5. ALTERNATIVES

5.1 Introduction

Section 15126.6 of the State CEQA Guidelines requires that an EIR include a discussion of a reasonable range of project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Within that context, this chapter discusses alternatives to the proposed project.

Key provisions of the State CEQA Guidelines on alternatives (Section 15126.6(a) through (f)) are excerpted below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible" (15126.6(a)).
- "…the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (15126.6(b)).
- "The specific alternative of 'no project' shall also be evaluated along with its impact" (15126.6(e)(1)). "The 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (15126.6(e)(2)).
- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making" (15126.6(f)).
- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (15126.6(f)(1)).
- For alternative locations, "[o]nly locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (15126.6(f)(2)(A)).
- "If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location" (15126.6(f)(2)(B)).
- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (15126.6(f)(3)).

The following sections discuss the significant impacts of the proposed project as identified in Chapter 4, *Environmental Impact Analysis*, the objectives of the proposed project, alternatives considered but rejected, and alternatives carried forward for further consideration in this EIR, and environmental impacts of such alternatives, including discussion as to whether such alternatives would avoid or substantially lessen any of the significant environmental impacts associated with the proposed project. Also included in this chapter is identification of the environmentally superior alternative.

5.2 Significant Impacts of the Project

The alternatives in this chapter have been selected to evaluate means for avoiding or substantially lessening the significant impacts of the proposed project identified in Chapter 4, *Environmental Impact Analysis*. As summarized in Table 1-1 in Chapter 1, *Introduction and Executive Summary*, impacts related to biological resources, archaeological resources, paleontological resources, and tribal cultural resources were determined to be significant, but less than significant with incorporation of mitigation measures. As described in Section 4.2, *Cultural Resources*, the proposed project would result in the demolition of the former CAL GO Building, which is eligible for listing in the California Register of Historical Resources and as a Los Angeles Historic-Cultural Monument, and is a contributor to a potential historic district eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. The demolition of the former CAL GO Building would be a significant and unavoidable impact, as well as a cumulatively considerable impact, after implementation of MM-HR (SAAP)-1: Conformance with LAWA's LAX Preservation Plan; no other feasible mitigation measures were identified.

5.3 Project Objectives

As identified in the State CEQA Guidelines, the achievement of project objectives was considered in determining potentially feasible alternatives that would avoid or substantially lessen any significant effects of the proposed project.

The 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;
- 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.

5.4 Alternatives Considered and Rejected

5.4.1 Alternative Airport Locations

The proposed project evolved from an original goal of upgrading some of the existing secured area access posts at LAX. These existing SAAPs are located on Avion Drive south of Century Boulevard, on a service road parallel to and west of Aviation Boulevard north of W. 111th Street and on Post Way west of Sepulveda Boulevard. However, with the closure of SAAP 5 and the then-pending closure of SAAP 21, there would be no full-access SAAP on the west side of LAX. It was decided that the need to establish a new SAAP on the west side of LAX was of greater importance than upgrading the existing posts; therefore, the planning effort was adjusted accordingly.

5.4.2 Alternative West Side Sites

Several alternative west side sites were considered for the new SAAP, including a site at the north end of Coast Guard Road and two locations on World Way West, including one immediately north of the proposed project site, and one to the west of the Taxilane AA bridge (see **Figure 5-1**). Reasons why these alternative sites were rejected as infeasible are addressed below.

- **Coast Guard Road Site:** Coast Guard Road would not provide adequate width to accommodate a new SAAP, and would not provide the required turning radius for rejected vehicles.
- **World Way West North of Proposed Project Site:** Location of a SAAP on World Way West north of the proposed project site would move the terminus of World Way West from its current terminus immediately east of Taxiway T to a location west of Coast Guard Road. This would result in the elimination of access to Coast Guard Road, and elimination of access to World Way West to the east of this alternative site. LAWA has several construction projects planned and underway that require access to World Way West east of Coast Guard Road. In addition, several LAWA and tenant facilities are located along Coast Guard Road and require that access to their facilities be maintained. Finally, this portion of World Way West is not wide enough to provide the required turning radius for rejected vehicles.
- **World Way West to the West of Taxilane AA Bridge:** Location of a SAAP on World Way West to the west of Taxilane AA Bridge would be infeasible for several reasons. There is no direct access to the AOA from this portion of World Way West. Moreover, World Way West in this area is depressed under the Taxilane AA Bridge, resulting in roadway grade differentials that may preclude siting a SAAP in this location. Finally, World Way West currently provides access to a number of non-AOA facilities on the west side of the airport, including the LAWA Administration Building, LAWA Security Badging Office, LAWA Maintenance Yard, the LAX Fuel Farm, and tenant facilities operated by American Airlines, United Airlines, Southwest Airlines and FedEx. No feasible solutions were identified that would separate the SAAP traffic from non-AOA traffic, while maintaining access to the non-AOA facilities.

For the reasons identified above, alternative sites on Coast Guard Road and on World Way West were determined to be infeasible and were not carried forward for full evaluation.

