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STAFF REPORT AND RECOMMENDATION

ON CONSISTENCY CERTIFICATION

Consistency Certification No.	CC-105-05
Staff	LJS-SF
File Date:	11/4/2005
3 Months:	2/4/2006
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Commission Meeting:	12/15/2005

APPLICANT: **Los Angeles World Airports**

PROJECT LOCATION: Los Angeles International Airport (Exhibits 1-3)

PROJECT DESCRIPTION: Final Conceptual Drainage Plan for water quality control/treatment to be implemented in conjunction with the LAX Master Plan.

SUBSTANTIVE FILE DOCUMENTS: See Page 13

EXECUTIVE SUMMARY

Los Angeles World Airports (LAWA) has submitted a consistency certification for the *Final Conceptual Drainage Plan* for the Los Angeles International Airport (LAX) Master Plan. The Commission conditionally concurred with a LAWA consistency certification (CC-061-04) in November 2004 for certain Master Plan airfield improvements and modifications at LAX located outside the coastal zone but which nevertheless held the potential to affect the water quality of Santa Monica and San Pedro Bays as a result of stormwater runoff. The condition called for LAWA to submit a final drainage plan for the LAX Master Plan developed to a level of detail

such that consistency with the water quality policies of the California Coastal Management Program could be evaluated.

The *Final Conceptual Drainage Plan* primarily recommends a mix of Best Management Practices (BMPs) to minimize pollutants in storm water discharges from implementation of LAX Master Plan development projects, to prevent a net increase in pollutant loads, and to present preliminary sizing and locations of treatment BMPs within project areas. The *Plan* includes assessing baseline condition hydrology and water quality, identifying measures to minimize potential drainage and water quality impacts, storm drain infrastructure improvements, water quality protection BMPs (treatment control, source control, and construction phase), and a phasing and implementation program. The *Plan* is designed to serve as the detailed guide for the subsequent development of project-specific water quality protection plans for individual LAX Master Plan projects to be constructed over the next fifteen years.

The *Plan* notes that as water quality protection standards are adopted at the federal, state, or local level and as new water quality protection techniques and methodologies are developed during the LAX Master Plan fifteen-year construction period, the *Plan* itself will be updated to reflect such changes. With LAWA's commitment to implement the *Final Conceptual Drainage Plan*, the LAX Master Plan development projects located inland of the coastal zone will be constructed and operated in a manner that protects coastal water quality. The project is consistent with the water quality policies of the California Coastal Management Program (Sections 30231 and 30232 of the Coastal Act).

STAFF SUMMARY AND RECOMMENDATION:

I. Project Description. Los Angeles World Airports (LAWA) has submitted a consistency certification for the *Final Conceptual Drainage Plan*. This *Plan* is a component of the Los Angeles International Airport (LAX) Master Plan, a modernization plan to guide future development at LAX through 2015 (**Exhibits 1-3**). The Commission conditionally concurred with a LAWA consistency certification (CC-061-04) in November 2004 for certain Master Plan airfield improvements and modifications at LAX located outside the coastal zone but which nevertheless held the potential to affect the coastal zone. The Commission determined that because the "HWQ-1 Drainage Plan" for the LAX Master Plan was not yet developed, it could not find that the proposed improvements and modifications were consistent with the water quality policies of the Coastal Act. As a result, the Commission approved the following condition of concurrence:

> *Phased Review. As part of the Commission's phased federal consistency review of the proposed LAX Alternative D project, Los Angeles World Airports (LAWA) will submit to the Commission, prior to the commencement of construction of Alternative D project components, one or more consistency certifications for: (1) the final "HWQ-1 Drainage Plan" and its provisions for protecting coastal water quality; and (2) the Alternative D development projects that would affect existing habitat at the west end of the LAX north airfield, which in turn could affect resources of the coastal zone. The future consistency certification(s) would be submitted to the Commission (under a schedule developed by*

> *Commission staff and LAWA personnel) when the drainage plan and development projects are developed to a level of detail such that consistency with the California Coastal Management Program can be evaluated.* (emphasis added.)

