

Los Angeles International Airport (LAX)  
**Secured Area Access Post Project**



**Draft Environmental Impact  
Report (Draft EIR)**

[State Clearinghouse No. 2017041053]

City of Los Angeles /// Los Angeles City File No. EIR-17-010-AD

**July 2017**



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## Table of Contents

1.	Introduction and Executive Summary .....	1-1
1.1	Project Objectives .....	1-1
1.2	Summary of Proposed Project .....	1-2
1.3	Purpose of this EIR .....	1-2
1.4	Organization of this EIR.....	1-3
1.5	Executive Summary of Environmental Impacts .....	1-4
1.6	Environmentally Superior Alternative .....	1-6
1.7	Areas of Known Controversy and Issues to be Resolved.....	1-7
2.	Project Description .....	2-1
2.1	Project Overview.....	2-1
2.2	Project Location .....	2-2
2.3	Project Objectives .....	2-4
2.3.1	Background .....	2-5
2.3.2	Objectives .....	2-6
2.4	Project Characteristics .....	2-6
2.5	Construction Schedule and Activities .....	2-13
2.6	Intended Use of this EIR.....	2-16
2.6.1	Federal Actions .....	2-17
2.6.2	Regional Actions .....	2-17
2.6.3	Local Actions .....	2-17
3.	Overview of Project Setting .....	3-1
3.1	Introduction .....	3-1
3.2	Land Use Setting .....	3-1
3.3	Environmental Setting .....	3-2
3.3.1	Biological Resources .....	3-2
3.3.2	Cultural Resources .....	3-2
3.3.3	Tribal Cultural Resources .....	3-3
3.4	Development Setting .....	3-3
4.	Environmental Impact Analysis.....	4.1-1
4.1	Biological Resources .....	4.1-1
4.1.1	Introduction .....	4.1-1
4.1.2	Methodology .....	4.1-2
4.1.3	Existing Conditions.....	4.1-2
4.1.3.1	Regulatory Setting .....	4.1-2
4.1.3.2	Existing Conditions .....	4.1-5
4.1.4	Thresholds of Significance .....	4.1-6
4.1.5	Impacts Analysis.....	4.1-6
4.1.6	Cumulative Impacts .....	4.1-6
4.1.7	Mitigation Measures.....	4.1-6
4.1.8	Level of Significance After Mitigation .....	4.1-7
4.2	Cultural Resources .....	4.2-1
4.2.1	Introduction .....	4.2-1
4.2.2	Methodology .....	4.2-1
4.2.2.1	Historical Resources .....	4.2-1

## Table of Contents

---

4.2.2.2	Archaeological and Paleontological Resources .....	4.2-1
4.2.3	Existing Conditions.....	4.2-2
4.2.3.1	Regulatory Context.....	4.2-2
4.2.3.1.1	Federal.....	4.2-2
4.2.3.1.2	State .....	4.2-5
4.2.3.1.3	Local .....	4.2-7
4.2.3.2	Baseline Conditions .....	4.2-10
4.2.3.2.1	Historical Resources .....	4.2-10
4.2.3.2.2	Archaeological and Paleontological Resources.....	4.2-19
4.2.4	Thresholds of Significance .....	4.2-23
4.2.5	Impacts Analysis.....	4.2-24
4.2.5.1	Historical Resources .....	4.2-24
4.2.5.2	Archaeological Resources.....	4.2-25
4.2.5.3	Paleontological Resources.....	4.2-25
4.2.5.4	Human Remains.....	4.2-25
4.2.6	Cumulative Impacts .....	4.2-26
4.2.6.1	Historical Resources .....	4.2-26
4.2.6.2	Archaeological Resources, Paleontological Resources, and Human Remains.....	4.2-28
4.2.7	Mitigation Measures.....	4.2-28
4.2.7.1	Historical Resources .....	4.2-28
4.2.7.2	Archaeological Resources.....	4.2-29
4.2.7.3	Paleontological Resources.....	4.2-30
4.2.7.4	Human Remains.....	4.2-30
4.2.8	Level of Significance After Mitigation .....	4.2-31
4.2.8.1	Historical Resources .....	4.2-31
4.2.8.2	Archaeological Resources.....	4.2-31
4.2.8.3	Paleontological Resources.....	4.2-31
4.2.8.4	Human Remains.....	4.2-31
4.3	Tribal Cultural Resources .....	4.3-1
4.3.1	Introduction .....	4.3-1
4.3.2	Methodology .....	4.3-1
4.3.3	Existing Conditions.....	4.3-1
4.3.3.1	Regulatory Context.....	4.3-1
4.3.3.1.1	Assembly Bill 52.....	4.3-1
4.3.3.2	Baseline Conditions .....	4.3-3
4.3.3.2.1	Previously Recorded Archaeological Resources.....	4.3-3
4.3.3.2.2	Sacred Lands File Search .....	4.3-4
4.3.3.2.3	AB 52 Tribal Consultation.....	4.3-4
4.3.4	Thresholds of Significance .....	4.3-4
4.3.5	Impacts Analysis.....	4.3-5
4.3.6	Cumulative Impacts .....	4.3-5
4.3.7	Mitigation Measures.....	4.3-6
4.3.8	Level of Significance After Mitigation .....	4.3-6
5.	Alternatives.....	5-1
5.1	Introduction .....	5-1
5.2	Significant Impacts of the Project.....	5-2

5.3	Project Objectives .....	5-2
5.4	Alternatives Considered and Rejected.....	5-2
5.4.1	Alternative Airport Locations.....	5-2
5.4.2	Alternative West Side Sites .....	5-3
5.5	Alternatives Carried Forward for Further Consideration.....	5-3
5.5.1	Alternative 1: No Project – No Build.....	5-3
5.5.2	Alternative 2: Alternative Site.....	5-5
5.5.3	Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site .....	5-5
5.6	Evaluation of Project Alternatives .....	5-5
5.6.1	Alternative 1 (No Project – No Build) .....	5-5
5.6.1.1	Environmental Impact Evaluation .....	5-5
5.6.1.2	Relationship of Alternative 1 (No Project – No Build) to Proposed Project Objectives .....	5-8
5.6.2	Alternative 2 (Alternative Site) .....	5-8
5.6.2.1	Environmental Impact Evaluation .....	5-8
5.6.2.2	Relationship of Alternative 2 (Alternative Site) to Proposed Project Objectives.....	5-10
5.6.3	Alternative 3 (Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site) .....	5-11
5.6.3.1	Environmental Impact Evaluation .....	5-11
5.6.3.2	Relationship of Alternative 3 (Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site) to Proposed Project Objectives.....	5-13
5.7	Environmentally Superior Alternative .....	5-14
6.	Other Environmental Considerations .....	6-1
6.1	Significant Unavoidable Impacts.....	6-1
6.2	Significant Irreversible Environmental Changes .....	6-1
6.3	Growth Inducing Impacts.....	6-2
6.3.1	Project Characteristics .....	6-2
6.3.2	Economic Growth .....	6-3
6.3.3	Removal of an Obstacle to Growth.....	6-3
6.4	Less Than Significant Effects .....	6-3
6.5	Energy Impacts and Conservation .....	6-4
6.5.1	Introduction .....	6-4
6.5.2	Energy Demand.....	6-4
6.5.2.1	Construction Activities.....	6-4
6.5.2.1.1	Worker, Vendor, and Haul Vehicle Trips.....	6-4
6.5.2.1.2	Construction Equipment Usage .....	6-7
6.5.2.2	Operational Activities .....	6-7
6.5.3	Energy Conservation .....	6-9
6.5.3.1	General Regulations, Plans, and Policies .....	6-9
6.5.3.1.1	State Regulations, Plans, and Policies .....	6-9
6.5.3.1.2	Local Regulations, Plans, and Policies .....	6-9
6.5.3.2	Electricity Efficiency.....	6-13
6.5.3.2.1	Electricity-Related Regulations, Plans, and Policies .....	6-13

## Table of Contents

---

6.5.3.2.2	Electricity Supply and Infrastructure in the Project Area .....	6-14
6.5.3.2.3	Applicability to the Proposed Project .....	6-15
6.5.3.3	Water Efficiency .....	6-15
6.5.3.3.1	Water-Related Regulations, Plans, and Policies.....	6-15
6.5.3.3.2	Water Supply and Infrastructure in the Project Area .....	6-16
6.5.3.3.3	Applicability to the Proposed Project .....	6-16
6.5.3.4	Transportation and Construction Equipment Fuel Efficiency .....	6-17
6.5.3.4.1	Fuel Efficiency-Related Regulations, Plans, and Policies.....	6-17
6.5.3.4.2	Applicability to the Proposed Project .....	6-18
6.5.3.5	Summary.....	6-19
6.5.4	Cumulative Impacts .....	6-19
6.6	Modifications to Standard Control Measures .....	6-20
7.	List of Preparers, Parties to Whom Sent, List of References, NOP Comments, and List of Acronyms .....	7-1
7.1	List of Preparers .....	7-1
7.2	Parties to Whom Sent.....	7-2
7.3	List of References.....	7-5
7.4	Notice of Preparation Comments .....	7-11
7.5	List of Acronyms.....	7-11

## List of Tables

Table 1-1	Summary of Environmental Impacts Related to the Proposed Project.....	1-5
Table 3-1	Development Projects At LAX.....	3-4
Table 4.2-1	Historical Resources on and in the Vicinity of the Project Site.....	4.2-15
Table 5-1	Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project .....	5-15
Table 5-2	Summary of Project's and Alternatives' Responsiveness to Project Objectives .....	5-16
Table 6-1	Construction Worker Gasoline Demand .....	6-5
Table 6-2	Construction Off-Site Deliveries and Hauling Diesel Demand .....	6-6
Table 6-3	Construction Equipment Diesel Demand.....	6-7
Table 6-4	Annual Increased Energy Demand by Source for Construction and Operations .....	6-8