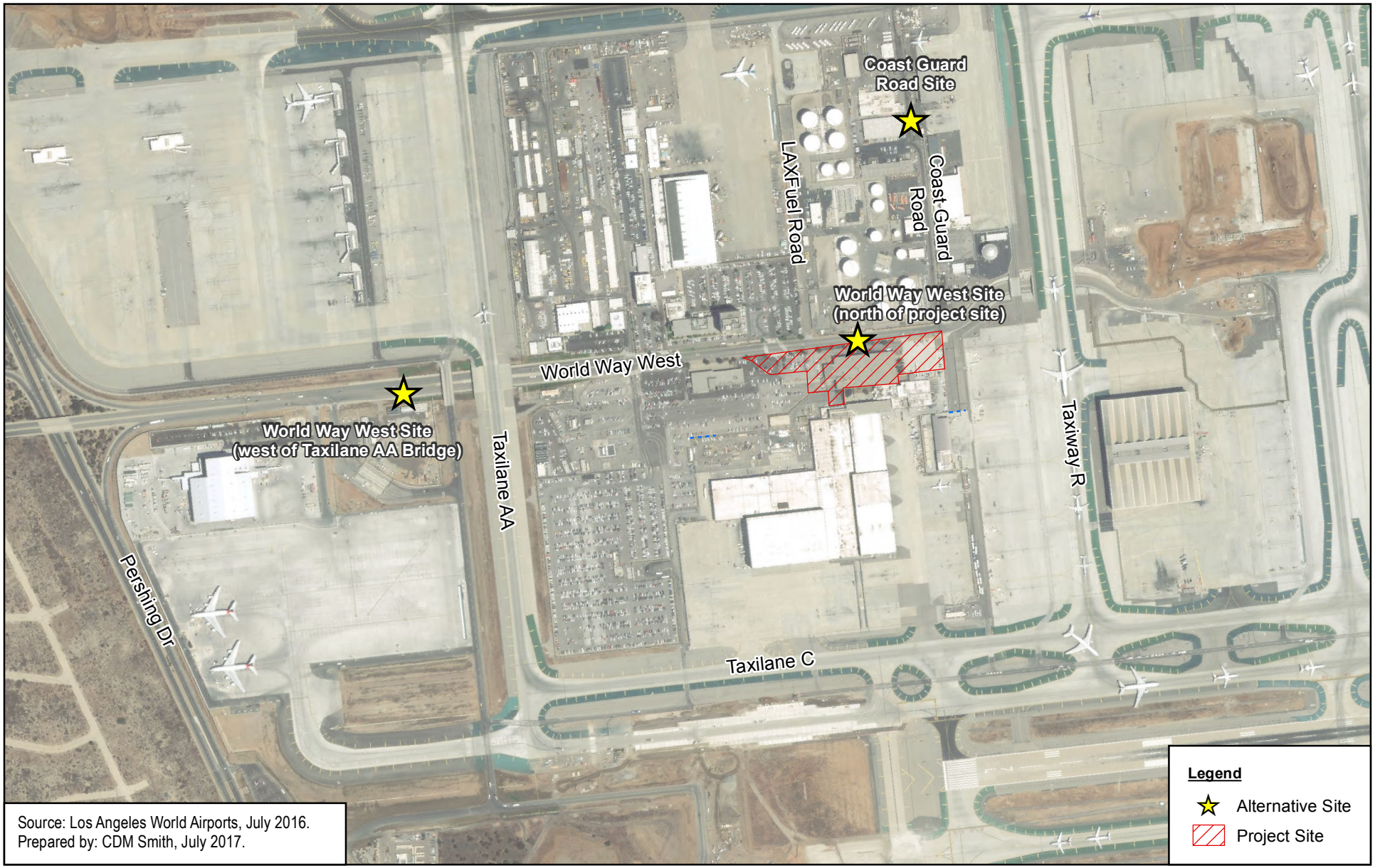
5.5 Alternatives Carried Forward for Further Consideration

The alternatives to the proposed project were formulated in an attempt to avoid or substantially lessen the site-specific significant impacts of the project, primarily impacts to historical resources from the demolition of the CAL GO Building and impacts to biological resources that may occur from the removal of mature trees. The potentially feasible alternatives carried forward for evaluation include an Alternative Site alternative (Alternative 2) and an alternative that would rehabilitate the CAL GO Building for reuse (Alternative 3) and would construct a new SAAP at the alternative site included in Alternative 2. In addition, as required by CEQA, a "no project" alternative is also addressed in this section (see Alternative 1).

The alternatives are described below. The environmental impacts of the alternatives are evaluated in Section 5.6, *Evaluation of Project Alternatives*.

5.5.1 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.



Source: Los Angeles World Airports, July 2016.
Prepared by: CDM Smith, July 2017.

LAX Secured Area Access Post Project

Alternative West Side Sites Not Evaluated in the EIR

Figure
5-1

5.5.2 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 (see **Figure 5-2**). 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.

5.5.3 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, including asbestos containing materials (ACM), lead containing surfaces (LCS), mold, polychlorinated biphenyls (PCBs), and mercury. In addition, all primary building systems, including electrical, HVAC (heating, ventilation, and air conditioning), plumbing, fire/life safety, and elevators, 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. These improvements would include blocking all access points from the CAL GO Building to adjacent buildings, including the AA Engineering Building and the AA OSF. Ancillary structures, such as the pedestrian bridge between the CAL GO Building and the AA Engineering Building, and the stairwell structure located between the southeast corner of the CAL GO Building and the northeast corner of the OSF basement, may need to be removed or altered. 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.[127]

