air Lines aircraft maintenance facility will be demolished as part of the LAX Landside Access Modernization Program. A new aircraft maintenance facility is currently under construction on the west side of the airport on the West Aircraft Maintenance Area site.

² Super Shuttle plans to relocate its vehicles in the fourth quarter of 2018. This relocation is occurring independently of the proposed project.

northeast; American Airlines Cargo and GSE facility to the east; and the LAX south airfield to the south, specifically Taxiway C, followed by Taxiway B, Runway 7L-25R, Taxiway H (centerline taxiway), Runway 7R-25L, and Taxiway A. Moreover, as discussed above, vacation of the West Maintenance Facility by UAL would not represent an increase in the area at LAX available to another entity for aircraft and/or GSE maintenance over historical levels. As such, the proposed project would not remove an obstacle to growth in maintenance or other activities at LAX.

4.5.3 Energy Impacts and Conservation

Chapter 6, *Other Environmental Considerations*, specifically Section 6.5 of the Draft EIR, quantifies and evaluates the proposed project's energy impacts. The proposed project would be located within an area that has existing energy and water infrastructure available to serve the proposed project. It would comply with federal, state, and local regulations and policies aimed at reducing energy demand associated with building energy use, water demand, wastewater generation, vehicle fuels, and construction equipment. In addition, electricity supplied to the proposed project would be required to comply with California's aggressive renewable portfolio standard. Therefore, the proposed project's construction and operation would not result in wasteful, inefficient, or unnecessary energy use; would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; would not increase reliance on fossil fuels; and would incorporate energy efficiency measures. The proposed project would not result in any significant adverse impacts with respect to energy consumption or energy conservation, therefore, no mitigation measures (e.g., additional energy conservation measures) are required. It should be noted, however, that Mitigation Measure MM-AQ (UAL)-1, Construction-Related Air Quality Mitigation Measures, would reduce energy consumption associated with the proposed project, and thereby would reduce the proposed project's reliance on fossil fuels.

4.6 Findings on Project Alternatives

4.6.1 Alternatives Considered and Rejected

In addition to the three alternatives that were evaluated in detail in the Draft EIR, LAWA considered six additional alternatives, all of which were eliminated from detailed analysis in the Draft EIR either because they did not meet the basic project objectives, would fail to avoid or substantially lessen the significant impacts, and/or were determined at the outset to be infeasible. The alternatives that were considered and rejected are discussed immediately below, and the discussion of the three alternatives evaluated in detail in the Draft EIR is provided in Section 4.6.2.

4.6.1.1 New West Maintenance Facility

One alternative considered was the consolidation of the East Maintenance Facility and West Maintenance Facility into a new facility to be constructed on the west side of the airport on a site that would include the West Maintenance Facility as well as the area between the existing northerly UAL lease boundary and World Way West, and between Maintenance Road on the west and the easterly edge of the former Continental Airlines (CAL) Training Center Building on the east. This would require modifications to UAL's leasehold. The existing facilities within this alternative site boundary would be demolished, including the UAL West Maintenance Facility and the former CAL Training Center Building. A new aircraft and GSE maintenance facility would be constructed, including hangars, stores, GSE bays, a GSE yard, aircraft parking spaces, and vehicle parking. The project site would be large enough to add additional RON/RAD spaces, but the total number of spaces would be lower than the 22 spaces associated with the proposed project.

As noted above, development of this new facility would require demolition of the CAL Training Center Building, which is eligible for listing in the National Register and the California Register, and for designation as a Los Angeles Historic-Cultural Monument. This would constitute a significant impact to historical resources that would be greater than the impact of the proposed project from the demolition of the two hangars associated with the Intermediate Terminal Facility, which are not National Register-eligible structures.

The scale of demolition and construction activities under this alternative would be similar to the proposed project, although construction workers and haul trucks would travel farther to reach the alternative project site. As a result, it is expected that this alternative would result in a significant unavoidable impact to air quality associated with temporary regional emissions of NO_x that would be similar to, but likely greater than, the impact associated with the proposed project. This alternative would also result in significant unavoidable localized air quality impacts for PM₁₀ and PM_{2.5} during construction that would be similar to the proposed project.

The proposed project would result in a cumulatively considerable contribution to significant impacts to three intersections from haul truck traffic during peak hours on a temporary basis during project construction: Aviation Boulevard and Century Boulevard, Imperial Highway and Aviation Boulevard, and Imperial Highway and I-105 Ramp. The proposed project's contribution to these cumulatively significant impacts would be less than significant with implementation of the proposed mitigation measure. Construction of the New West Maintenance Facility Alternative would avoid the proposed project's cumulatively considerable, but mitigable, contribution to significant cumulative traffic impacts to these intersections. It is possible that construction of this alternative would have impacts to intersections not studied for the proposed project (including Imperial Highway and Sepulveda Boulevard, Imperial Highway and Main Street, or Imperial Highway and Pershing Drive). Such impacts can only be determined by performing a detailed traffic study, which was not done for this alternative.

In summary, as compared to the proposed project, this alternative would increase the severity of the significant unavoidable impacts to historical resources and to air quality emissions during construction, and would have the same significant unavoidable localized air quality impacts during construction. This alternative would avoid the proposed project's cumulatively considerable contribution to significant traffic impacts to three intersections during construction that would be fully mitigated under the proposed project.

According to the State CEQA Guidelines Section 15126.6(b), "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project." This alternative would not reduce or avoid the significant unavoidable effects of the proposed project and, in fact, would increase the severity of these significant unavoidable effects.

Moreover, this alternative would not meet many of the project objectives. Although this alternative would result in the consolidation of UAL's existing aircraft and GSE maintenance facilities in a single location, this would not meet the first project objective of providing a facility that would be more efficient and effective or the second project objective of reducing the distance between the maintenance facilities and UAL's passenger gates (which are located in Terminals 7 and 8). On the contrary, aircraft and GSE that currently undergo maintenance at the East Maintenance Facility would now be maintained at a New West Maintenance Facility. This would increase the distance that aircraft and GSE would have to travel to reach the maintenance facility, which would increase fuel consumption and related emissions of criteria pollutants, toxic air contaminants, and GHG. The increased distance would also increase the time required to transport aircraft and GSE to the maintenance facility, which would not be efficient from an operations perspective. It would also increase the number of aircraft on already-congested taxiways at LAX, which

would not be consistent with the mission of LAX Airfield Operations of providing an efficient airport operating environment. The New West Maintenance Facility alternative site is smaller than the proposed project site and would hinder the project objective of providing sufficient RON/RAD aircraft parking spaces to support routine servicing and maintenance of aircraft and to provide overnight parking.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make this alternative infeasible and rejects this alternative because it would not meet many of the key project objectives and would not fulfill the requirement of CEQA to focus on alternatives that would avoid or substantially lessen the project's significant and unavoidable impacts.

