5. CUMULATIVE IMPACTS

CEQA Guidelines Section 15355 defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. CEQA Guidelines Section 15130(a) requires that an EIR discuss the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." As set forth in CEQA Guidelines Section 15065(a)(3), "cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Thus, the cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions to more accurately gauge the effects of multiple projects.

In accordance with CEQA Guidelines Section 15130(a)(3), a project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. In addition, the lead agency is required to identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

CEQA Guidelines Section 15130(b) further provides that the discussion of cumulative impacts reflect "the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." Rather, the discussion is to "be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute."

Related Projects

Projects that are considered in the cumulative impact analysis are those projects that may occur in the project vicinity within the same timeframe as the proposed project. In addition, CEQA Guidelines Section 15130(b) states that using one of the following two protocols to identify related projects is necessary to provide an adequate discussion of significant cumulative impacts:

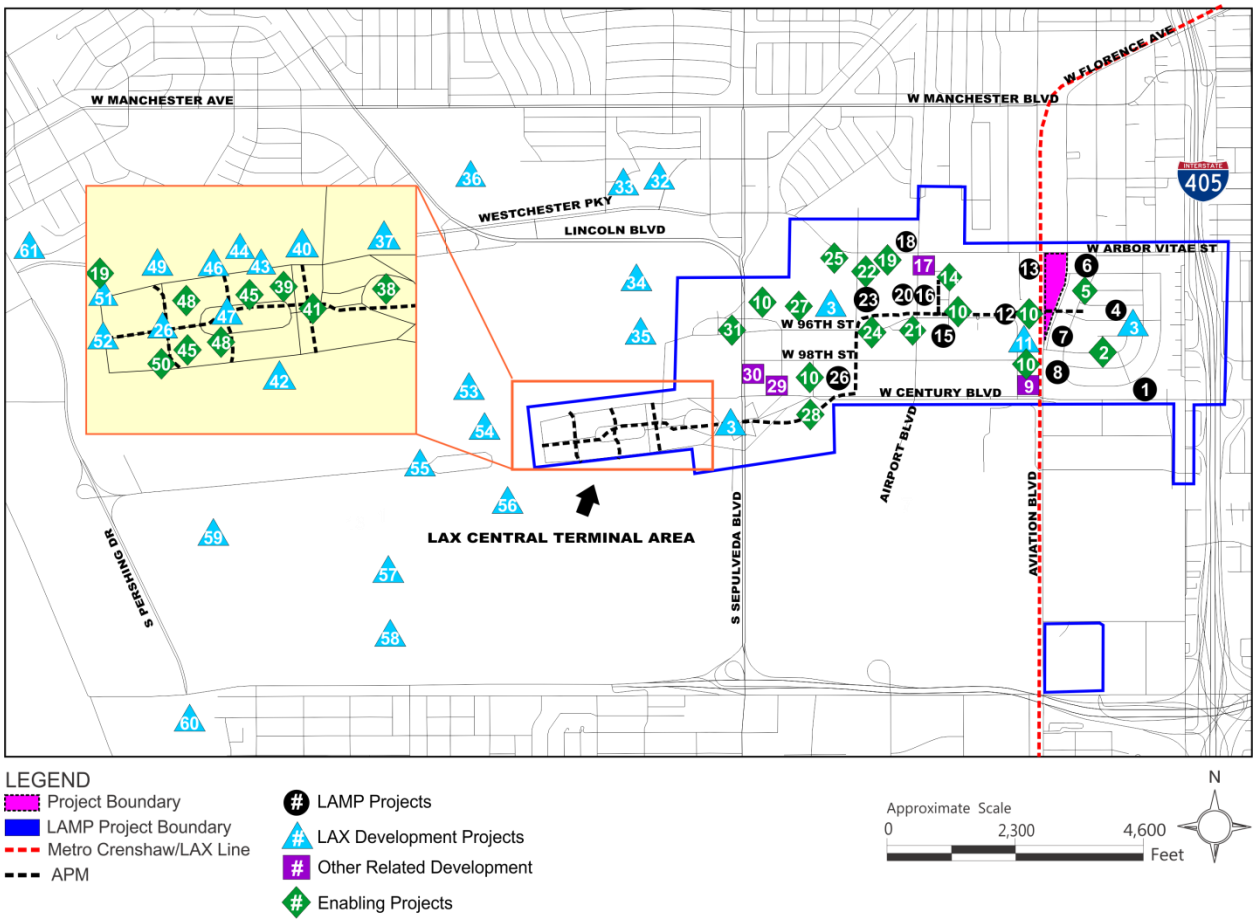
- A list of past, present, and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. For example, a cumulative land use impact generally may only affect the compatibility of uses within the vicinity of a project site, while a cumulative air quality impact may affect the entire air basin. In this regard, the following impact analysis considers the combined effect of the proposed project with improvements proposed by LAWA as part of the LAMP, the Crenshaw/LAX Line, Aviation/Century station, and privately developed projects in the project vicinity. However, the cumulative analysis is based on the geographic extent of each potential impact ranges according to the environmental topic being evaluated. For example, potential construction noise impacts are more localized than GHG emissions impacts. Additionally, each environmental topic area is subject to regulations with varying jurisdictional boundaries, which is noted as applicable in the ensuing discussions. The improvements are forecast to be constructed and completed within the same timeframe as the proposed project (2035). These projects are depicted graphically in Figure 5.1 and listed in Table 5.1.

The LAMP consists of a number of components, including:

- An approximately 2.25-mile APM system connecting a new consolidated rental car center, two ITFs, airport parking and Metro facilities to the airline terminals. There would be a total of six stations, including three in the CTA and one immediately adjacent to the proposed project. The APM system would simultaneously operate up to nine APM trains with a two-minute wait time and be free for airport users. The APM system would be 50 to 70 feet above ground with a guideway width of 35 to 75 feet and guideway columns located approximately every 100 feet. The APM system will also include passenger walkways with 24-hour access that would connect the APM stations to passenger terminals or ground transportation facilities;
- Two ITFs (ITF East to be located at 98th Street and Aviation Boulevard area and ITF West to be located at West Westchester Parkway/Arbor Vitae Street and Airport Boulevard area)would include LAX parking for private vehicles, passenger pick-up and drop-off areas, connections/transfers to hotels, shuttles/commercial vehicles, LAX FlyAway, and amenities such as waiting areas, concessions and ticketing/information kiosks;
- A CONRAC would relocate existing rental car companies into one location adjacent to the Interstate 405 with direct connections to the airport using the APM;
- Modifications to existing passenger terminals and parking garages within the CTA for passenger walkway system connections and vertical circulation to the arrival, departure and concourse levels;
- Roadway improvements to the CTA from the Interstate 405 to develop access to the ITFs and CONRAC;
- Utilities infrastructure improvements; and
- Potential future collateral non-residential land use development (approximately 900,000 square feet) on LAWA-owned property adjacent to the proposed ITFs.

Figure 5.1 Cumulative Impact Study Area



Source: Terry A. Hayes Associates Inc., 2016.