The LAX Master Plan Commitment HWQ-1 required that sufficient facilities be provided to adequately convey stormwater runoff, meet water quality regulations (specifically requirements outlined in the Los Angeles County Department of Public Works Standard Urban Stormwater Mitigation Plan), and ensure no net increase in pollutant loadings to receiving water bodies. LAWA completed and submitted to the Commission the Final "HWQ-1 Drainage Plan," now referred to as the *Final Conceptual Drainage Plan*. Drainage within the LAX project area eventually reaches Santa Monica Bay to the west and San Pedro Bay to the south via a series of storm drains and flood control channels. **Exhibit 4** illustrates the LAX watershed and the five primary sub-areas in which major development projects requiring drainage improvements and water quality best management practices (BMPs) will occur.

The consistency certification states that:

> *. . . a comprehensive program of water quality control/treatment improvements is proposed to be implemented in conjunction with implementation of the LAX Master Plan. The program includes a combination of, and options for, treatment control best management practices (BMPs), source control BMPs, and construction phase BMPs. An extensive array of BMPs are described in the FCDP, and delineated in terms of which BMPs are associated with each project proposed under the LAX Master Plan. The water quality benefits associated with these BMPs are described and quantified relative to each of the on-airport and off-airport drainage facilities that receive and convey surface water flows from LAX, and ultimately drain to coastal waters.*
>
> . . .
>
> *. . . implementation of such BMPs as part of the LAX Master Plan will reduce surface water pollutant loads in all of the affected sub-areas to levels less than those associated with baseline (i.e., existing) conditions. Such reductions in estimated pollutant loads range from approximately 20 to 51 percent for flows to Santa Monica Bay, and from approximately 17 to 51 percent for flows to San Pedro Bay . . . These reductions in estimated pollutant loads are based on implementation of the types of BMPs described in the FCDP, recognizing that the specifics of such BMPs will be determined in conjunction with the engineering design of each project proposed under the LAX Master Plan. This is particularly true with respect to identifying and incorporating specific BMPs as part of the Standard Urban Stormwater Mitigation Plan (SUSMP) prepared for each project.*

The scope of the *Final Conceptual Drainage Plan* is as follows:

> *The purpose of this Conceptual Drainage Plan is to provide a more refined assessment of potential hydrology and water quality impacts associated with the LAX Master Plan*

improvements and identify measures to minimize those impacts. By doing this, the Conceptual Drainage Plan serves the following functions:

- *Act as a bridge document between the Master Plan EIS and EIR and project implementation*
- *Determine input and recommendations for project development*
- *Integrate drainage and water quality assessments and recommendations*
- *Address phasing and implementation issues*
- *Fulfill Master Plan Commitment HWQ-1*

Preparation of the Conceptual Drainage Plan included the following:

- *Reviewing available studies and analyses*
- *Assessing baseline condition hydrology and water quality*
- *Identifying measures to minimize potential drainage and water quality impacts*
- *Evaluating project condition hydrology and water quality*

A separate evaluation of storm water pollutant loads was conducted and is provided in Appendix C.

Section 3 contains the analysis and recommendations for storm drain infrastructure to provide sufficient capacity to convey at a minimum a 10-year storm event throughout the project site with future Master Plan improvements. The recommendations in Section 3 are to guide the advance planning development and further analyses in the implementation of individual Master Plan projects. Section 4 provides recommendations for addressing water quality issues raised in the Final EIS and Final EIR, as identified in Master Plan Commitment HWQ-1. The recommendations in Section 4 will be further developed in the advance planning stage to support environmental clearance efforts as well as schematic design and design development for individual projects.

Section 5 lists the proposed infrastructure by Phase. Further analysis regarding the construction of each project within each phase will be developed in advance planning. Since the proposed storm drain recommendations address primarily main trunk lines, the recommendations contained herein could be constructed independently or as part of discrete projects without affecting neighboring systems. Furthermore, since the exact sequence of project development may be subject to change, projects were considered individually.

Appendix A and Appendix B contain detailed maps and supporting information for the Conceptual Drainage Plan described in this report. Appendix C presents an updated analysis of the pollutant load estimates calculated for Master Plan Alternative D in the Final EIS and Final EIR that takes into account reductions from the treatment control BMPs identified in the Conceptual Drainage Plan. This analysis fulfills the requirement of HWQ-1 to demonstrate that the goal of achieving no net increase in loadings of pollutants of concern to receiving water bodies will be met through implementation of the BMPs.

The analysis of consistency with the water quality policies of the Coastal Act is examined in Section A of this report.

II. Applicant's Consistency Certification. Los Angeles World Airports has certified that the proposed activity complies with California's approved coastal management program and will be conducted in a manner consistent with such program.

III. Staff Recommendation:

The staff recommends that the Commission adopt the following resolution:

Motion: I move that the Commission concur with Los Angeles World Airports' consistency certification.

