1. INTRODUCTION AND EXECUTIVE SUMMARY

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

A Notice of Preparation and Initial Study, included as Appendix A of this Draft EIR, was circulated for public review from April 20, 2017 to May 22, 2017. The Initial Study identified the resource areas that could be subject to significant impacts from the proposed project. Based on the analysis in the Initial Study, LAWA determined that the proposed project would have the potential to result in potentially significant impacts on biological resources and cultural resources, and their related cumulative impacts. As a result, these resources are evaluated further in this Draft EIR. In addition, the potential for the proposed project to result in direct and cumulative impacts to tribal cultural resources is evaluated in the Draft EIR.

LAWA determined that impacts related to aesthetics, agriculture and forestry resources, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems would be less than significant through the analysis in the Initial Study (see Appendix A); therefore, these topics are not analyzed further in this Draft EIR. Federal, state, regional, and local agencies, as well as the public, were afforded the opportunity to comment on the findings of the Initial Study through the 30-day scoping period associated with circulation of the Notice of Preparation for this Draft EIR.

1.1 Project Objectives

LAWA proposes the construction of a new Secured Area Access Post (SAAP) to provide a fully functional, secured access point onto the Airport Operations Area (AOA) on the west side of LAX. A new SAAP is needed on the west side to replace SAAP 5, which was displaced by the Midfield Satellite Concourse (MSC) North Project, and SAAP 21, which was removed in May 2017 to enable the full build-out of the West Aircraft Maintenance Area (WAMA).[1] The proposed SAAP would be the sole full-access SAAP on World Way West. Currently, with the closure of SAAP 21, access to the AOA is provided by several other full-access SAAPs that are located around the AOA perimeter.

The specific objectives of the proposed project are to:

- Provide a new fully functional SAAP on World Way West to replace SAAP 5 and SAAP 21, which were taken out of service by recent construction projects on the west side of LAX;
- Allow for a new SAAP at a location that is generally central to the western portion of the AOA to provide a more direct path of travel to the north and south airfields, as well as airside access to the terminal area;
- Locate and design a new SAAP to provide access that connects with the existing AOA vehicle service road system in a manner that supports safe and efficient vehicle movement within the AOA, consistent with the mission of LAX Airfield Operations;

[1] After SAAP 21 was closed, the majority of the vehicles that previously used SAAP 21 now utilize other AOA access points; some vehicles that previously used SAAP 21 have been redirected to a temporary AOA access point located off of Maintenance Way, southwest of the proposed project site. The temporary SAAP only provides access to LAWA personnel and tenants; no construction vehicle access is provided. Development of the temporary AOA access point at LAX occurred independently of (i.e., was not related to) the proposed project. Previously, the tenant operated the location as a gate for their leasehold. If the proposed project were constructed, it is expected that the temporary AOA access point would revert back to tenant control.

- Provide a state-of-the-art SAAP to serve as a prototype for any future SAAPs and/or improvements to existing SAAPs at LAX;
- Effectively reuse the project site – which currently contains a building that is uninhabitable due to age (does not comply with current building codes), disrepair, and the presence of hazardous material – for an AOA-related use that fulfills LAWA's strategic goal of innovating to enhance security, efficiency, and effectiveness; and
- Redevelop the project site in a manner that is consistent with LAWA's Design and Construction Handbook, specifically the definition of sustainability as the "triple bottom line" consisting of social, economic, and environmental considerations.

1.2 Summary of Proposed Project

The proposed new SAAP along World Way West would accommodate all types of vehicles that require access to the AOA (construction, aircraft service vehicles, vendors, LAWA, etc.). Its elements would be the prototype for any future SAAPs and/or improvements to existing SAAPs at LAX. The new SAAP facility would have a land footprint of approximately 1,200 feet by 150 feet, consisting primarily of paved areas with various pieces of equipment to control access (gates, traffic lights, signage, vehicle arrest systems, security fencing, etc.), vehicle inspection equipment (license plate readers, under-vehicle scanners, etc.), and facilities and shelter for inspection staff, including two canopy structures spanning the width of the first and last inspection stations, and two guard station buildings, one at each of the first and last inspection stations. Each guard house would be approximately 350 square feet and would include monitoring equipment and a restroom facility. Construction of the new SAAP would require the demolition and removal of the former Continental Airlines (CAL) General Office (GO) Building, which is vacant, and associated facilities. Demolition and construction of the proposed project is estimated to take approximately 13 months. Demolition and construction may not be continuous; it is estimated that demolition and construction would occur in the timeframe between the fourth quarter of 2017 and the first quarter of 2019. The proposed project would only affect vehicles accessing the AOA. The proposed project would not increase existing passenger capacity or the number of aircraft operations at LAX.

1.3 Purpose of this EIR

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

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

LAWA must certify the EIR before approving the proposed project. Upon certification, LAWA, as well as any responsible agencies, will then use the EIR to decide whether to approve and implement the proposed project. Other agencies may also use this EIR in their review and approval processes.