Table 5.1 Related Projects

Map ID	Project Type	Project
1	LAMP Project	Collateral Development #7
2	Enabling Project	Completion of the Manchester Square Acquisition program
3	LAX Development Project	Miscellaneous Projects and Improvements
4	LAMP Project	CONRAC
5	Enabling Project	Manchester Square Secondary Roadways
6	LAMP Project	Collateral Development #8
7	LAMP Project	ITF East
8	LAMP Project	Collateral Development #6
9	Other Related Development	Aviation/Century Station
10	Enabling Project	Land Acquisition
11	LAX Development Project	Metro Crenshaw / LAX Transit Corridor and Station
12	LAMP Project	APM
13	LAMP Project	Metro Crenshaw/LAX Maintenance Facility
14	Enabling Project	Belford Area Secondary Roadways

Map ID	Project Type	Project
15	LAMP Project	Collateral Development #5
16	LAMP Project	Collateral Development #4
17	Other Related Development	Car Wash
18	LAMP Project	Collateral Development #3
19	Enabling Project	Bob Hope Hollywood USO (multiple locations)
20	LAMP Project	Collateral Development #2
21	Enabling Project	Restaurant Building
22	Enabling Project	Jenny Ave
23	LAMP Project	ITF West
24	Enabling Project	96th Street between Vicksburg Ave. and Airport Blvd.
25	Enabling Project	Reliant Medical Center (potential)
26	LAMP Project	Collateral Development #1
27	Enabling Project	Metro Bus terminal
28	Enabling Project	Hanger Complex
29	Other Related Development	Proposed Airport Parking (6225 W. Century Blvd)
30	Other Related Development	Hotel (9800 S. Sepulveda Blvd)
31	Enabling Project	Reliant Medical Center
32	LAX Development Project	Airport Police Station Relocation
33	LAX Development Project	Canine Facility/Airport Police Department Range
34	LAX Development Project	Runway 6L-24R Runway Safety area Improvements Project
35	LAX Development Project	Runway 6R-24L Runway Safety Area Improvement Project North Airfield
36	LAX Development Project	Northside Development
37	LAX Development Project	Concourse 0
38	Enabling Project	Clifton Moor Administration Building (admin east)
39	Enabling Project	Bob Hope Hollywood USO
40	LAX Development Project	Terminal 1 Improvements
41	Enabling Project	improvements to portion of center way within CTA
42	LAX Development Project	South Terminal Improvements
43	LAX Development Project	Terminal 1.5
44	LAX Development Project	Terminal 2 Improvements
45	Enabling Project	replacement garages in CTA
46	LAX Development Project	Terminals 2 and 3 Modernization Project
47	LAX Development Project	Central Utility Plant Replacement Project (CUO - RP)
48	Enabling Project	Parking Garages P2a, P2b, and P5
49	LAX Development Project	Terminal 3 Improvements
50	Enabling Project	West Way Relocations
51	LAX Development Project	Terminal 3 (T-3) Connector
52	LAX Development Project	LAX Bradley West Project
53	LAX Development Project	MSC North Extension
54	LAX Development Project	LAX Midfield Satellite Concourse (MSC) North Project

Map ID	Project Type	Project
55	LAX Development Project	Secured Area Access Post (SAAP) Project
56	LAX Development Project	MSC South Project
57	LAX Development Project	Runway 7L-25R Safety Area Improvements South Airfield
58	LAX Development Project	Runway 7R-25L Rehabilitation
59	LAX Development Project	West Aircraft Maintenance Area Project
60	LAX Development Project	Hyperion Treatment Plant Connector
61	LAX Development Project	City of Los Angeles Bureau of Sanitation (BOS) Stormwater Infiltration and Treatment Facility

Source: Terry A. Hayes Associates Inc., 2016.

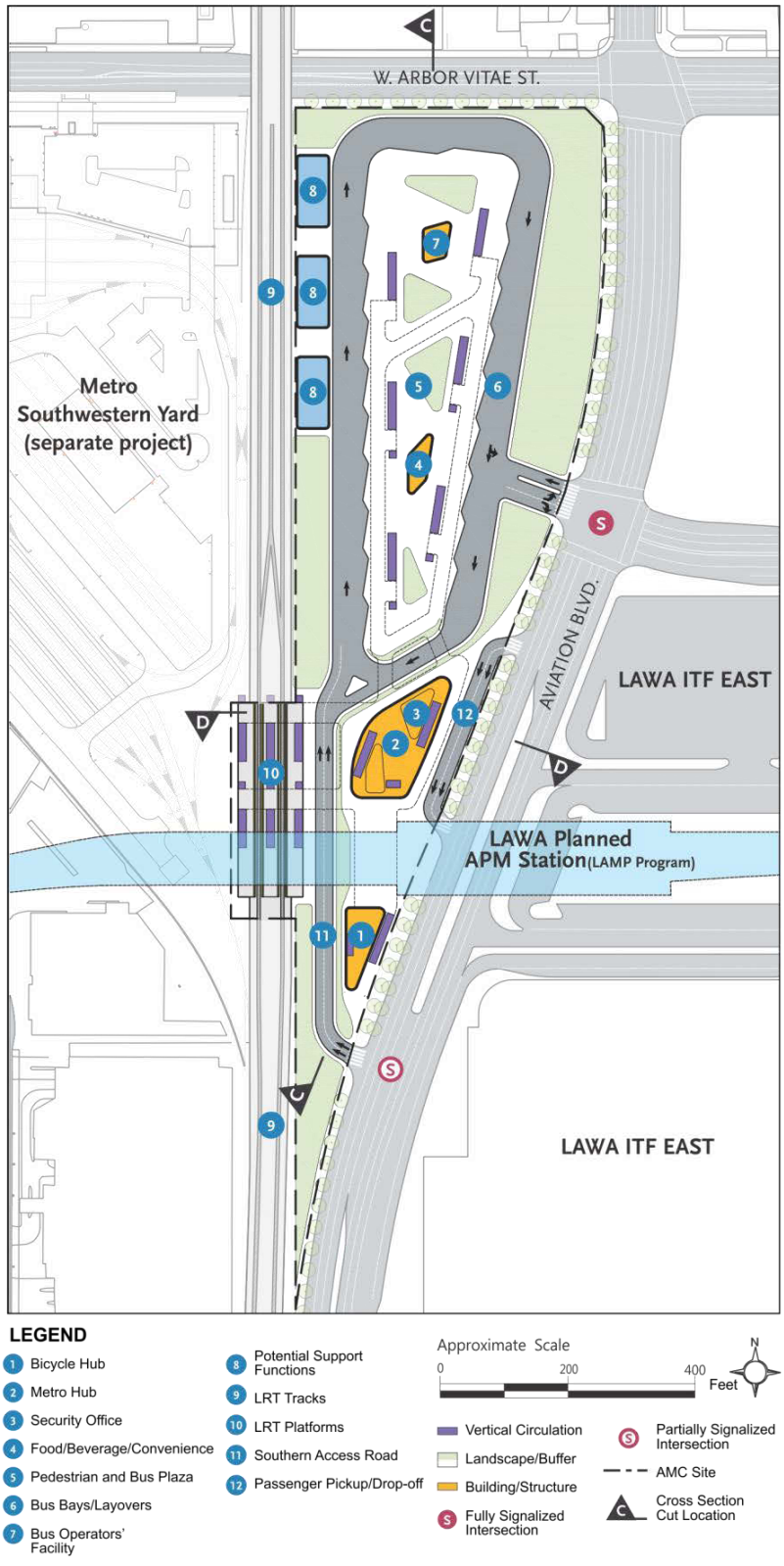
The primary component of the LAMP as it relates to the proposed project would be the APM system, which would provide 24-hour access to the CTA for passengers, employees and other users of LAX. The APM would be built completely above grade and connect to the passenger terminals in the CTA with a pedestrian walkway system located above the existing roads and curb areas. The APM would transport passengers between the CTA and the other main components of the LAMP located east of the CTA, including a CONRAC, two ITFs, and new public parking facilities.

The proposed project design includes vertical circulation and other elements not to preclude the APM connection. The APM would pass above the southern portion of the project site. The connection to the APM would be provided from the mezzanine level of the proposed project. There are projected to be just under 46,000 daily bus, rail and APM boardings at the project site in 2035 with the addition of the APM.

