
4.0 ENVIRONMENTAL IMPACT ANALYSIS

This chapter presents an assessment of the environmental impacts of the MSC North Project and future phase(s) of the MSC Program, as described in Chapter 2, Project Description. This chapter describes the physical environment at and within the vicinity of LAX that may be affected by the MSC North Project and the future phase(s) of the MSC Program; the potential impacts to that physical environment; and the measures proposed to mitigate those impacts, as warranted.

As identified in the Notice of Preparation (NOP) published on February 8, 2013 for this EIR, LAWA initially determined, based on a preliminary review of the MSC North Project and future phase(s) of the MSC Program, that four categories of environmental resources could potentially be affected by construction of the project and require additional review that was not otherwise provided in the LAX Master Plan Final EIR. These categories of environmental resources were:

- Air Quality
- Greenhouse Gases
- Public Services
- Traffic/Transportation

In addition, public comments received during the scoping comment period requested that the EIR analyze potential noise effects from the change in aircraft taxi operations that would occur if the MSC Project were constructed. Thus, noise associated with aircraft taxi operations was added as a resource category for additional analysis.

Organization

Each of the environmental disciplines addressed in this chapter is discussed in a separate section using a common organization. Sections are numbered 4.1 through 4.7 (Human Health Risk Assessment and Construction Traffic are provided in their own sections). Several sections are divided into subsections to simplify and clarify the discussion. Within each environmental topic section, discussion of the following is provided:

- The **Introduction** briefly describes the issues addressed in the analysis and identifies related topics. The Introduction also identifies any specific issue area of the topic that is not being addressed as part of the MSC EIR and provides a discussion explaining the reasons why. In many cases, a number of specific issue areas were evaluated and impacts determined to be less than significant, as documented in the MSC Initial Study/NOP (February 2013), which is included as **Appendix A**. In accordance with Sections 15063(c)(3)(A) and 15128 of the State *CEQA Guidelines*, further analysis of specific issue areas where impacts were determined to be less than significant in the Initial Study is not required and is not provided in this EIR.
- The **Methodology** describes how the issue was approached, including explanations of any assumptions, equations, or calculations; identification of information sources used for the analysis; and delineation of the study area considered for each environmental discipline. This section also identifies the environmental baseline used to determine the significance of potential impacts. A discussion of the environmental baseline is provided below under Analytical Framework.

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- The **Existing Conditions** discusses the existing conditions for the environmental discipline in the study area, including relevant activities, facilities, and regulations. The environmental baseline is described below under Analytical Framework.
- The **CEQA Thresholds of Significance** are quantitative or qualitative measures used to determine whether an environmental impact that would occur as a result of the project would be considered significant. This section identifies the origins of the thresholds of significance used in the analysis. In general, and unless otherwise noted, the thresholds of significance used in the analysis of MSC North Project and future phase(s) of the MSC Program impacts reflect guidance provided in Appendix G of the State *CEQA Guidelines*¹ and/or criteria or guidance included in the *L.A. CEQA Thresholds Guide*.²
- The **Applicable LAX Master Plan Commitments and Mitigation Measures** section lists the LAX Master Plan commitments and mitigation measures applicable to the MSC North Project and future phase(s) of the MSC Program. As background, in conjunction with approval of the LAX Master Plan and certification of the Final EIR in December 2004, the Los Angeles City Council adopted a Mitigation Monitoring and Reporting Program (MMRP)³ to ensure that mitigation measures and LAX Master Plan commitments identified in the Final EIR are implemented. Mitigation measures are activities, policies, or practices designed to avoid or minimize significant environmental impacts. Besides mitigation measures, the MMRP for the LAX Master Plan includes Master Plan commitments. LAX Master Plan commitments were determined to be more appropriate than mitigation measures where: (1) standards and regulations exist with which compliance is already required by the applicable regulatory agency; (2) impacts would be adverse but not significant; and (3) design refinements could be incorporated into the project to reduce or avoid potential impacts. The timing of implementation of LAX Master Plan commitments and mitigation measures is set forth in the LAX Master Plan MMRP. Unless otherwise noted, the impacts analysis for the MSC North Project and future phase(s) of the MSC Program assumes that the applicable LAX Master Plan commitments and mitigation measures would be implemented concurrently with and as part of the Project. To the extent that the LAX Master Plan commitments and mitigation measures would not reduce significant environmental impacts to a level that is less than significant, MSC North Project-specific and/or future phase(s) of the MSC Program-specific mitigation measures, if feasible, are separately identified in the Mitigation Measures section (described below). In addition, mitigation measures identified in other LAWA or City documents are identified, if applicable.
- The **Impact Analysis** section presents the analysis of impacts for the MSC North Project for the build-out horizon year 2019 and the future phase(s) of the MSC Program for the year 2025. Impacts were compared to the thresholds of significance to determine whether they would be, under CEQA, significant or less than significant. For purposes of