4.6.1.2 West Remote Pads/Gates Site

One alternative considered focused on development of the proposed project on the site of the current West Remote Pads/Gates. This site is located in the western portion of the airport and is bounded to the south by World Way West, to the north by Taxiway D, to the west by Pershing Drive, and to the east by Taxiway AA. The approximately 71-acre West Remote Pads/Gates site is currently utilized as an apron/gate area for on-loading and off-loading of international and domestic flights that cannot be handled in the Central Terminal Area. Passengers are ferried to and from the site by buses. The apron area is also utilized for RON and RAD parking of aircraft when the gates are not in use.

The West Remote Pads/Gates site has 9 apron gates with jet loading bridges and another 17 hardstand (pads) without loading bridges, for a total of 26 aircraft positions. Due to the high demand for these gates and parking positions, aircraft are double- and sometimes triple-parked at some of these positions during overnight and early morning hours. A large maneuvering area is located in the southwest quadrant of this alternative site. This maneuvering area is large enough to serve as an operational readiness area for "super-jumbo" aircraft (i.e., Aircraft Design Group VI), such as the Airbus A380, Boeing 747-8, Antonov AN-124, and Lockheed C-5 with limited capabilities. Additionally, this space is utilized for RON/RAD for highly secure visits by public and government officials that at times require staging of military cargo and other large aircraft.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make this alternative infeasible and rejects this alternative because the alternative site is highly utilized and would not be available for use during the time-frame required for development of the proposed project.

4.6.1.3 Other Alternative Locations

In addition to the sites identified above, other alternative locations at LAX were considered for the new UAL aircraft and GSE maintenance facilities. However, due to space constraints at the airport, no suitable locations are available, other than the former CAL complex and its environs, which is discussed in Section 4.6.1.1 above and a portion of which is carried forward as an alternative, as described in Section 4.6.2.2 below. All of the areas that have access to the airfield are currently occupied by existing uses that require airfield access, many of which are themselves space-constrained. Location of the proposed project at an alternative location would displace an existing use for which no relocation sites are available at the airport. Reasons why alternative locations within specific areas of LAX were rejected as infeasible are presented below.

- **Area South of Century Boulevard:** The area situated north of the south airfield, east of Sepulveda Boulevard, and south of Century Boulevard is occupied primarily by cargo facilities and aircraft and GSE maintenance facilities. This area includes UAL's East Maintenance Facility (i.e., the proposed project site), which would be redeveloped under the proposed project. In addition to the UAL East Maintenance Facility, primary land uses in this portion of the airport include the American Eagle Commuter Facility, Delta Air Lines aircraft maintenance facility (which will be removed with implementation of the LAX Landside Access Modernization

Program), Delta Air Lines GSE maintenance facility, Mercury Air Group cargo facility, U.S. Postal Service Regional Post Office, American Airlines GSE and Cargo, and the Century Cargo Complex. Other than the proposed project site, there are no undeveloped parcels or underutilized facilities in this portion of the airport of a sufficient size to accommodate the proposed maintenance facility.

- **Area North of Imperial Boulevard:** The area situated south of the south airfield and north of Imperial Boulevard includes cargo and ancillary uses. Primary land uses in this portion of the airport include the Imperial Cargo Complex, South Cargo Area – East, and South Cargo Area – West; fixed-base operators (Signature Flight Support and Atlantic Aviation); and ancillary facilities including the Flight Path Museum and Learning Center, flight kitchens, and miscellaneous LAWA uses, such as the LAWA Inspector’s Office, and similar LAWA administrative functions. There are no undeveloped parcels or underutilized facilities in this portion of the airport of a sufficient size to accommodate the proposed maintenance facility.
- **Area North and South of World Way West:** The area situated between the north and south airfields on either side of World Way West is occupied by a variety of airport uses, including maintenance facilities, LAWA administration functions, and ancillary facilities. The former CAL complex of hangars, shops, and storage facilities, which currently houses the UAL West Maintenance Facility, Compass Airlines maintenance operation, American Airlines Operations Support Facility, and other tenants, is proposed as a project alternative (see Section 4.6.2.2 below). Other key land uses in the area south of World Way West include the West Aircraft Maintenance Area, portions of which are currently under construction, following which it will be completely built out; employee parking; and American Airlines aircraft maintenance facility (Super Bay Hangar). Primary land uses north of World Way West include the West Remote Pads/Gates (discussed in Section 4.6.1.2 above), LAWA Maintenance Facility and administrative buildings, FedEx aircraft maintenance facility, LAX Fuel Farm, and the future Midfield Satellite Concourse (MSC), currently under construction. Other facilities to be constructed in this part of the airport include aprons, taxiways, taxilanes, and other components associated with the MSC, as well as a new Secured Area Access Post located south of World Way West and west of Coast Guard Road. Other than the former CAL complex, there are no underutilized facilities, or parcels that are undeveloped or not already planned for future development, in this portion of the airport of a sufficient size to accommodate the proposed maintenance facility.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make these alternative locations infeasible and rejects these alternative locations for the reasons described above.

4.6.1.4 Construction Phasing Alternative

In order to reduce construction-related air pollutant emissions to a level that is less than significant (i.e., reduce the proposed project’s 260.4 pounds per day of peak daily construction-related regional NO_x emissions to less than the significance threshold of 100 pounds per day), the phasing of the proposed project would be extended from the currently-proposed 22 months to 57 months by reducing the daily construction activity levels by a factor of 2.6 (i.e., reduce the typical 8-hour daily construction work shifts to approximately 3-hour daily work shifts). The extended schedule would also reduce construction-related localized air quality impacts for NO_x, PM₁₀, and PM_{2.5} to levels that would be less than their respective significance thresholds. Although this alternative would reduce daily emissions, it would increase the overall duration of air pollutant emissions as well as the costs associated with construction. Additionally, this alternative would delay achievement of the project objectives, most notably the objective of consolidating UAL’s maintenance activities.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make these alternatives infeasible and rejects this alternative.

4.6.2 Alternatives Carried Forward for Further Consideration

Three alternatives to the proposed project were described in Section 5.5 of the Draft EIR and evaluated in detail in Section 5.6 of the Draft EIR. These alternatives and their impacts compared to the proposed project are discussed below.