Figure 5.2 shows the ground-level plan, Figure 5.3 shows the mezzanine-level plan, and Figure 5.4 shows cross-sections of the project site, from east to west and north to south views. Figure 5.5 shows visual representations of the proposed project in the cumulative condition. These views reflect LAWA's proposed development of ITF East and the CONRAC on the east side of Aviation Boulevard in the Manchester Square area. ITF East would be located at the northeast corner of Aviation Boulevard and 98th Street, providing a connection to the proposed project. Other LAMP-related improvements that would directly affect the proposed project would include:

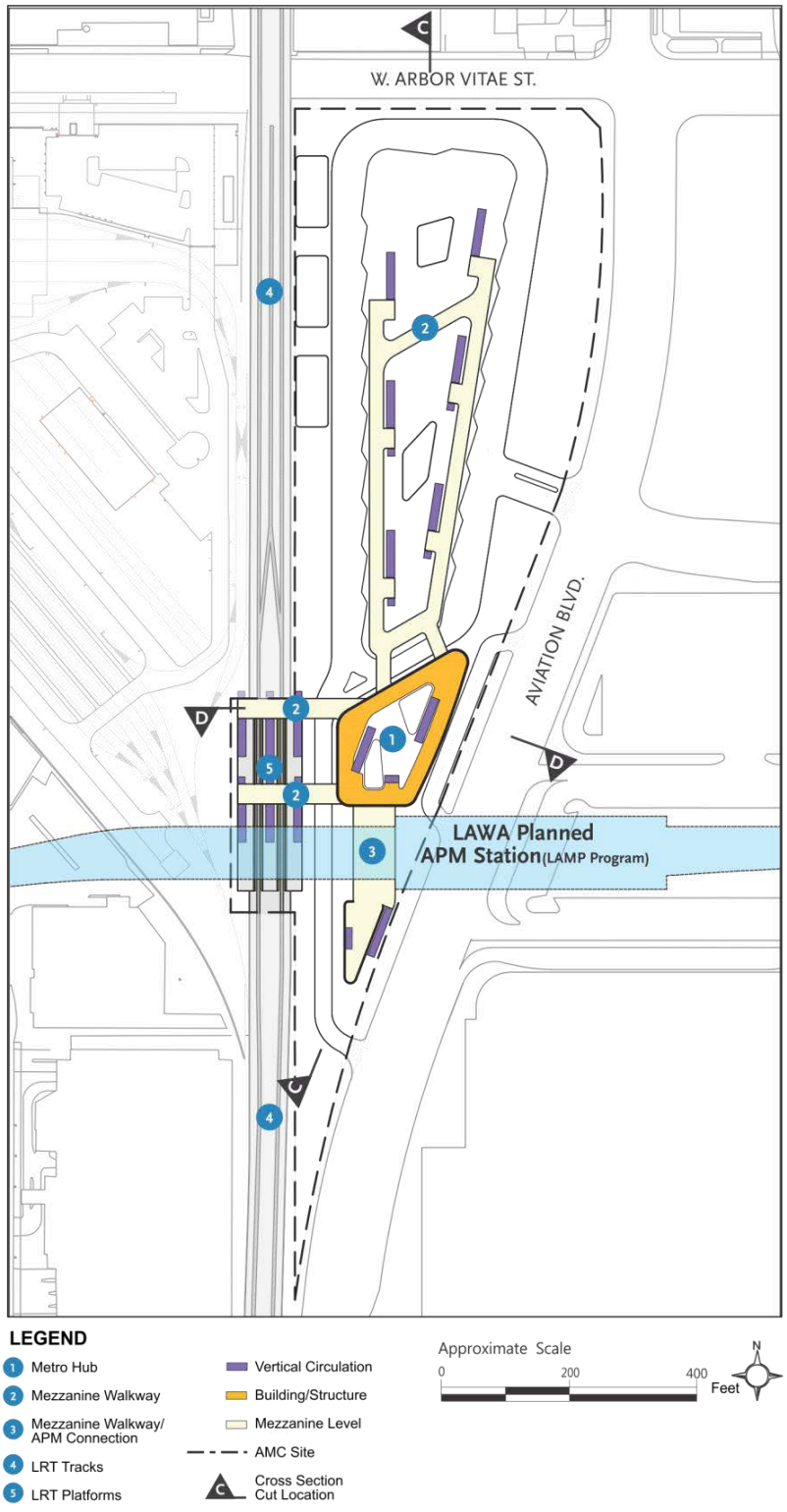
- Widening of Aviation Boulevard to accommodate three lanes in each direction;
- Installation of a multi-use pathway for cyclists and pedestrians along the west side of Aviation Boulevard and south of Arbor Vitae Street;
- Construction of the ITF East and CONRAC on the east side of Aviation Boulevard, including a driveway intersection to align with the proposed project main driveway; and
- Collateral land use development by LAWA on or near the southeast corner of Arbor Vitae Street and Aviation Boulevard.

Figure 5.2 Cumulative Conceptual Ground-Level Site Plan



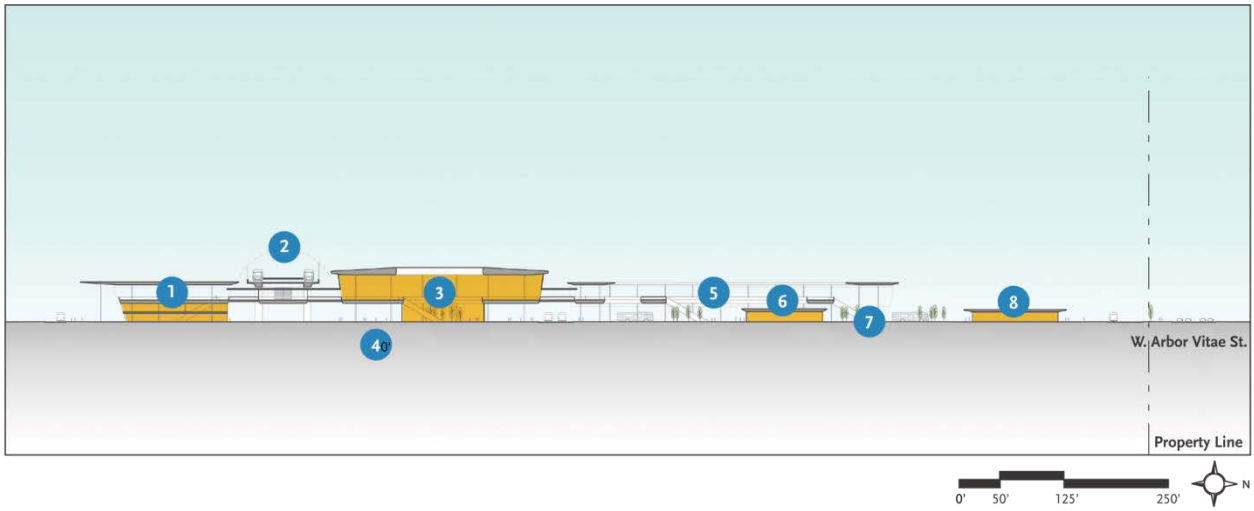
Source: Cityworks Design, 2016.

Figure 5.3 Cumulative Conceptual Mezzanine-Level Site Plan



Source: Cityworks Design, 2016.

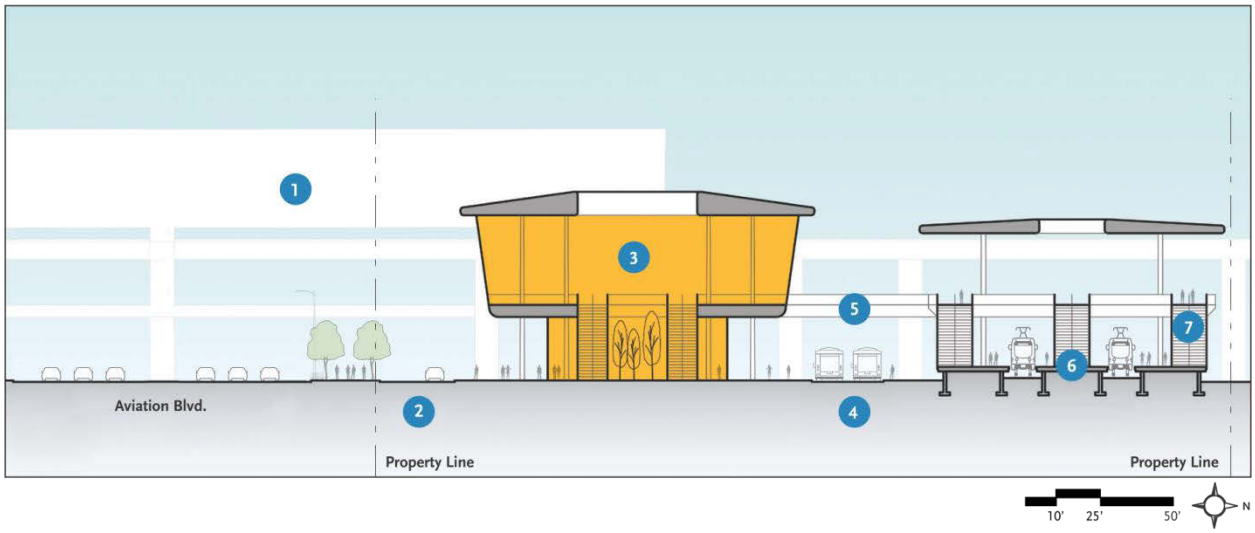
Figure 5.4 Cumulative Conceptual Cross-Sections