5.6 Evaluation of Project Alternatives

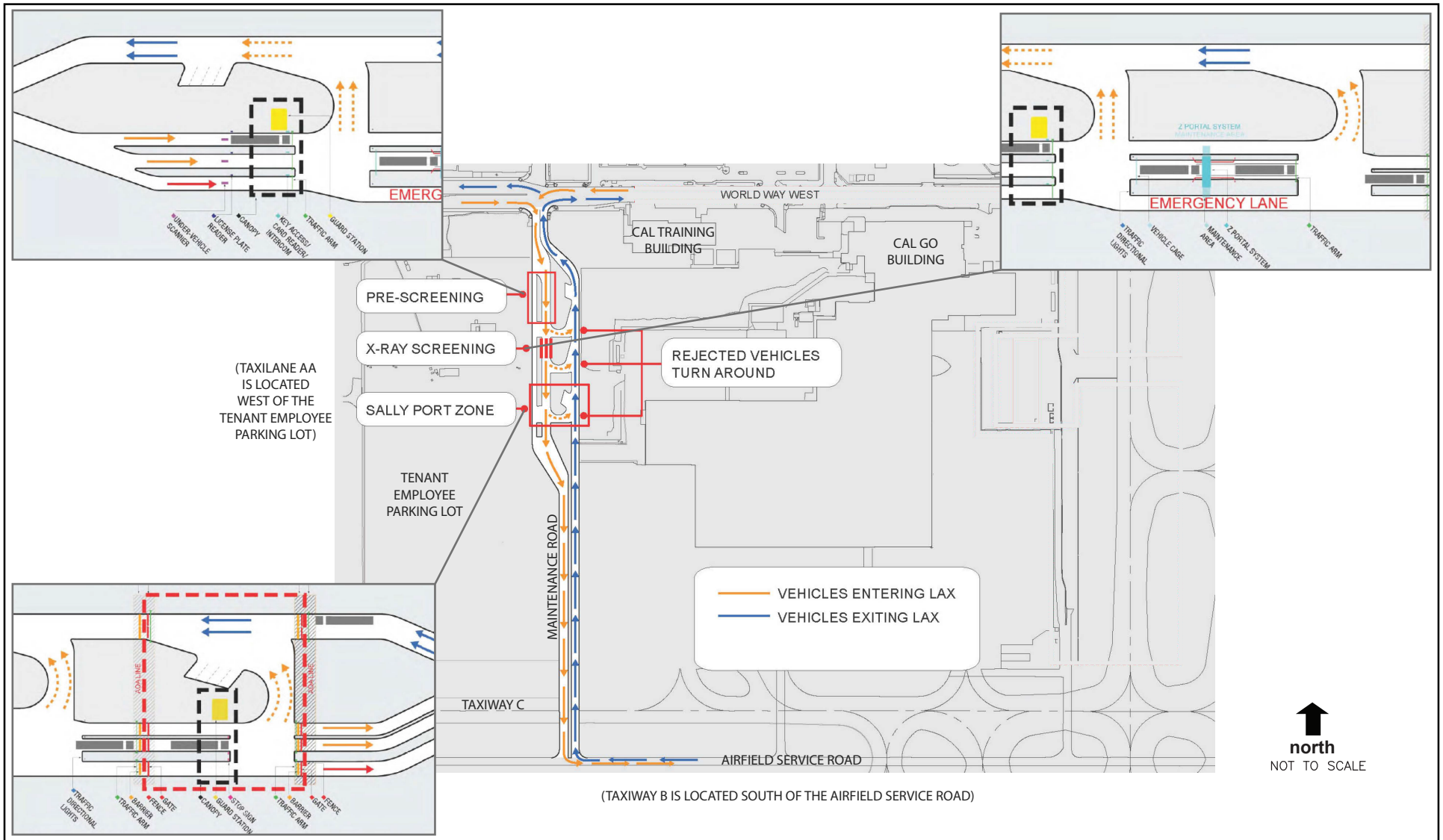
5.6.1 Alternative 1 (No Project – No Build)

5.6.1.1 Environmental Impact Evaluation

Biological Resources

As discussed in Section 4.1, *Biological Resources,* the proposed project could result in significant impacts to migratory or nesting birds, or raptors, protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code through the removal of trees, which could interfere with the movement of resident or migratory wildlife species. Recommended mitigation would reduce this impact to a level that is less than significant. Under Alternative 1, the project site would not be demolished and the non-native ornamental trees on the project site would not be removed. Therefore, there would be no potential for impacts to migratory or nesting birds through interference with the movement of resident or migratory wildlife species. Alternative 1 would avoid the impact to biological resources associated with the proposed project.

[127] The project site does not have sufficient room to accommodate rehabilitation of all, or even a portion, of the CAL GO Building in conjunction with co-location of a new SAAP. For this reason, rehabilitation of the CAL GO Building was studied in conjunction with location of a new SAAP at an alternative site.



Source: Los Angeles World Airports, April 2017.
Prepared by: CDM Smith, July 2017.

LAX Secured Area Access Post Project	**Maintenance Road South Site**	Figure **5-2**

Cultural Resources

As discussed in Section 4.2, *Cultural Resources*, the proposed project could have significant impacts on archaeological and paleontological resources, if previously unknown resources are encountered during construction; these impacts would be less than significant with the implementation of recommended mitigation. Because no construction would occur under Alternative 1, this alternative would avoid the impacts on archaeological and paleontological resources associated with the proposed project.

The proposed project would have a significant and unavoidable adverse impact on historical resources because it would result in the demolition of the CAL GO Building, which has been found to be individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, and is a contributor to a potential historic district eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Under Alternative 1, the CAL GO Building would not be demolished. Therefore, there would be no impacts to historical resources. Alternative 1 would avoid the significant and unavoidable adverse impact to historical resources associated with the proposed project.