4.6.2.1 Alternative 1: No Project

Under the No Project Alternative, development of a consolidated aircraft and GSE maintenance facility for UAL would not occur. In accordance with Section 15126.6(e)(3)(B) of the State CEQA Guidelines, both the West Maintenance Facility and the East Maintenance Facility would remain in their existing state; that is, both facilities would continue to be used for aircraft and GSE maintenance and the physical conditions associated with the two sites and their activities would remain essentially the same as under baseline conditions. This would require modification and extension of UAL's current lease on the West Maintenance Facility. Without the proposed project, current inefficiencies associated with operation of two separate maintenance facilities would continue, and UAL aircraft would continue to travel long distances to reach the West Maintenance Facility from the gates at Terminals 7 and 8. Moreover, the existing maintenance facilities, which were constructed between the mid-1940s and the 1970s, would not be modernized. Existing deficiencies in the buildings, such as aging infrastructure and inaptly sized and located facilities, would be unimproved. All UAL aircraft at the East Maintenance Facility would continue to be serviced out-of-doors (i.e., at RON spaces on the apron) due to the lack of a hangar of sufficient size to accommodate the aircraft.

4.6.2.1.1 Description of Effects as Compared to Proposed Project's Significant Effects

Air Quality

As discussed in Section 5.6.1.1 of the Draft EIR, Alternative 1 would not involve any construction and, therefore, would not result in any construction-related impacts to air quality. Alternative 1 would avoid the significant unavoidable construction-related air quality impacts associated with the proposed project. With respect to operational air quality, under this alternative, UAL's maintenance facilities would not be consolidated in a single location, and activities that currently occur at the West Maintenance Facility would not be relocated closer to UAL's passenger gates at Terminals 7 and 8. As a result, UAL aircraft and GSE would travel longer distances to be serviced than they would under the proposed project and operational emissions of criteria air pollutants would be higher. In addition, the reduction in average operational vehicle miles traveled (VMT) by current West Maintenance Facility employees from their residences to their work site that would occur under the proposed project would not occur under this alternative. Overall, operational air pollutant emissions under Alternative 1 would be greater than operational air pollutant emissions under the proposed project.

Human Health Risk

As discussed in Section 5.6.1.2 of the Draft EIR, Alternative 1 would not contribute any construction-related impacts to health risks or hazards. With respect to operational health risks and hazards under this alternative, UAL aircraft and GSE would travel longer distances to be serviced than they would under the proposed project, resulting in higher emissions of toxic air pollutants. However, a portion of the maintenance activities that would be relocated to the East Maintenance Facility under the proposed project would remain at the West Maintenance Facility under Alternative 1; these maintenance activities and related aircraft movements would occur farther from the nearest residential and worker locations as

compared to the proposed project, resulting in lower exposure concentrations. Overall, operational impacts associated with human health risks would be lower than under the proposed project.

Cultural Resources

As discussed in Section 5.6.1.3 of the Draft EIR, Alternative 1 would avoid the significant unavoidable impact on historical resources associated with the proposed project because the historical structures located at 6000-6016 and 6020-6024 Avion Drive would not be demolished.

Greenhouse Gas Emissions

As discussed in Section 5.6.1.4 of the Draft EIR, Alternative 1 would avoid the construction-related GHG emissions associated with the proposed project. With respect to operational GHG emissions under this alternative, UAL aircraft and GSE would travel longer distances to be serviced than they would under the proposed project, resulting in higher GHG emissions. In addition, the reduction in average operational VMT by current West Maintenance Facility employees that would occur under the proposed project would not occur under this alternative. Overall, operational GHG emissions under Alternative 1 would be greater than under the proposed project.

Transportation/Traffic

As discussed in Section 5.6.1.5 of the Draft EIR, Alternative 1 would have no construction-related transportation/traffic impacts and would avoid the construction-related transportation/traffic impacts associated with the proposed project. Alternative 1 would maintain current operational employee and delivery vehicle traffic patterns. Employees of the West Maintenance Facility would continue to drive to the west side of the airport and employees of the East Maintenance Facility would continue to drive to the east side of the airport. Under Alternative 1, traffic on roadways leading to the East Maintenance Facility would not increase due to project-related traffic. Alternative 1 would avoid operational traffic increases on certain local roadways that would occur under the proposed project.

Energy

As discussed in Section 5.6.1.6 of the Draft EIR, Alternative 1 would avoid the construction-related energy use associated with the proposed project. With respect to operational energy use under this alternative, UAL aircraft and GSE would travel longer distances to be serviced than they would under the proposed project, which would increase fossil fuel consumption as compared to the proposed project. In addition, the reduction in average operational VMT by current West Maintenance Facility employees that would occur under the proposed project would not occur under this alternative, nor would the elimination of vehicle trips between the east and west maintenance facilities. As a result, vehicle-related fossil fuel consumption would increase compared to the proposed project. Moreover, under Alternative 1, older, less energy efficient buildings, fixtures, and equipment would not be replaced with more energy efficient facilities, therefore, building-related energy consumption during operations would be higher. Overall, operational energy use under Alternative 1 would be greater than under the proposed project.

Summary of Alternative 1 Effects as Compared to the Proposed Project's Significant Effects

Alternative 1 is considered to be the environmentally superior alternative because it would avoid all construction impacts of the proposed project, including significant unavoidable temporary construction-related air quality impacts, and it would avoid the significant unavoidable impact to historical resources that would occur under the proposed project. However, Alternative 1 would have greater operational air pollutant and GHG emissions than the proposed project and would result in a less efficient consumption of energy resources as compared to the proposed project.

4.6.2.1.2 Relationship to Project Objectives

Alternative 1 would not meet half of the key project objectives listed in Section 2, *Project Objectives*, above. It would not result in construction of a new, modern aircraft and GSE maintenance facility for UAL at LAX (i.e., the third project objective). As described in Chapter 2, *Project Description*, of the Draft EIR, the existing East Maintenance Facility was constructed in the mid-1940s and the West Maintenance Facility was constructed in the 1960s and 1970s. The buildings were constructed in accordance with building codes in place at the time of construction, which at the time did not include requirements contained in current building codes, including seismic standards or California Title 24 energy standards pertaining to energy efficiency. All air conditioning is provided by window units, which are less efficient than central heating, ventilation, and air conditioning (HVAC) systems. Building systems, particularly those at the East Maintenance Facility, were not constructed to accommodate modern equipment or building needs. Both the building systems and the buildings themselves have exceeded their useful life spans. The East Maintenance Facility does not have sufficient power to adequately meet current electrical demands, including demands for building systems such as air conditioners and air compressors as well as demands associated with modern airline fleets, such as electric Ground Power Units (GPUs) and other electric GSE (eGSE). In addition, the facilities, particularly the East Maintenance Facility, do not have modern fire and life safety systems and would require extensive modifications to meet modern accessible design standards. Moreover, the buildings were constructed when aircraft and GSE equipment were much smaller than they are today. The aircraft hangar at the East Maintenance Facility is not tall enough to accommodate modern aircraft; all aircraft maintenance at the East Maintenance Facility is conducted out-of-doors on the apron area. The equipment bays at the GSE hangar are similarly unable to accommodate large GSE equipment (the doors are not wide enough). Some of the equipment storage areas are located in building spaces that are too small, making it difficult to stack equipment or accommodate forklifts. The East Maintenance Facility lacks sufficient GSE yard space, and the West Maintenance Facility lacks adequate RON/RAD aircraft parking spaces. Alternative 1 would not provide for modernization of UAL's existing, outdated facilities. This alternative would not provide for modern facilities that meet LAWA's Sustainable Design and Construction Policy and, therefore, would not fulfill LAWA's strategic goal of innovating to enhance efficiency and effectiveness. As a result, Alternative 1 would not meet the third project objective.