NORTH-SOUTH CROSS SECTION C-C
Looking West

LEGEND

1. Bicycle Hub
2. LAWA Automated People Move (LAMP Program)
3. Metro Hub
4. Pedestrian Plaza/ Passenger Pick-up/Drop-off
5. Mezzanine Walkway
6. Food/Beverage/Convenience
7. Food/Beverage/Convenience
8. Bus Plaza
9. Bus Operators' Facility
10. Bus Way



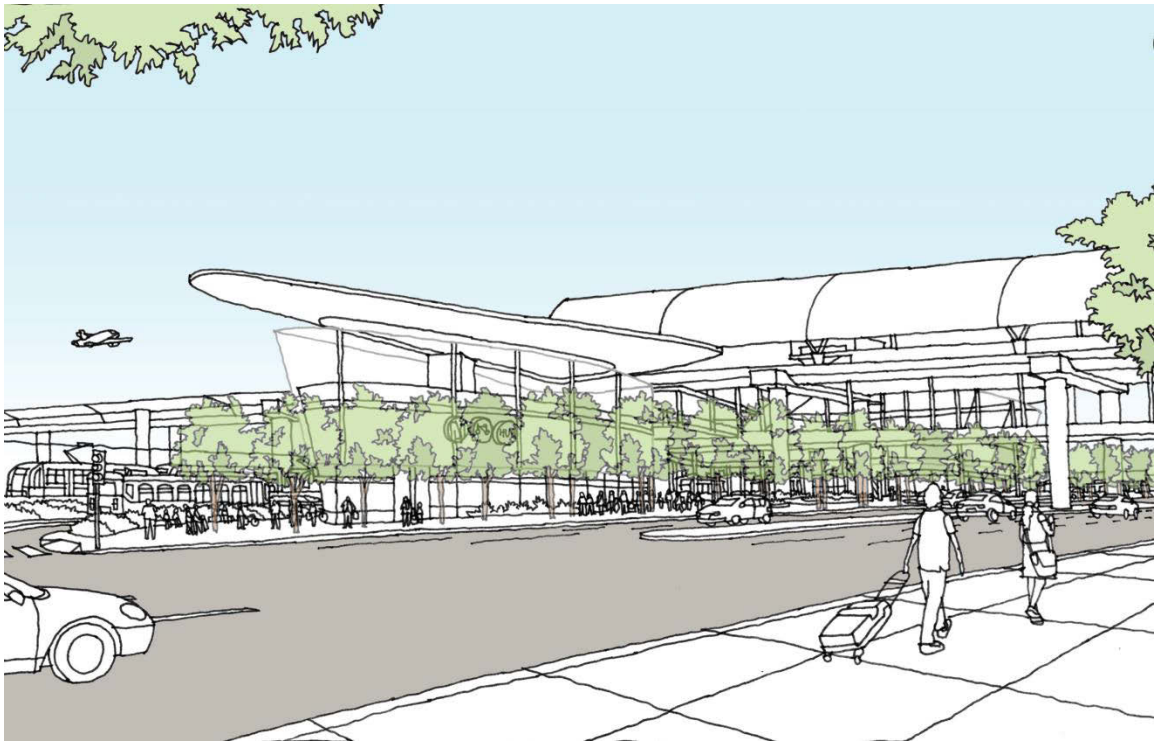
EAST-WEST CROSS SECTION D-D

LEGEND

1. LAWA Automated People Mover (LAMP PROGRAM)
2. Passenger Pick-up/Drop-off
3. Metro Hub
4. Bus Way
5. Mezzanine Walkway
6. LRT Platforms
7. Vertical Circulation

Source: Cityworks Design, 2016.

Figure 5.5 Cumulative Conceptual Views of the Project Site



Northwest view of the project site

Southwest view of the project site

Source: Cityworks Design, 2016.

Methodology

The assessment presented below addresses the potential combined effect of the proposed project in combination with the Related Projects. Cumulative impacts are first determined by assessing whether the proposed project combined with the Related Projects could result in a significant cumulative impact. If it is determined that the proposed project combined with the Related Projects could result in a significant cumulative impact, the proposed project's incremental contribution is evaluated to determine whether it would be cumulatively considerable. If the combined impact of the proposed project with the Related Projects would not be significant, no analysis of the proposed project's incremental contribution is necessary.

Table 5.2 shows the significance of the proposed project's impacts on each evaluated environmental topic enumerated in CEQA's Environmental Checklist Form (Appendix G). Chapter 3 Environmental Impacts includes a detailed analysis of environmental topics where the proposed project would result in a Less-Than-Significant Impact or a Less-Than-Significant Impact with Incorporation of Mitigation. As stated in CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the Proposed Project evaluated in the EIR. Therefore, environmental topics where the proposed project would not have the potential to cause significant impacts or would have a less than significant impact with regulatory compliance are addressed in Section 4.4 Effects Determined Not to Be Significant of this Draft EIR. The cumulative impacts analysis below addresses the same environmental topics that were evaluated in Section 3.1 Air Quality, Section 3.2 Greenhouse Gas Emissions, Section 3.3 Hazards and Hazardous Materials, Section 3.4 Land Use and Planning, Section 3.5 Noise and Vibration, and Section 3.6 Transportation and Traffic. Further discussion is not warranted for environmental issue areas that were determined to have no potential for significant impacts.

Table 5.2 Proposed Project Impacts

Environmental Topic	Significance of Impact
Aesthetics Agricultural Resources Mineral Resources Population and Housing Recreation Utilities and Service Systems	No Impact
Air Quality Greenhouse Gas Emissions Land Use and Planning Noise and Vibration Transportation and Traffic	Less-Than-Significant Impacts
Biological Resources Cultural Resources Geology and Soils Hydrology and Water Quality Public Services	Less-Than-Significant Impacts With Regulatory Requirements
Hazards and Hazardous Materials	Less-Than-Significant Impacts With Mitigation

Source: Terry A. Hayes Associates Inc., 2016; STV, 2016.

5.1. AIR QUALITY

Cumulative impacts for air pollutants are first determined by assessing if the proposed project would result in a significant project-level impact related to regional air quality based on SCAQMD significance thresholds. If the project exceeds SCAQMD thresholds, is part of an ongoing regulatory program, or is contemplated in a Program EIR and the related projects are located within approximately one mile of the project site, then the additive effects of these related projects are considered. As the proposed project is not part of an ongoing regulatory program, project-specific air quality impacts were used to determine the potential cumulative impacts to regional air quality. The impact evaluation for regional emissions includes the South Coast Air Basin and the impact evaluation for localized impacts is 500 meters (based on the SCAQMD localized significance thresholds).

Air Quality Management Plan (AQMP) Consistency

The AQMP is the applicable air quality plan for the SCAG region. The emissions forecasting is based on projected population and employment growth within the SCAG region. Projects that are considered to be consistent with the AQMP would not interfere with attainment because the associated growth is included in the SCAG projections utilized in the formulation of the AQMP. Therefore, projects, uses and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. The emissions modeling in the AQMP prepared by the SCAQMD accounts for past, present, and reasonably probable future projects. The proposed project was included in the regional emissions modeling for the AQMP. However, the AQMP was prepared in 2012 and it is possible that projects developed or planned since the completion of the modeling would be inconsistent with the AQMP. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact.