## List of Figures

Figure 2-1	Regional Location Map .....	2-3
Figure 2-2	Project Location Map.....	2-4
Figure 2-3	Project Site and Surrounding Land Uses.....	2-7
Figure 2-4	Conceptual Rendering of Proposed SAAP.....	2-8
Figure 2-5	Proposed SAAP Layout.....	2-9
Figure 2-6	Proposed Landside Access Road .....	2-11
Figure 2-7	Proposed Construction Staging Area and Haul Route .....	2-14
Figure 3-1	Cumulative Development Projects At LAX.....	3-6
Figure 4.2-1	Aerial Photograph of Continental Airlines Facilities (1976).....	4.2-13
Figure 4.2-2	Historic Resources in the Project Vicinity .....	4.2-14
Figure 4.2-3	Continental Airlines GO Building Photographs .....	4.2-16
Figure 4.2-4	Continental Airlines Training Center Building Photographs .....	4.2-18
Figure 4.2-5	Continental Airlines Hangars, Shop, and Storage Facilities Photographs.....	4.2-20
Figure 5-1	Alternative West Side Sites Not Evaluated in the EIR.....	5-4
Figure 5-2	Maintenance Road South Site .....	5-6

## List of Appendices

Appendix A	Notice of Preparation/Initial Study and Scoping
	A-1 Notice of Preparation and Initial Study
	A-2 Notice of Preparation Comments
Appendix B	Historic Resources
	B-1 Historic Resources Technical Report
	B-2 Historic Building Documentation Continental Airlines General Office Building

## ***Table of Contents***

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# 1. INTRODUCTION AND EXECUTIVE SUMMARY

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

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

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

## 1.1 Project Objectives

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

The specific objectives of the proposed project are to:

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

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

## 1. Introduction and Executive Summary

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

### 1.2 Summary of Proposed Project

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

### 1.3 Purpose of this EIR

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

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

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

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

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

### 1.4 Organization of this EIR

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

#### Chapter 1 – Introduction and Executive Summary

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

#### Chapter 2 – Project Description

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

#### Chapter 3 – Overview of Project Setting

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

#### Chapter 4 – Environmental Impact Analysis

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

#### Chapter 5 – Alternatives

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

### Chapter 6 – Other Environmental Considerations

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

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

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

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

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

### Appendices

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

**Appendix A** – Notice of Preparation/Initial Study and Scoping

**Appendix B** – Historic Resources

## 1.5 Executive Summary of Environmental Impacts

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

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

Source: CDM Smith, 2017

Notes:

<sup>1</sup> Impacts of the proposed project on this resource could be significant, depending on the conditions encountered prior to, or during, construction.

### 1.6 Environmentally Superior Alternative

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

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

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

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

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

### 1.7 Areas of Known Controversy and Issues to be Resolved

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

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

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

## ***1. Introduction and Executive Summary***

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## 2. PROJECT DESCRIPTION

The project description is intended, among other things, to serve as a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and the supporting public services facilities. (State CEQA Guidelines Section 15124(c)). The proposed project's technical and engineering characteristics are detailed below in Section 2.4, *Project Characteristics*. The objectives, purpose, and economic characteristics of the proposed project are detailed in Section 2.3, *Project Objectives*, below.

The environmental and engineering characteristics of the proposed project specific to each environmental resource analyzed within this Draft EIR are further detailed in the individual subsections (i.e., Sections 4.1, 4.2, and 4.3) of Chapter 4, *Environmental Impact Analysis*. Supporting public services facilities associated with the proposed project are discussed in Appendix A, Notice of Preparation/Initial Study.

### 2.1 Project Overview

Los Angeles World Airports (LAWA) proposes a new Secured Area Access Post (SAAP) to provide a fully functional, secured access point onto the Airport Operations Area (AOA) on the west side of Los Angeles International Airport (LAX). The proposed 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.<sup>3,4,5</sup> 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 proposed 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.). Its elements would be the prototype for any future SAAPs and/or improvements to existing SAAPs at LAX.

The new SAAP facility would have a land footprint of approximately 1,200 feet by 150 feet, consisting primarily of paved areas with various pieces of equipment to control access (gates, traffic lights, signage, vehicle arrest systems, security fencing, etc.), vehicle inspection equipment (license plate readers, under-vehicle scanners, etc.), and facilities and shelter for inspection staff, including two canopy structures spanning the width of the first and last inspection stations, and two guard station buildings, one at each of the first and last inspection stations. Each guard house would be approximately 350 square feet (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 associated facilities. Demolition and construction of the proposed project is estimated to take approximately 13 months. Demolition and construction may not be continuous; it is

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<sup>3</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse*, (SCH2013021020), June 2014. The MSC North Project consists of a satellite concourse west of the Tom Bradley International Terminal that will include up to 11 aircraft gates. Construction of the MSC North Project is underway and is projected to be completed in November 2019.

<sup>4</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project*, (SCH20122091037), February 2014. The WAMA Project, located south of World Way West and east of Pershing Drive, includes new aircraft parking and maintenance facilities in the western portion of LAX. The first phase of the WAMA Project was completed in 2016. The second phase of the WAMA Project (construction of a second maintenance hangar) is projected to begin in 2017 and be completed by 2018.

<sup>5</sup> 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. Previously, the tenant operated the location as a gate for their leasehold. If the proposed project were constructed, it is expected that the temporary AOA access point would revert back to tenant control.

## 2. Project Description

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estimated that demolition and construction would occur in the timeframe between the fourth quarter of 2017 and the first quarter of 2019.

The proposed project would relocate activities associated with a former SAAP located on World Way West (i.e., SAAP21) to a new location less than half a mile to the east. The new SAAP would incorporate state-of-the-art technologies for vehicle screening. The proposed project would affect the location and process by which vehicles accessing the AOA are screened, but would not result in an increase in the number or type of vehicles that would utilize the new facility. Operations at the new SAAP would be the same as at the former SAAP (SAAP 21), which is the SAAP that was most recently in operation in proximity to the proposed project site.<sup>6</sup>

The proposed project would relocate existing security access posts at LAX; the project would not affect the number of passengers served by the airport or the number or type of aircraft operations. Moreover, the proposed new SAAP would not have any adverse effect on passenger activity, aircraft activity, or aircraft movements.

The proposed project would only affect vehicles accessing the AOA. The project would not increase existing passenger capacity or the number of aircraft operations at LAX.

## 2.2 Project Location

As shown in **Figure 2-1**, the project site is located within the City of Los Angeles, at LAX on LAWA property. The project site is located within the LAX Plan area of the City of Los Angeles, which is in the County of Los Angeles. LAX is the primary airport for the greater Los Angeles area, encompassing approximately 3,800 acres, and is situated at the western edge of the City of Los Angeles.

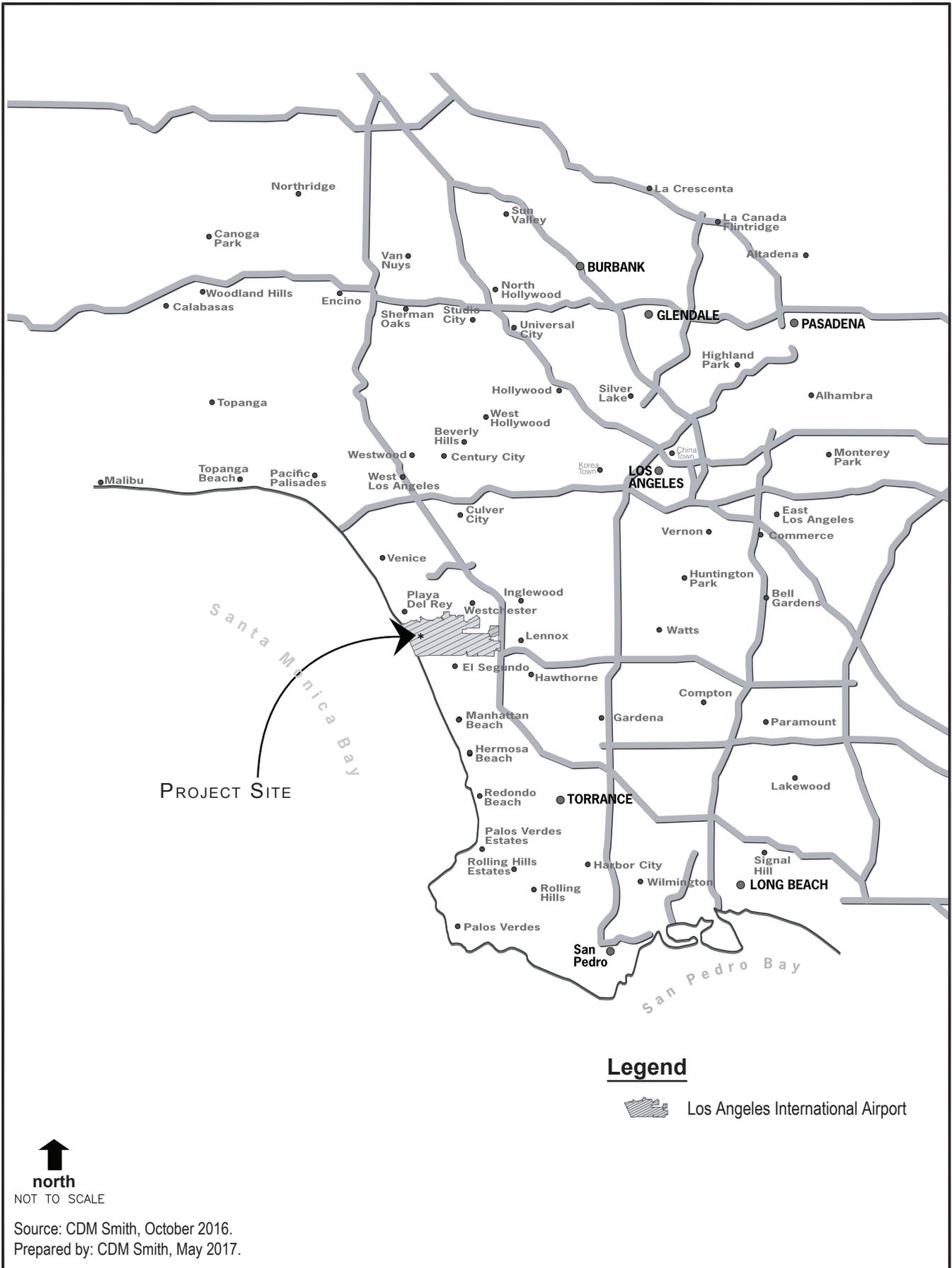
In the LAX vicinity, the community of Westchester is located to the north, the City of El Segundo is to the south, the City of Inglewood and unincorporated portions of Los Angeles County are to the east, and the Pacific Ocean lies to the west. Regional access to LAX is provided by Interstate 105 (I-105), which runs east-west and is located adjacent to LAX on the south, and the San Diego Freeway (Interstate 405 or I-405), which runs north-south and is located east of LAX. Access to the west side of the airport is via Imperial Highway and off Pershing Drive.