The staff recommends a **YES** vote on this motion. A majority vote in the affirmative will result in adoption of the following resolution:

Concurrence

The Commission hereby **concurs** with the consistency certification made by Los Angeles World Airports for the proposed project, finding that the project is consistent with the California Coastal Management Program.

IV. Findings and Declarations:

The Commission finds and declares as follows:

A. Water Quality.

The Coastal Act provides the following:

Section 30231. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

> *Section 30232. Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.*

1. Introduction. The *Final Conceptual Drainage Plan* primarily recommends a mix of Best Management Practices (BMPs) to minimize pollutants in storm water discharges from implementation of LAX Master Plan development projects, to prevent a net increase in pollutant loads, and to present preliminary sizing and locations of treatment BMPs within project areas. The recommendations in the *Plan* are based on

- Review of planned Master Plan activities
- Identification of existing and pending regulations
- Examination of potential land uses
- Identification of pollutants of concern
- Identification of project constraints
- Evaluation of feasible BMPs
- Evaluation of a suite of BMPs, including project-specific, sub-regional and regional BMP options

As previously noted in Section I of this staff report, the *Plan* states that:

> *The information presented here is intended to be used as a preliminary step in planning of the type of BMPs and as an indication of various options which may be feasible for implementation within the LAX Master Plan area and criteria for capacity sizing. Project specific requirements, such as exact number of BMPs, footprints and other details, are not discussed in this document. Specific BMP requirements will be assessed in the future phases of the project and with availability of more detailed project information. These will be documented in project-specific Standard Urban Stormwater Mitigation Plan(s) and submitted to the City of Los Angeles Bureau of Sanitization, Watershed Protection Division for review during project planning and design.*

The *Final Conceptual Drainage Plan* examines the relevant storm water regulations affecting the development and the methodology used in evaluation of required BMPs. A detailed analysis of the existing federal, state, regional, and local water quality regulations which served as the context for developing the *Final Conceptual Drainage Plan* for the LAX Master Plan is provided in **Exhibit 5** of this report. The water quality methodology and criteria used in *Final Conceptual Drainage Plan* to develop a plan for phased implementation of BMPs to minimize water quality impacts from LAX Master Plan projects takes into consideration:

- *Sizing of treatment BMPs to meet LACDPW* (Los Angeles County Department of Public Works) *SUSMP* (Standard Urban Stormwater Mitigation Plan) *and MS4 permit requirements* (Los Angeles Regional Water Quality Control Board Municipal Permit (2001 MS4 Permit) No. 01-182, NPDES No. CAS004001 (adopted December 13, 2001).

- *Source control BMPs to meet the 2001 MS4 permit requirements*
- *Source control and treatment control BMPs to meet City of Los Angeles (Watershed Protection Division) Program Development BMP requirements*
- *TMDL* (Total Maximum Daily Load) *requirements, once implemented*
- *Construction and Industrial SWPPP* (Storm Water Pollution Prevention Plan) *requirements meeting the State and 2001 MS4 permit requirements*
- *Maintenance capabilities and concerns*

2. Pollutants of Concern. The pollutants of concern within the LAX project areas include sediments (soil and other surface materials), nutrients (inorganic substances such as nitrogen and phosphorus), metals, organic compounds (carbon-based substances), trash and debris, oxygen-demanding substances (ammonia and hydrogen sulfide), oil and grease, and bacteria and viruses. In order to minimize potential impacts and meet regulatory requirements, BMPs must be identified and implemented to address the applicable pollutants of concern. The *Final Conceptual Drainage Plan* notes that:

As part of the CEQA/NEPA documents, pollutant load models were developed for specific constituents based on the following criteria:

- *the pollutant was determined to be a constituent of concern at LAX, and*
- *the pollutant had statistically valid data (to support the analysis).*

Due to limitations on statistically valid pollutant monitoring data, the models focused on the constituents as summarized in Table 4-7:

TABLE 4-7
CONSTITUENTS ANALYZED IN PREVIOUS POLLUTANT LOAD MODELS

Specific Constituents	Category
TSS	Sediment
TKN, Phosphorus, Ammonia	Nutrients
Copper, Lead, Zinc	Metals
Oil & Grease	Oil & Grease
5-Day Biochemical Oxygen Demand, Chemical Oxygen Demand	Oxygen Demanding Substances
Total Coliform, Fecal Coliform, Fecal Enterococcus	Bacteria & Viruses