As discussed in Section 3.1 Air Quality, the proposed project is included in the SCAG growth forecasts and is consistent with the AQMP. The proposed project would consolidate bus and rail transit services in the LAX area and provide pedestrian street access to the facilities. The goal of the proposed project is to increase transit ridership and provide a reliable and convenient transit option to and from LAX, which currently does not exist. This regional connectivity to the transit network would be consistent with regional and local air quality reduction goals to increase transit ridership.

Furthermore, the proposed project would provide public transit access to the LAMP at LAX, as well as other future projects in the area. The LAMP is designed to enhance local access to the CTA at LAX through implementation of an APM system that would transect a 2.25-mile corridor and end at the CONRAC, which would be adjacent to the proposed project across Aviation Boulevard. Together, the proposed project and the LAMP would provide regional access to LAX via public transit and reduce congestion in the LAX area. Furthermore, the proposed project would not construct or contribute to residential growth in the region; however, the proposed project would create a secondary economic benefit through

opportunities for future transit-oriented residential and commercial development as it would facilitate a connection to the regional public transit system.

The proposed project would be required to comply with all applicable SCAQMD rules and regulations that are in effect at the time of development. The proposed project would not conflict with or obstruct implementation of the AQMP. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Air Quality Standards Violations, Exposure of Sensitive Receptors to Substantial Pollutant Concentrations, and Nonattainment Pollutant Emissions

The South Coast Air Basin is currently designated nonattainment for ozone (CAAQS/NAAQS), PM_{10} (CAAQS) and $PM_{2.5}$ (CAAQS/NAAQS). Emissions generated by the proposed project combined with past, present, and reasonably probable future projects could impede attainment efforts or result in locally significant pollutant concentrations. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact.

The SCAQMD has not established quantitative cumulative thresholds for emissions of criteria pollutants. For both construction and operational activities, if a project exceeds the identified project-level significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Conversely, SCAQMD guidance asserts that projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. As discussed in Section 3.1 Air Quality, the proposed project would not generate emissions that would exceed the significance thresholds during construction or operation, and therefore would not violate any air quality standards in the long term from a cumulative standpoint.

As the proposed project does not exceed any project-specific significance thresholds—and air quality within the South Coast Air Basin is projected to improve over time—it would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Creation of Nuisance Odors

Noxious odors are generally limited to the immediate area surrounding the source. Land uses and industrial operations commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD, 1993). None of these land use have been identified in the immediate vicinity of the project site. Therefore, the proposed project combined with other past, present, and reasonably probable future projects would not create a significant cumulative impact.

5.2. GREENHOUSE GAS EMISSIONS

GHG Emissions and GHG Emissions Reduction Plan Consistency

Through AB 32, the State of California has acknowledged that GHG emissions are a Statewide impact. Emissions generated by the proposed project combined with past, present, and reasonably probable future projects could contribute to this impact. The CEQA Guidelines emphasize that the effects of GHG emissions are cumulative in nature and should be analyzed in the context of CEQA's existing cumulative impacts analysis. The Office of Planning and Research acknowledges that although climate change is cumulative in nature, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment (OPR, 2008). CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project. As discussed in Section 3.2 Greenhouse Gas Emissions, the proposed project is included in the RTP/SCS, which outlines regional transportation and sustainability planning objectives within SCAG. Additionally, components of the LAMP are included in the RTP/SCS, separately tabulated as the landside APM system, the ITF East, and the ITF West. Both the proposed project and the LAMP have been approved as consistent with transportation and sustainability efforts within the City of Los Angeles. The proposed project and the LAMP together would encourage alternative modes of transportation to passenger vehicles, and improve the ability of people at existing and future-transit oriented development to access LAX using the regional transit system.

Furthermore, the SCAQMD states that a project's cumulative GHG impacts are mitigated to a less-than-significant magnitude if it can demonstrate consistency with the GHG component of a local General Plan or equivalent regional approach. Consequently, the project-level analysis, provided in Section 3.2 Greenhouse Gas Emissions, also represents the cumulative GHG analysis for the proposed project. The GHG analysis determined that the proposed project would not result in significant impacts and would be consistent with applicable GHG plans, policies, and regulations. The proposed project would implement several defined features for sustainability, including LEED Silver minimum rating for the building structures and reduced potable water demand by using recycled water for landscaping and installing low-flow plumbing fixtures. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

5.3. HAZARDS AND HAZARDOUS MATERIALS

Transport, Use or Disposal of Hazardous Materials

Construction

The potential for a cumulative impact would be limited to the areas adjacent to the project site, which includes the projects shown in Figure 5.1. As discussed in Section 3.3 Hazards and Hazardous Materials, there are multiple contaminated properties near the project site.

The project is known to have contaminated soils. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact.

The proposed project would be required to comply with all applicable local, state and federal laws, rules and regulations. These regulations apply to, but are not limited to, contaminated soils, asbestos-containing materials, and lead-based paint. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Operations

The potential for a cumulative impact would be limited to the areas adjacent to the project site. The proposed project combined with past, present, and reasonably probable future projects would most likely involve the occasional use, storage and disposal of hazardous materials that could include limited quantities of vehicle fuels, oils, transmission fluids, paints, solvents, cleaners and pesticides. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact.

The proposed project would be regulated by the California Division of Occupational Safety and Health, the City of Los Angeles Fire Code and all other federal, state and local regulations. All hazardous materials would be required to be contained, stored and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Release of Hazardous Materials from Upset or Accident Conditions

Construction

The analysis of the project site in Section 3.3 Hazards and Hazardous Materials assessed the potential risk associated with disturbance of a natural gas line and groundwater monitoring wells, as well as the discovery and removal of ASTs, USTs, clarifiers, sumps, and furnace pits. The potential for a cumulative impact would be limited to the areas adjacent to the project site. The proposed project combined with past, present, and reasonably probable future projects could create a cumulative impact. As discussed in Section 3.3, the proposed project would be required to comply with all applicable local, state and federal laws, rules and regulations. In addition, the proposed project would incorporate mitigation measures HAZ-1 through HAZ-6, which would reduce impacts to less than significant levels. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Operations

The analysis of the project site in Section 3.3 Hazards and Hazardous Materials assessed the potential risk associated with occasional use, storage and disposal of hazardous materials.

The potential for a cumulative impact would be limited to the areas adjacent to the project site. The proposed project combined with past, present, and reasonably probable future projects could create a cumulative impact. As discussed in Section 3.3, the proposed project would be required to comply with all applicable local, state and federal laws, rules and regulations. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Hazardous Conditions at a School

Construction

The potential for a cumulative impact would be limited to within one-quarter mile of the project site. There would be no schools located within one-quarter mile of the project site in the cumulative condition. The Bright Star Secondary Charter Academy is being relocated from Manchester Square by LAWA as part of the LAMP. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Operations

The potential for a cumulative impact would be limited to within one-quarter mile of the project site. There would be no schools located within one-quarter mile of the project site in the cumulative condition. The Bright Star Secondary Charter Academy is being relocated from Manchester Square as part of the LAMP. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Locate on a Site That Would Create Significant Hazard to the Public or Environment

The potential for a cumulative impact would be limited to the areas adjacent to the project site, which include the projects shown in Figure 5.1. The project site and adjacent land uses contain several existing hazardous materials contaminations. As discussed in Section 3.3 Hazards and Hazardous Materials, seven recognized environmental conditions have been identified in the analysis of hazardous conditions (refer to Table 3.3.1 and Figure 3.3.1). One such REC is the former freight distribution and warehouse facility located at 5600 Arbor Vitae Street, which is the site of the future Crenshaw/LAX Line maintenance facility. The petroleum hydrocarbon plume at 5600 Arbor Vitae Street is comingling with the VOC plume beneath the project site. In addition, initial studies have indicated that a VOC plume on the northeast portion of the project site may have migrated under Manchester Square. Other recognized environmental conditions near the project site include contaminated soils, ASTs and USTs. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact.