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

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

1.4 Organization of this EIR

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

Chapter 1 – Introduction and Executive Summary

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

Chapter 2 – Project Description

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

Chapter 3 – Overview of Project Setting

This chapter provides an overview of the existing environmental setting related to the proposed project area and the topical issues evaluated in Chapter 4, *Environmental Impact Analysis*, of this EIR. This chapter also describes other projects proposed in the nearby area that may, in conjunction with the proposed project, result in cumulative impacts on that existing setting.

Chapter 4 –Environmental Impact Analysis

The introductory section of Chapter 4 describes the analytical framework for the environmental review of the proposed project. The remaining sections of the chapter provide detailed analysis of the potential environmental impacts of the proposed project on biological resources, cultural resources, and tribal cultural resources.

Chapter 5 – Alternatives

This chapter provides a description and evaluation of project alternatives that could feasibly attain most of the basic objectives of the proposed project while avoiding or substantially reducing any of the significant effects of the proposed project identified in Chapter 4, *Environmental Impact Analysis*, in this EIR. This chapter also identifies alternatives that were considered but rejected from further consideration and explains why they were rejected.

Chapter 6 – Other Environmental Considerations

This chapter includes a discussion of issues required by CEQA that are not covered in Chapter 4. This includes growth-inducing impacts, irreversible environmental changes, and identification of unavoidable significant impacts (i.e., impacts that cannot be mitigated to a level less than significant) that would be caused by the proposed project, as well as the impacts of the proposed project determined to be less than significant and less than significant with mitigation. This chapter also includes information about the proposed project's energy consumption and energy efficiency measures. In addition, Chapter 6 includes a summary of the topics evaluated in the Initial Study but not carried forward for further evaluation in this Draft EIR (impacts found not to be significant).

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

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

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

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

Appendices

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

Appendix A – Notice of Preparation/Initial Study and Scoping

Appendix B – Historic Resources

1.5 Executive Summary of Environmental Impacts

Table 1-1 summarizes the environmental impacts from implementation of the proposed project to biological resources, cultural resources, and tribal cultural resources as identified in Chapter 4, *Environmental Impact Analysis*, of this EIR. It also summarizes the energy impacts discussed in Chapter 6, *Other Environmental Considerations*. In accordance with the requirements of the State CEQA Guidelines, and as further described in Chapter 6, impacts on all other environmental resources addressed in the Initial Study, including aesthetics, agriculture and forestry resources, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems, were determined to be less than significant in the Initial Study prepared for the proposed project. The Notice of Preparation/Initial Study is included as Appendix A of this EIR.

Table 1-1
Summary of Environmental Impacts Related to the Proposed Project

Resource Category	Impact Before Mitigation	Proposed Mitigation Measures/Standard Control Measures	Level of Significance After Mitigation
Biological Resources			
Nesting Birds/Raptors	Significant[1]	LAX-BR-1. Conservation of Faunal Resources: Nesting Birds/Raptors, and LAX-BR-2. Conservation of Floral Resources: Mature Tree Replacement – Nesting Raptors	Less Than Significant
Cultural Resources			
Historic Resources	Significant	MM-HR (SAAP)-1. Historic American Buildings Survey (HABS) Document.	Significant and Unavoidable
Archaeological Resources	Significant[1]	LAX-AR-1. Conformance with LAWA's Archaeological Treatment Plan, and LAX-AR-2. Archaeological Resources Construction Personnel Briefing	Less Than Significant
Paleontological Resources	Significant[1]	LAX-PR-1. Conformance with LAWA's Paleontological Management Treatment Plan, and LAX-PR-2. Paleontological Resources Construction Personnel Briefing	Less Than Significant
Human Remains	Less Than Significant	None Required	Less Than Significant
Tribal Cultural Resources			
Tribal Cultural Resources	Significant[1]	LAX-AR-1. Conformance with LAWA's Archaeological Treatment Plan, and LAX-AR-2. Archaeological Resources Construction Personnel Briefing	Less Than Significant
Energy Impacts And Conservation (Construction and Operation)			
Wasteful, Inefficient or Unnecessary Consumption	Less Than Significant	None Required, however, further reduced during construction with implementation of LAX-AQ-1. Construction-Related Air Quality Control Measures	Less Than Significant
Reliance on Fossil Fuels	Less Than Significant	None Required, however, further reduced during construction with implementation of LAX-AQ-1	Less Than Significant

Source: CDM Smith, 2017

Notes:

[1] Impacts of the proposed project on this resource could be significant, depending on the conditions encountered prior to, or during, construction.

