LAX Secured Area Access Post Project
California Environmental Quality Act Findings

1. PROJECT DESCRIPTION SUMMARY

The Los Angeles International Airport (LAX) Secured Area Access Post (SAAP) Project consists of a new SAAP to provide a fully functional, secured access point onto the Airport Operations Area (AOA) on the west side of LAX. The new SAAP would be the sole full-access SAAP on World Way West and would replace SAAP 5, which was displaced in January 2016 by the Midfield Satellite Concourse (MSC) North Project, and SAAP 21, which was taken out of service by Phase 2 of the West Aircraft Maintenance Area (WAMA) Project in May 2017. After SAAP 21 closed, access to the AOA continues to be provided by several other full-access SAAPs that are located around the AOA perimeter. The new state-of-the-art SAAP along World Way West would accommodate all types of vehicles that require access to the AOA (construction, aircraft service vehicles, vendors, LAWA, etc.).

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 (SF) 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 its associated facilities (the pedestrian bridge between the CAL GO Building and the American Airlines Engineering Building to the south, and pedestrian access point infrastructure [i.e., concrete walks, asphalt pavement, curbs and gutters, retaining walls, trees, and planter areas surrounding the CAL GO Building]).

2. PROJECT OBJECTIVES

Los Angeles World Airports (LAWA) proposes the construction of a new SAAP to provide a fully functional, secured access point onto the AOA on the west side of LAX. As indicated above, a new SAAP is needed on the west side to replace SAAP 5, which was displaced by the MSC North Project, and SAAP 21, which was taken out of service by Phase 2 of the WAMA Project. The proposed SAAP would be the sole full-access SAAP on World Way West and would provide much-needed access to the north and south airfields, and to ongoing construction projects on the west side of the airport.[1] Vehicles accessing the AOA from the west side of the airport would travel to the north and south airfields as well as to the terminal area. In order to provide for safe and efficient access to all these locations, a site that is centrally located between the north and south airfields is desirable. A central location would reduce total vehicle miles traveled by vehicles accessing the AOA by providing direct access that minimizes the need for the vehicles to double-back to reach their intended destination. A central location on the AOA would also result in less travel on AOA service roadways and around airfield facilities, and would minimize the number of vehicles crossing active taxiways.

LAWA is also seeking to reuse the project site for an airfield-related use. LAX is a geographically constrained facility, bound by the Los Angeles/El Segundo Dunes and the Pacific Ocean on the west, and fully developed urban uses on the south, east, and north, including the City of El Segundo to the south, the unincorporated area of Lennox to the southeast, the City of Inglewood to the east-northeast, and the Westchester community of the City of Los Angeles to the north. As a consequence of these constraints, LAWA must fully utilize all available areas of the airport in a manner that supports its aviation mission. The project site is occupied by the former CAL GO Building, which is

[1] After SAAP 21 was closed, some traffic that previously used SAAP 21 now utilizes other permanent AOA access points, and other traffic is being 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.

vacant. The building is uninhabitable, and has been largely unoccupied since approximately 1995, with the exception of one office, which was occupied until 2001. After 2001, the building was completely vacated by personnel. A small portion of the building (the west entrance addition), contains security system electronic infrastructure; no staff occupy this area. The CAL GO Building contains hazardous building materials, including asbestos containing materials (ACM), lead containing surfaces (LCS), mold, and other hazardous substances. Building systems have exceeded their useful life span, and the lack of proper ongoing maintenance over the last two decades has left the CAL GO Building in a state of substantial disrepair. Furthermore, as the CAL GO Building is an older steel frame design (i.e., constructed prior to the Northridge earthquake of 1994), the structural system has numerous inadequacies that do not meet current building codes.

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;
- 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.

3. PROCEDURAL HISTORY

LAWA has prepared an environmental impact report (EIR) for the proposed project pursuant to the California Environmental Quality Act (CEQA). A Notice of Preparation (NOP) for the Draft EIR, along with an Initial Study, was circulated for public review from April 20, 2017 to May 22, 2017. On July 27, 2017, the City of Los Angeles published the Draft EIR for the proposed project. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period closing on September 11, 2017. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were also provided the opportunity to comment through September 11, 2017. The City of Los Angeles published the Final EIR for the proposed project on January 4, 2018.