The pollutant load models applied event mean concentrations (EMCs) for various land uses to determine relative impacts of the various project alternatives on the two main watersheds, Santa Monica Bay and Dominguez Channel. Pollutant loads for the baseline conditions as well as Alternative D indicated that due to minor changes in land use (from existing to proposed conditions), it is anticipated that, without implementation of BMPs, the project could result in some water quality impacts. However, the CEQA/NEPA documents also determined that through the implementation of BMPs (existing BMPs as well as those

implemented through Master Plan Commitment HWQ-1) no net increase in pollutant loading will occur in storm water runoff from LAX that discharges to receiving water bodies. The proposed BMPs are discussed in Section 4.4.

It is recognized that should new statistically valid and appropriate data become available (particularly concentration and BMP effectiveness data) these new data should be considered for future impact assessments.

An updated evaluation of pollutant loads based on the application of BMPs in accordance with this Conceptual Drainage Plan is contained in Appendix C. The analysis demonstrates that implementation of the BMP plan described in this Conceptual Drainage Plan as part of the overall development of Master Plan projects will prevent a net increase in pollutant loads to surface waters.

3. Best Management Practices (BMPs). The *Final Conceptual Drainage Plan* examines the particular BMPs to be implemented at LAX to address the aforementioned pollutants of concern:

One of the main objectives of this Conceptual Drainage Plan is to identify BMPs currently accepted by regulatory authority to mitigate water quality impacts to the MEP. As mentioned previously, the BMP identification and recommendation strategy emphasizes implementation of the most effective combination of BMPs for storm water/urban runoff pollution control. When implemented and maintained properly, these BMPs are intended to result in the reduction of pollutants in storm water to the MEP. Furthermore, the Conceptual Drainage Plan provides general recommendations for implementation of measures to satisfy the General Construction and Industrial Permit requirements (see Section 4.2.2). These recommendations include requirements for measures and controls that utilize BAT and BCT to reduce pollutants.

In addition, BMP implementation considers minimizing the following potential impacts:

- *Polluted runoff that may require supplemental storm water treatment.*
- *Exceedance of surface water quality criteria as outlined in the RWQCB Water Quality Control Plan for the Los Angeles Basin.*
- *Exceedance of RWQCB surface water quality criteria in groundwater recharge areas.*
- *Negative effects on the capacity for surface water to recharge groundwater aquifer systems.*

BMPs can be designed to either prevent pollution from reaching runoff waters (pollution prevention or source control) or to treat affected runoff before it discharges into receiving waters (treatment control). Treatment control BMPs mitigate identified impacts on a site-specific basis. Source control BMPs are baseline measures used to address design phase elements, routine and good housekeeping measures, construction and industrial activities as well as spill control mitigation.

> *All of the proposed BMPs require maintenance over time to ensure proper operation and function. The CASQA BMP Handbooks (2003) include fact sheets which provide a summary of the basic maintenance requirements for the proposed BMPs. A comprehensive Operations and Maintenance (O&M) Plan for the project-specific BMPs will be developed during the design and construction phase of each Master Plan project. The BMPs will be monitored as needed to assure compliance with maintenance criteria and schedules. LAWA will continue to provide annual reports to the Los Angeles RWQCB to document the maintenance of the BMPs.*

A list of potential treatment BMPs – along with their limitations and benefits – is included in the *Final Conceptual Drainage Plan* (**Exhibit 6)**.

(a) Treatment Control BMPs. The *Final Conceptual Drainage Plan* next provides an overview of the treatment control BMP options which may be implemented within the LAX Master Plan watershed. Treatment control BMPs will be sized to meet the Standard Urban Stormwater Mitigation Plan (SUSMP) numerical sizing requirements, and will use volume-based and/or flow-based designs. The SUSMP requirements give several alternative criteria for volumetric and flow sizing. For the LAX Master Plan projects, the volume of runoff produced by a 0.75-inch 24-hour rainfall event, and water quality flow produced from a 0.2 inches/hour intensity rainfall event from the project site, will be used for conceptual BMP sizing.