Tribal Cultural Resources

As discussed in Section 4.3, *Tribal Cultural Resources*, the proposed project would have a significant impact on tribal cultural resources, which would be less than significant with the implementation of recommended mitigation. Because no construction would occur under Alternative 1, this alternative would avoid the impact to tribal cultural resources associated with the proposed project.

Energy and Conservation

As discussed in Section 6.5, *Energy Impacts and Conservation,* construction and operation of the proposed project would not result in wasteful, inefficient, or unnecessary energy use; would not increase reliance on fossil fuels; and would incorporate renewable energy and energy efficiency measures. The proposed project would not result in any significant adverse impacts with respect to energy consumption or energy conservation.

Alternative 1 would not involve any construction; therefore, no energy impacts from construction would occur. However, Alternative 1 would result in additional vehicle miles traveled by vehicles accessing the AOA as compared to the proposed project, and thereby would result in increased consumption of fossil fuels. Under Alternative 1, vehicles needing to access the western portion of the AOA would be required to use one of the other access posts at LAX. The closest access posts to the west side of the airport are SAAP 23, which is located south of the intersection of Westchester Parkway and Falmouth Avenue, and SAAP 4, which is located in proximity to the intersection of Aviation Boulevard and W. 111th Street. In the absence of a fully functional SAAP on the west side of LAX, many of the vehicles needing to access the AOA would have to travel greater distances from their point of origin to the nearest SAAP, or from the AOA access point to their intended AOA destination. This would result in increased consumption of fossil fuels and would be a less efficient consumption of energy resources as compared to the proposed project. Therefore, the impact of Alternative 1 on energy and conservation during operations would be greater than that associated with the proposed project. Nevertheless, energy use associated with Alternative 1 would not be wasteful, inefficient, or unnecessary, and impacts on energy and conservation would be less than significant.

Other Environmental Resources

Because no construction would occur under Alternative 1, this alternative would not have any construction-related impacts on any other environmental resources. However, as noted above, Alternative 1 would result in additional vehicle miles traveled by vehicles accessing the AOA as compared to the proposed project, which, in turn, would result in increased emissions of criteria pollutants and greenhouse gases (GHG). As a result, impacts to air quality and GHG would be greater as compared to the proposed project. Based on the relatively compact size of the AOA, it is expected that, even with the additional vehicle miles, impacts to air quality and GHG would be less than significant.

5.6.1.2 Relationship of Alternative 1 (No Project – No Build) to Proposed Project Objectives

Alternative 1 would not result in construction of a new SAAP on World Way West. Alternative 1 would not meet any of the project objectives listed in Section 5.3 above. SAAP 5 was decommissioned in January 2016 in order to facilitate landside construction of the Midfield Satellite Concourse (MSC) North Project. SAAP 21 was taken out of service by Phase 2 of the West Aircraft Maintenance Area (WAMA) Project in May 2017. As noted in Chapter 2, *Project Description,* following the closure of SAAP 21, LAWA established a temporary AOA access point using an AOA gate on Maintenance Road south of World Way West. However, this temporary access point only provides access to LAWA personnel and tenant vehicles. Therefore, Alternative 1 would render LAX with no state-of-the-art, fully-functional SAAP on the west side of the airport, and would not provide a centrally-located access point with a direct path of travel to the north and south airfields. As a result, Alternative 1 would not meet the first two project objectives.

Under Alternative 1, many vehicles needing to access the western portion of the AOA, including all construction vehicles, would be required to use one of the other access posts at LAX. The closest access posts to the west side of the airport are SAAP 23, which is located southwest of the intersection of Westchester Parkway and Falmouth Avenue, and SAAP 4, which is located in proximity to the intersection of Aviation Boulevard and West 111th Street. Use of these or other SAAPs at LAX would require much greater travel distances on AOA service roadways and around airfield facilities, and would increase the number of vehicles on service roads within the northern and eastern portions of the AOA. In addition, vehicles accessing the western portion of the AOA from these access posts would be required to cross active taxiways that they would not need to cross were they to access the AOA from the proposed SAAP, thereby increasing the number of vehicles crossing these taxiways. Increasing the number of vehicles on AOA roadways within the northern and eastern portions of the AOA, the travel distances on AOA roadways, and the number of taxiway crossings would not be consistent with the third project objective of providing access to the AOA vehicle service road in a manner that supports safe and efficient vehicle movement within the AOA, consistent with the mission of LAX Airfield Operations.[128]

Under Alternative 1, the fourth project objective would not be met because LAX would not have a state-of-the-art SAAP that would serve as a prototype for any future SAAPs and/or improvements to existing SAAPs at LAX, nor would the fifth project objective met because the project site – which is currently occupied by an uninhabitable building – would not be effectively reused for an AOA-related function that fulfills LAWA's strategic goal of innovating to enhance security, efficiency, and effectiveness.[129]

As Alternative 1 would not involve any construction, the sixth project objective pertaining to redevelopment of the project site in a manner that is consistent with LAWA's Design and Construction Handbook, does not pertain to this alternative.

5.6.2 Alternative 2 (Alternative Site)

5.6.2.1 Environmental Impact Evaluation

Biological Resources

As discussed in Section 4.1, *Biological Resources,* the proposed project could result in significant impacts to migratory or nesting birds, or raptors, protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code through the removal of trees, which could interfere with the movement of resident or migratory wildlife species. Recommended mitigation would reduce this impact to a level that is less than significant. Under Alternative 2, a new SAAP would be constructed at an alternative site. The alternative site is entirely paved and does not have any trees.