The Final EIR incorporates and responds to comments received on the Draft EIR, and includes corrections and additions to the Draft EIR. One project-specific mitigation measure and other mitigation measures that are LAWA LAX Standard Control Measures have been included in a Mitigation Monitoring and Reporting Program for the proposed project. In addition, the Mitigation Monitoring and Reporting Program includes LAWA LAX Standard Control Measures that would further reduce certain less-than-significant impacts. LAWA, the Los Angeles Board of Airport Commissioners (BOAC), and other decision-makers will use the Final EIR to inform their decisions on the proposed project.

The findings herein have been prepared on the proposed project and its significant impacts, as discussed in the Draft EIR and amended in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR.

4. ENVIRONMENTAL IMPACTS AND FINDINGS

Pursuant to Public Resources Code Section 21081 and State CEQA Guidelines Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR.

The BOAC has made one or more of these specific written findings regarding each significant impact associated with the proposed project. Those findings are presented below, along with a presentation of facts in support of the findings. Concurrent with the adoption of these findings, the BOAC adopts the Mitigation Monitoring and Reporting Program (MMRP) (State CEQA Guidelines Section 15097(a)) for the proposed project; the MMRP sets forth the full text of each adopted mitigation measure and Standard Control Measure adopted in these findings.

4.1 Findings on No Impacts and Less Than Significant Impacts Identified in the Initial Study

4.1.1 Description of Effects

The Initial Study prepared for the proposed project in August 2016, included as Appendix A of the Draft EIR, evaluated potential impacts on a range of subjects listed in Appendix G of the State CEQA Guidelines. The analysis conducted for the Initial Study determined that the proposed project would have no impacts or less than significant impacts on the following resource areas: aesthetics, agriculture and forestry resources, air quality, biological resources (sensitive or special status species or habitats, riparian/wetland areas, native trees, adopted/approved habitat conservation plan), 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.

4.1.2 Findings

Based on substantial evidence in the administrative record, including the Initial Study, provided as Appendix A of the Draft EIR, the BOAC hereby finds and determines that no impacts or less than significant impacts for the proposed project would occur to aesthetics, agriculture and forestry resources, air quality, biological resources (sensitive or special status species or habitats, riparian/wetland areas, native trees, adopted/approved habitat conservation plan), 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.

4.2 Findings on Less than Significant Impacts Identified in the EIR

4.2.1 Description of Effects

Based on the issue area assessment in the EIR, the BOAC has determined that the proposed project (as described above) will have less than significant impacts to human remains, and energy impacts and conservation. For each of these impacts, the BOAC adopts and incorporates by reference the discussion of each of the impacts in the detailed

issue area analyses in Chapters 4 and 6 of the Draft EIR as the rationale for the conclusion that there would be less than significant impacts.

4.2.2 Findings

Based on substantial evidence in the administrative record, including Chapters 4 and 6 of the Draft EIR, the BOAC hereby finds and determines that impacts to human remains, and energy impacts and conservation, associated with the proposed project would be less than significant. The BOAC hereby adopts the conclusions regarding less than significant impacts to human remains and energy impacts and conservation.

4.3 Findings on Significant Impacts Identified in the EIR that Will be Reduced to Below the Level of Significance with Mitigation

4.3.1 Biological Resources - Nesting Birds/Raptors

4.3.1.1 Impacts

A significant impact to biological resources would occur if the proposed project would:

- Substantially interfere with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

4.3.1.2 Description of Effects

Approximately 45 non-native ornamental trees are located around the perimeter of the CAL GO Building. Although native birds prefer native trees for nesting, the non-native trees on the project site could harbor raptor and other native bird nests. Therefore, project-related tree removals due to construction of the proposed project could result in impacts to migratory or nesting birds, or raptors protected under the Migratory Bird Treaty Act and/or California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513. This impact is significant because tree removals could substantially interfere with the movement of these resident or migratory wildlife species. However, with implementation of Standard Control Measures LAX-BR-1, Conservation of Faunal Resources: Nesting Birds/Raptors, and LAX-BR-2, Conservation of Floral Resources: Mature Tree Replacement – Nesting Raptors, as mitigation measures, impacts would be reduced to a level that is less than significant.

4.3.1.3 Findings

Based on substantial evidence in the administrative record, including Section 4.1, *Biological Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the EIR. Beyond Standard Control Measures LAX-BR-1 and LAX-BR-2, which will be included in the MMRP for the proposed project, no other mitigation measures would be required for this impact as it will be less than significant.

