
6.0 OTHER ENVIRONMENTAL CONSIDERATIONS

6.1 Significant Unavoidable Impacts

Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe significant environmental impacts that cannot be avoided, including impacts that can be mitigated but not reduced to a less than significant level. Chapter 4 of this EIR provides detailed analyses of the environmental topics identified in the Initial Study, prepared in August 2013, as having the potential to result in significant impacts with implementation of the proposed Project. The following identifies the impacts that cannot be mitigated to a level that is less than significant.

Air Quality

- Proposed Project construction-related regional emissions of carbon monoxide (CO), volatile organic compounds (VOC), and nitrogen oxides (NO_x).
- Construction-related localized emissions of NO_x.
- Cumulatively considerable contribution to significant cumulative construction-related air quality impacts, based on significant construction-related Project impacts.

Human Health Risk Assessment

- Increased incremental acute non-cancer health hazards for acrolein to people living at or near the fence-line from the shift in operations during construction of the proposed Project.
- Cumulatively considerable contribution to acute non-cancer hazards for acrolein during construction of the proposed Project.

In addition to identifying the significant unavoidable impacts of the proposed Project, Section 15126.2(b) of the CEQA Guidelines also requires a description of the reasons why the Project is being proposed, notwithstanding the significant unavoidable impacts associated with the Project. As discussed in Chapter 2, *Project Description*, the main objective of the proposed Project is to comply with the *Transportation, Treasury, Housing and Urban Development, the Judiciary, The District of Columbia, and Independent Agencies Appropriations Act* (Public Law 109-115)¹, which states that all RSAs at 14 CFR Part 139 airports must meet FAA design standards by December 31, 2015. Another objective of the proposed Project is to maintain safe operations and extend the life of Runway 6L-24R and associated Taxiway AA.

¹ *The Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law [P.L.] 109-115), November 30, 2005.

6. Other Environmental Considerations

6.2 Irreversible Environmental Changes

According to the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed Project. Specifically, as stated in CEQA Guidelines Section 15126.2(c):

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The proposed Project site is already dedicated to airport uses. However, construction of the proposed Project would involve consumption of non-renewable resources, including fossil fuel-derived energy sources such as gasoline, diesel fuel, and electricity, which are necessary for the transport of workers and materials during construction, as well as powering construction equipment. This would represent a loss of non-renewable resources, which are generally not retrievable.

The proposed Project would not cause any long-term changes to operations; it is not a capacity-enhancing project and would not result in any associated permanent increase or decrease in aviation activity at the Airport. Therefore, there would be no additional use of non-renewable resources during operations, and would not result in significant irreversible changes to the environment.

6.3 Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires an EIR to discuss the ways the proposed Project could foster economic or population growth, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth, and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

6.3.1 Project Characteristics

The proposed Project would enable LAWA to comply with federal law and improve passenger and aircraft safety at LAX by implementing infrastructure improvements on the Airport's northernmost runways. The proposed Project would not increase passenger or gate capacity, and would not change the number or type of flights and/or aircraft operations at LAX.

6. Other Environmental Considerations

6.3.2 Economic Growth

Implementation of the proposed Project would not directly generate economic growth, would not increase passenger or gate capacity, would not increase flights and/or aircraft operations, or increase the number of permanent employees. Additionally, as the proposed Project is an airfield project, it would not create or support, directly or indirectly, any permanent new jobs or businesses in the area that could indirectly induce growth. Therefore, potential direct or indirect population, housing, or employment growth would not occur. The proposed Project would, however, indirectly foster economic growth in the region through short-term construction jobs.

6.3.3 Removal of an Impediment to Growth

The proposed Project would not increase the number or type of flights and/or aircraft operations, and would not cause LAX to grow beyond what has been evaluated and approved under the LAX Master Plan. In addition, the proposed Project would not provide new access to an area that is undeveloped since the site is located within an area of the airport that is in active use, including existing use as staging areas for airport construction projects. Furthermore, existing uses of the proposed Project site will continue after implementation of the proposed Project.

6.3.4 Development or Encroachment into an Isolated Open Space

Development can be considered growth inducing when it is not contiguous to existing urban development and introduces development into open space areas. The proposed Project site is situated within the northern airfield of LAX, within the airport boundary, and currently used exclusively for airport uses. Therefore, development of the proposed Project would occur in an existing developed area and would not introduce new development into an undeveloped or open space area.

6.3.5 Precedent Setting Action

The proposed Project would improve passenger and aircraft safety at LAX in compliance with Public Law 109-115 by implementing infrastructure improvements on the Airport's northernmost runways. The proposed Project would not encourage or facilitate new activities that do not already occur at the airport, or that have not been anticipated and accounted for under the LAX Master Plan. The proposed Project would not increase the number or type of flights and/or aircraft operations, and would not cause LAX to grow beyond what has been evaluated and approved under the LAX Master Plan. Therefore, it would not establish a precedent for unanticipated growth.

6.4 Less Than Significant Effects

This EIR concludes that construction-related air quality odor impacts and all operational air quality impacts, including human health risk, would be less than significant. In addition, construction and operational impacts on biological resources, greenhouse gas emissions,

6. Other Environmental Considerations

hydrology and water quality, noise, and construction surface transportation would be less than significant, as documented in Chapter 4, *Environmental Impact Analysis*.

In addition, an Initial Study (IS) was prepared for the proposed Project. Based on the analysis contained in the IS, LAWA determined that the proposed Project would result in “not significant” or “less than significant” environmental impacts in the following subject areas:

- Aesthetics;
- Agriculture and Forestry Resources;
- Cultural Resources;
- Geology and Soils;
- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation; and
- Utilities and Service Systems.

Since the impacts of the proposed Project with respect to these subject areas were determined to be either “not significant” or “less than significant,” these environmental topics were not evaluated further in this EIR. This methodology is consistent with *CEQA Guidelines* Section 15063(c)(3). Pursuant to *CEQA Guidelines* Section 15128, the various possible Project effects found not to be significant are discussed in the Initial Study, attached to this EIR as Appendix A. No additional potentially significant impacts were identified during the circulation of the Notice of Preparation (NOP) for public and agency comments.