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128 City of Los Angeles, Los Angeles World Airports, *Airfield Operations Mission Statement*, 2017. Available: https://www.lawa.org/airops.aspx?id=850, accessed May 18, 2017.

129 City of Los Angeles, Los Angeles World Airports, *Aerogramme: LAWA Unveils New Strategic Plan*, November 2016. Available: https://www.lawa.org/uploadedFiles/LAX/pdf/Aero_Newsletter_201611.pdf, accessed May 18, 2017.

Therefore, there would be no potential for impacts to migratory or nesting birds through interference with the movement of resident or migratory wildlife species. Alternative 2 would avoid the impact to biological resources associated with the proposed project.

Cultural Resources

As discussed in Section 4.2, *Cultural Resources*, the proposed project could have significant impacts on archaeological and paleontological resources, if previously unknown resources are encountered during construction; these impacts would be less than significant with the implementation of recommended mitigation. Under Alternative 2, a new SAAP would be constructed at an alternative site. While there are no known archaeological or paleontological resources at the alternative site, similar to the proposed project site, there is a potential that construction of Alternative 2 could have an impact on previously unknown subsurface archaeological or paleontological resources. As with the proposed project, impacts to cultural resources would be less than significant with the incorporation of mitigation. The impact of Alternative 2 on archaeological and paleontological resources would be the same as that associated with the proposed project.

The proposed project would have a significant and unavoidable adverse impact on historical resources because it would result in the demolition of the CAL GO Building, which has been found to be individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, and is a contributor to a potential historic district eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Under Alternative 2, a new SAAP would be constructed at an alternative site. The alternative site consists of a roadway and a portion of a parking lot and does not contain any historical resources. Therefore, construction of a SAAP at the alternative site would have no impacts to historical resources. Alternative 2 would avoid the significant and unavoidable adverse impact to historical resources associated with the proposed project.

Tribal Cultural Resources

As discussed in Section 4.3, *Tribal Cultural Resources*, the proposed project would have a significant impact on tribal cultural resources, which would be less than significant with the implementation of recommended mitigation. Under Alternative 2, a new SAAP would be constructed at an alternative site. While there are no known tribal cultural resources at the alternative site, similar to the proposed project site, there is a potential that construction of Alternative 2 would have an impact on previously unknown tribal cultural resources. As with the proposed project, impacts to tribal cultural resources would be less than significant with the incorporation of mitigation. The impact of Alternative 2 on tribal cultural resources would be the same as that associated with the proposed project.

Energy and Conservation

As discussed in Section 6.5, *Energy Impacts and Conservation,* construction and operation of the proposed project operation would not result in wasteful, inefficient, or unnecessary energy use; would not increase reliance on fossil fuels; and would incorporate renewable energy and energy efficiency measures. The proposed project would not result in any significant adverse impacts with respect to energy consumption or energy conservation.

Alternative 2 would involve construction of a new SAAP at an alternative site, which would require the consumption of energy. However, this alternative would be subject to the same regulations, plans, and policies as the proposed project. As a result, construction of Alternative 2 would not result in wasteful, inefficient, or unnecessary energy use; would not increase reliance on fossil fuels; and would incorporate renewable energy and energy efficiency measures. Construction of Alternative 2 would not result in any significant adverse impacts with respect to construction-related energy consumption or energy conservation.

During operations, Alternative 2 would result in additional vehicle miles traveled by vehicles accessing the AOA as compared to the proposed project, and thereby would result in increased consumption of fossil fuels. Under Alternative 2, the access point onto the AOA would not be in a location that is generally central to the western portion of the AOA and, therefore, a SAAP in this location would not provide a direct path of travel to the north airfield. Instead, under Alternative 2, after being screened, vehicles would be discharged onto a service road located between Taxiways C and B within the south airfield. By discharging vehicles within the south airfield, rather than in a location that is a central access point onto the AOA, vehicles needing access to areas within the northern portion

of the AOA would be required to travel greater distances to reach the north airfield. Specifically, each vehicle would travel approximately 1,700 feet south from World Way West to reach the AOA service road at the SAAP discharge location, and would travel approximately the same distance north from that service road to reach the general location of what would have been the discharge point under the proposed project. In comparison, the AOA access point associated with the proposed project would be located in the middle of the north and south airfields and vehicles would not incur any additional travel distance to reach the north or south airfield from the AOA access point. The additional travel distance under Alternative 2 would add approximately 3,400 feet, or 0.6 mile, to each one-way trip by a vehicle needing to access the north airfield. In 2012, over 140,000 vehicles accessed the AOA through SAAP 21. Although the percentage of these trips destined for the north airfield is not known, implementation of Alternative 2 would result in additional vehicles miles traveled as compared to the proposed project, and thereby would result in increased consumption of fossil fuels and would be a less efficient consumption of energy resources as compared to the proposed project. Therefore, the impact of Alternative 2 on energy and conservation would be greater than that associated with the proposed project. Nevertheless, energy use associated with Alternative 2 would not be wasteful, inefficient, or unnecessary, and impacts on energy and conservation would be less than significant.