Existing groundwater monitoring wells are located on the project site (refer to Table 3.3.1 and Figure 3.3.1). Hazardous materials site remediation and hazardous materials themselves are well regulated. The proposed project would be developed on contaminated site but would comply with all local, state and federal regulations related hazardous materials removal and

monitoring as outlined in Subsection 3.3.1. Compliance with Mitigation Measures HAZ-1 through HAZ-6 would ensure the proposed project would not create a significant hazard to the public or the environment. This mitigation and remediation would also eliminate the project's potential to contribute to the cumulative impact. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Safety Hazard near a Public Airport

The potential for a cumulative impact is limited to within the LAX airport influence area. The project area is governed by the Los Angeles County Airport Land Use Plan which has established safety zones for each airport under its jurisdiction in the form of RPZ's. The RPZ's function is to enhance the protection of people and property on the ground by restricting building heights, limiting light and glare, limiting the attraction of flocks of birds, and other restrictions to reduce potential conflicts with airplanes. Title 14, Part 77 of the CFR, Safe, Efficient Use, and Preservation of Navigable Airspace, establishes minimum standards to ensure air safety by regulating the construction or alteration of buildings or structures that may affect airport operations. The project area is located within the Airport Influence Area and is subject to FAA height restrictions. The proposed project and the past, present, and reasonably probable future projects within the Airport Influence Area are legally required by the CFR to file a Form 7460, Notice of Proposed Construction or Alteration, with the FAA to make an airspace determination. This determination ensures compliance with applicable federal guidelines and eliminates the potential for a cumulative impact. Therefore, proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Safety Hazard near a Private Airstrip

The proposed project and the projects shown in Figure 5.1 are not within the proximity of a private airstrip. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Emergency Plans

The nearest emergency/disaster routes to the project site are Manchester Boulevard approximately 0.5 mile to the north, Lincoln Boulevard (East Pacific Coast Highway) approximately 1 mile to the west, Sepulveda Boulevard approximately 1 mile to the west, State Route-90 approximately 3 miles to the northwest, and Interstate 405 approximately 0.5 miles to the east (City of Los Angeles, 1996). The proposed project and the Related Projects would not modify these emergency/disaster routes. Per state and local regulations, emergency vehicle access would be maintained at all times during construction and operation of the proposed project and Related Projects. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Wildland Fires

Exhibit D of the City of Los Angeles Safety Element indicates that no portion of the project area is within or in close proximity to a Wildfire Hazard Area (City of Los Angeles, 1996). Accordingly, the surrounding area would not be subject to wildland fires. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

5.4. LAND USE AND PLANNING

Cumulative land use planning impacts related to a transit station location are typically defined as those areas within a one-half mile radius of the proposed project. Mix of uses, including commercial, light industrial, residential and educational uses are currently located within this adjacent area. Specifically, Manchester Square and medium density residential areas are interspersed with industrial uses to the north and west. In the future, residences and the Bright Star Secondary Charter Academy within the Manchester Square area would be relocated by LAWA as part of the LAMP.

Division of an Established Community

According to the City of Los Angeles Neighborhood Council boundary map, the Westchester community is located north and east of the proposed project. The vast majority of the community is located north of Arbor Vitae Boulevard, adjacent to airport-related parking and other light industrial uses. Manchester Square is the only residential community that would be affected by the development of the Related Projects and currently consists of sparsely distributed multi-family residences, a small number of single-family homes and an elementary school east of the proposed project. It should be noted that Manchester Square is within an airport noise abatement area where the majority of land is owned by LAWA and the entire area is zoned as LAX and has a General Plan land use designation of LAX Landside. Consistent with the zoning and General Plan designations, this area is proposed to be developed by LAWA for the APM, the ITF East/CONRAC with adjacent collateral land use development. Thus, with future development, the remaining residences and Bright Star Secondary Charter Academy would be relocated and thus considered a significant cumulative impact. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact.

The proposed project would have no direct or indirect effect on this change. Overall, the proposed project combined with the projects within one-half mile radius of the proposed project would result in shifting the land use character from a variety of industrial and commercial uses to a more defined transportation network with supporting facilities that would serve LAX and its patrons. A significant cumulative land use impact could occur. However, the project site would constitute a small percentage of the land area proposed for redevelopment compared to the LAMP and other private actions. As discussed in Section 3.4 Land Use and Planning, potential impacts of the proposed project would be less than significant. Given the scale and nature of the proposed project as a transit station with light

rail platforms, bus bays and ancillary facilities, the overall contribution of the proposed project to land use change would not be significant. Therefore, the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Compatibility with Land Use Plans and Policies

As discussed in Section 3.4 Land Use and Planning, project implementation would not require any zone changes or plan amendments and the proposed project is compatible with applicable land use plans and policies. Accordingly, impacts on existing land use plans and policies would be less than significant. The proposed project would be integrated with future transit connections and airport facilities included in the LAMP. As indicated in the Initial Study for the LAMP, ground access improvements (e.g., the APM) were anticipated in the LAX Master Plan and the LAX Specific Plan; however, implementation of projects within one-half mile radius of the proposed project could require discretionary actions such as zone changes and plan amendments. LAWA anticipates that these changes would be consistent with applicable land use plans and policies as they would largely serve to update the existing boundaries and locations of the LAMP components. The projects would be subject to applicable land use plans and polices and, as with the proposed project, must be evaluated in terms of compatibility and approved by the governing jurisdiction. Due to the nature of the development of the uses proposed by the Related Projects (i.e., primarily airport-serving commercial uses) in an area largely designated for LAX, LAX-related, and a mix of industrial and commercial uses; significant cumulative impacts are not anticipated. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Habitat Conservation

The project site and the cumulative impact study area are fully developed with industrial and commercial uses in a highly urbanized area of the City. Neither the site nor the cumulative impact study area are identified as critical habitat for threatened or endangered species and does not contain any candidate, sensitive or special status species. Neither the proposed project nor the Related Projects would conflict with any habitat conservation plan or natural community conservation plan. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

5.5. Noise and Vibration

Exposure to Excessive Noise Levels

Construction

The potential for a cumulative impact was assessed for the nearest sensitive receptors that could be affected by the proposed project and Related Projects. This was identified as the Travelodge Hotel LAX, which would be located approximately 1,300 feet from typical construction activity at the project site. Components of the LAMP and Other Related Development (shown as Map ID #9 in Figure 5.1) would be located approximately 1,300 feet

from the Travelodge Hotel LAX. Therefore, the potential exists for the proposed project potential to combine with past, present, and reasonably probable future projects to create a cumulative impact. As described in Section 3.5 Noise and Vibration, the project-related construction noise increase would be approximately 0.5 dBA. A change in existing noise levels of at least 5 dBA is considered to be noticeable and would likely evoke a community reaction. Even in the unlikely case of a cumulative increase in noise levels, the project's contribution to the significant impact would not be audible given its distance from the Travelodge Hotel LAX. Therefore, the proposed project's incremental contribution to a potential significant cumulative impact is not cumulatively considerable.

Operations

The potential for a cumulative impact was assessed for the nearest sensitive receptors that could be affected by the proposed project and proposed projects located approximately 1,300 feet from the Travelodge Hotel LAX. This was identified as the Travelodge Hotel LAX, which would be located adjacent to project-related bus activity and the LAMP facilities. The operation of the proposed project with the proposed projects located approximately 1,300 feet from the Travelodge Hotel LAX would include several additional noise generating components. These components include operation of the APM and increase in volume of traffic due to the LAMP parking and roadway improvements. Cumulative noise levels were assessed using the FTA's Noise Impact Assessment Spreadsheet. In the cumulative condition, the nearest sensitive receptor to the project site would be the Travelodge Hotel LAX. The noise level at this land use was estimated for all project components with the addition of the LAMP (APM, traffic on 98th Street and parking activity at ITF East) and mobile traffic noise along Aviation Boulevard. The cumulative condition would result in a moderate impact at the Travelodge Hotel LAX, with a total noise exposure of 72 dBA L_{dn} and a 24-hour increase of one dBA over existing conditions. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact.