Under Alternative 1, UAL would continue to operate in its current east and west maintenance facilities. Aircraft and GSE maintenance activities would continue to occur at two separate locations on opposite sides of the airport. The current inefficiencies associated with the operation of dual maintenance facilities would not be remedied. Maintaining two separate facilities would not meet the first project objective of consolidating and relocating UAL's existing aircraft and GSE maintenance facilities at LAX into a single location to provide for more efficient and effective maintenance of UAL aircraft and equipment at the airport that eliminates duplicate facilities.

By maintaining operation of the West Maintenance Facility, the second project objective would not be met under Alternative 1 because a portion of UAL's aircraft and GSE maintenance activities would not be relocated closer to UAL's gates. As a result, aircraft and GSE would continue to travel long distances across the airfield and airfield vehicle service roads between the West Maintenance Facility and UAL's passenger gates in Terminals 7 and 8. This would not be consistent with the project objective of being consistent with the mission of LAX Airfield Operations of providing an efficient airport operating environment.

Maintaining both the east and west maintenance facilities would fulfill the fourth project objective, which aims to provide sufficient enclosed aircraft maintenance space and RON/RAD aircraft parking spaces on UAL's leasehold to support routine servicing and maintenance of aircraft and provide overnight parking, as well as the fifth project objective, which is to provide facilities to support the maintenance requirements of UAL's operations at LAX. By meeting these project objectives, Alternative 1 would also

meet the sixth project objective, which is to fulfill LAWA's strategic goal of sustaining a strong business that recognizes the fiscal impact the airport makes on the regional economy.

4.6.2.1.3 Findings

In light of the analysis in the EIR and substantial evidence in the administrative record, as summarized above, the BOAC hereby rejects Alternative 1: No Project as infeasible for the specific economic, legal, social, technological, or other considerations discussed below, including the fact that it would not meet most of the key project objectives.

Rationale: As explained above, Alternative 1 would not consolidate UAL's operations and would not provide for the much-needed modernization of UAL's maintenance facilities. Maintenance activities would not be moved closer to UAL's passenger gates and existing operations would continue to be bifurcated at two facilities on opposite sides of the airfield, which is not efficient or effective operationally. Alternative 1 would have greater operational air pollutant and GHG emissions than the proposed project and would result in a less efficient consumption of energy resources as compared to the proposed project. For these reasons, the BOAC hereby rejects Alternative 1: No Project.

4.6.2.2 Alternative 2: West Maintenance Facility Consolidation

Under Alternative 2, UAL would consolidate all aircraft and GSE maintenance activities at the current West Maintenance Facility. This would require modification and extension of UAL's current lease on the West Maintenance Facility. The leasehold would be extended north and east to encompass a portion of the current surface parking lots located south of the former CAL Training Center Building. In order to accommodate the consolidated activities, the existing buildings would be substantially refurbished or altered to provide additional GSE bays, paint booths, and office space, to the extent possible. The narrow-body aircraft hangars would be modified to include doors to accommodate maintenance functions that are required to be conducted in an enclosed space. Under this alternative, the number of RON/RAD spaces available to UAL would decrease from the 34 total spaces under baseline conditions (including the west and east facilities) to 15 or fewer positions. This site does not have any space to accommodate any additional RON/RAD spaces. It is possible that UAL could use RON/RAD spaces at LAWA's West Aircraft Maintenance Area or at the West Remote Pads/Gates; however, there are already substantial demands on existing RON/RAD areas at LAX and these spaces may not be available for use by UAL aircraft. Moreover, even if spaces at the West Remote Pads/Gates were available for aircraft parking, aircraft maintenance is not permitted at these pads (with the exception of interior cabin maintenance). If no additional RON/RAD spaces were available, some aircraft undergoing servicing and light maintenance, or waiting to take off, would need to remain at UAL's gates in Terminals 7 and 8. Additionally, double-parking of aircraft at the maintenance facility RON/RAD areas may be required, space permitting, which would hinder the efficient management and movement of aircraft. This alternative would not replace UAL's outdated maintenance facilities with a modern facility.

4.6.2.2.1 Description of Effects as Compared to Proposed Project's Significant Effects

Air Quality

As discussed in Section 5.6.2.1 of the Draft EIR, Alternative 2 would involve limited construction associated with refurbishment or interior alteration of the CAL hangar facility and, therefore, would avoid the significant unavoidable construction-related air quality impacts associated with the proposed project. With respect to operational air quality, under Alternative 2, all of UAL's aircraft and GSE maintenance would be consolidated at the West Maintenance Facility, requiring relocation of activities that currently occur at the East Maintenance Facility. This would increase the distance that aircraft and GSE would have to travel to reach the maintenance facility, which would increase fuel consumption and related emissions of criteria pollutants compared to the proposed project. Operational emissions under Alternative 2 would

be less than significant, but would be greater than the proposed project emissions for all criteria air pollutants analyzed. Alternative 2 would not have the beneficial impact with respect to operational air quality emissions that would be associated with the proposed project. In addition, the reduction in average operational VMT by current West Maintenance Facility employees that would occur under the proposed project would not occur under this alternative. Moreover, employees would be relocated to the west, which would increase average VMT and related emissions compared to baseline conditions. Overall, Alternative 2 would avoid the significant unavoidable construction air quality impacts that would occur under the proposed project, but would have greater long-term, operational air quality impacts.

Human Health Risk

As discussed in Section 5.6.2.2 of the Draft EIR, the intensity of construction activity under Alternative 2 would be lower than that under the proposed project and would occur farther from the nearest residential and worker locations; therefore, Alternative 2 would result in lower construction-related impacts to health risks and hazards. With respect to operational health risks and hazards, the consolidation of UAL's aircraft and GSE maintenance at the West Maintenance Facility would increase the distance that aircraft and GSE would have to travel to reach the maintenance facility, resulting in higher emissions of toxic air pollutants. However, much of this activity would occur farther from the nearest residential and worker locations than under the proposed project, resulting in lower exposure concentrations. Overall, operational impacts associated with human health risks would likely be lower than under the proposed project.