Other Environmental Resources

Construction-related impacts of Alternative 2 on other environmental resources would be less than the construction-related impacts related to the proposed project as the CAL GO Building would not be demolished under this alternative. However, as noted above, during operations, Alternative 2 would result in additional vehicle miles traveled by vehicles accessing the AOA as compared to the proposed project. As stated above, vehicles needing to access areas within the northern portion of the AOA would travel a circuitous route from the discharge point associated with this alternative site. Specifically, each vehicle would travel south from World Way West to reach the AOA service road at the SAAP discharge point, would turn east onto the AOA service road, and then would travel north from that service road to reach the general location of what would have been the discharge point under the proposed project. The additional travel distance under Alternative 2 would add approximately 3,400 feet, or 0.6 mile, to each trip by a vehicle needing to access the north airfield. In 2012, over 140,000 vehicles accessed the AOA through SAAP 21. Although the percentage of these trips destined for the north airfield is not known, implementation of Alternative 2 would result in additional vehicles miles traveled as compared to the proposed project, which, in turn, would result in increased emissions of criteria pollutants and GHG. As a result, impacts to air quality and GHG would be greater as compared to the proposed project. Based on the relatively low additional trip length, it is expected that, even with the additional vehicle miles, impacts to air quality and GHG would be less than significant.

5.6.2.2 Relationship of Alternative 2 (Alternative Site) to Proposed Project Objectives

Although Alternative 2 would not provide a new SAAP directly on World Way West, this alternative would partially fulfill the first project objective by providing a new fully functional SAAP on the west side of the airport. In addition, this alternative would fulfill the fourth project objective by providing a state-of-the art SAAP which would serve as a prototype for any future SAAPs and/or improvements to existing SAAPs at LAX.

Alternative 2 would not, however, meet the second project objective of providing a 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. Instead, under Alternative 2, after being screened, vehicles would be discharged onto a service road located between Taxiways C and B within the south airfield. Taxiways C and B are two of the busiest taxiways at LAX, and the service road itself is a very busy roadway. By discharging vehicles within the south airfield, rather than in a location that is a central access point onto the AOA, vehicles would not have a direct path of travel to both the north and south airfields; to the contrary, vehicles needing access to areas within the northern portion of the AOA would be required to travel a more circuitous route, which would result in greater travel distances on AOA service roadways and around airfield facilities. The increased travel distances would increase the time spent by vehicle operators and would increase costs associated with fuel and vehicle operating expenses.

The third project objective is to provide an access point 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. As noted above, under Alternative 2, vehicles would be discharged onto a very busy service road located between two of the busiest taxiways at LAX. Discharging vehicles at this location would unnecessarily overburden the service road, and would lead to greater congestion and inefficiency in vehicle movements within the AOA. Moreover, under Alternative 2, vehicles would be required to travel on an AOA roadway that crosses active taxiways that they would not need to cross were they to access the AOA from the proposed SAAP. As a result, the number of taxiway crossings would be increased, which is not preferred in terms of supporting the safety or efficiency of the airport operating environment. Increasing the travel distances on AOA roadways and the number of taxiway crossings would not be consistent with this project objective.

Alternative 2 would not fulfill the fifth project objective of effectively reusing the project site – which is currently occupied by an uninhabitable building – for an AOA-related function that fulfills LAWA's strategic goal of innovating to enhance security, efficiency, and effectiveness. Although Alternative 2 would not redevelop the project site, construction of a SAAP at the alternative site would be consistent with the portion of the sixth project objective pertaining to development of the project site in a manner that is consistent with LAWA's Design and Construction Handbook, including LAWA's "triple bottom line" definition of sustainability, which consists of social, economic, and environmental considerations.[130]

5.6.3 Alternative 3 (Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site)

5.6.3.1 Environmental Impact Evaluation

Biological Resources

As discussed in Section 4.1, *Biological Resources,* the proposed project could result in significant impacts to migratory or nesting birds, or raptors, protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code through the removal of trees, which could interfere with the movement of resident or migratory wildlife species. Recommended mitigation would reduce this impact to a level that is less than significant. Under Alternative 3, a new SAAP would be constructed at an alternative site. The alternative site is entirely paved and does not have any trees. Therefore, there would be no potential for impacts to migratory or nesting birds through interference with the movement of resident or migratory wildlife species. Alternative 3 would avoid the impact to biological resources associated with the proposed project.

Cultural Resources

As discussed in Section 4.2, *Cultural Resources*, the proposed project could have significant impacts on archaeological and paleontological resources, if previously unknown resources are encountered during construction; these impacts would be less than significant with the implementation of recommended mitigation. Under Alternative 3, a new SAAP would be constructed at an alternative site. While there are no known archaeological or paleontological resources at the alternative site, similar to the proposed project site, there is a potential that construction of Alternative 3 could have an impact on previously unknown subsurface archaeological or paleontological resources. As with the proposed project, impacts to cultural resources would be less than significant with the incorporation of mitigation. The impact of Alternative 3 on archaeological and paleontological resources would be the same as that associated with the proposed project.

The proposed project would have a significant and unavoidable adverse impact on historical resources because it would result in the demolition of the CAL GO Building, which has been found to be individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, and is a contributor to a potential

[130] City of Los Angeles, Los Angeles World Airports, *2016 Design and Construction Handbook: Environmental – Sustainability*, July 2016. Available: http://www.lawa.org/uploadedFiles/LAXDev/DCH/Environmental/Sustainability%20CALGreen%20LEED.pdf.

historic district eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Under Alternative 3, the CAL GO Building would be rehabilitated. Rehabilitation of an historical resource that is currently in a state of disrepair would be a beneficial impact on an historical resource. Alternative 3 would avoid the significant and unavoidable adverse impact to historical resources associated with the proposed project and, instead, would have a beneficial impact on historical resources.