4.3.2 Cultural Resources - Archaeological and Paleontological Resources

4.3.2.1 Impacts

A significant impact on archaeological and paleontological resources would occur if the proposed project would result in:

- A substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5.
- Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.

4.3.2.2 Description of Effects

4.3.2.2.1 Archaeological Resources

As discussed in Section 4.2, *Cultural Resources*, of the Draft EIR, based on records searches and surveys, no previously recorded archaeological resources (including historic or prehistoric archaeological resources) have been recorded at or within a half-mile radius of the project site. The project area (including the project site and construction staging area) is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities. Thus, surficial archaeological resources that may have existed at one time have likely been displaced by these disturbances. While discovery of archaeological resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could impact previously unknown buried archaeological resources that fall within the definition of historical resources or unique archaeological resources. Thus, impacts to archaeological resources could be significant.

However, with implementation of Standard Control Measures LAX-AR-1, Conformance with LAWA's Archaeological Treatment Plan, and LAX-AR-2, Archaeological Resources Construction Personnel Briefing, as mitigation measures, significant impacts to archaeological resources that are historical resources or unique archeological resources would be reduced to a level that is less than significant and the proposed project's contribution to significant cumulative impacts on archaeological resources would not be cumulatively considerable. These mitigation measures would ensure that construction contractors are aware of LAWA's Archaeological Treatment Plan and will implement the procedures that need to be followed in the event of an unanticipated discovery.

4.3.2.2.2 Paleontological Resources

As discussed in Section 4.2, *Cultural Resources*, of the Draft EIR, the paleontological resources records search indicated that no previously recorded vertebrate fossil localities are located within the project area (including the project site and construction staging area). As mentioned previously, the project area is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities that have likely displaced surficial paleontological resources. While discovery of paleontological resources in artificial fill deposits within the project area is unlikely, proposed excavations at the project site could impact intact, unique paleontological resources that have not been disturbed or displaced by previous development. Since the proposed project would include excavations of varying depths across portions of the project site, the proposed project could impact previously unknown buried unique paleontological resources. Thus, impacts to paleontological resources could be significant.

With implementation of Standard Control Measures LAX-PR-1, Conformance with LAWA's Paleontological Management Treatment Plan (PMTP), and LAX-PR-2, Paleontological Resources Construction Personnel Briefing, as mitigation measures, significant impacts to paleontological resources would be reduced to a level that is less than significant and the proposed project's contribution to significant cumulative impacts on paleontological resources would not be cumulatively considerable. These mitigation measures would ensure that construction contractors are aware of LAWA's Paleontological Management Treatment Plan and will implement the procedures that need to be followed in the event of an unanticipated discovery.

4.3.2.3 Findings

Based on substantial evidence in the administrative record, including Section 4.2, *Cultural Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the EIR. Beyond Standard Control Measures LAX-AR-1, LAX-AR-2, LAX-PR-1, and LAX-PR-2, which will be included in the MMRP for the proposed project, no other cultural resource mitigation measures would be required for these impacts as they will be less than significant. Additionally, with the mitigation described above, the project's contribution to significant cumulative impacts to archaeological and paleontological resources will be less than cumulatively considerable.

4.3.3 Tribal Cultural Resources

4.3.3.1 Impacts

A significant impact on tribal cultural resources would occur if the proposed project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:
  - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
  - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.3.3.2 Description of Effects

As discussed in Section 4.3, *Tribal Cultural Resources*, of the Draft EIR, the project site and construction staging area are within a highly urbanized area that has been subject to disturbance by airport operations and development, placement of artificial fill, grading, and other on-going construction activities. There are no known tribal cultural resources, as defined in Public Resources Code Section 21074, at the project site and construction staging area or in the vicinity, and no Native American tribes have identified any known tribal cultural resources that may be affected by the proposed project. Therefore, the discovery of tribal cultural resources within the project site is unlikely. While discovery of tribal cultural resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could impact previously unknown tribal cultural resources. Thus, impacts on tribal cultural resources would be significant.