The 4.1-acre project site is located within the western portion of LAX parallel to and south of World Way West (see **Figure 2-2**). The project site includes paved areas currently used for vehicle parking and the former CAL GO Building, which was formerly the general office building for Continental Airlines' Corporate Headquarters, and is now vacant. In addition to the CAL GO Building, the original Continental Airlines facility at LAX included a maintenance base with six aircraft hangars and apron areas, a Training Center building, operations offices, shop buildings, commissary and in-flight kitchen facilities, and supporting infrastructure.<sup>7</sup>

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<sup>6</sup> Tomcheck, Pat, Los Angeles World Airports, Electronic Mail Message to Angelica Espiritu, Los Angeles World Airports, *Subject: New SAAP Traffic Volume*, January 10, 2017.

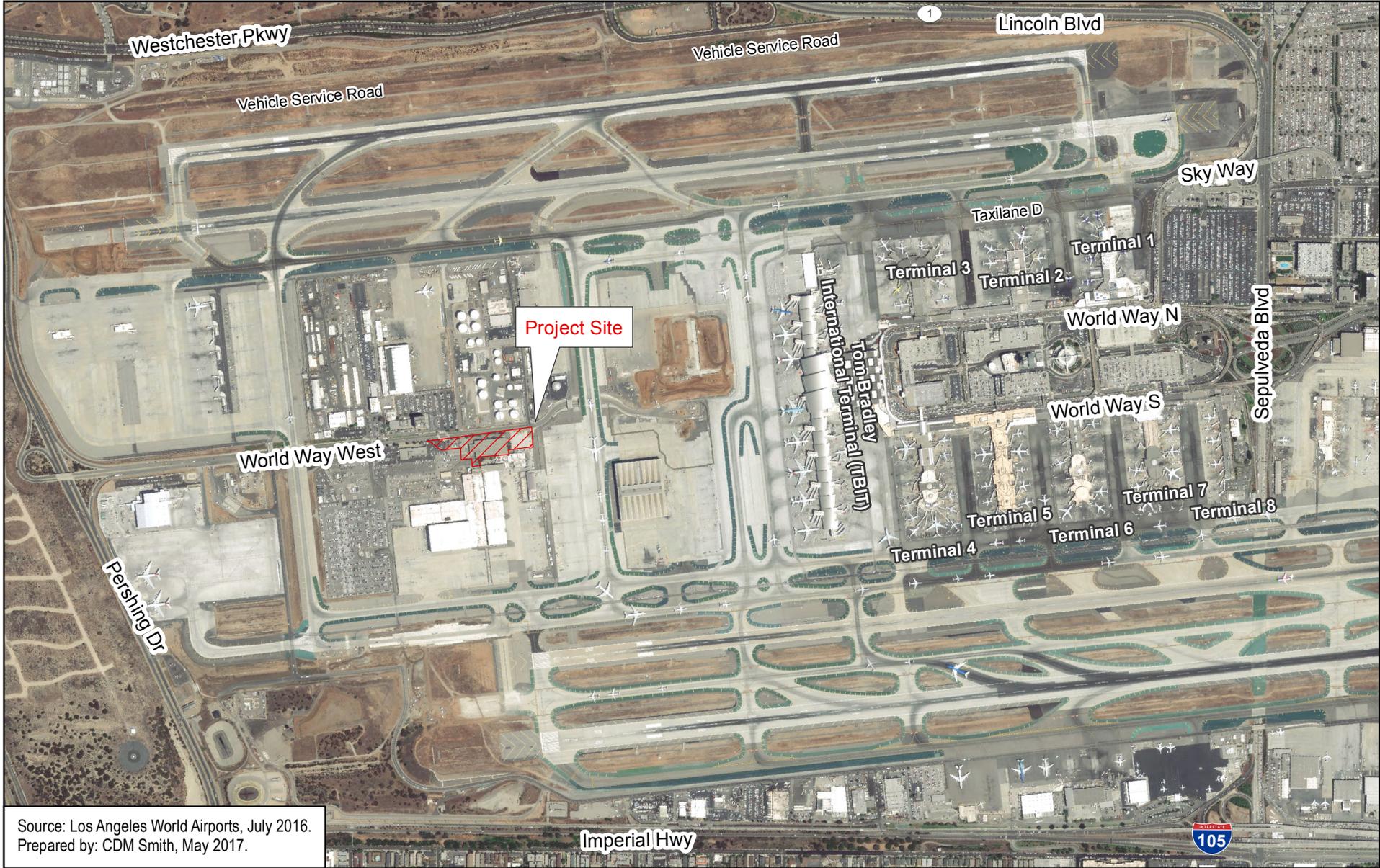
<sup>7</sup> PCR Services Corporation, *Draft Historic Resources Assessment Report: Continental Airlines Facilities, 7300 Maintenance Road (APN: 4129-026-903) and 7300 World Way West (APN: 4129-026-903), Los Angeles, Los Angeles County, California*, September 2013.



**LAX Secured Area Access Post Project**

**Regional Location Map**

Figure  
2-1



**LAX Secured Area Access Post Project**

**Project Location Map**

Figure  
2-2

The land use setting around the project site is characterized by airport operations and aircraft maintenance facilities. Existing adjacent uses include: the LAX Fuel Farm and LAWA administrative offices/vehicle parking to the north and northwest, respectively; a remain overnight (RON) aircraft parking area to the east; the American Airlines (AA) Operations Support Facility (OSF), AA Engineering Building, United Airlines Maintenance Hangar, and Los Angeles Fire Department (LAFD) Fire Station 80/Aircraft Rescue and Fire Fighting Facility (ARFF) to the south; and the former CAL Training Building (vacant) to the west. The LAX Plan, the City of Los Angeles General Plan Land Use Element that governs uses on LAX, designates the project site as Airport Airside. The corresponding LAX Specific Plan designates this area as LAX-A Zone: Airport Airside Sub-Area.<sup>8,9</sup>

## 2.3 Project Objectives

### 2.3.1 Background

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. 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.<sup>10</sup> 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 vacant.<sup>11</sup> The building is uninhabitable, and has been largely unoccupied since approximately 1995, with the exception of one office, which was occupied until 2001.<sup>12</sup> 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.<sup>13</sup>

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<sup>8</sup> City of Los Angeles, Department of City Planning, *LAX Plan*, adopted December 14, 2004, last amended May 24, 2013. Available: [http://planning.lacity.org/complan/specplan/pdf/LAXPLAN\\_AMENDED20130524\\_FINAL\(SECURED\).pdf](http://planning.lacity.org/complan/specplan/pdf/LAXPLAN_AMENDED20130524_FINAL(SECURED).pdf).

<sup>9</sup> City of Los Angeles, Department of City Planning, *Los Angeles International Airport (LAX) Specific Plan*, adopted December 4, 2004, last amended June 14, 2016. Available: [http://clkrep.lacity.org/onlinedocs/2013/13-0285-s3\\_ORD\\_184348\\_6-15-16.pdf](http://clkrep.lacity.org/onlinedocs/2013/13-0285-s3_ORD_184348_6-15-16.pdf).

<sup>10</sup> 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.

<sup>11</sup> PCR Services Corporation, *Draft Historic Resources Assessment Report: Continental Airlines Facilities, 7300 Maintenance Road (APN: 4129-026-903) and 7300 World Way West (APN: 4129-026-903), Los Angeles, Los Angeles County, California*, September 2013.

<sup>12</sup> Tomcheck, Pat, Los Angeles World Airports, Electronic Mail Message to Robin Ijams, CDM Smith, *Subject: Continental General Office Building – last occupancy*, January 26, 2017.

<sup>13</sup> Ninyo & Moore, *Hazardous Building Material Survey, Continental Airlines General Office Building, Chelsea Kitchen Basement, and Training Buildings, Los Angeles International Airport, 7270, 7300, and 7320 World Way West, Los Angeles*,

## 2. Project Description

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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., prior to the Northridge earthquake of 1994), the structural system has numerous inadequacies that do not meet current building codes.