The *Final Conceptual Drainage Plan* also notes that:

> *. . . recent discussions with the RWQCB indicates that the treatment requirement is expected to increase in the near future. Accordingly, the volume- and flow-based calculations shown in the analysis include a safety factor of approximately 50 percent in order to maximize the projected size of proposed BMPs, in anticipation of possible future requirements. For project-specific designs, the minimum sizing criteria used will be the approved SUSMP criteria in effect at the time of project design and approval.*

The *Final Conceptual Drainage Plan* evaluated existing treatment control BMPs at LAX and determined that that the existing treatment control BMPs are not sufficiently sized to meet the new water quality requirements based on applying SUSMP criteria to the proposed Alternative D improvements. The *Plan* examines recommended treatment control BMP options:

> *As discussed previously, the main goal of the recommendations provided in this section is to present a suite of feasible BMPs based on current project data and information. Project specific requirements, such as exact number of BMPs, footprints and other details, are not discussed in this document. Specific BMP requirements may be assessed in the future phases of the project and with availability of further project specific information.*
>
> *The LAX Master Plan assumes ultimate build-out of the preferred alternative, Alternative D, by the year 2015. As described in Section 5, this construction is proposed to occur in three phases, each of which is comprised of several projects scattered throughout the site. Accordingly, the BMP strategy will need to consider the phased implementation of the*

project. As such, various categories of BMP options are recommended to effectively minimize water quality impacts throughout the phases of construction:

- *Project-Specific BMPs are intended to provide coverage for specific projects, meeting on-site requirements as well as serving as interim measures until sub-regional or regional BMPs are installed.*
- *Sub-Regional BMPs maximize opportunities for mitigation by meeting the needs of several projects.*
- *Regional BMPs serve the largest tributary area and are designed to address the needs of larger portions of the airport and, if appropriate, off-site needs as well.*

It should be noted that the intent of recommending the various levels of BMP options is not to provide redundant coverage, but to enable flexibility in meeting the project's water quality needs throughout the phased implementation of the LAX Master Plan.

Project-specific BMPs are recommended to be implemented, only if the recommended sub-regional and regional BMPs are not feasible for the project area due to site constraints. These BMPs are proposed to address the pollutants of concern to the MEP level.

Exhibit 7 provides an overview of the recommended treatment control BMP options for each specific sub-area within the LAX Master Plan area.

(b) Source Control BMPs. The *Final Conceptual Drainage Plan* next provides an overview of the source control BMP options which may be implemented:

The operations at LAX involve a high level of complexity and numerous tenants performing fueling, cargo handling, maintenance, cleaning activities and/or other aircraft operations, which in turn result in the discharge of storm water to the LAWA-operated, non-municipal storm drain system. Consequently, LAWA has assumed the role of principal permittee, with airport tenants that conduct industrial activities included as co-permittees. This permit structure conforms to federal regulations and is preferred by the SWRCB. In addition, it allows for the consistent implementation of storm water pollution prevention measures between the various tenant and LAWA facilities.

In September 2003, LAWA fulfilled the requirements of the state general permit for industrial activities by preparing a compilation of documents associated with LAX industrial activities from 2002–2003 including documentation of pollutants, existing and proposed BMPs and other data collected from tenants. These documents include the following:

- *SWPPP for Industrial Activities*
- *SWMPP*
- *Storm Water Sampling Protocol*
- *Observation Records*
- *Storm Water Sampling Records*
- *Facility Inspection Records*

- *Annual Report*
- *Fuel Spill Record*

Recommended Source Control Options

Source control (or pollution prevention) BMPs are a necessary part of any effective BMP strategy. Source controls may be able to provide further mitigation and control some pollutants not controlled by a specific treatment control BMP. Proper incorporation and implementation of these measures during appropriate stages of project development (i.e. design) will result in consistent protection of receiving waters. In combination with the other recommended treatment control BMPs, when implemented properly, the source control BMPs are intended to result in the reduction of pollutants in storm water to the MEP level.

A table summarizing potential source control BMPs for the various site specific projects of the LAX Master Plan is included in the *Final Conceptual Drainage Plan* (**Exhibit 8**). The table shows basic pollution prevention measures conforming with the City of Los Angeles SUSMP guidelines, and the *Plan* notes that additional opportunities for source control may be identified during final design.