However, with implementation of Standard Control Measures LAX-AR-1, Conformance with LAWA's Archaeological Treatment Plan, and LAX-AR-2, Archaeological Resources Construction Personnel Briefing, as mitigation measures, significant impacts to tribal cultural resources would be reduced to a level that is less than significant and the proposed project's contribution to significant cumulative impacts to tribal cultural resources would not be cumulatively considerable. Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2 require conformance with LAWA's Archaeological Treatment Plan, which contains detailed monitoring procedures and other protocols regarding the treatment of previously unidentified archaeological resources or Native American remains that may be encountered during construction, and briefing by a qualified archaeologist to construction personnel in the identification of archaeological resources and in the correct procedures for notifying the relevant individuals should such a discovery occur. Section 5.2 of LAWA's Archaeological Treatment Plan includes protocols for Native American monitoring in the event of the discovery during construction of an archaeological resource or discovery of Native American remains.

4.3.3.3 Findings

Based on substantial evidence in the administrative record, including Section 4.3, *Tribal Cultural Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the EIR. Beyond Standard Control Measures LAX-AR-1 and LAX-AR-2, which will be included in the MMRP for the proposed project, no other tribal cultural resource mitigation measures would be required for this impact as it will be less than significant. Additionally, with the mitigation described above, the project's contribution to significant cumulative impacts to tribal cultural resources will be less than cumulatively considerable.

4.4 Findings on Significant and Unavoidable Impacts Identified in the EIR

4.4.1 Cultural Resources - Historical Resources

4.4.1.1 Impacts

A significant impact on historical resources would occur if the proposed project would result in:

- A substantial adverse change in the significance of an "historical resource" as defined by State CEQA Guidelines Section 15064.5(a). Substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the National Register, California Register, and/or local register.

4.4.1.2 Description of Effects

As discussed in Section 4.2, *Cultural Resources*, of the Draft EIR, the proposed project would involve 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. Demolition of the CAL GO Building would result in a significant impact to an historical resource at the state and local levels. LAWA has prepared archival photographic documentation of the CAL GO Building in accordance with Historic American Buildings Survey (HABS) standards to document the building and its historic character-defining features (the Historic Building Documentation for the CAL GO Building, which includes archival-quality photographs and accompanying report, is included as Appendix B-2 of the Draft EIR). A complete set of the documentation, including original archival photographs, was provided to both the Flight Path Learning Center and Museum, and the South Central Coastal Information Center at California State University, Fullerton.

The CAL GO Building is also a contributor to a potential Continental Airlines Complex historic district, which was found to be eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Constructed as the headquarters office building for Continental Airlines, the CAL GO Building housed the administrative center for Continental Airlines' global operation and served as the public face for Continental's complex of buildings at LAX. The attached flight kitchen, hangars, shops and storage facilities, and the nearby Training Center Building, housed functions ancillary to the CAL GO Building and it was through the CAL GO Building that the district's association with Continental Airlines was largely established. Demolition of the CAL GO Building would result in the loss of a primary contributing building to the potential historic district, substantially reducing the integrity of the district. Without the CAL GO Building, much of the potential district's association with Continental Airlines would be lost and the district would no longer be eligible for listing in the California Register or as a City of Los Angeles Historic-Cultural Monument. For these reasons, demolition of the CAL GO Building would also result in a significant impact to the potential Continental Airlines Complex historic district.

New construction associated with the proposed project would be located approximately 55 feet from the CAL Training Center Building at the closest point, and approximately 65 feet from the north edge of the Continental Airlines flight kitchen, hangars, shops, and storage facilities that would remain after demolition of the CAL GO Building. The proposed new construction would consist primarily of paved roadway, canopy structures, two guard houses, gates, and fencing. Section XII, *Noise*, of the Initial Study prepared for the proposed SAAP project evaluated whether vibration from project construction-related activities (including demolition and new construction) would have an impact on nearby historical resources, including the Training Center Building and remaining Continental Airlines hangars, shops, and storage facilities (refer to Appendix A of the Draft EIR). The analysis in the Initial Study found that, due to the distance between construction activities and these structures, construction-related vibration would be well below the threshold of significance established by the California Department of Transportation and vibration-related impacts would be less than significant. Because of its distance from the Training Center Building and remaining former Continental Airlines facilities, new construction associated with the project would not result

in physical demolition, destruction, relocation, or alteration such that their significance would be materially impaired. All the physical characteristics that convey historic significance and justify eligibility for historic listing would remain intact and unchanged. Therefore, new construction associated with the project would not result in significant impacts to the Training Center Building or to the remaining former Continental Airlines facilities.