The proposed project constitutes a small portion of operational noise, with the majority of noise being generated by proposed projects located approximately 1,300 feet from the Travelodge Hotel LAX. With the proposed project, the noise level at the Travelodge Hotel LAX would be 64 dBA L_{dn}. As discussed in Section 3.5 Noise and Vibration, this would not result in a significant impact. With the LAMP and without the proposed project, the noise level at the Travelodge Hotel LAX would be 66 dBA L_{dn}. This would result in a significant impact using the methodology described in Section 3.5 Noise and Vibration. Combining the noise generated by the LAMP components with the project results in a noise level of 66.4 dBA L_{dn}, making the project's contribution approximately 0.4 dBA L_{dn}. The proposed projects located approximately 1,300 feet from the Travelodge Hotel LAX would result in a significant impact without the proposed project, and the project's contribution to noise levels at the Travelodge Hotel LAX is small compared to the Related Projects. Therefore, the proposed project's incremental contribution to a potential significant cumulative impact is not cumulatively considerable.

Exposure to Excessive Ground-Borne Vibration

Construction

Based on FTA impact criteria and equipment vibration levels, vibration impacts typically occur within 25 feet of the source. In the cumulative condition, the nearest sensitive receptor to the project site would be the Travelodge Hotel LAX. Neither the project site nor the projects within 25 feet of the Travelodge Hotel LAX would be located within 25 feet of the Travelodge Hotel LAX. The LAMP components would be the nearest construction activity to the Travelodge Hotel LAX, and LAWA has indicated that construction activity would be approximately 241 feet away from the hotel. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Operations

The vibration analysis in Section 3.5 Noise and Vibration stated that the greatest potential for impact would be to the Travelodge Hotel LAX. Vibration is a localized and instantaneous effect and would not differ along Aviation Boulevard in the project or cumulative condition. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Exposure to Excessive Noise Levels Associated with Public Airports

The potential for a cumulative impact related to excessive public airport noise is site specific. The analysis in Chapter 3 Environmental Impacts assessed LAX-related noise levels at the project site, which were determined to be less than significant. This potential impact would be independent of Related Projects. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Exposure to Excessive Noise Levels Associated with Private Airstrips

The proposed project and Related Projects are not within the proximity of a private airstrip. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

5.6. TRANSPORTATION AND TRAFFIC

Circulation System

The cumulative impact study area is defined roughly by Manchester Avenue to the north, La Cienega Boulevard to the east, the Imperial Highway and Interstate 105 to the south and Sepulveda Boulevard to the west. This is based on the influence area of the proposed project as a bus center and bus to a Metro rail transfer facility. Nineteen of the analyzed intersections are located entirely within the City of Los Angeles. Five intersections are located on the border of the City of Los Angeles and other cities and the unincorporated County of Los Angeles: three along the Imperial Highway are shared with the City of El Segundo, one at

Aviation and Arbor Vitae Street is shared with the City of Inglewood, and the intersection of Aviation and Imperial Highway is shared with the City of Los Angeles, El Segundo, and Los Angeles County. All intersections in this analysis are signalized. For intersections bordering one or more jurisdictions, the intersection was analyzed using both the ICU and CMA methodology.

Construction

Construction of the proposed project and the proposed projects within the study area may include temporary intermittent lane closures, although this is unlikely to be necessary on Aviation Boulevard due to the center turn median on Aviation Boulevard. In the event of road closures due to simultaneous construction activities, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. For the proposed project, some temporary and minor impacts due to encroachment may occur on Arbor Vitae Street during the construction of the station platforms; however impacts would be less than significant. Metro creates Construction Staging and Traffic Management Plans for each project. It is anticipated that construction activity may encroach onto roadways, such as Arbor Vitae Street, Aviation Boulevard and 96th and 98th Streets. To the extent feasible, construction management plans for both the proposed project and LAMP would be coordinated to maintain access for nearby land uses, limit lane closures, and maintain safe and adequate pedestrian protection. Therefore, the proposed project's incremental contribution to a potential significant cumulative impact is not cumulatively considerable.

Operations

Cumulative conditions with the proposed projects within the study area that affect local roadway circulation include the CONRAC, East and West ITFs, the APM, roadway improvements throughout the cumulative impact study area and collateral private development on the east side of Aviation Boulevard. This scenario analyzes the cumulative forecasted conditions for the year 2035, reflecting regional growth and transportation improvements identified in the RTP/SCS, as well as the proposed projects within the study area. Bus routing assumes the presence of new roadways around LAX per the LAMP. The first step in developing the cumulative traffic forecasts was to apply Metro's TDF Model to determine the background growth in traffic volumes in the cumulative impact study area. Using the growth in volumes at intersections within the cumulative impact study area, an annual average growth rate of 0.85 percent was applied to the existing counts. The redistribution of traffic related to the LAMP was used to adjust the intersection forecasts.

The cumulative condition also includes rerouted bus transit trips and passenger vehicle pick-up and drop-off areas. These trips were assigned to the roadway network in the cumulative impact study area to produce traffic forecasts. The cumulative traffic forecasts reflect the LAX Flyaway service, which may be consolidated onto the project site to provide a single location for bus transfers. As part of this operating scenario, the FlyAway bus routes are assumed to drop-off airport-bound passengers directly at the LAX airport terminals and then proceed east

on Century Boulevard to Aviation Boulevard and into the project site. The buses would lay over at the project site and pick up outbound airport passengers before proceeding south to their destinations via Aviation and Century Boulevards, or north via Aviation Boulevard and Arbor Vitae Street or Manchester Boulevard. This rerouting of FlyAway trips is included in the cumulative condition. In addition, the connection of 98th Street to Aviation Boulevard planned as part of the LAMP was assumed to be in place under cumulative conditions and used by buses accessing/departing the project site.

Cumulative conditions with and without the proposed project were used to determine traffic operations with the anticipated growth and transportation improvements in the cumulative impact study area. Table 5.3 compares proposed project to future without project conditions. The results show that the average increase in V/C was less than one percent under the CMA and ICU methods, and there were no exceedances of the significance thresholds. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

CMP Analysis

The CMP is a state-mandated program administered by Metro's 2010 CMP that provides a mechanism for coordinating land use and development decisions. CMP requires establishment of LOS standards to measure congestion at specific monitoring locations on the freeway and arterial systems. LOS ranges from LOS A to F, with LOS A representing free-flow conditions and LOS F representing a high level of congestion.

The following CMP freeway monitoring locations fall within the project area:

- Interstate 105 east of Sepulveda Boulevard (eastbound and westbound)
- Interstate 405 north of La Tijera Boulevard (northbound and southbound)

The following CMP arterial monitoring locations are within the cumulative impact study area and are also project study intersections:

- Lincoln Boulevard and Sepulveda Boulevard
- Manchester Avenue and Sepulveda Boulevard

Since the proposed project would not add more than 150 trips to the freeway monitoring locations nor would it add more than 50 trips to the intersection monitoring locations, a CMP analysis is not necessary. Additionally, the intersection LOS impact analysis showed that the project-related V/C would change by less than 0.02 under cumulative conditions at the two CMP monitoring locations. Based on the project trip generation and resulting increases in traffic volumes in the cumulative impact study area, no impacts would occur at any CMP monitoring locations. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Table 5.3 Cumulative Intersection Conditions

