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# 1. INTRODUCTION AND EXECUTIVE SUMMARY

This document is a Draft Environmental Impact Report (EIR) for the United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project at Los Angeles International Airport (LAX). LAX is owned and operated by the City of Los Angeles, whose Board of Airport Commissioners oversees the policy, management, operation, and regulation of LAX. Los Angeles World Airports (LAWA) is a proprietary department of the City of Los Angeles charged with administering the day-to-day operations of LAX. This Draft EIR has been prepared by LAWA as the lead agency in conformance with the California Environmental Quality Act (CEQA - Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Title 14, Section 15000 et seq.).

A Notice of Preparation and Initial Study, included as Appendix A of this Draft EIR, was circulated for public review from December 7, 2017 to January 8, 2018. The Initial Study identified the following resource areas for further evaluation in the EIR: air quality (including human health risk), cultural resources (historical resources), greenhouse gas (GHG) emissions, and transportation/traffic, and their related cumulative impacts. As a result, these resources are evaluated further in this Draft EIR.

LAWA determined that impacts related 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, and utilities and service systems would be less than significant through the analysis in the Initial Study (see Appendix A); therefore, these topics are not analyzed further in this Draft EIR. In addition, this Draft EIR concludes that impacts to archaeological, paleontological, and tribal cultural resources would be less than significant and that no further evaluation in this Draft EIR is required. Federal, state, regional, and local agencies, as well as the public, were afforded the opportunity to comment on the findings of the Initial Study through the 30-day scoping period associated with circulation of the Notice of Preparation for this Draft EIR.

## 1.1 Project Objectives

Section 15124(b) of the State CEQA Guidelines states that the project description shall contain “[a] statement of the objectives sought by the proposed project.” In addition, Section 15124(b) of the State CEQA Guidelines further states, “[t]he statement of objectives should include the underlying purpose of the project.”

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;

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- 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.

### 1.2 Summary of Proposed Project

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. 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. Reasonably foreseeable uses of the West Maintenance Facility are discussed in Chapter 3, *Overview of Project Setting*, and the cumulative impacts of the proposed project, reasonably foreseeable future use of the West Maintenance Facility, and other development projects at and adjacent to LAX are addressed in Chapter 4, *Environmental Impact Analysis*.

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.

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.

### 1.3 Purpose of this EIR

Because the Initial Study determined that the proposed project may have a significant effect on the environment, the State CEQA Guidelines require the preparation of this Draft EIR. LAWA has undertaken this Draft EIR for the following purposes, as required by CEQA:

- To evaluate the potentially significant environmental effects associated with the implementation of the proposed project;
- To indicate the manner in which those significant impacts can be avoided or substantially lessened;
- To identify any significant and unavoidable adverse impacts that cannot be mitigated;
- To identify a reasonable range of potentially feasible alternatives to the proposed project that would attain most of the project objectives and eliminate any significant adverse environmental impacts or substantially lessen any of the significant effects;
- To inform the general public, the local community, and responsible trustee, State, and federal agencies of the nature of the proposed project, its potentially significant environmental effects, feasible mitigation measures to mitigate those effects, and a reasonable range of potentially feasible alternatives;
- To enable LAWA decision-makers to consider the environmental consequences of the proposed project and make findings regarding each significant effect that is identified; and
- To facilitate any responsible agencies in issuing permits and approvals for the proposed project.

Prior to approving the proposed project, LAWA would be required to certify the EIR. Upon certification, the EIR would serve as the environmental document for LAWA and would be used as a basis for decisions on implementation of the proposed project. Other agencies may also use this EIR in their review and approval processes.

This Draft EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection; but for adequacy, completeness, and good faith effort at full disclosure.

### 1.4 Organization of this EIR

This Draft EIR follows the preparation and content guidance provided by CEQA and the State CEQA Guidelines. Listed below is a summary of the contents of each chapter of this report.

### **Chapter 1 – Introduction and Executive Summary**

This chapter provides a summary of the proposed project, CEQA compliance requirements, an overview of the report organization, and a discussion of areas of controversy known to LAWA and issues to be resolved. Also included is a summary of the environmental analysis, including impacts and mitigation measures, and identification of the environmentally superior alternative.