Tribal Cultural Resources

As discussed in Section 4.3, *Tribal Cultural Resources*, the proposed project would have a significant impact on tribal cultural resources, which would be less than significant with the implementation of recommended mitigation. Under Alternative 3, a new SAAP would be constructed at an alternative site. While there are no known tribal cultural resources at the alternative site, similar to the proposed project site, there is a potential that construction of Alternative 3 would have an impact on previously unknown tribal cultural resources. As with the proposed project, impacts to tribal cultural resources would be less than significant with the incorporation of mitigation. The impact of Alternative 3 on tribal cultural resources would be the same as that associated with the proposed project.

Energy and Conservation

As discussed in Section 6.5, *Energy Impacts and Conservation,* construction and operation of the proposed project operation would not result in wasteful, inefficient, or unnecessary energy use; would not increase reliance on fossil fuels; and would incorporate renewable energy and energy efficiency measures. The proposed project would not result in any significant adverse impacts with respect to energy consumption or energy conservation.

Alternative 3 would involve rehabilitation of the CAL GO Building, which would require the consumption of energy. However, this alternative would be subject to the same regulations, plans, and policies as the proposed project. As a result, construction and operation of Alternative 3 would not result in wasteful, inefficient, or unnecessary energy use; would not increase reliance on fossil fuels; and would incorporate renewable energy and energy efficiency measures. Construction of Alternative 3 would not result in any significant adverse impacts with respect to construction-related energy consumption or energy conservation.

However, during operations, Alternative 3 would result in additional vehicle miles traveled by vehicles accessing the AOA as compared to the proposed project, and thereby would result in increased consumption of fossil fuels. Under Alternative 3, the access point onto the AOA would not be in a location that is generally central to the western portion of the AOA and, therefore, a SAAP in this location would not provide a direct path of travel to the north airfield. Instead, under Alternative 3, after being screened, vehicles would be discharged onto a service road located between Taxiways C and B within the south airfield. By discharging vehicles within the south airfield, rather than in a location that is a central access point onto the AOA, vehicles needing access to areas within the northern portion of the AOA would be required to travel greater distances to reach the north airfield. Specifically, each vehicle would travel approximately 1,700 feet south from World Way West to reach the AOA service road at the SAAP discharge location, and would travel approximately the same distance north from that service road to reach the general location of what would have been the discharge point under the proposed project. In comparison, the AOA access point associated with the proposed project would be located in the middle of the north and south airfields and vehicles would not incur any additional travel distance to reach the north or south airfield from the AOA access point. The additional travel distance under Alternative 3 would add approximately 3,400 feet, or 0.6 mile, to each one-way trip by a vehicle needing to access the north airfield. In 2012, over 140,000 vehicles accessed the AOA through the former SAAP 21. Although the percentage of these trips destined for the north airfield is not known, implementation of Alternative 3 would result in additional vehicles miles traveled as compared to the proposed project, and thereby would result in increased consumption of fossil fuels and would be a less efficient consumption of energy resources as compared to the proposed project. Therefore, the impact of Alternative 3 on energy and conservation would be greater than that associated with the proposed project. Nevertheless, energy use associated with Alternative 3 would not be wasteful, inefficient, or unnecessary, and impacts on energy and conservation would be less than significant.

Other Environmental Resources

Alternative 3 would require interior and exterior improvements to the CAL GO Building. Under Alternative 3, no excavation would be anticipated in areas that have not been previously disturbed; however, there would still be construction-related activities and traffic associated with rehabilitation of the subject building, which would result in impacts to air quality, GHG, noise, and traffic. The scale and intensity of construction activities associated with building rehabilitation are anticipated to be generally less than those associated with demolition of the building; hence the construction-related impacts of Alternative 3 would likely be less than those of the proposed project.

However, as noted above, during operations, Alternative 3 would result in additional vehicle miles traveled by vehicles accessing the AOA as compared to the proposed project. As stated above, vehicles needing to access areas within the northern portion of the AOA would travel a circuitous route from the discharge point associated with this alternative site. Specifically, each vehicle would travel south from World Way West to reach the AOA service road at the SAAP discharge point, would turn east onto the AOA service road, and then would travel north from that service road to reach the general location of what would have been the discharge point under the proposed project. The additional travel distance under Alternative 3 would add approximately 3,400 feet, or 0.6 mile, to each trip by a vehicle needing to access the north airfield. In 2012, over 140,000 vehicles accessed the AOA through SAAP 21. Although the percentage of these trips destined for the north airfield is not known, implementation of Alternative 3 would result in additional vehicles miles traveled as compared to the proposed project, which, in turn, would result in increased emissions of criteria pollutants and GHG. As a result, impacts to air quality and GHG would be greater as compared to the proposed project. Based on the relatively low additional trip length, it is expected that, even with the additional vehicle miles, impacts to air quality and GHG would be less than significant.

5.6.3.2 Relationship of Alternative 3 (Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site) to Proposed Project Objectives

Construction of a new SAAP at the alternative site would fulfill the project objectives to the same extent as would Alternative 2. Specifically, Alternative 3 would partially fulfill the first project objective by providing a new fully functional SAAP on the west side of the airport, even though the SAAP would not be located on World Way West. In addition, this alternative would meet the fourth project objective by providing a state-of-the art SAAP which would serve as a prototype for any future SAAPs and/or improvements to existing SAAPs at LAX.