1.6 Environmentally Superior Alternative

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

- **Alternative 1: No Project – No Build.** Under Alternative 1, none of the proposed improvements would occur. The project site would remain in its existing physical condition. The CAL GO Building would not be demolished. However, the building would remain uninhabitable due to its poor condition, the presence of hazardous materials, and the fact that the primary building systems do not comply with current building codes. Under this alternative, no new SAAP would be constructed on the west side of LAX.
- **Alternative 2: Alternative Site.** Under Alternative 2, a new SAAP would be constructed along Maintenance Road south of World Way West. The SAAP would include the same footprint, facilities, and equipment as the proposed project. Vehicles would access the Maintenance Road South Site via World Way West. After undergoing screening, vehicles would be discharged onto the service road that is located between Taxiways C and B. Development of a SAAP at the alternative site would result in the removal of some parking spaces from the existing tenant employee parking lot that is located immediately east of Taxilane AA and immediately north of Taxiway C.
- **Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site.** Under Alternative 3, the CAL GO Building would be rehabilitated to bring it to a habitable state for reuse. This would entail removal of all hazardous materials. In addition, all primary building systems would be brought up to code. Implementation of Alternative 3 would require that the interior of the building be stripped to the original steel core. All interior building components – including flooring, walls, ceiling tiles, insulation, etc. – would be removed and entirely replaced. In addition, exterior portions of the building that are in disrepair would be repaired. A use for the rehabilitated building has not been identified at this time. If the building were to be used for non-AOA functions (such as office or administrative space), additional improvements would be required to ensure a secure AOA perimeter. Non-secure building ingress would need to be reestablished and modifications to the existing perimeter fence may be required. Under this alternative, in addition to the rehabilitation of the CAL GO Building described above, a new SAAP would be constructed at the alternative site identified in Alternative 2.

Based on the analysis in Chapter 4, *Environmental Impact Analysis*, and Chapter 5, *Alternatives*, Alternative 1, the No Project – No Build Alternative is considered to be the environmentally superior alternative. Alternative 1 would avoid all construction impacts of the proposed project, including significant but mitigable impacts on biological resources, archaeological resources, paleontological resources, and tribal cultural resources. In addition, because it would not require the demolition of the CAL GO Building, Alternative 1 would avoid the significant and unavoidable impact to historical resources that would occur under the proposed project. Operations-related impacts to air quality, greenhouse gas (GHG), and energy and conservation under Alternative 1 would be greater than the proposed project's impacts. However, the No Project – No Build Alternative would not meet any of the objectives of the proposed project, which are identified in Section 1.1, *Project Objectives*, above, and in Chapter 2, *Project Description.*

In accordance with the State CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, Alternative Site, would be the environmentally superior alternative relative to the other alternatives. Alternative 2 would avoid the significant and unavoidable impact to historical resources associated with the proposed project. Alternative 2 would have the same impacts to archaeological, paleontological, and tribal cultural resources that would be associated with the other build alternatives. Alternative 2 would have fewer construction-related impacts to air quality, GHG, and energy and conservation than would the proposed project, because it would not involve demolition of any structures. Alternative 2 would also have fewer construction-related impacts than Alternative 3, because Alternative 3 would include both construction of the new SAAP at the alternative site as well as rehabilitation of the CAL GO Building. However, Alternative 2 would increase operations-related impacts to air quality, GHG, and energy and conservation as compared to the proposed project.

While Alternative 2 is considered the environmentally superior alternative, aside from Alternative 1 (No Project – No Build), it would not meet three of the six project objectives, and would only partially meet two of the objectives. While this alternative would provide a state-of-the art SAAP to serve as a prototype for future SAAPs, this alternative would only partially fulfill the objective of locating a new SAAP on World Way West. This alternative would not provide a SAAP in a central location on the western portion of the AOA, and would not provide a direct path of travel to both the north and south airfields. This alternative would discharge vehicles onto a busy service road and would increase vehicles crossing active taxiways, which does not advance the mission of LAX Airfield Operations to provide safe and efficient vehicle movement within the AOA. In addition, this alternative would increase total vehicle miles traveled as well as travel distances on AOA service roads and around airfield facilities. Alternative 2 would not provide for any reuse of the proposed project site.

1.7 Areas of Known Controversy and Issues to be Resolved

No substantive comments were received during the public circulation period for the Notice of Preparation/Initial Study prepared for this EIR. Only two of the letters that were received concerned environmental issues. The Native American Heritage Commission submitted a letter outlining CEQA requirements pertaining to the analysis of tribal cultural resources and the South Coast Air Quality Management District (SCAQMD) submitted a letter outlining the requirements for the analysis of air quality in an EIR.[2] The Notice of Preparation comments are included in Appendix A of this EIR.

Therefore, there are no areas of known controversy related to the proposed project or the EIR. Issues to be resolved include the choice among alternatives and how to mitigate the proposed project's significant impacts.

[2] It should be noted that the comment letter from SCAQMD is the agency's standard letter concerning air quality analysis in an EIR. As identified earlier in this section, the Initial Study prepared for the proposed project (which is included in Appendix A of this Draft EIR) determined that construction-related air quality impacts associated with the proposed project would be less than significant, and air quality impacts from operation would be beneficial; as a result, air quality was not analyzed in this Draft EIR.

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