Cultural Resources

As discussed in Section 5.6.2.3 of the Draft EIR, the building alterations and refurbishment associated with Alternative 2 would not have any impact on historical resources. Therefore, Alternative 2 would avoid the significant and unavoidable adverse impact to historical resources associated with the proposed project because the historical structures located at 6000-6016 and 6020-6024 Avion Drive would not be demolished.

Greenhouse Gas Emissions

As discussed in Section 5.6.2.4 of the Draft EIR, Alternative 2 would result in lower construction-related GHG emissions than the proposed project due to the reduced level of construction activity. With respect to operational GHG emissions under this alternative, UAL aircraft and GSE would travel longer distances to be serviced than they would under the proposed project, resulting in higher GHG emissions. In addition, the reduction in average operational VMT by current West Maintenance Facility employees that would occur under the proposed project would not occur under this alternative and VMT from the relocation of East Maintenance Facility employees to the west would increase, resulting in increased GHG emissions compared to baseline conditions. Overall, operational GHG emissions under Alternative 2 would be greater than under the proposed project.

Transportation/Traffic

As discussed in Section 5.6.2.5 of the Draft EIR, the location of Alternative 2 on the west side of the airport would avoid the construction-related cumulative impacts to intersections that would occur under the proposed project. Moreover, due to the relatively low level of construction under this alternative, impacts to intersections not studied for the proposed project are not expected. Overall, the construction-related impacts of Alternative 2 on transportation/traffic would be less than those associated with the proposed project. With respect to operational impacts, although traffic would shift to different roads, the impacts of Alternative 2 on operational transportation/traffic would be comparable to those associated with the proposed project and are expected to be less than significant.

Energy

As discussed in Section 5.6.2.6 of the Draft EIR, Alternative 2 would involve limited construction associated with refurbishment or interior alteration of the existing CAL hangar facility, which would result in less construction-related energy use than the proposed project. With respect to operational energy use, under Alternative 2, all of UAL's aircraft and GSE maintenance would be consolidated at the West Maintenance Facility, requiring relocation of activities that currently occur at the East Maintenance Facility. The increased distance that aircraft and GSE would have to travel to reach the maintenance facility would increase fossil fuel consumption compared to the proposed project. In addition, increased operational VMT from UAL employees would result in increased vehicle-related fossil fuel consumption. Moreover, under Alternative 2, older, less energy efficient buildings, fixtures, and equipment would not be replaced with more energy efficient facilities, therefore, building-related energy consumption during operations would be higher. Overall, operational energy use under Alternative 2 would be greater than under the proposed project.

Summary of Alternative 2 Effects as Compared to the Proposed Project's Significant Effects

Alternative 2 would avoid the significant unavoidable impact to historical resources associated with the proposed project. Because it would not involve demolition of any structures and would involve less construction overall, Alternative 2 would also avoid the significant unavoidable temporary construction-related air quality impacts associated with the proposed project and would have lower construction-related impacts associated with GHG and energy consumption than the proposed project. Alternative 2 would also have fewer construction-related air quality and GHG impacts than Alternative 3 (which is discussed below); this is because Alternative 3 would result in demolition of one of the two hangars located on the proposed project site and construction of new facilities, whereas Alternative 2 would only involve refurbishment of the existing West Maintenance Facility. Construction-related impacts of Alternative 2 on transportation/traffic would be less than those of the proposed project, although these impacts would be less than significant under both Alternative 2 and the proposed project (with implementation of mitigation measures). With respect to operations, Alternative 2 would increase operations-related impacts to air quality, GHG, and energy and conservation as compared to the proposed project.

4.6.2.2.2 Relationship to Project Objectives

Alternative 2 would not meet most of the project objectives listed in Section 2, *Project Objectives*, above. By consolidating all aircraft and GSE maintenance activities at the existing West Maintenance Facility, this alternative would not result in construction of a new, modern aircraft and GSE maintenance facility for UAL at LAX (i.e., the third project objective). As described in Chapter 2, *Project Description*, of the Draft EIR, the existing West Maintenance Facility was constructed in the 1960s and 1970s. The buildings were constructed in accordance with building codes in place at the time of construction, which at the time did not include requirements contained in current building codes, including seismic standards or California Title 24 energy standards pertaining to energy efficiency. Building systems were not constructed to accommodate modern equipment or building needs. Building systems at the West Maintenance Facility were not constructed to accommodate modern equipment or building needs. Both the building systems and the buildings themselves have exceeded their useful life spans. In addition, the West Maintenance Facility does not have modern fire and life safety systems and would require extensive modifications to meet modern accessible design standards. Moreover, the buildings were constructed when aircraft and GSE equipment were much smaller than they are today. In addition, the West Maintenance Facility lacks adequate RON/RAD aircraft parking spaces. Alternative 2 would not provide for modernization of UAL's existing, outdated facilities. This alternative would not provide for modern facilities that meet LAWA's Sustainable Design and Construction Policy and, therefore, would not fulfill LAWA's strategic goal of

innovating to enhance efficiency and effectiveness. As a result, Alternative 2 would not meet the third project objective.

By consolidating all maintenance activities at the West Maintenance Facility, Alternative 2 would not meet the second project objective. Under this alternative, not only would aircraft and GSE maintenance activities that are currently conducted on the west side of the airport not be relocated closer to UAL's passenger gates in Terminals 7 and 8, all of the maintenance activities that currently occur at the East Maintenance Facility would be relocated to the West Maintenance Facility, which is considerably farther from the gates. As a result, all of UAL's aircraft and GSE would travel long distances across the airfield and airfield vehicle service roads between the West Maintenance Facility and UAL's passenger gates in Terminals 7 and 8. This would exacerbate the existing inefficiencies caused by the distance between the gates and the maintenance area and would not be consistent with the project objective of being consistent with the mission of LAX Airfield Operations of providing an efficient airport operating environment.

The West Maintenance Facility lacks adequate RON/RAD aircraft parking spaces. As noted previously, under Alternative 2, the number of RON/RAD spaces available to UAL would decrease from the 34 total spaces under baseline conditions (including the west and east facilities) to 15 or fewer positions. This site does not have any space to accommodate any additional RON/RAD spaces. It is possible that UAL could use RON/RAD spaces at LAWA's West Aircraft Maintenance Area or at the West Remote Pads/Gates; however, there are already substantial demands on existing RON/RAD areas at LAX and these spaces may not be available for use by UAL aircraft. Moreover, even if spaces at the West Remote Pads/Gates were available for aircraft parking, aircraft maintenance is not permitted at these pads (with the exception of interior cabin maintenance). If no additional RON/RAD spaces were available, some aircraft undergoing servicing and light maintenance, or waiting to take off, would need to remain at UAL's gates in Terminals 7 and 8. Additionally, double-parking of aircraft at the maintenance facility RON/RAD areas may be required, space permitting, which would hinder the efficient management and movement of aircraft. By consolidating all aircraft and GSE maintenance activities at a refurbished West Maintenance Facility, Alternative 2 would not fulfill the fourth project objective, because it would not provide sufficient enclosed aircraft maintenance space and RON/RAD aircraft parking spaces on UAL's leasehold to support routine servicing and maintenance of aircraft and provide overnight parking. Moreover, this alternative would not meet the fifth project objective, which is to provide facilities to support the maintenance requirements of UAL's operations at LAX. By failing to achieve these key project objectives, Alternative 2 would not meet the sixth project objective, which is to fulfill LAWA's strategic goal of sustaining a strong business that recognizes the fiscal impact the airport makes on the regional economy.