However, as with Alternative 2, Alternative 3 would not meet the second project objective of providing a 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. Instead, under Alternative 3, after being screened, vehicles would be discharged onto a service road located between Taxiways C and B within the south airfield. Taxiways C and B are two of the busiest taxiways at LAX, and the service road itself is a very busy roadway. By discharging vehicles within the south airfield, rather than in a location that is a central access point onto the AOA, vehicles would not have a direct path of travel to both the north and south airfields; to the contrary, vehicles needing access to areas within the northern portion of the AOA would be required to travel a more circuitous route, which would result in greater travel distances on AOA service roadways and around airfield facilities. The increased travel distances would increase the time spent by vehicle operators and would increase costs associated with fuel and vehicle operating expenses.

In addition, this alternative would not be consistent with the third project objective, which is to provide an access point 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. As noted above, under Alternative 3, vehicles would be discharged onto a very busy service road located between two of the busiest taxiways at LAX. Discharging vehicles at this location would unnecessarily overburden the service road, and would lead to greater congestion and inefficiency in vehicle movements within the AOA. Moreover, vehicles would be required to travel on an AOA roadway that crosses active taxiways that they would not need to cross were they to access the AOA from the proposed SAAP. As a result, the number of taxiway crossings would be increased, which is not preferred in terms of supporting the safety or efficiency of the airport operating environment. Increasing the travel distances on AOA roadways and the number of taxiway crossings would not be consistent with this project objective.

Rehabilitation of the CAL GO Building under Alternative 3 would partially fulfill the fifth project objective of efficiently reusing the project site. However, the alternative would not meet the portion of the objective that calls for reusing the project site for an AOA-related use that fulfills LAWA's strategic goal of innovating to enhance security, efficiency, and effectiveness.

Rehabilitation of the CAL GO Building under Alternative 3 would meet some, but not all, of the components of the sixth project objective pertaining to redevelopment of the project site in a manner that is consistent with LAWA's "triple bottom line" definition of sustainability. Rehabilitation of the CAL GO Building under this alternative would be conducted in accordance with LAWA's Design and Construction Handbook, and would meet CALGreen Tier 1 requirements. Therefore, the rehabilitation component under Alternative 3 would fulfill LAWA's sustainability objectives with respect to environmental considerations. In addition, by rehabilitating a historic structure that is associated with the development of commercial aviation in the U.S. and the development of LAX, the rehabilitation component of this alternative would fulfill the social aspect of sustainability. However, rehabilitation would not meet LAWA's sustainability objectives with respect to economic considerations. Detailed engineering design has not been undertaken for the Rehabilitation Alternative. However, based on general knowledge of the building, including its size, outdated structural and building systems, current state of disrepair, and the presence of hazardous materials, it is estimated that the total cost to rehabilitate the building would be approximately $133 million. In comparison, the cost to build a building of similar size at LAX is estimated to be approximately $63 million. Rehabilitation of the CAL GO Building is estimated to cost more than double what it would cost to build an entirely new building at the airport. This higher cost would be inconsistent with the economic aspect of sustainability.

5.7 Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The State CEQA Guidelines also state that should it be determined that the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an environmentally superior alternative among those analyzed in this EIR, the range of alternatives includes Alternative 1: No Project – No Build, Alternative 2: Alternative Site, and Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site.

A comparative summary of the environmental impacts under each alternative with the environmental impacts associated with the proposed project is provided in **Table 5-1**. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the State CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the project.

As discussed above, and as shown in **Table 5-1**, Alternative 1 (No Project – No Build) is considered to be the environmentally superior alternative as it would avoid all construction impacts of the proposed project and the operations-related energy and conservation, air quality and GHG impacts associated with the use of other SAAPs at LAX would be similar to the other alternatives. However, as indicated above and shown in **Table 5-2**, this alternative would not meet any of the objectives established for the proposed project.

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 Alternative2, 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.

Table 5-1
Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

Environmental Resource	Proposed Project Impact	Alternative 1: No Project-No Build	Alternative 2: Alternative Site	Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site
Biological Resources				
	Less Than Significant with mitigation	No Impact	No Impact	No Impact
Cultural Resources				
Archaeological/ Paleontological Resources	Less Than Significant with mitigation	No Impact	Less Than Significant with mitigation	Less Than Significant with mitigation
Historical Resources	Significant and Unavoidable	No Impact	No Impact	Beneficial Impact
Tribal Cultural Resources				
	Less Than Significant with mitigation	No Impact	Less Than Significant with mitigation	Less Than Significant with mitigation
Energy Impacts and Conservation				
Wasteful, Inefficient or Unnecessary Consumption	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
Reliance on Fossil Fuels	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
Other Environmental Resources: Air Quality and Greenhouse Gas Emissions				
	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant

Source: CDM Smith, 2017.

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.

Table 5-2
Summary of Project's and Alternatives' Responsiveness to Project Objectives

Objective	Does the Project or Alternative Meet the Objective?			
	Proposed Project	Alternative 1: No Project-No Build	Alternative 2: Alternative Site	Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site
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.	Yes	No	Partially	Partially
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.	Yes	No	No	No
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.	Yes	No	No	No
Provide a state-of-the-art SAAP to serve as a prototype for any future SAAPs and/or improvements to existing SAAPs at LAX.	Yes	No	Yes	Yes
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.	Yes	No	No	Partially
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.	Yes	NA	Partially	Partially

Source: CDM Smith, 2017.