### 2.3.2 Objectives

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;<sup>14</sup>
- 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;<sup>15</sup> 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.<sup>16</sup>

## 2.4 Project Characteristics

### SAAP Facility

The proposed project is the construction of a new SAAP on the west side of LAX that would accommodate all types of vehicles that require access to the AOA (construction, aircraft service vehicles, vendors, LAWA, etc.). The new SAAP would be located parallel to and south of World Way West, near where the road will terminate at Coast Guard Road once the MSC North Project is completed (see Figure 2-2). Facilities and land uses surrounding the project site are shown on **Figure 2-3**. A graphic rendering and the layout of the proposed SAAP are provided in **Figure 2-4** and **Figure 2-5**, respectively. 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 station, and two guard station buildings, one at each of the first and last inspection stations. Each guard house would be approximately 350 SF and would include monitoring equipment and a single

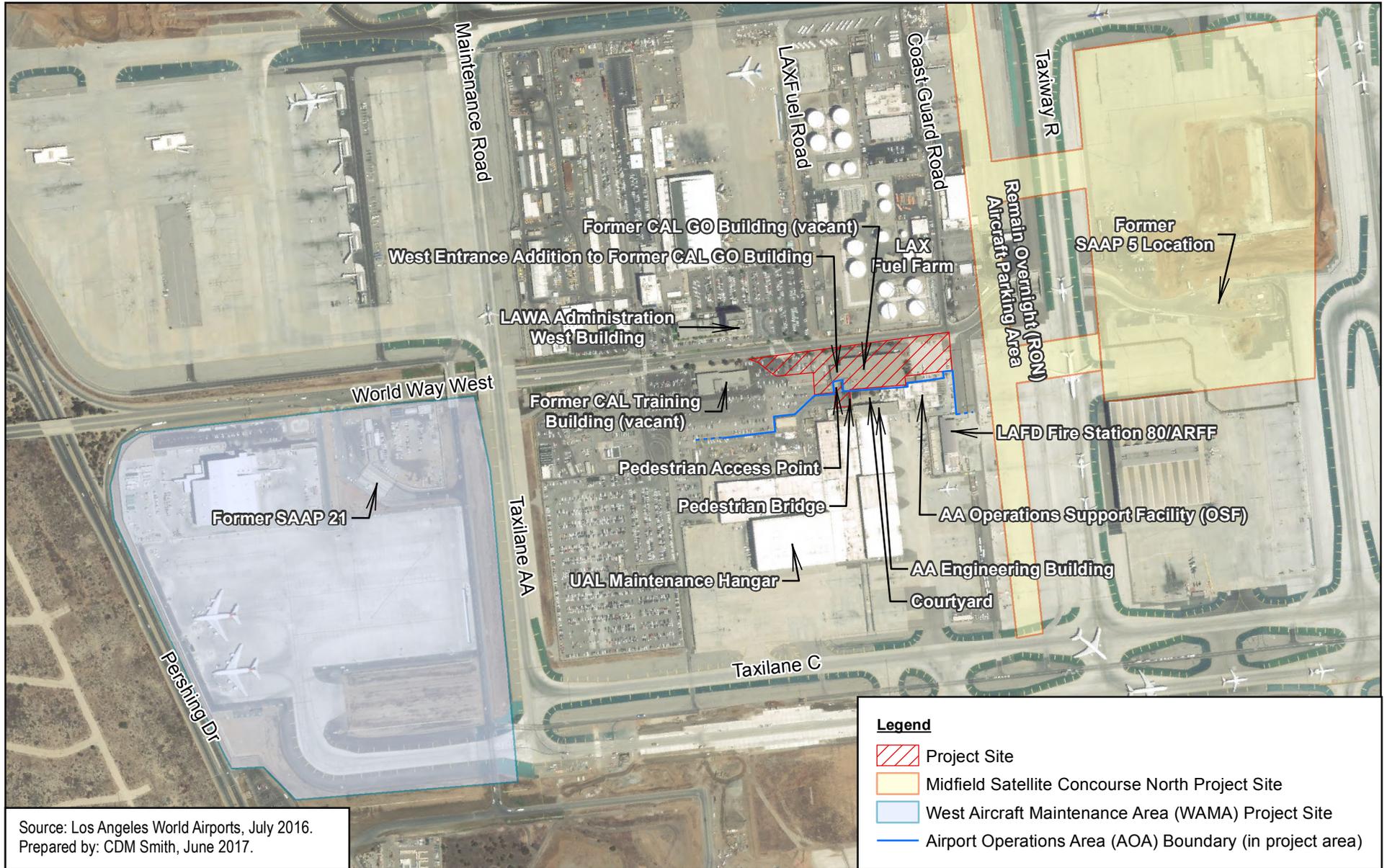
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California, May 18, 2016.

<sup>14</sup> 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.

<sup>15</sup> 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](https://www.lawa.org/uploadedFiles/LAX/pdf/Aero_Newsletter_201611.pdf), accessed May 18, 2017.

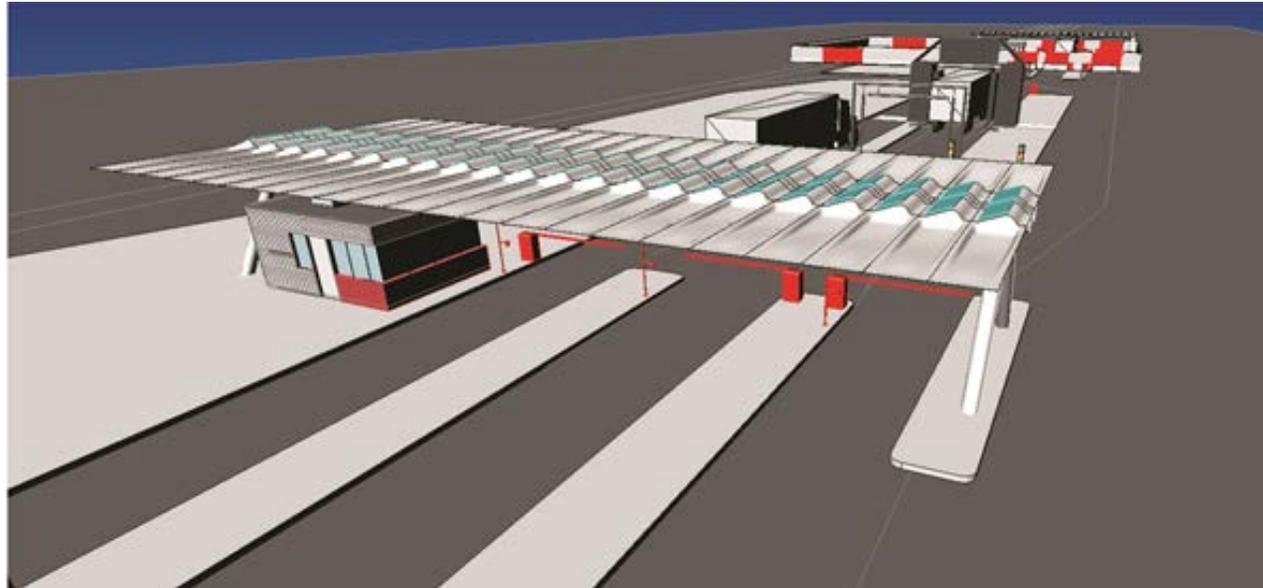
<sup>16</sup> City of Los Angeles, Los Angeles World Airports, 2016 Design and Construction Handbook: Environmental – Sustainability, July 2016. Available: <http://www.lawa.org/uploadedFiles/LAXDev/DCH/Environmental/Sustainability%20CALGreen%20LEED.pdf>.



**LAX Secured Area Access Post Project**

**Project Site and Surrounding Land Uses**

Figure  
2-3

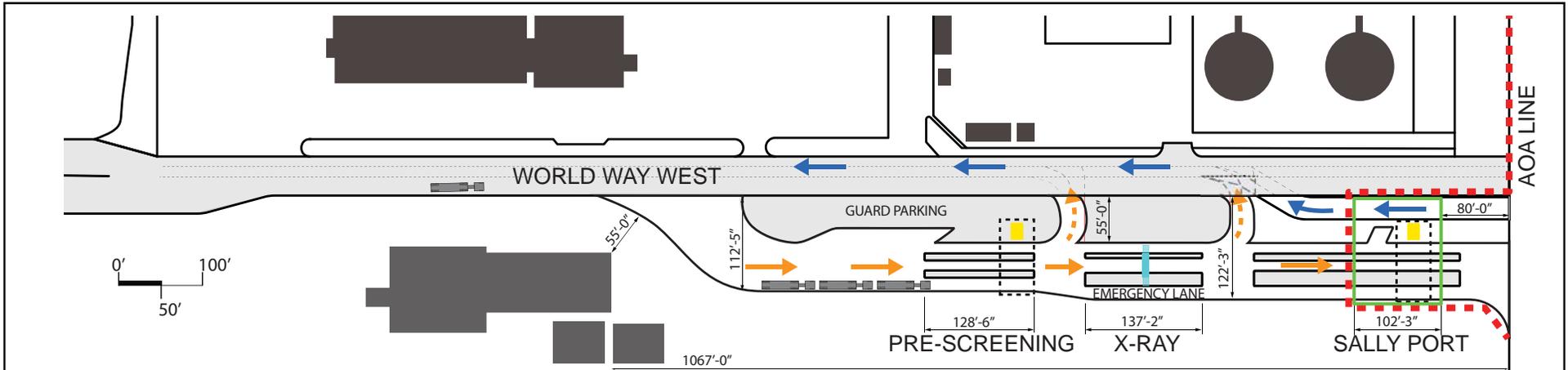


Source: Los Angeles World Airports, July 2015.  
Prepared by: CDM Smith, May 2017.

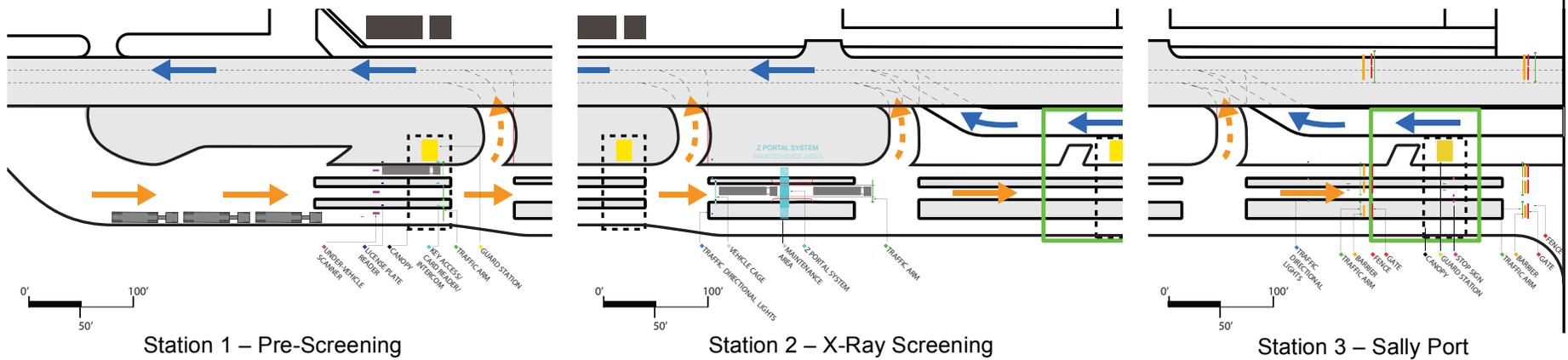
**LAX Secured Area Access Post Project**

**Conceptual Rendering of Proposed SAAP**

Figure  
**2-4**



Proposed SAAP Layout



**LEGEND**

- SAAP inbound traffic
- SAAP outbound traffic
- X-ray equipment
- Guard booth
- Exit for traffic denied access
- Canopy structure
- Sally port perimeter

Source: Los Angeles World Airports, September 2015.  
Prepared by: CDM Smith, May 2017.