The demolition of the former CAL GO Building would also result in a significant and unavoidable cumulatively considerable impact due to the combined impacts of the LAX SAAP Project and other cumulative projects at LAX. Specifically, the LAX Landside Access Modernization Program would have a significant and unavoidable visual impact to the Theme Building (eligible for listing in the National Register, listed in the California Register, and a designated City of Los Angeles Historic-Cultural Monument), and the United Airlines East Aircraft Maintenance and Ground Service Equipment Project would result in the demolition of two hangars associated with the Intermediate Terminal Facility (eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument). Together, these projects would result in a significant cumulative impact on historical resources at LAX, and the contribution of the LAX SAAP Project (i.e., the direct impact to the CAL GO Building) to this impact would be cumulatively considerable.

LAWA would implement Mitigation Measure MM-HR (SAAP)-1, Conformance with LAWA's LAX Preservation Plan,[2] to lessen the impact associated with demolition of the CAL GO Building, which has been found 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. In some cases, including demolition of the CAL GO Building, demolition of an historical resource cannot clearly be mitigated to a less-than-significant level (State CEQA Guidelines Section 15126.4(b)(2)). However, pursuant to the State CEQA Guidelines, documentation of an historical resource, by way of historic narrative, photographs, or architectural drawings, can serve to reduce the effect of demolition of the resources, even though such documentation will not mitigate the effects to a point where clearly no significant effect on the environment would occur. As discussed above, LAWA has completed recordation of the CAL GO Building in accordance with HABS standards (the report, titled *Historic Building Documentation, Continental Airlines General Office Building*, is provided in Appendix B-2 of the Draft EIR), and has deposited the resulting documentation with the South Central Coastal Information Center at California State University, Fullerton, which is the CHRIS Information Center for Los Angeles County (documentation was also provided to the Flight Path Learning Center and Museum). In addition, Mitigation Measure MM-HR (SAAP)-1 requires LAWA to submit the Historic Building Documentation report to the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR). No additional mitigation is feasible to address the impact to the CAL GO Building and the impact would be significant and unavoidable.

4.4.1.3 Findings

Based on substantial evidence in the administrative record, including Section 4.2, *Cultural Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the project which lessen the significant environmental effects identified in the EIR. Even with incorporation of Mitigation Measure MM-HR (SAAP)-1, impacts of the project to 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, would not be reduced to a level that is less than significant or less than cumulatively considerable. No other feasible mitigation measures are available that would further reduce impacts to the CAL GO Building. Therefore, impacts to historical resources from the proposed project would be significant and unavoidable.

Despite incorporation of project-specific mitigation, the BOAC hereby finds that impacts on the CAL GO Building from the proposed project would remain significant and unavoidable and that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the proposed mitigation measure identified above, which will be included in the MMRP for the proposed project, no other mitigation measures are feasible that would mitigate the historic resources impacts of the proposed project.

[2] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix J, LAX Preservation Plan, September 2016.

4.5 Findings on Other CEQA Considerations

4.5.1 Significant Irreversible Environmental Changes

Section 6.2 of the Draft EIR identifies the significant and irreversible environmental changes associated with the proposed project. Irreversible impacts would include commitment of various non-renewable resources. Construction of the proposed project would involve the consumption of building materials during construction, such as aggregate (sand and gravel), metals (e.g., steel, copper, lead), and petrochemical construction materials (e.g., plastics). This would represent the loss of non-renewable resources, which are generally not retrievable. Aggregate resources are locally constrained, but regionally available. Their use would not have a project-specific adverse effect upon the availability of these resources.

Construction and operation of the proposed project would require energy resources such as electricity, diesel, and various transportation-related fuels. This would represent the loss of non-renewable resources, which are generally not retrievable. See Section 4.5.3 below for a discussion of energy impacts and conservation.