(c) Construction BMPs. The *Final Conceptual Drainage Plan* states that construction phase BMPs will be identified and implemented as part of the construction Storm Water Pollution Prevention Plan (SWPPP) for each specific project, and that the SWPPP should be developed and amended or revised, when necessary, to:

- *Identify all pollutant sources including sources of sediment that may affect the quality of storm water discharges associated with construction activity (storm water discharges) from the construction site,*
- *Identify non-storm water discharges,*
- *Identify, construct, implement in accordance with a time schedule, and maintain BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site during construction, and*
- *Develop a maintenance schedule for BMPs installed during construction designed to reduce or eliminate pollutants after construction is completed (post-construction BMPs).*

An overview of possible construction phase BMP options which may be considered are listed in **Exhibit 9**. The water quality BMPs needed to support the LAX Master Plan developments will be designed and implemented in phases to follow the expected construction schedule of the Master Plan projects. The phasing and implementation chapter of the *Final Conceptual Drainage Plan* provides tabular summaries of the water quality treatment BMPs for each of the three Master Plan phases (**Exhibit 10**).

LAWA concludes in the *Final Conceptual Drainage Plan* that the proposed treatment, source control, and construction BMPs represent a conceptual plan that:

> *. . . will provide the required compliance with water quality permits and regulations and prevent a net increase in pollutant loads to surface water following the development of Master Plan projects. The plan provides the basis for preparation of project-specific SUSMPs during the advance planning of Master Plan projects. Project-specific BMPs designed in conjunction with specific site engineering must be similar to or provide equivalent or better overall pollutant removal performance to the BMPs presented in this Conceptual Drainage Plan.*
>
> *LAWA will monitor BMP implementation as Master Plan projects are implemented to ensure that the water quality goals of Master Plan Commitment HWQ-1 continue to be met. As each project moves through advance planning, LAWA will document that a project-specific SUSMP has been prepared and that the type and capacity of BMPs selected are consistent with the Conceptual Drainage Plan and/or provide equivalent pollutant removal. LAWA will also monitor the construction and long-term operation and maintenance of the BMPs.*

LAWA has committed to forwarding to the Commission's Executive Director copies of the annual monitoring reports on operation and maintenance of BMPs implemented for the future LAX Master Plan projects. In addition, LAWA will also forward to the Executive Director copies of the Standard Urban Stormwater Mitigation Plans (SUSMP) to be developed for those future projects.

The Commission's federal consistency and water quality staff reviewed the contents of the *Draft Conceptual Drainage Plan* and in September 2005 discussed the *Plan* with representatives from LAWA and their engineering consultants. At that time the Commission staff raised questions regarding the sizing approach for treatment control BMPs, the rating procedure for treatment BMPs, and the expected reduction in pollutant loads. LAWA responded to these questions in October 2005 with clarifications and additional information (**Exhibit 11**). The *Plan* also addresses the issues raised by Commission staff in its September 2001 comment letter on the LAX Master Plan DEIS/EIR, including the project design storm, stormwater treatment, pollutant loads and monitoring, and construction and operations BMPs.

The *Final Conceptual Drainage Plan* recommends a mix of source control, treatment control, and construction phase Best Management Practices to minimize pollutants in storm water runoff to Santa Monica and San Pedro Bays from the implementation of LAX Master Plan development projects located inland of the coastal zone. The *Plan* meets the requirement of the Commission's conditional concurrence in CC-061-04 (LAWA) which called for preparation and submittal of the final drainage plan for the LAX Master Plan at a level of detail such that consistency with the CCMP can be evaluated. Implementation of the *Plan* in the design of LAX Master Plan development projects will protect water quality in Santa Monica and San Pedro Bays during construction and operation of those projects. In addition, the Commission retains the authority to "reopen" its federal consistency review under the provisions of Section 930.65 of the federal consistency regulations (15 CFR Part 930), and request appropriate remedial action in the event the Commission believes: (1) the previously-concurred with project could have an effect on coastal resources substantially different than originally described; and (2) the project is no longer

consistent with the applicable CCMP policies, in particular, the water quality policies of the CCMP.

With LAWA's commitment to implement the *Final Conceptual Drainage Plan* as discussed above, the LAX Master Plan development projects will be carried out in a manner consistent with the water quality policies of the Coastal Act. Therefore, the Commission finds that the *Final Conceptual Drainage Plan* is consistent with the water quality policies of the California Coastal Management Program (Sections 30231 and 30232 of the Coastal Act).

SUBSTANTIVE FILE DOCUMENTS:

1. CC-061-04 (Los Angeles World Airports, Airfield Improvements and Modifications, Los Angeles International Airport, Los Angeles County).
2. Los Angeles International Airport Proposed Master Plan Improvements, Final Environmental Impact Report, Los Angeles World Airports, April 2004.
3. Los Angeles International Airport Final Conceptual Drainage Plan, Los Angeles World Airports, October 2005.