**LAX Secured Area Access Post Project**

**Proposed SAAP Layout**

Figure  
**2-5**

## 2. Project Description

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Americans with Disabilities Act (ADA)-compliant restroom. The guard houses would be single-story structures approximately 16 feet in height; the two canopies would be tall enough to provide 25 feet in clearance for trucks accessing the SAAP. New lighting associated with the proposed project would include security lighting on the new guard station buildings, canopy lighting, roadway lighting, and perimeter fence lighting along the last inspection station. Perimeter fence lighting would include either pole-mounted or fence-mounted LED fixtures matching existing foot-candle outputs. All external lights would be shielded and focused to avoid glare and prevent unnecessary light spillover. Power to the proposed project would be provided by the grid. An emergency generator would be located onsite to provide power in the event of a power failure or service interruption.

As shown in Figure 2-5, the proposed new SAAP would consist of three screening areas:

- Station 1 – Pre-Screening: card swipe; physical inspection of badges; guard and driver interactions; license plate reader; and cameras/scanners providing under-carriage, top view, and interior view of vehicles.
- Station 2 – X-ray Screening: selected vehicles would drive through an x-ray machine (back scatter technology would not require driver to exit the vehicle).
- Station 3 – Sally Port: the primary two functions of this station are to provide a secure gateway to the AOA and to allow LAWA Police Division (LAWAPD) officers to inspect vehicles within a controlled environment.

The proposed SAAP would include an independent emergency lane to provide dedicated access for emergency vehicles. The emergency lane would be intended to be used by LAWA and LAFD emergency vehicles. In addition, the proposed SAAP would include employee parking onsite. (LAWAPD personnel were transported to the former Post 21 by van.)

As described below, constructing the proposed new SAAP would require the removal of the former CAL GO Building and associated facilities. Some LAWA and tenant/visitor parking spaces in the parking lot south of World Way West would also be eliminated. Construction of the new SAAP would also eliminate the current landside access routes to the AA OSF and Fire Station 80/ARFF. Access to the AA OSF is currently provided via World Way West to a surface parking lot located to the east of the CAL GO Building. Under the proposed project, the current site of the parking lot would be occupied by the easterly portion of the SAAP. Access to Fire Station 80/ARFF is currently provided via World Way West to an access-controlled road located east of the AA OSF (the access road is located across World Way West and slightly to the east of Coast Guard Road). This access road would no longer be accessible from World Way West with implementation of the proposed project. Access to the AA OSF and Fire Station 80/ARFF would be maintained by providing a new access road along the south side of the new SAAP (see **Figure 2-6**). As proposed, the entrance to this new access road would be located off of World Way West, adjacent to the proposed SAAP access point.

### Demolition of CAL GO Building and Associated Facilities

Construction of the new SAAP would require the demolition and removal of the former CAL GO Building (both the main building and the west entrance addition), the pedestrian bridge between the CAL GO Building and the AA Engineering Building, and pedestrian access point infrastructure. Activities associated with demolition of these facilities are described below.

The main CAL GO Building was constructed in 1963 and is a two-story structure with subterranean parking. Its footprint is approximately 310 feet by 164 feet, encompassing roughly 151,000 SF of floor area, including a basement garage. The 1974 west entrance addition to the main CAL GO Building is approximately 4,500 SF and is one-story plus a basement. In total, the building is approximately 155,500 SF. The CAL GO Building is steel-framed with metal



Source: Ricondo & Associates, April 2017.  
 Prepared by: CDM Smith, May 2017.

**LAX Secured Area Access Post Project**

**Proposed Landside Access Road**

Figure  
**2-6**

## 2. Project Description

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stud-framed exterior walls on its west, south, and east sides, and a glass curtain wall on the north exterior side.<sup>17,18</sup> The CAL GO Building has been largely unoccupied since approximately 1995, with the exception of one office, which was occupied until 2001.<sup>19</sup> 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. As described previously, the CAL GO Building contains hazardous building materials, including ACM, 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., prior to the Northridge earthquake of 1994), the structural system has numerous inadequacies that do not meet current building codes.

Facilities to be demolished are the CAL GO Building, including the west entrance addition, and associated facilities. The associated facilities are the pedestrian bridge connecting the CAL GO Building to the AA Engineering Building and the pedestrian access facility at the southwest corner of the CAL GO Building, including the gates and canopy structures. Building and system modifications needed as a result of these demolitions would also be made during the demolition phase.

Prior to the initiation of demolition activities, abatement of hazardous building materials would be conducted to remove ACM, LCS, mold, and other hazardous materials inside the CAL GO Building. Abatement and disposal of hazardous building materials would be done in accordance with local, state, and federal regulations which govern the removal and disposal of hazardous building materials; see Initial Study Attachment A, Section VIII (Appendix A of this EIR) for a description of key regulations.

Demolition of the CAL GO Building would include removal of the building foundation and below grade footings, removal of utility infrastructure, and demolition of several retaining walls. Demolition would extend approximately 5 feet below the existing ground surface. Demolition of the CAL GO Building foundations and footings would require backfill of the void left by the demolition. In addition, the partial subterranean parking area would also be filled.

As noted above, adjoining the southeast portion of the CAL GO Building is the smaller AA OSF structure (see Figure 2-3). The CAL GO Building and adjoining AA OSF structure are separated by a seismic joint all the way through the underground garage and basement, making the two structures seismically and structurally independent. The partition separating the spaces between the two structures is an interior partition wall, and removal of the CAL GO Building would expose this interior wall to the elements, thus requiring that this wall be modified to be a finished exterior wall. A new exterior wall skin would be constructed to make the AA OSF structure secure, weather tight, and whole. The existing basement floor of the AA OSF structure is approximately 5 feet below the projected finish grade. When the CAL GO Building is demolished, this condition would require construction of a new retaining wall along a portion of the existing OSF structure north wall. The new retaining wall would tie into existing retaining walls that would remain along the east and west sides of the AA OSF basement. The new wall would be constructed with a waterproofing system to maintain a dry environment in the existing basement. Demolition of the CAL GO Building would be planned and undertaken in a manner to ensure occupancy and operation of the AA OSF during and after demolition.

At the west end of the CAL GO Building is a pedestrian bridge that spans across the AA OSF exterior courtyard to the AA Engineering Building to the south (see Figure 2-3). The bridge structure is steel-framed with a bare metal roof deck. This bridge provided access between the CAL GO Building and the AA Engineering Building before it was sealed off on both ends. As part of the proposed project, the pedestrian bridge would be demolished. Following demolition of the pedestrian bridge, a new exterior infill wall would be constructed at the existing AA Engineering Building

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<sup>17</sup> 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.

<sup>18</sup> Ninyo & Moore, *Hazardous Building Material Survey, Continental Airlines General Office Building, Chelsea Kitchen Basement, and Training Buildings, Los Angeles International Airport, 7270, 7300, and 7320 World Way West, Los Angeles, California*, May 18, 2016.

<sup>19</sup> Tomcheck, Pat, Los Angeles World Airports, Electronic Mail Message to Robin Ijams, CDM Smith, *Subject: Continental General Office Building – last occupancy*, January 26, 2017.

exterior wall, and the existing AA OSF courtyard finish pavement surfaces would be repaired where bridge foundations are removed. Demolition of the pedestrian bridge would be planned and undertaken in a manner to ensure occupancy and operation of the AA Engineering Building during and after demolition.

At the southwest corner of the west entrance addition of the CAL GO Building is a pedestrian access point used by AA and United Airlines employees to access the AA Engineering Building and United Airlines Maintenance Hangar (see Figure 2-3). The pedestrian access gate includes two ACAMS-controlled turnstiles gates, one turnstile exit gate, and one pedestrian ADA-compliant swing gate (all currently under lease to, and operated by, United Airlines). The turnstiles and pedestrian gate are shaded by two freestanding canopy roof structures. All infrastructure related to the pedestrian access point, including the canopy structures, would be demolished.

The CAL GO Building west entrance addition currently houses security system electronic infrastructure, which supports operation of the existing pedestrian point mentioned above as well as a vehicle access point. While the vehicle access point would remain, all infrastructure related to the pedestrian access point would be demolished (as described above). The electronic infrastructure that supports the vehicle access gate would be disconnected and relocated to an area within the AA Engineering Building. This would not require any additional building area to be added to the AA Engineering Building.

Demolition would also include removal of existing concrete walks, asphalt pavement, curbs and gutters, retaining walls, trees, and planter areas surrounding the CAL GO Building. Removal of landscaping would result in the removal of approximately 45 non-native ornamental trees located around the perimeter of the CAL GO Building and within the surface parking area to the west.

Demolition is projected to commence in late 2017. All demolition activities would occur on the landside (i.e., publicly-accessible areas outside the AOA).