As described in Chapter 2, *Project Description*, of the Draft EIR, the proposed new SAAP would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy. Per this policy, non-building projects, such as runways, taxiways, and civil infrastructure, which are not typically eligible for U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) certification, are required to meet the Los Angeles Green Building Code (LAGBC) Tier 1 requirements, unless exempted by LAWA's Sustainability Review Committee. These LAGBC standards are based on the California Green Building Code (CALGreen). Projects that are not able to pursue LEED® Silver certification or better, or LAGBC Tier 1 or better, are required to comply with LAWA's Sustainable Design & Construction Requirements. The proposed project would achieve, at a minimum, LAGBC Tier 1 conformance or would comply with LAWA's Sustainable Design & Construction Requirements through environmentally-sensitive features. Certain measures of note that would reduce the use of non-renewable resources include: efficient lighting fixtures and controls with occupancy sensors to reduce energy consumption during off-peak hours; the SAAP's heating, ventilation, and air conditioning controls would be designed to reset temperatures to maximum efficiency without sacrificing occupant comfort; where possible, the facility would incorporate coated glass that minimizes heat gain as well as building materials and furnishings made of recycled content; the restrooms in the new SAAP would be designed with low- or ultra-low-flow systems; and recycled water would be used for construction-related dust control and construction equipment washing when feasible. Therefore, the use of non-renewable resources from construction and operation of the proposed project would not result in significant irreversible changes to the environment.

4.5.2 Growth Inducing Impacts

Section 6.3 of the Draft EIR addresses the growth inducing impacts of the proposed project. As indicated therein, the proposed project would not affect the number of passengers served by the airport or the number or type of aircraft operations. In addition, the proposed project would not provide new access to an area that is undeveloped since the project site is located within an area of the airport that is in active use. Therefore, the proposed project would not remove an obstacle to growth.

Construction activity associated with the proposed project would directly and indirectly foster economic growth over the one to two year construction period in terms of spending by workers and the provision of goods and services in support of construction; however, the construction employment would be temporary and transitory in nature, drawing from primarily from an existing local labor pool (i.e., construction workers already living in the greater Los Angeles area transitioning from one construction project to another) and the number of construction workers would be relatively low (approximately 40). Operation of the proposed project would not induce economic growth beyond that projected to occur with natural growth in activity levels at LAX that will occur irrespective of the project.

4.5.3 Energy Impacts and Conservation

Chapter 6, *Other Environmental Considerations*, specifically Section 6.5 of the Draft EIR, quantifies and evaluates the proposed project's energy impacts. The proposed project would be located within an area that has existing energy and water infrastructure available to serve the proposed project. It would comply with federal, state, and local

regulations and policies pertaining to reduction in energy demand associated with building energy use, water demand, wastewater generation, vehicle fuels, and construction equipment. In addition, electricity supplied to the project would be required to comply with California's aggressive renewable portfolio standard. Therefore, the proposed project's construction and 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, therefore, no mitigation measures (e.g., additional energy conservation measures) are required. It should be noted, however, that Standard Control Measure LAX-AQ-1 (Construction-Related Air Quality Control Measures) would reduce energy consumption associated with the proposed project, and thereby would reduce the proposed project's reliance on fossil fuels.

4.6 Findings on Project Alternatives

4.6.1 Alternatives Considered and Rejected

In addition to the proposed project that was evaluated in detail in the Draft EIR, LAWA considered making improvements to three existing secured area access posts at different locations on the airport, and also considered three alternative sites on the west side of the airport for a new SAAP. These alternative locations and alternative sites were eliminated from detailed analysis in the Draft EIR because they did not meet the basic project objective of providing a new SAAP on the west side of LAX and were determined at the outset to be operationally infeasible. These alternatives are discussed below.

4.6.1.1 Alternative Airport Locations

This alternative is discussed in Section 5.4.1 of the Draft EIR. 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, all of which are on the east side of the airport. 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 on the east side of the airport. As discussed in Section 5.6.1 of the Draft EIR, leaving the west side of the airport without a SAAP would result in more travel on AOA service roadways and around airfield facilities, increasing the number of vehicles crossing active taxiways, which would not advance the mission of LAX Airfield Operations to provide safe and efficient vehicle movement within the AOA. Upgrading of existing posts on the east side of the airport rather than establishing a new SAAP on the west side of the airport would also result in additional vehicle miles traveled by vehicles accessing the AOA which, in turn, would result in increased emissions of criteria pollutants and greenhouse gases (GHG), as well as increased consumption of fossil fuels.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not meet the basic project objective of establishing a new SAAP on the west side of LAX and was determined to be operationally inefficient as there would be no full-access SAAP on the west side of LAX, resulting in more travel on AOA service roadways and around airfield facilities, and increasing the number of vehicles crossing active taxiways, which would not advance the mission of LAX Airfield Operations to provide safe and efficient vehicle movement within the AOA.