¹ State of California, [Guidelines for California Environmental Quality Act \(State CEQA Guidelines\), California Code of Regulations](#), Title 14, Chapter 3, Sections 15000-15387.

² City of Los Angeles, [L.A. CEQA Thresholds Guide, Your Resource for Planning CEQA Analysis in Los Angeles](#), 2006.

³ City of Los Angeles, Los Angeles World Airports, [Alternative D Mitigation Monitoring and Reporting Program](#), September 2004.

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determining significance, potential impacts were compared to the environmental baseline conditions, as further described in the Analytical Framework below.

- **Cumulative Impacts** are the impacts of the proposed Project in conjunction with past, present, and reasonably foreseeable future projects. The environmental impacts of the proposed Project may be individually minor, but collectively significant when considered in conjunction with other projects.
- **Mitigation Measures** are specified procedures, plans, policies, or activities proposed for adoption by the lead agency to reduce or avoid the significant impacts identified in the analysis of environmental impacts. This section identifies MSC North Project-specific and/or future phase(s) of the MSC Program-specific mitigation measures proposed to address significant impacts that would occur with implementation of the MSC North Project or future phase(s) of the MSC Program. In accordance with the requirements of CEQA, an MMRP would be adopted as part of the MSC North Project, to ensure that implementation of mitigation measures is properly monitored and documented.
- **Level of Significance After Mitigation** is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant. These "significant unavoidable impacts" are also listed in Section 6.1, *Significant Unavoidable Impacts*, of this EIR. The level of significance after mitigation is not included for those environmental topics where no significant impacts would occur and, as a result, where no mitigation measures specific to the Project/Program are required.

Analytical Framework

Program Level vs. Project Level Environmental Entitlements and Analysis

As described in Chapter 1, in April 2004 LAWA published a Final EIR that analyzed the potential environmental effects associated with the implementation of comprehensive long-term plans to modernize LAX (the LAX Master Plan), including the processing of "program level" entitlements, such as a general plan amendment and zoning regulations (the LAX Plan and LAX Specific Plan). The LAX Master Plan included the MSC Program as an implementing project of the Plan, and thus the LAX Master Plan EIR analyzed the potential impacts of the MSC Program to the extent feasible and appropriate at that time.

As discussed under Section 15146(b) of the State *CEQA Guidelines*, an EIR prepared for program level entitlements, "need not be as detailed as an EIR on the specific construction projects that might follow." The State *CEQA Guidelines* incorporate the "rule of reason" and advise public agencies to avoid "speculative analysis of environmental consequences for future and unspecified development."

Consequently, the LAX Master Plan Final EIR addressed the more general level of detail that is required for program level entitlements under CEQA. In an effort to be as comprehensive and thorough as possible, the Final EIR nonetheless also contains extensive "project level" analysis that is beyond the level of detail normally found in a program level environmental document.