Alternative 2 would consolidate all of UAL's aircraft and GSE maintenance activities into a single location and eliminate duplicate facilities, in partial fulfillment of the first project objective. However, although this would provide for some efficiencies, the consolidation of all maintenance activities at a location that is on the opposite side of the airfield from UAL's passenger gates would exacerbate existing inefficiencies associated with the distance between the passenger gates and the maintenance area.

4.6.2.2.3 **Findings**

In light of the analysis in the EIR and substantial evidence in the administrative record, as summarized above, the BOAC hereby rejects Alternative 2: West Maintenance Facility Consolidation as infeasible for the specific economic, legal, social, technological, or other considerations discussed below, including the fact that it would not meet five of the six project objectives.

Rationale: As explained above, Alternative 2 would not meet five of the six project objectives, and would only partially meet the sixth objective. Although Alternative 2 would consolidate UAL's existing aircraft and GSE maintenance facilities at LAX into a single location, it would not result in construction of a new,

modern aircraft and GSE maintenance facility for UAL at LAX. Alternative 2 would move aircraft and GSE maintenance activities that currently occur at the East Maintenance Facility to a location that is farther from UAL's passenger gates, which would exacerbate the existing inefficiencies caused by the distance between the gates and the maintenance area and would not advance the mission of LAX Airfield Operations of providing an efficient airport operating environment. The lack of sufficient RON/RAD aircraft parking spaces would not adequately support routine servicing and maintenance of aircraft or provide overnight parking, which would have substantial effects on UAL's LAX operations. By failing to achieve these key project objectives, Alternative 2 would not meet the sixth project objective, which is to fulfill LAWA's strategic goal of sustaining a strong business that recognizes the fiscal impact the airport makes on the regional economy. Moreover, Alternative 2 would increase operations-related impacts to air quality, GHG, and energy and conservation as compared to the proposed project. For these reasons, the BOAC hereby rejects Alternative 2: West Maintenance Facility.

4.6.2.3 Alternative 3: Reduced Development

Under Alternative 3, UAL would consolidate all aircraft and GSE maintenance activities at the East Maintenance Facility. However, instead of demolishing both hangars, only Hangar 2 (the easternmost hangar) would be demolished. A new GSE facility and yard would be constructed north of the existing hangars and a new, single-bay aircraft maintenance hangar would be constructed to replace Hangar 2. Hangar 1 (the westernmost hangar) would be used for aircraft maintenance-related support uses, such as stores. In order to provide for aircraft movement, the six proposed RON/RAD spaces on the southern portion of the leasehold would not be able to be accommodated. Under this alternative, the total number of RON/RAD spaces would be 13, including 10 on the western portion of the leasehold and 3 in the new hangar. This alternative would not provide sufficient space for aircraft maintenance activities. The single bay would provide room for three narrow-body aircraft or one large-body aircraft. This is less hangar space than under existing conditions and would be less aircraft space than provided by the proposed project or by Alternative 2. In addition, the project site would accommodate 10 outdoor parking positions. As with Alternative 2, it is possible that UAL could use RON/RAD spaces at LAWA's West Aircraft Maintenance Area or at the West Remote Pads/Gates; however, there are already substantial demands on existing RON/RAD areas at LAX and these spaces may not be available for use by UAL aircraft. Moreover, even if spaces at the West Remote Pads/Gates were available for aircraft parking, aircraft maintenance is not permitted at these pads (with the exception of interior cabin maintenance). If no additional RON/RAD spaces were available, with the limited number of aircraft maintenance bays and parking positions, some aircraft undergoing servicing and light maintenance, or waiting to take off, would need to remain at UAL's gates in Terminals 7 and 8. Additionally, double-parking of aircraft at the maintenance facility RON/RAD areas may be required, space permitting. This alternative would not replace the outdated Hangar 1 with a modern facility.

4.6.2.3.1 Description of Effects as Compared to Proposed Project's Significant Effects

Air Quality

As discussed in Section 5.6.3.1 of the Draft EIR, Alternative 3 would involve reduced demolition and construction as compared to the proposed project, resulting in lower overall construction air pollutant emissions and a shorter duration of impacts. However, it is likely that this alternative would result in similar maximum daily emissions given that the intensity of construction activity would likely remain the same. Therefore, this alternative would result in similar significant, unavoidable impacts with respect to maximum daily regional NO_x emissions and localized impacts relative to PM₁₀ and PM_{2.5} as compared to the proposed project. With respect to operational air quality, under Alternative 3, regional emissions would be lower than baseline conditions (i.e., a beneficial impact) and localized impacts would be less than significant. However, aircraft travel between the East Maintenance Facility and RON/RAD spaces

located elsewhere on the airport would result in increased operational emissions compared to the proposed project. Overall, it is expected that Alternative 3 would have greater operational air quality impacts than the proposed project.

Human Health Risk

As discussed in Section 5.6.3.2 of the Draft EIR, the reduced amount of demolition and construction that would occur under Alternative 3 would result in lower cancer risks, and possibly lower chronic non-cancer health hazards, than the proposed project. However, because maximum daily emissions would be similar, acute non-cancer health hazards due to construction of Alternative 3 would be the same as those for the proposed project. With respect to operational health risks and hazards, aircraft travel between the East Maintenance Facility and RON/RAD spaces located elsewhere on the airport would result in increased operational toxic air contaminant emissions and increased cancer risks and chronic non-cancer health hazards. Acute non-cancer health hazards of Alternative 3 would be similar to the proposed project. Overall, it is expected that Alternative 3 would have greater operational contributions to cancer risks and non-cancer health hazards than the proposed project. However, because of the relative contribution of construction-related toxic air contaminants to cancer risks and chronic non-cancer health hazards, the combined construction and operational impacts to health risks and hazards under Alternative 3 would likely be lower than those associated with the proposed project, whereas combined construction and operational acute non-cancer health hazard impacts would be the same.