4.6.1.2 Alternative West Side Sites

These alternatives are discussed in Section 5.4.2 of the Draft EIR. 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 of the Draft EIR). Reasons why these alternative west side sites were rejected as infeasible are as follows:

- **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.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of these alternatives infeasible and rejects these alternatives because they are operationally infeasible.

4.6.2 Alternatives Carried Forward for Further Consideration

Three alternatives to the proposed project were described in Section 5.5 of the Draft EIR and evaluated in detail in Section 5.6 of the Draft EIR. These alternatives and their impacts compared to the proposed project are discussed below.

4.6.2.1 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.

4.6.2.1.1 Description of Effects as Compared to Proposed Project's Significant Effects

Biological Resources

As discussed in Section 4.1, *Biological Resources*, of the Draft EIR, 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.

Cultural Resources

As discussed in Section 4.2, *Cultural Resources*, of the Draft EIR, 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*, of the Draft EIR, 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*, of the Draft EIR, 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 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 traveled, impacts to air quality and GHG would be less than significant.

4.6.2.1.2 Relationship to 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*, of the Draft EIR, 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.[3]

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.[4]

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.

4.6.2.1.3 Findings

In light of the analysis in the EIR and substantial evidence in the administrative record, as summarized below, the BOAC hereby rejects Alternative 1: No Project – No Build as infeasible for the specific economic, legal, social, technological, or other considerations discussed below, and because it would not meet any of the project objectives. Alternative 1 would avoid all construction impacts of the proposed project. However, this alternative would require greater travel distances on AOA service roadways and around airfield service facilities, thereby increasing consumption of fossil fuels as compared to the proposed project, which would increase operations-related impacts to air quality, GHG, and energy and conservation as compared to the proposed project. This alternative would also increase the number of vehicles on service roads within the northern and eastern portions of the AOA, and would increase the number of vehicles crossing taxiways, which would not advance the mission of LAX Airfield Operations to provide safe and efficient vehicle movement within the AOA. Moreover, this alternative would not meet any of the project objectives described in Section 2 above. For these reasons, the BOAC hereby rejects Alternative 1: No Project – No Build.

4.6.2.2 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 of the Draft EIR). 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.

[3] 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.

[4] 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.

4.6.2.2.1 Description of Effects as Compared to Proposed Project's Significant Effects

Biological Resources

As discussed in Section 4.1, *Biological Resources*, of the Draft EIR, 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. 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*, of the Draft EIR, 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 implementation 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*, of the Draft EIR, 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 implementation 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*, of the Draft EIR, 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 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 the former 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 the former 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 traveled, impacts to air quality and GHG would be less than significant.

4.6.2.2.2 Relationship to 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 redevelopment 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.[5]

4.6.2.2.3 Findings

Of the alternatives other than Alternative 1: No Project-No Build, Alternative 2: Alternative Site, is the environmentally superior alternative, as discussed in Section 5.7 of the Draft EIR. Nevertheless, in light of the analysis in the EIR and substantial evidence in the administrative record, as summarized below, the BOAC hereby rejects Alternative 2: Alternative Site as infeasible for the specific economic, legal, social, technological, or other considerations discussed below, and because it would not meet three basic project objectives and, as compared to the proposed project, it is not as responsive to meeting two other project objectives. While 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, including the proposed project. 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 and 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.

Alternative 2 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, thereby increasing consumption of fossil fuels as compared to the proposed project, which would increase operations-related impacts to air quality, GHG, and energy and conservation as compared to the proposed project. Finally, Alternative 2 would

[5] 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.

not provide for any reuse of the proposed project site. For these reasons, the BOAC hereby rejects Alternative 2: Alternative Site.

4.6.2.3 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 ACM, 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 Operations Support Facility (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.[6]

4.6.2.3.1 Description of Effects as Compared to Proposed Project's Significant Effects

Biological Resources

As discussed in Section 4.1, *Biological Resources*, of the Draft EIR, 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*, of the Draft EIR, 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 implementation 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 historic district eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument.

[6] 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.

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*, of the Draft EIR, 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 implementation 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*, of the Draft EIR, 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 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 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, 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 traveled, impacts to air quality and GHG would be less than significant.