### **Chapter 2 – Project Description**

Chapter 2 presents the location of the proposed project, the objectives of the proposed project, and a description of the components and construction schedule of the proposed project. In addition, Chapter 2 identifies the intended use of the EIR and the approvals required for implementation of the proposed project.

### **Chapter 3 – Overview of Project Setting**

Chapter 3 provides an overview of the existing environmental setting related to the proposed project area and the environmental resources evaluated in Chapter 4, *Environmental Impact Analysis*, of this EIR. This chapter also describes other projects proposed at and adjacent to LAX that, in conjunction with the proposed project, need to be considered in order to assess cumulative impacts.

### **Chapter 4 – Environmental Impact Analysis**

The introductory section of Chapter 4 describes the analytical framework for the environmental review of the proposed project. The remaining sections of the chapter provide detailed analysis of the potential environmental impacts of the proposed project on air quality (including human health risk), cultural resources (historical resources), GHG emissions, and transportation/traffic. For each environmental resource, the individual sections describe existing conditions; methodology used in the impact analysis; thresholds of significance; impacts that would result from the proposed project; applicable mitigation measures that would eliminate or reduce significant impacts, if warranted; the residual impacts after mitigation for each environmental issue; and cumulative impacts.

### **Chapter 5 – Alternatives**

As required by CEQA, Chapter 5 identifies and evaluates a range of potentially feasible alternatives that would avoid or substantially reduce any significant effects of the proposed project.

### **Chapter 6 – Other Environmental Considerations**

Chapter 6 includes a discussion of issues required by CEQA that are not covered in Chapter 4. This includes growth-inducing impacts, irreversible environmental changes, and unavoidable significant impacts, as well as the impacts of the proposed project determined to be less than significant. This chapter also includes information about the proposed project's energy consumption and energy efficiency measures.

### **Chapter 7 – List of Preparers, Parties to Whom Sent, References, NOP Comments, and Acronyms**

Chapter 7 provides the following: a list of the individuals from the City of Los Angeles, the applicant, and contractors that performed key roles in the preparation and development of this Draft EIR; a list of the parties to whom this Draft EIR was sent for review or to whom notice of the availability of this Draft EIR was sent; the bibliography of documents used in the preparation of this Draft EIR; a list of agencies, organizations, and individuals who provided comments on the Notice of Preparation/Initial Study; and acronyms used in this Draft EIR.

All documents listed in Section 7.3, *References*, of Chapter 7 are available for public inspection at the following location:

Los Angeles World Airports  
One World Way, Room 218  
Los Angeles, California 90045

### Appendices

The appendices present data supporting the analysis contained in the Draft EIR. The appendices in this Draft EIR include:

Appendix A – Notice of Preparation/Scoping

Appendix B – Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy

Appendix C – Historic Resources Technical Report

Appendix D – Transportation/Traffic

## 1.5 Summary of Environmental Impacts

**Table 1-1** summarizes the environmental impacts from implementation of the proposed project to air quality (including human health risk), cultural resources (historical resources), GHG emissions, and transportation/traffic as identified in Chapter 4, *Environmental Impact Analysis*, of this EIR. It also summarizes the energy impacts discussed in Chapter 6, *Other Environmental Considerations*. In accordance with the requirements of the State CEQA Guidelines, and as further described in Chapter 6, impacts on all other environmental resources, including aesthetics, agriculture and forestry resources, biological resources, cultural resources (archaeological and paleontological 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, were determined to be less than significant and were not evaluated in this Draft EIR.