Cultural Resources

As discussed in Section 5.6.3.3 of the Draft EIR, Alternative 3 would result in the demolition of Hangar 2 (the easternmost hangar), while Hangar 1 would remain. As discussed in Section 4.2 of the Draft EIR, Hangar 1 and Hangar 2 together are eligible for listing in the California Register and for designation as a Los Angeles Historic-Cultural Monument. Therefore, demolition of Hangar 2 would result in a significant unavoidable impact to an historical resource. Even with demolition of Hangar 2, Hangar 1 would remain eligible for listing in the California Register and for designation as a Los Angeles Historic-Cultural Monument. Therefore, even though Alternative 3 would have a significant unavoidable impact on historical resources, the severity of this impact would be less than the impact associated with the proposed project.

Greenhouse Gas Emissions

As discussed in Section 5.6.3.4 of the Draft EIR, Alternative 3 would result in lower overall construction-related GHG emissions than the proposed project due to the reduced duration of construction. With respect to operational GHG emissions under this alternative, GHG emissions would be lower than baseline conditions (i.e., a beneficial impact). However, aircraft travel between the East Maintenance Facility and RON/RAD spaces located elsewhere on the airport would increase operational GHG emissions compared to the proposed project. Overall, it is expected that Alternative 3 would have greater operational GHG emissions than the proposed project.

Transportation/Traffic

As discussed in Section 5.6.3.5 of the Draft EIR, Although Alternative 3 would result in a reduced amount of demolition and construction and a shorter construction schedule, it is expected that the daily construction activity level would be similar to the proposed project. Therefore, this alternative would result in similar cumulative impacts to roadway intersections as the proposed project. As with the proposed project, following implementation of mitigation, these impacts would be less than significant. With respect to operational impacts, Alternative 3 would not change traffic on off-airport roadways as compared to the proposed project and operational traffic impacts associated with Alternative 3 would be the same as the proposed project.

Energy

As discussed in Section 5.6.3.6 of the Draft EIR, Alternative 3 would require less construction than the proposed project, resulting in lower construction-related energy. With respect to operational energy use under Alternative 3, use of fossil fuels would be lower than baseline conditions (i.e., a beneficial impact). However, aircraft travel between the East Maintenance Facility and RON/RAD spaces located elsewhere on the airport would increase operational fossil fuel consumption compared to the proposed project. VMT from UAL employees would be the same as the proposed project. However, because Hangar 1 would not be replaced, building-related energy use would be higher. Overall, operational energy use under Alternative 3 would be greater than the proposed project.

Summary of Alternative 3 Effects as Compared to the Proposed Project's Significant Effects

Alternative 3 would reduce the severity of impacts to historical resources as compared to the proposed project, although the impact would remain significant and unavoidable. Construction-related cancer risks and chronic non-cancer hazards would be lower than those associated with the proposed project, while operational impacts would be higher, and construction-related and operational acute non-cancer health hazards would be similar. Because this alternative would have a similar intensity of daily construction activity as the proposed project, construction-related air quality impacts would similarly be significant and unavoidable, and cumulative transportation/traffic impacts would similarly be significant but mitigable. Long-term operational-related air quality impacts under Alternative 3 would be greater than the proposed project, although it is likely that they would be less than significant. Alternative 3 would reduce construction-related GHG emissions compared to the proposed project, however, operational GHG emissions associated would likely be greater. Alternative 3 would result in less efficient consumption of energy resources as compared to the proposed project.

4.6.2.3.2 Relationship to Project Objectives

Alternative 3 would not meet most of the project objectives listed in Section 2, *Project Objectives*, above. It would only partially fulfill the objective of providing a new, modern aircraft and GSE maintenance facility for UAL at LAX (i.e., the third project objective). Under this alternative, only Hangar 2 (the easternmost hangar) would be demolished. A new GSE facility and yard would be constructed north of the existing hangars and a new, single-bay aircraft maintenance hangar would be constructed to replace Hangar 2. Aircraft maintenance-related support uses, such as stores, would be moved to Hangar 1, which was constructed in the mid-1940s. Hangar 1 was constructed in accordance with building codes in place at the time of construction, which at the time did not include requirements contained in current building codes, including seismic standards or California Title 24 energy standards pertaining to energy efficiency. All air conditioning is provided by window units, which are less efficient than central HVAC systems. The building systems in Hangar 1 were not constructed to accommodate modern equipment or building needs. Moreover, both the building systems and the building itself have exceeded their useful life spans. Hangar 1 does not have sufficient power to adequately meet current electrical demands, including demands for building systems such as air conditioners and air compressors as well as demands associated with modern airline fleets, such as electric GPUs and other eGSE. In addition, Hangar 1 does not have modern fire and life safety systems and would require extensive modifications to meet modern accessible design standards. Some of the equipment storage areas would be located in building spaces that are too small, making it difficult to stack equipment or accommodate forklifts. In summary, Alternative 3 would only modernize a portion of UAL's existing, outdated facilities. This alternative would not fully provide for modern facilities that meet LAWA's Sustainable Design and Construction Policy and, therefore, would not fulfill LAWA's strategic goal of innovating to enhance efficiency and effectiveness. As a result, Alternative 3 would not fully meet the third project objective.

Alternative 3 would not fulfill the fourth project objective, which aims to provide sufficient enclosed aircraft maintenance space and RON/RAD aircraft parking spaces on UAL's leasehold to support routine servicing and maintenance of aircraft and provide overnight parking. As noted above, this alternative would provide only one enclosed bay for aircraft maintenance. Moreover, under this alternative, the total number of RON/RAD spaces would be 13, including 10 on the western portion of the leasehold and 3 in the new hangar. This alternative would not provide sufficient space for aircraft maintenance activities. The single bay would provide room for three narrow-body aircraft or one large-body aircraft. This is substantially less hangar capacity than under existing conditions and would be less aircraft space than provided by the proposed project or by Alternative 2. The lack of covered aircraft maintenance area would be exacerbated by the limited number of outdoor RON/RAD spaces (i.e., 10). As with Alternative 2, it is possible that UAL could use RON/RAD spaces at LAWA's West Aircraft Maintenance Area or at the West Remote Pads/Gates, although this would present operational challenges due to the distance from the Reduced Development Alternative site and these areas. Moreover, there are already substantial demands on existing RON/RAD areas at LAX and these spaces may not be available for use by UAL aircraft. Even if spaces at the West Remote Pads/Gates were available for aircraft parking, aircraft maintenance is not permitted at these pads (with the exception of interior cabin maintenance). If no additional RON/RAD spaces were available, with the limited number of aircraft maintenance bays and parking positions, some aircraft undergoing servicing and light maintenance, or waiting to take off, would need to remain at UAL's gates in Terminals 7 and 8. Additionally, double-parking of aircraft at the maintenance facility RON/RAD areas may be required, space permitting, which would hinder the efficient management and movement of aircraft. Due to the substantial reduction in space for aircraft maintenance, this alternative would have the greatest impacts on UAL's operations. As a result, not only would Alternative 3 not achieve the fifth project objective, which is to provide facilities to support the maintenance requirements of UAL's operations at LAX, this alternative would undermine UAL's ability to maintain its current operations at LAX. By failing to meet the fifth project objective, Alternative 3 would also not meet the sixth project objective, which is to fulfill LAWA's strategic goal of sustaining a strong business that recognizes the fiscal impact the airport makes on the regional economy.