## 2.5 Construction Schedule and Activities

The primary consideration in planning for proposed project construction activities is to maintain safe and uninterrupted operation of the airport, including airfield operations and aircraft maintenance activities. Demolition and construction of the proposed project is estimated to take approximately 13 months. Demolition and construction may not be continuous; it is estimated that demolition and construction would occur in the timeframe between the fourth quarter of 2017 and the first quarter of 2019. Work would occur between 6:00 am and 3:30 pm; work hours would be written into the construction specifications. At peak construction, approximately 40 construction personnel would be onsite.

Development of the proposed SAAP would occur on a portion of LAX that is currently paved/developed, with small areas of ornamental landscaping. The total area of ground surface to be disturbed would be approximately 23,000 square yards, extending down to a maximum depth of approximately 5 to 8 feet. Approximately 33,000 cubic yards of soil/pavement would be removed from the project site; the peak daily amount of soil/pavement to be removed would be approximately 370 cubic yards. Non-hazardous construction and demolition debris generated at the site would be recycled or salvaged to achieve a 65 percent diversion in construction waste. Transport of hazardous building materials associated with demolition of the CAL GO Building and any contaminated soils (if encountered and requiring disposal) would be performed by licensed hazardous waste haulers. Disposal would comply with applicable local, state, and federal regulations governing disposal of hazardous materials, including transport by a licensed waste hauler and disposal at a properly certified facility.

If it is feasible and practical, existing pavement, such as asphalt and concrete, would be crushed at a location on airport property and reused as base material or as aggregate in the production of concrete to be poured/placed onsite.

The construction staging area and haul route for the proposed project are shown on **Figure 2-7**. As shown, the proposed construction staging area is located immediately west of the project site, within the parking lot around the former CAL Training Building, which is now vacant. During the demolition activities, as well as during construction of the new SAAP, all construction activities would occur on the landside and no on-airport entry would be required.



**LAX Secured Area Access Post Project**

**Proposed Construction Staging Area and Haul Route**

Figure  
2-7

The haul route on public roads to and from the project site would extend from the driveway at World Way West to south on Pershing Drive, to east on Imperial Highway, and then connecting to I-105. No lane or road closures of public roadways would be required for construction. Demolition/construction activities for the proposed project would not affect airport/aircraft operations. The project site is not located adjacent to any areas used by aircraft or ground support equipment. Moreover, as noted above, all construction activities would be planned and undertaken in a manner that would ensure the occupancy and operation of the AA OSF and AA Engineering Building during and after demolition of the CAL GO Building. Construction staging areas would be coordinated by LAWA's Construction and Logistics Management (CALM) Team. The CALM Team helps monitor and coordinate the construction logistics of development projects at LAX in the interest of avoiding conflicts between ongoing airport operations and construction activities. In accordance with standard LAWA practice, construction would be coordinated with the LAWA CALM Team to ensure that occupancy and operation of adjacent and surrounding facilities, including the AA Engineering Building, AA OSF, United Airlines Maintenance Hangar, Fire Station 80/ARFF, LAX Fuel Farm, and LAWA administrative offices, would be maintained throughout demolition and construction activities.<sup>20</sup>

As required by the Los Angeles Department of Building and Safety, LAWA would submit a Haul Route Form and Haul Route Map, as shown on Figure 2-7, identifying routes to be used by trucks to export soil or demolition debris offsite. In addition, pursuant to standard City of Los Angeles Department of Transportation (LADOT) practices, a Work Traffic Control Plan, showing the location of the construction area and identifying construction traffic would be submitted to LADOT.<sup>21</sup>

### LAWA Design and Construction Practices

The proposed new SAAP would be designed and constructed in accordance with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code (CALGreen), and would achieve, at a minimum, LAGBC Tier 1 conformance through environmentally-sensitive features including, but not limited to, the types described below.<sup>22,23</sup>

Non-hazardous construction and demolition debris generated at the site would be recycled or salvaged to achieve a 65 percent diversion in construction waste, as required to achieve LAGBC Tier 1 conformance.<sup>24</sup> The SAAP would include efficient lighting fixtures and controls with occupancy sensors to reduce energy consumption during off-peak hours, and 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. During construction, low-emitting paints, adhesives, and sealants would be used to the extent feasible. To conserve potable water, 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. The relationship of these features and practices to potential project impacts is identified in Attachment A of the Initial Study (included in Appendix A of this Draft EIR).

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<sup>20</sup> City of Los Angeles, Los Angeles World Airports, *Design and Construction Handbook: Coordination and Logistics Management (CALM) – CALM Review Procedures*, June 2016. Available: <http://www.lawa.org/uploadedFiles/LAXDev/DCH/Construction/CALM%20Review%20Procedures%20TIAP%20Process%20July%202016.pdf>.

<sup>21</sup> City of Los Angeles, Department of Transportation, *LADOT Homepage: Transportation Impact Studies, B-Permits, & CCTC*. Available: <http://ladot.lacity.org/contact-us/transportation-impact-studies-b-permits-cttc>.

<sup>22</sup> City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended.

<sup>23</sup> 24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*.

<sup>24</sup> City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended, Appendix A5, Table A5.601 Non Residential Buildings: Green Building Standards Code Tier 1 and Tier 2 Reference Table.

## 2. Project Description

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In addition to the measures identified above, LAWA has implemented a wide range of actions designed to reduce temporary, construction-related air pollutant and greenhouse gas emissions from its ongoing construction program and has established aggressive construction emissions reduction measures, particularly with regard to requiring construction equipment and heavy duty trucks to be newer models that have low-emission engines or be equipped with emissions control devices.<sup>25</sup> To achieve this commitment, LAWA has developed standard control measures which would be applied to the project, as discussed in greater detail in the Initial Study (Appendix A of this Draft EIR). For example, on-road haul trucks with a gross vehicle weight rating of at least 14,001 pounds would comply with U.S. Environmental Protection Agency (USEPA) 2010 on-road emissions standards for particulate matter up to 10 micrometers in size (PM10) and nitrogen oxides (NOx). Contractors would be required to use compatible on-road haul trucks or the next cleanest burning vehicle available. Off-road diesel-powered construction equipment greater than 50 horsepower would meet new USEPA Tier 4 (final) off-road emissions standards or the next cleanest equipment available. Other measures would be implemented to further reduce fugitive dust generation and minimize use of portable generators for electrical power in favor of grid power where available. An independent Third-Party Monitor would track, verify, and report on the use of clean construction equipment and would quantify emissions benefits.

The impacts of the proposed project on the majority of the resource areas addressed by these measures— air quality, greenhouse gas emissions, solid waste, and water supply—would be less than significant, as discussed in the Initial Study. The ability of these practices to further reduce these less-than-significant project impacts is also identified in the Initial Study. The energy implications of the proposed project, including its design and construction practices, are addressed in Section 6.5 of this Draft EIR, with emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy pursuant to State CEQA Guidelines Appendix F.

### 2.6 Intended Use of this EIR

Implementation of the proposed project would require approvals from and consultation with federal, state, and regional/local agencies. The EIR will be used by the agencies identified below in connection with permits and approvals necessary for the construction and operation of the proposed project. Federal, state, and regional/local agency actions required for the construction and operation of the proposed project may include, but are not limited to, those described below. This EIR may also be used in connection with other federal, state, or regional/local approvals, permits, or actions that may be deemed necessary for the proposed project, but which are not specifically identified below.

This Draft EIR will be used primarily to (1) inform decision-makers and the public about the potentially significant environmental effects of the proposed project and the ways to avoid or reduce the significant environmental effects to the extent feasible; (2) demonstrate to the public that the environment is being protected; and (3) ensure that the planning and decision-making processes reflect an understanding of the environmental effects of the proposed project.

In addition to use of this EIR by LAWA and the City of Los Angeles City Council and Planning Commission, the proposed project requires various federal, state, and local agency approvals. CEQA requires that all state and local agencies consider the environmental consequences of projects over which they have discretionary authority. These agencies may use this EIR in their respective decision-making and approval processes, and federal agencies may use information in this EIR when conducting NEPA reviews. A list of federal, state, and local permits and approvals that may be needed to implement the proposed project includes, but is not necessarily limited to, the following:

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<sup>25</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

### 2.6.1 Federal Actions

- U.S. Department of Transportation FAA - Approval of Form 7460-1 (Notice of Proposed Construction or Alteration) in consideration of Part 77 requirements.<sup>26</sup>

### 2.6.2 Regional Actions

- South Coast Air Quality Management District (SCAQMD) - Review of any permits required under the Clean Air Act for stationary sources (i.e., emergency generator).

### 2.6.3 Local Actions

- LAWA Board of Airport Commissioners – Project approval;
- City Council of the City of Los Angeles;
- Preparation of a project-specific Storm Water Management Plan or Standard Urban Storm Water Mitigation Plan for approval by the City of Los Angeles Bureau of Sanitation, Watershed Protection Division;
- City of Los Angeles Fire Department approval – Approval related to ARFF access road;
- City of Los Angeles Department of Cultural Affairs - Permit application clearance;
- City of Los Angeles Department of Transportation - Approval of Work Traffic Control Plan;
- City of Los Angeles Department of Building and Safety – Grading, foundation, and building permits and Haul Route Plan approval; and
- City of Los Angeles Department of Public Works – Permits for infrastructure improvements, as needed.

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<sup>26</sup> While FAA is not a state agency regarding CEQA review, the proposed project would require approval of Form 7460 (Notice of Proposed Construction or Alteration) in consideration of Part 77 requirements.

## **2. Project Description**

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## 3. OVERVIEW OF PROJECT SETTING

### 3.1 Introduction

This chapter provides an overview of the existing land use, environmental, and development setting relevant to the proposed Secured Area Access Post Project (proposed project). More detailed descriptions of the existing setting specific to each of the environmental topics evaluated in this Environmental Impact Report (EIR) are provided within their respective sections in Chapter 4, Environmental Impact Analysis. This chapter also describes other development projects proposed at and adjacent to Los Angeles International Airport (LAX) that may, in conjunction with the proposed project, result in cumulative impacts to the environment.