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<b>Table 1-1 Summary of Environmental Impacts Related to the Proposed Project</b>			
Resource Category	Impact Before Mitigation	Proposed Mitigation Measures	Level of Significance After Mitigation
<b>Air Quality and Human Health Risk</b>			
Air Quality – Construction	Significant	MM-AQ (UAL)-1. Construction-Related Air Quality Mitigation Measures	Significant and Unavoidable (NO <sub>x</sub> - regional construction emissions; PM <sub>10</sub> and PM <sub>2.5</sub> localized construction emissions)
Air Quality – Cumulative Construction	Significant	MM-AQ (UAL)-1. Construction-Related Air Quality Mitigation Measures	Significant and Unavoidable (NO <sub>x</sub> - regional construction emissions; PM <sub>10</sub> and PM <sub>2.5</sub> localized construction emissions)
Air Quality – Operations	Less Than Significant	None Required	Less Than Significant
Air Quality – Cumulative Operations	Less Than Significant	None Required	Less Than Significant
Human Health Risk Assessment – Construction	Less Than Significant	None Required; however, further reduced with implementation of MM-AQ (UAL)-1	Less Than Significant
Human Health Risk Assessment – Cumulative Construction	Less Than Significant	None Required; however, further reduced with implementation of MM-AQ (UAL)-1	Less Than Significant
Human Health Risk Assessment – Operations	Less Than Significant	None Required	Less Than Significant
Human Health Risk Assessment – Cumulative Operations	Less Than Significant	None Required	Less Than Significant
<b>Cultural Resources</b>			
Historical Resources	Significant	No feasible mitigation is available	Significant and Unavoidable
Historical Resources – Cumulative	Less Than Significant	None Required	Less Than Significant
<b>Greenhouse Gas Emissions</b>			
Construction plus Operations	Less Than Significant (Beneficial)	None Required; however, further reduced with implementation of MM-AQ (UAL)-1	Less Than Significant
<b>Transportation/Traffic</b>			
Construction Transportation/Traffic	Less Than Significant	None Required	Less Than Significant
Construction Transportation/Traffic – Cumulative	Significant	MM-ST (UAL)-1. Designated Truck Delivery Hours	Less Than Significant

Table 1-1 Summary of Environmental Impacts Related to the Proposed Project			
Resource Category	Impact Before Mitigation	Proposed Mitigation Measures	Level of Significance After Mitigation
Operational Transportation/Traffic	Less Than Significant	None Required	Less Than Significant
Operational Transportation/Traffic – Cumulative	Less Than Significant	None Required	Less Than Significant
<b>Energy Impacts And Conservation (Construction and Operation)</b>			
Wasteful, Inefficient or Unnecessary Consumption	Less Than Significant	None Required; however, further reduced during construction with implementation of MM-AQ (UAL)-1	Less Than Significant
Reliance on Fossil Fuels	Less Than Significant	None Required; however, further reduced during construction with implementation of MM-AQ (UAL)-1	Less Than Significant
Comply with State or Local Plan for Renewable Energy or Energy Efficiency	Less Than Significant	None Required	Less Than Significant
<p>Source: CDM Smith, 2018.</p> <p>Notes:</p> <p>NO<sub>x</sub> = nitrogen oxides</p> <p>PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers</p> <p>PM<sub>2.5</sub> = fine particulate matter, or particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers</p>			

## 1.6 Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the “no project” alternative, the EIR must identify an environmentally superior alternative among the other alternatives. As further described in Chapter 5, *Alternatives*, the alternatives to the proposed project evaluated in detail in the Draft EIR are:

- **Alternative 1: No Project.** Under Alternative 1, development of a consolidated aircraft and GSE maintenance facility for UAL would not occur. 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. 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. Under this alternative, a consolidated, modernized aircraft maintenance and GSE facility for UAL would not be constructed on the proposed project site.
- **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. This alternative would provide 15 or fewer aircraft parking positions. Operational changes would need to be implemented to continue to conduct maintenance activities and provide aircraft parking. These changes would be expected to require additional aircraft movement around the airfield.
- **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. 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 aircraft parking positions. Operational changes would need to be implemented to continue to conduct maintenance activities and provide aircraft parking. These changes would be expected to require additional aircraft movement around the airfield.



Based on the analysis in Chapter 4, *Environmental Impact Analysis*, and Chapter 5, *Alternatives*, Alternative 1, the No Project Alternative, is considered to be the environmentally superior alternative. Alternative 1 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. It should be noted that 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. Moreover, the No Project Alternative would not meet many of the objectives of the proposed project, which are identified in Section 1.1, *Project Objectives*, above, and in Chapter 2, *Project Description*.

In accordance with the State CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, West Maintenance Facility Consolidation, would be the environmentally superior alternative relative to the other build alternative. Alternative 2 would avoid the significant unavoidable impact to historical resources associated with the proposed project. 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. 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.

### 1.7 Areas of Known Controversy and Issues to be Resolved

LAWA is not aware of any areas of known controversy or issues to be resolved related to the proposed project or the EIR.

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