Alternative 3 would consolidate all of UAL's aircraft and GSE maintenance activities into a single location and eliminate duplicate facilities, in partial fulfillment of the first project objective. In addition, this alternative would locate UAL's aircraft and GSE maintenance facilities closer to UAL's gates, in partial fulfillment of the second project objective. Although Alternative 3 would provide for some efficiencies, the fact that the facilities would not be sufficient to accommodate the aircraft maintenance activities and would not provide sufficient RON/RAD aircraft parking spaces would create new inefficiencies that would be even greater than the inefficiencies associated with the existing dual maintenance facilities. These are described above and include the need for aircraft to use RON/RAD spaces elsewhere on the airfield, extend occupancy times at UAL's gates in Terminals 7 and 8, and/or double-park aircraft at the maintenance facility RON/RAD areas. All of these options would hinder the efficient management and movement of aircraft, which would not be consistent with the mission of LAX Airfield Operations of providing an efficient airport operating environment and would result in substantial impacts on UAL's operations at LAX.

4.6.2.3.3 Findings

In light of the analysis in the EIR and substantial evidence in the administrative record, as summarized above, the BOAC hereby rejects Alternative 3: Reduced Development as infeasible for the specific economic, legal, social, technological, or other considerations discussed below, including the fact that it would not meet most of the project objectives.

Rationale: As explained above, Alternative 3 would not meet three of the project objectives (the fourth, fifth, and six project objectives) and only partially meet the other three project objectives. Alternative 3 would only partially fulfill the objective of providing a new, modern aircraft and GSE maintenance facility for UAL at LAX (i.e., the third project objective). Alternative 3 would not fulfill the fourth project objective, which aims to provide sufficient enclosed aircraft maintenance space and RON/RAD aircraft parking spaces on UAL’s leasehold to support routine servicing and maintenance of aircraft and provide overnight parking. Due to the substantial reduction in space for aircraft maintenance, this alternative would have the greatest impacts on UAL’s operations. As a result, not only would Alternative 3 not achieve the fifth project objective, which is to provide facilities to support the maintenance requirements of UAL’s operations at LAX, this alternative would undermine UAL’s ability to maintain its current operations at LAX. By failing to meet the fifth project objective, Alternative 3 would also not meet the sixth project objective, which is to fulfill LAWA’s strategic goal of sustaining a strong business that recognizes the fiscal impact the airport makes on the regional economy.

Although Alternative 3 would provide for some efficiencies, the fact that the facilities would not be sufficient to accommodate the aircraft maintenance activities and would not provide sufficient RON/RAD aircraft parking spaces would create new inefficiencies that would be even greater than the inefficiencies associated with the existing dual maintenance facilities. These include the need for aircraft to use RON/RAD spaces elsewhere on the airfield, extend occupancy times at UAL’s gates in Terminals 7 and 8, and/or double-park aircraft at the maintenance facility RON/RAD areas. All of these options would hinder the efficient management and movement of aircraft, which would not be consistent with the mission of LAX Airfield Operations of providing an efficient airport operating environment and would result in substantial impacts on UAL’s operations at LAX. Additionally, Alternative 3 would have the same significant unavoidable impact associated with historical resources as the proposed project, although at a reduced level of intensity. Similarly, the alternative would have the same significant and unavoidable regional construction emissions and localized construction impacts as the proposed project. For these reasons, the BOAC hereby rejects Alternative 3: Reduced Development.

4.7 Findings on Suggestions Included in Comments on the Draft EIR

One comment from Shute Mihaly & Weinberger LLP on behalf of the City of El Segundo (UAL-AL01-4) on the Draft EIR expressed a concern regarding the potential for the proposed project to increase passenger or gate capacity. Specifically, the comment stated that LAWA “must make a clear commitment that United’s updated lease will prohibit passenger loading/unloading at the project site” and that the Draft EIR should state what the parking positions will be used for and provide an enforceable commitment that parking spaces will be used only for those purposes. For the reasons discussed in Response to Comment UAL-AL01-4, the proposed project site is currently used for aircraft and GSE maintenance, and RON/RAD aircraft parking. The project site would continue to be used for these purposes with implementation of the proposed project. No regularly scheduled commercial flight activity, including passenger loading and unloading, would occur on the project site. Moreover, no cargo loading/unloading would occur on the project site. For the reasons discussed in Response to Comment UAL-AL01-4, the BOAC adopts and incorporates by reference the specific reasons contained in Response to Comment UAL-AL01-4 in the UAL East Aircraft Maintenance and GSE Project EIR as its grounds for rejecting this suggested commitment as it pertains to the UAL East Aircraft Maintenance and GSE Project.

Another comment from Shute Mihaly & Weinberger LLP on behalf of the City of El Segundo (UAL-AL01-6) on the Draft EIR requested that LAWA implement real-time noise monitoring for all project-related run-ups (including a portal on LAWA’s website where the public can keep track of single event run-up noise), as is currently conducted at the West Aircraft Maintenance Area. For the reasons discussed in

Response to Comment UAL-AL01-6, as noted in the response to Item XII, *Noise*, in the Initial Study, engine run-up activity associated with the proposed project would not result in any significant noise impacts. For the reasons discussed in Response to Comment UAL-AL01-6, the BOAC adopts and incorporates by reference the specific reasons contained in Response to Comment UAL-AL01-6 in the UAL East Aircraft Maintenance and GSE Project EIR as its grounds for rejecting this suggested measure as it pertains to the UAL East Aircraft Maintenance and GSE Project.

4.8 Findings on Comments on the Draft EIR, Responses to Comments, and Revisions Made in the Final EIR

Comments made on the Draft EIR, responses to those comments, and revisions made in the Final EIR merely clarify and amplify the analysis presented in the document and do not amount to significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that LAWA has declined to implement. Therefore, the BOAC finds that recirculation of the UAL East Aircraft Maintenance and GSE Project Draft EIR is not required pursuant to State CEQA Guidelines Section 15088.5(b).

4.9 Location of Custodian Records

The documents and other materials that constitute the administrative record for LAWA's actions related to the UAL East Aircraft Maintenance and GSE Project are located at LAWA, One World Way, 2nd Floor, Los Angeles, CA 90045. The LAWA Environmental Programs Group is the custodian of the administrative record for the project.