4.6.2.3.2 Relationship to 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 achieve, at a minimum, LAGBC Tier 1 conformance or would comply with LAWA's Sustainable Design & Construction 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.

4.6.2.3.3 Findings

In light of the analysis in the EIR and substantial evidence in the administrative record, as summarized below, the BOAC hereby rejects Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site as infeasible for the specific economic, legal, social, technological, or other considerations discussed below, and because it would not meet two basic project objectives, and, as compared to the proposed project, it is not as responsive to meeting three other project objectives. 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. This alternative would have the same impacts to archaeological, paleontological, and tribal cultural resources that would be associated with the other build alternatives, including the proposed project. Alternative 3 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. However, Alternative 3 would increase operations-related impacts to air quality, GHG, and energy and conservation as compared to the proposed project.

Alternative 3 would not meet two of the six project objectives, and would only partially meet three 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, and would only partially fulfill the objective of reusing the project site for an AOA-related use that fulfills LAWA's strategic goal of innovating to enhance security, efficiency, and effectiveness. 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, thereby increasing consumption of fossil fuels as compared to the proposed project, which would increase operations-related impacts to air quality, GHG, and energy and conservation as compared to the proposed project. For these reasons, the BOAC hereby rejects Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site.

4.7 Findings on Suggestions Included in Comments on the Draft EIR

One comment on the Draft EIR expressed a concern about the integrity of Imperial Highway between Pershing Drive and Interstate 405 due to its proposed use as a haul route for the proposed project and suggested the need for road improvements and periodic repairs. Specifically, a comment from Shute Mihaly & Weinberger LLP on behalf of the City of El Segundo (SAAP-AL01-1) on the Draft EIR recommended that LAWA's regular reliance on Imperial Highway as a construction haul route, for the SAAP Project and others, highlights the immediate need for long-promised road improvements, and periodic repairs as they become necessary in the future.

For the reasons discussed in Response to Comment SAAP-AL01-1, LAX existing planning addresses maintenance of haul route pavement conditions. More specifically, LAX Master Plan Commitment ST-17, Maintenance of Haul Routes, provides that haul routes on off-airport roadways will be maintained and comply with City of Los Angeles and other appropriate jurisdictional requirements for maintenance. As noted on page 29 of LAWA's LAX Master Plan Mitigation Monitoring and Reporting Program 2016 Annual Progress Report, this is an ongoing effort and continues to be implemented.[7] Moreover, as part of a Settlement Agreement negotiated between the City of Los Angeles, its Board of Airport Commissioners, LAWA, and the City of El Segundo related to the LAX Landside Access Modernization Plan approved by the Los Angeles City Council on November 29, 2017, the City of Los Angeles committed to performing rehabilitation and preventive maintenance work on certain portions of Imperial Highway located with the City of Los Angeles generally between Vista del Mar and Aviation Boulevard for a cost of approximately $1.9 million.[8] LAWA will continue to consult with the agencies responsible for maintenance of Imperial Highway and other roadways to identify any issues during construction with the condition of the haul routes.

For the reasons discussed in Response to Comment SAAP-AL01-1, and because the proposed project's road integrity impacts will be effectively addressed, no additional mitigation is required to reduce road integrity impacts. The BOAC adopts and incorporates by reference the specific reasons contained in the responses to comments in the LAX SAAP Project EIR as its grounds for rejecting this suggested mitigation measure as it pertains to the SAAP project.

4.8 Findings on Comments on the Draft EIR, Responses to Comments, and Revisions Made in the Final EIR

Comments made on the Draft EIR, responses to those comments, and revisions made in the Final EIR merely clarify and amplify the analysis presented in the document and do not amount to significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that LAWA has declined to implement. Therefore, the BOAC finds that recirculation of the LAX SAAP Project Draft EIR is not required pursuant to State CEQA Guidelines Section 15088.5(b).

4.9 Location of Custodian Records

The documents and other materials that constitute the administrative record for LAWA's actions related to the LAX SAAP Project are located at LAWA, One World Way, 2nd Floor, Los Angeles, CA 90045. The LAWA Environmental Programs Group is the custodian of the administrative record for the project.

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[7] City of Los Angeles, Los Angeles World Airports, *LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) 2016 Annual Progress Report.* Available: http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/MMRP_2016.pdf.

[8] City of Los Angeles, LA City Clerk Connect, Council File 17-0276, *Motion,* November 29, 2017.

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