Where a program level environmental document has been prepared, CEQA encourages the public agency to "tier" subsequent project level environmental analyses (Pub. Res. Code § 21093). Section 15152(a) of the CEQA Guidelines describe this approach as follows:

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"Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

Because the MSC Program was analyzed in the LAX Master Plan EIR, this EIR is "tiered" from, and incorporates by reference, the LAX Master Plan Final EIR.⁴ This EIR provides Project-specific information on the development of the MSC North Project, focusing on potentially significant environmental effects that may not have been fully addressed in the prior EIR at the project level of detail. This EIR also discusses the future phase(s) of the MSC Program at a program level, focusing on potentially significant environmental effects that may not have been fully addressed in the prior EIR. This methodology is consistent with State *CEQA Guidelines* Section 15168, which is discussed in greater detail in Section 1.2 of this EIR.

Environmental Baseline

Section 15125 of the State *CEQA Guidelines* requires that an EIR describe the physical environmental conditions in the vicinity of a proposed project "as they exist at the time the notice of preparation is published...." and further states that "[t]his environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."

The Notice of Preparation (NOP) for this EIR was published on February 8, 2013. In accordance with the provisions of CEQA, 2013 is the baseline year for characterizing existing conditions in the environmental analysis. Where existing conditions data specific to 2013 were not available or where 2013, by itself, was not an appropriate representation of baseline conditions, this EIR identifies this fact, explains what data was used to determine existing conditions, and provides evidence of why this information is representative of baseline conditions.

For certain analyses, a full year's worth of data was considered necessary and appropriate to characterize existing baseline conditions. Such is the case relative to existing aircraft-related air pollutant emissions and existing airport traffic generation, whereby the variability in airport operations throughout the year, especially seasonal variations, results in "existing" conditions for those topics being very different depending on time of year. Similar to the approach used in the LAX Master Plan Final EIR, airport operations data for the prior calendar year, which in the case of this EIR is 2012, were used to define existing baseline conditions for those topics.

Description of Cumulative Impacts

Cumulative impacts are the impacts of the project in conjunction with past, present, and reasonably foreseeable future projects. The environmental impacts of the Project may be individually minor, but collectively significant when considered in conjunction with other projects.

⁴ Los Angeles World Airports, Los Angeles International Airport Master Plan Final Environmental Impact Statement/Environmental Impact Report, April 2004.

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In accordance with the State *CEQA Guidelines*, the LAX Master Plan Final EIR evaluated the contributions of the LAX Master Plan to cumulative impacts for each environmental discipline to determine if they would be significant. The MSC North Project and future phase(s) of the MSC Program are consistent with the entitlements approved for the LAX Master Plan, and thus, the cumulative effect of the MSC North Project and future phase(s) of the MSC Program have been adequately addressed in the LAX Master Plan Final EIR for most environmental topics.⁵ Pursuant to Sections 15130(d) and 15152(f) of the State *CEQA Guidelines*, no further evaluation of these topics is required. However, because adequate construction-level information was unavailable at the time, the LAX Master Plan did not include a construction-level analysis of human health risks, including a cumulative analysis of construction-related human health risks. Such an analysis is included in this EIR. Additionally, this EIR provides an analysis of cumulative surface transportation impacts associated with construction of the MSC North Project in conjunction with other nearby construction projects for which relevant detailed project information was not available at the time of the LAX Master Plan EIR analysis. In addition to evaluating cumulative impacts associated with human health risk and surface transportation, this EIR also includes information related to past, present, and reasonably foreseeable future projects in its analysis of construction impacts related to air quality and global climate change.

As documented in Chapter 3 of this EIR, construction of several LAX development projects (LAX Master Plan projects and other LAX projects) and non-LAX development projects could occur simultaneously with the MSC North Project construction. These projects are described in Section 3.3 of this EIR.

⁵ Los Angeles World Airports, Los Angeles International Airport Master Plan Final Environmental Impact Statement/Environmental Impact Report, April 2004.

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