### 3.2 Land Use Setting

As indicated in Chapter 1, *Introduction and Executive Summary*, and Chapter 2, *Project Description*, and depicted in Figure 2-1 and Figure 2-2, the proposed project is located at LAX, within a highly-developed, urbanized area consisting of airport, commercial, transportation (i.e., interstate highways), and residential uses. More specifically, the proposed project site is located within the western portion of LAX, parallel to and south of World Way West (see Figure 2-3). The project site includes paved areas currently used for vehicle parking and the former Continental Airlines (CAL) General Office (GO) Building, which is vacant, and associated facilities. The LAX Plan, the City of Los Angeles General Plan Land Use Element that governs uses on LAX, designates the project site as Airport Airside. The corresponding LAX Specific Plan designates this area as LAX A Zone: Airport Airside Sub-Area. The proposed project is consistent with the LAX Plan land use designation and with the allowable uses under the LAX Specific Plan.<sup>27,28</sup>

The land use setting around the project site is characterized by airport operations and aircraft maintenance facilities. Existing adjacent and nearby uses include: the LAX Fuel Farm and LAWA administrative offices/vehicle parking to the north and northwest, respectively; a remain overnight (RON) aircraft parking area to the east; the American Airlines (AA) Operations Support Facility (OSF), AA Engineering Building, United Airlines Maintenance Hangar, and Los Angeles Fire Department (LAFD) Fire Station 80/Aircraft Rescue and Fire Fighting Facility (ARFF) to the south and southeast; and the former CAL Training Building (vacant) to the west.

The closest land uses in the project vicinity that are not airport-related include the following:

- The City of Los Angeles communities of Westchester and Playa del Rey north of LAX;
- A mix of commercial, hotel, office, industrial, and residential uses east of LAX in the City of Los Angeles, City of Inglewood, and unincorporated community of Lennox;
- Residential, commercial, office, and institutional uses to the south of LAX in the City of El Segundo and the unincorporated community of Del Aire; and
- Dockweiler State Beach, the Pacific Ocean, and the Los Angeles/El Segundo Dunes to the west.

The Dunes Specific Plan Area, a designated Los Angeles County Significant Ecological Area, is located approximately 0.9 mile to the west of the project site, opposite Pershing Drive. The proposed project site is not located within the Coastal Zone, which is approximately 0.9 mile to the west of the project site.

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<sup>27</sup> City of Los Angeles, Department of City Planning, *LAX Plan*, Originally Adopted December 4, 2004, last amended May 24, 2013. Available: [http://planning.lacity.org/complan/specplan/pdf/LAXPLAN\\_AMENDED20130524\\_FINAL\(SECURED\).pdf](http://planning.lacity.org/complan/specplan/pdf/LAXPLAN_AMENDED20130524_FINAL(SECURED).pdf).

<sup>28</sup> City of Los Angeles, Department of City Planning, *LAX Specific Plan*, adopted by Los Angeles City Council December 14, 2004, last amended June 14, 2016. Available: [http://clkrep.lacity.org/onlinedocs/2013/13-0285-s3\\_ORD\\_184348\\_6-15-16.pdf](http://clkrep.lacity.org/onlinedocs/2013/13-0285-s3_ORD_184348_6-15-16.pdf).

### **3. Overview of Project Setting**

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The only unique resources located on or within the vicinity of the project site are the CAL GO Building and CAL Training Building, which are examples of Mid-century Modern corporate architecture. In addition, the former Continental Airlines maintenance complex (including hangars, shops, offices and storage facilities) is located in the immediate vicinity of the project site and is considered a contributor to a potential historic district that includes the CAL GO Building and CAL Training Building, as further discussed in Section 3.3.2 below.

## **3.3 Environmental Setting**

This section provides an overview of the existing environmental setting related to the proposed project and the topical issues evaluated in Chapter 4, *Environmental Impact Analysis*, of this EIR. Additional information regarding existing conditions for these topics is provided in Chapter 4 of this EIR.

### **3.3.1 Biological Resources**

The project site and adjacent construction staging area are highly developed and/or disturbed and do not contain any sensitive biological resources (i.e., sensitive or special status species or habitats; riparian/wetland areas), or native trees. Further, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applicable to the project area.

Approximately 45 non-native ornamental trees (i.e., pine, juniper, bottle brush, American sweet gum, ficus, and olive) ranging in height from 8 feet to 50 feet are located around the perimeter of the CAL GO Building and surface parking area to the west. These trees may be used for nesting by raptors or birds. None of these trees meet the criteria for being a locally-protected tree, such as native oak, sycamore, or California walnut, under the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the Los Angeles Municipal Code).

### **3.3.2 Cultural Resources**

As discussed further in Appendix B of this Draft EIR, the project site includes the former CAL GO Building, which is vacant. The CAL GO Building was built in 1963, with a new west entrance to the building added in 1974. The CAL GO Building was constructed at least 50 years ago and is an example of Mid-century Modern corporate architecture. It is eligible for listing in the California Register of Historical Resources (California Register) and as a Los Angeles Historic-Cultural Monument, and is a contributor to a potential historic district that is eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument (see below)., The former CAL Training Center Building to the west of the project site is eligible for listing in the National Register of Historic Places, the California Register, and as a Los Angeles Historic-Cultural Monument, and is a contributor to a historic district that is eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Furthermore, the CAL GO Building, CAL Training Center Building, and associated Continental Airlines complex of hangars, shops, and storage facilities have been identified as eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument as a historic district. No other potential historical structures are located on or in the vicinity of the project site.

The LAX Master Plan Final EIR identified 36 previously recorded archaeological sites within a radius of approximately two miles of LAX, including eight sites located on LAX property.<sup>29</sup> None of the eight sites identified on LAX property is located within the boundaries of the project site or in the immediate vicinity. The project site is a highly disturbed area that has long been, and is currently being, used for airport uses. Any resources that may have existed on the site at one time are likely to have been displaced and, as a result, the overall sensitivity of the site with respect to buried resources is low.

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<sup>29</sup> City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

The LAX property lies in the northwestern portion of the Los Angeles Basin, a broad structural syncline with a basement of older igneous and metamorphic rocks overlain by thick younger marine and terrestrial deposits. The older deposits that underlie the LAX area are assigned to the Palos Verdes Sand formation, which is one of the better known Pleistocene age deposits in southern California. The results of the records search conducted as part of the LAX Master Plan EIR indicate that the Palos Verdes Sand formation is a formation with a high potential for yielding unique paleontological deposits.<sup>30</sup>

#### 3.3.3 Tribal Cultural Resources

The project site is developed with aviation-related uses, and the airport is located within a highly urbanized area. Within the project area, traditional burial resources would likely be associated with the Native American group known as the Gabrieliño. Based on previous surveys conducted at LAX and the results of the record searches completed in 1995, 1997, and 2000 for the LAX Master Plan EIR, no traditional burial sites have been identified within the LAX boundaries or in the vicinity.<sup>31</sup>

### 3.4 Development Setting

This section identifies past, present, and reasonably foreseeable probable future projects at LAX that could, in conjunction with the proposed project, result in cumulative impacts to the environmental resources addressed in this EIR. These projects are listed in **Table 3-1** and identified in **Figure 3-1**. A description of each project is also provided in Table 3-1. The projects listed in Table 3-1 were considered in the cumulative impacts analysis for each resource analyzed in Chapter 4, *Environmental Impact Analysis*.

In accordance with State CEQA Guidelines Section 15130(b), there are essentially two approaches to evaluating cumulative impacts:

- a. List past, present, and reasonably foreseeable probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- b. Summarize projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program.

For purposes of analyzing the proposed project's cumulative impacts to biological resources, cultural resources, and tribal cultural resources, the first approach, the list approach, was used.

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<sup>30</sup> City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.2 – Paleontological Resources, April 2004.