Int #	Intersection	Future Without Project				Future With Project							
		AM		PM		AM		PM		AM		PM	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	Delta	Impact?	Delta	Impact?
1	Sepulveda Blvd. & Manchester Ave.	0.851	D	0.941	E	0.851	D	0.942	E	0.001	NO	0.001	NO
2	Sepulveda Blvd. & La Tijera Blvd.	0.689	B	0.747	C	0.690	B	0.747	C	0.001	NO	0.001	NO
3	Sepulveda Blvd. & Westchester Pkwy.	0.894	D	0.946	E	0.901	E	0.945	E	0.007	NO	-0.001	NO
4	Lincoln Blvd. & Sepulveda Blvd.	0.739	C	0.749	C	0.739	C	0.749	C	0.000	NO	-0.001	NO
5	Sepulveda Blvd. & Century Blvd.	1.024	F	0.925	E	1.025	F	0.925	E	0.001	NO	0.001	NO
6	Sepulveda Blvd. & I-105 WB Ramps (n/o Imperial Hwy.)	1.246	F	1.035	F	1.246	F	1.036	F	0.000	NO	0.001	NO
7	Sepulveda Bl & Imperial Hwy.	0.872	D	0.952	E	0.872	D	0.953	E	0.001	NO	0.001	NO
8	Sepulveda Eastway & Westchester Pkwy.	0.519	A	0.710	C	0.522	A	0.713	C	0.003	NO	0.003	NO
9	La Tijera Blvd. & Manchester Ave.	0.622	B	0.598	A	0.622	B	0.599	A	0.000	NO	0.001	NO
10	Jenny Ave. & Westchester Pkwy.	0.426	A	0.474	A	0.426	A	0.474	A	0.000	NO	0.000	NO
11	Avion Dr. & Century Blvd.	0.435	A	0.287	A	0.433	A	0.285	A	-0.002	NO	-0.002	NO
12	Airport Blvd. & Manchester Ave.	0.723	C	0.719	C	0.723	C	0.720	C	0.001	NO	0.001	NO
13	Airport Blvd. & Arbor Vitae St./Westchester Pkwy.	0.829	D	0.877	D	0.832	D	0.879	D	0.002	NO	0.002	NO
14	Airport Blvd. & 96th St.	0.708	C	0.603	B	0.701	C	0.604	B	-0.007	NO	0.001	NO
15	Airport Blvd. & 98th St.	0.529	A	0.579	A	0.531	A	0.583	A	0.003	NO	0.004	NO
16	Airport Blvd. & Century Blvd.	0.669	B	0.624	B	0.661	B	0.622	B	-0.007	NO	-0.002	NO
17	Nash St./I-105 WB Ramps & Imperial Hwy.	0.503	A	0.345	A	0.504	A	0.346	A	0.001	NO	0.001	NO
18	Douglas St. & Imperial Hwy.	0.472	A	0.675	B	0.472	A	0.675	B	0.000	NO	0.001	NO
19	Bellanca Ave. & Century Blvd.	0.463	A	0.382	A	0.435	A	0.371	A	-0.029	NO	-0.011	NO
20	Aviation Blvd. & Arbor Vitae St.	0.971	E	0.773	C	0.972	E	0.779	C	0.001	NO	0.005	NO
21	Aviation Blvd. & Century Blvd.	0.875	D	0.819	D	0.877	D	0.828	D	0.001	NO	0.009	NO
22	Aviation Blvd. & 104th St.	0.659	B	0.823	D	0.660	B	0.824	D	0.001	NO	0.001	NO
23	Aviation Blvd. & 111th St.	0.764	C	0.697	B	0.765	C	0.699	B	0.001	NO	0.001	NO

Int #	Intersection	Future Without Project				Future With Project							
		AM		PM		AM		PM		AM		PM	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	Delta	Impact?	Delta	Impact?
24	Aviation Blvd. & Imperial Hwy	0.525	A	0.854	D	0.525	A	0.854	D	0.000	NO	0.000	NO
--	Project Driveway - Option 1	--	--	--	--	0.539	A	0.692	B	--	NO	--	NO
--	Project Driveway - Option 2	--	--	--	--	0.539	A	0.660	B	--	NO	--	NO
LOS results based on CMA methodology; Intersections on the border of the City of Los Angeles were also analyzed using the ICU methodology and the LOS results are included in Appendix X, Traffic Study. No impacts occur under the CMA or ICU methodologies.													

Source: Fehr and Peers, 2016.

Air Traffic Patterns

The project site and Related Projects are within the LAX airport influence area, which is the area wherein current or future airport-related noise, over flight, safety and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses. The proposed project and Related Projects are surface transportation and general development projects and would not change air traffic patterns. The overall intentions of the proposed project and Related Projects are to satisfy existing and future transit demand in the airport vicinity. Utility and other infrastructure upgrades are also intended to meet cumulative demand. The demand for commercial goods and services would be met by new retail, services and community facilities and by existing retail, service and other resources already located within proximity to LAX. The proposed project and Related Projects would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure and reduce regional congestion, and as a result would not induce unanticipated growth and development. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Traffic Hazards

As discussed in Subsection 3.6.4, none of the transportation system improvements proposed by the project would introduce new safety hazards at intersections or along roadway segments, as most would be designed to improve safety for all roadway users. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Emergency Access

Construction

Construction activities have the potential to affect emergency access by adding construction traffic to the street network. Construction activity in the cumulative condition may include temporary, intermittent lane closures on adjacent streets and emergency access could slightly affect emergency access. However, emergency access to the project site would be maintained during construction. These impacts would be negligible and temporary and the proposed project would be required to prepare a Construction Staging and Traffic Management Plan that would address traffic and access control during construction. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Operations

Cumulative development would utilize the existing and planned network of regional and local streets in the cumulative impact study area. Construction of the roadway network is required to comply with standard engineering practices and design standards and would not include design elements that would increase roadway hazards or impede emergency access. As discussed in Subsection 3.6.5, the project area is served by at least four LAFD stations. As

there are four fire stations located in proximity to the project site, there would be no need to build a new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. In addition, the LAFD Deployment Plan has been in place since mid-2011, which enables LAFD to shift resources to meet local demands for fire protection. It is not anticipated that the proposed project would create a substantial increase in demand for police protection services and impacts would be less than significant. The City of Los Angeles Police Department, including the Los Angeles Airport Police Division, patrols the project area on a regular basis. This would continue in the cumulative condition, in addition to LASD patrols of the Crenshaw/LAX Line and the Aviation/Century station. Response times would be minimally affected by new development due largely to the fact that most officers respond to calls for service from the field and not from the station. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Public Transit, Bicycle or Pedestrian Facilities

The proposed project and the LAMP are being developed to enhance regional bus and rail connectivity and connectivity to LAX. The proposed project and the LAMP enhance bicycle and pedestrian access through and adjacent to the site. The enhancements would improve local network connectivity and access. The Metro hub and ITFs would link the multiple modes of transportation. The bicycle hub on the project site would accommodate up to 150 bicycles in a secure location and additional space for up to 50 bicycles would be provided for short-term parking. The LAMP would also include bicycle facilities and a multi-use pedestrian and bicycle path.

All transport modes would connect directly via vertical circulation elements (i.e., stairs, escalators, and elevators) to an elevated mezzanine level. The elevated walkways and interconnected mezzanines would allow safe intermodal transfers between the project site and the LAMP components. They would separate pedestrians and passengers from vehicle lanes, avoiding any crossovers and mode of transportation conflicts. This elevated network would provide oversight of all the transport functions on site, creating a zone where passengers can move in an unencumbered way.

Under the proposed project, the rerouting of bus routes would have a minimal reduction in direct access for current passengers, other than transfers to the Metro rail system that are between 96th Street and Century Boulevard, depending on the bus line and the scope of rerouting. However, for most routes the rerouting is not substantial and substantially increases connectivity and access to the transit system. The truncation of ten routes results in a shorter overall run time for each line and is not anticipated to change vehicle requirements or substantially effect operations otherwise. For the three routes being lengthened, the additional service miles are generally minimal; two routes are extended approximately a half mile and the third is extended just over one mile. These extensions would expand the run time by a small duration. The cumulative condition would have the capacity to accommodate both the existing and future passengers, as it would have room for

expanded frequency or additional lines in the future. Under the LAMP, the LAX FlyAway service may be consolidated onto the project site to provide a single location for bus transfers. FlyAway routes are assumed to drop off airport-bound passengers directly at the terminal and then proceed south to their destinations via Aviation and Century Boulevards, or north via Aviation Boulevard and Arbor Vitae Street or Manchester Boulevard. The buses would lay over at the project site and pick-up outbound passengers before proceeding to their destinations via Aviation and Century Boulevards. Therefore, the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

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