<sup>31</sup> City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

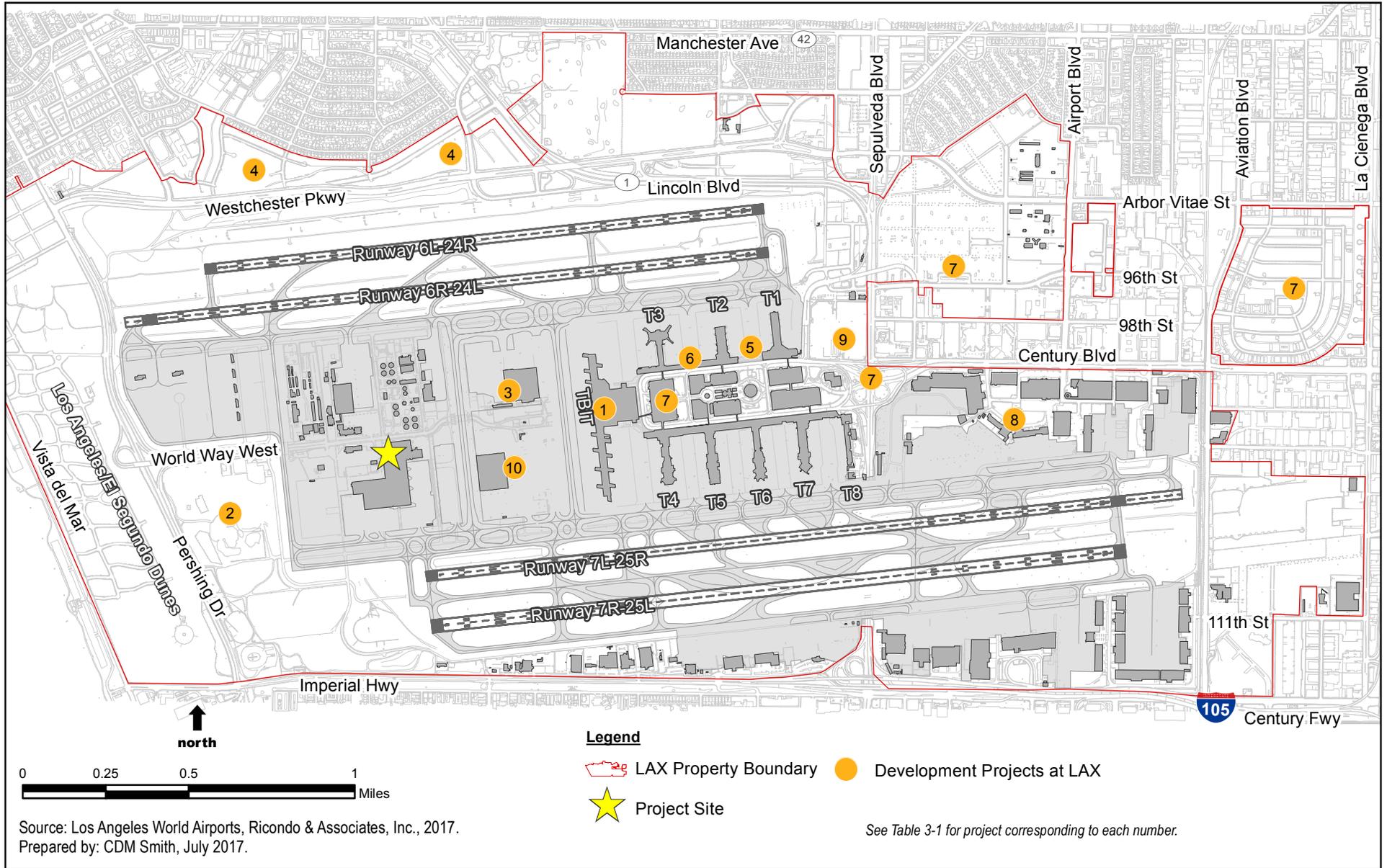
### 3. Overview of Project Setting

	Project	Dates	Description
1	LAX Bradley West Project	Nov 2013 – Nov 2017	Replacement of existing concourses and aprons at the Tom Bradley International Terminal (TBIT) with new concourses and gates at Bradley West. Work includes demolition of existing TBIT concourses and installation of east gates/aprons along Bradley West concourses. Also includes Taxilane T project and construction of secure/sterile passenger and baggage connection between the TBIT core and Terminal 4. Although construction of a similar connection between TBIT core and Terminal 3 is also part of the overall Bradley West Project, it is broken out separately below (Project 18, Terminal 3 Connector), as its construction would not begin until after the majority of the Bradley West improvements are completed.
2	West Aircraft Maintenance Area Project	Aug 2014 – Jan 2018	The West Aircraft Maintenance Area (WAMA) project will allow for more efficient and effective maintenance of existing aircraft at LAX, including Aircraft Design Group (ADG) VI aircraft (Airbus A380s and Boeing 747-8s). The project includes aircraft parking and maintenance facilities, employee parking areas, and related storage, equipment, and facilities. The project will be able to accommodate up to 8 ADG VI aircraft simultaneously or 18 ADG III aircraft (aircraft similar in size to, and including, Boeing 737s). The first phase of the WAMA Project was completed in July 2016. The second phase of the WAMA Project (construction of an additional maintenance hangar) will be dictated by market conditions and is anticipated to be completed by 2018.
3	LAX Midfield Satellite Concourse North Project	Apr 2015 – Mar 2020	The Midfield Satellite Concourse (MSC) North Project consists of a satellite concourse west of TBIT that will include up to 12 aircraft gates that could accommodate ADG V and ADG VI aircraft. The MSC North Project includes associated apron areas, a new crossfield taxiway, a taxilane, and provisions for an underground tunnel.
4	LAX Northside Development	Apr 2016 – Jun 2025	The Northside Development will transform approximately 340 acres of land on the north side of the airport to better serve LAWA and the local communities of Westchester and Playa del Rey.
5	Terminal 1.5	Jun 2017 – Feb 2020	Terminal 1.5 will be constructed between existing Terminal 1 and Terminal 2 to provide additional passenger processing facilities for the north passenger terminals.
6	Terminals 2 and 3 Modernization Project	Sep 2017 – Dec 2023	Improvements to Terminals 2 and 3, consisting of upgrading the Terminal 2 concourse, including construction of additional floor area; the demolition and reconstruction of the Terminal 3 concourse building to provide additional concourse area, including a new operation control center; the demolition of the southern appendages of the Terminal 3 satellite; the demolition and reconstruction of the passenger and baggage processing facilities (ticketing buildings) at Terminals 2 and 3, including new facilities for passenger and baggage screening, ticketing, and baggage claim; and a secure connector between Terminals 2 and 3.

### 3. Overview of Project Setting

	Project	Dates	Description
7	LAX Landside Access Modernization Program <sup>1</sup>	Late 2017 – Dec 2035	Improvements within and east of the CTA to improve access options and the travel experience for passengers; provide a direct connection to the Metro transit system; provide easier and more efficient access to rental cars; relieve congestion in the CTA and on the surrounding street system; and improve the efficiency and operation of the transportation system serving LAX. The program components include an automated people mover (APM) system, Intermodal Transportation Facilities (ITFs), a Consolidated Rental Car Facility (CONRAC), pedestrian walkway connections to the passenger terminals within the CTA, and roadway improvements.
8	United Airlines (UAL) East Aircraft Maintenance/Ground Support Equipment (GSE) Project	Late 2018 – Dec 2020	UAL’s aircraft and GSE maintenance activities will be consolidated from locations on the west and east side of LAX into a single location on the east side. The existing facilities on the east side would be demolished and replaced with new, modernized facilities.
9	Concourse 0	Jan 2020 – Dec 2023	Concourse 0 would be constructed to the east of Terminal 1, in the current location of the Park One surface parking lot. Concourse 0 would provide up to 660,000 square feet of floor space, including 11 aircraft gates.
10	MSC South Project	2020 - 2025	The MSC South concourse would be constructed on the south end of the MSC North concourse in order to provide up to 18 additional aircraft gates. The facility would provide approximately 560,000 square feet of floor space.
<p>Notes:</p> <p>1 There are no current proposals or plans regarding what types or amounts of development may occur on the parcels that would be available for other uses as a result of the proposed Landside Access Modernization Program. Further planning, assessment, and other efforts would be needed. Thus, particular uses and development are not reasonably foreseeable at this time.</p> <p>Sources: LAWA, Ricondo &amp; Associates, Inc., 2017.</p>			

Figure 3-1 illustrates the location of the projects in Table 3-1 in relationship to the project site.



**LAX Secured Area Access Post Project**

**Cumulative Development Projects At LAX**

Figure  
3-1

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## 4. ENVIRONMENTAL IMPACT ANALYSIS

This chapter presents an assessment of the potentially significant environmental impacts of the proposed project, as described in Chapter 2, *Project Description*. This chapter describes the physical environment at and within the vicinity of LAX that may be affected by the proposed project; the impacts to that physical environment; and the measures proposed to mitigate those impacts, as required.

As identified in the Notice of Preparation (NOP)/Initial Study published on April 20, 2017 for this EIR, LAWA initially determined, based on a preliminary review of the proposed project, that construction of the proposed project could cause significant impacts within three environmental resource areas. The following environmental resource areas were identified in the NOP/Initial Study and are addressed in this chapter:

- Biological Resources
- Cultural Resources
- Tribal Cultural Resources

In addition, Appendix F of the State CEQA Guidelines requires an EIR to consider the potentially significant energy impacts of the proposed project. Therefore, Section 6.5 in Chapter 6, *Other Environmental Considerations*, addresses the infrastructure capacity and demand associated with the energy consumption associated with the construction and operation of the proposed project.

### Organization

Each of the environmental resource areas addressed in this chapter is discussed in a separate section using a common organization. Sections are numbered 4.1, 4.2 and 4.3. The sections are divided into subsections to simplify and clarify the discussion. Within each environmental resource area section, discussion of the following is provided:

- The **Introduction** briefly describes the resource topics addressed in the analysis. The Introduction also identifies any specific resource topic for that environmental resource area that is not being addressed as part of this EIR and provides a discussion explaining the reasons why. For biological resources, a number of resource topics were evaluated and it was determined that the proposed project would have no impact or impacts were determined to be less than significant, as documented in the Initial Study that was published with the NOP for the proposed project on April 20, 2017 (included as Appendix A of this EIR).
- The **Methodology** describes how the resource topics were approached, including explanations of any assumptions; identification of information sources used for the analysis; and delineation of the study area considered for each environmental resource area. This section also identifies the environmental baseline used to determine the significance of impacts. A discussion of the environmental baseline is provided below under Analytical Framework.
- The **Existing Conditions** discusses the baseline conditions for the environmental resource topic in the study area, including relevant activities, facilities, and regulations. The environmental baseline is described below under Analytical Framework.
- The **Thresholds of Significance** are quantitative or qualitative criteria used to determine whether a significant environmental impact would occur as a result of the project. This section identifies the origins of the thresholds of significance used in the analysis. In general, and unless otherwise noted, the thresholds

## 4. Environmental Impact Analysis

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of significance used in the analysis of the proposed project impacts reflect guidance provided in Appendix G of the State CEQA Guidelines and/or criteria or guidance included in the L.A. CEQA Thresholds Guide.<sup>32,33</sup>

- The **Impacts Analysis** section presents the analysis of impacts for the construction (the build-out horizon year 2019) of the proposed project. Impacts were compared to the thresholds of significance to determine whether they would be, under CEQA, significant or less than significant. For purposes of determining significance, impacts were compared to the environmental baseline conditions, as further described in the Analytical Framework below. The impact analysis includes a determination of the level of significance of impacts under each threshold before mitigation.
- **Cumulative Impacts** are the impacts of the proposed project in conjunction with past, present, and reasonably foreseeable probable future projects. The environmental impacts of the proposed project may be individually minor, but cumulatively considerable when considered in conjunction with other projects.
- **Mitigation Measures** are specified procedures, plans, policies, or activities proposed for adoption by the lead agency to reduce or avoid the significant impacts identified in the analysis of environmental impacts. This section identifies applicable Standard Control Measures that LAWA would apply as mitigation measures and any proposed project-specific mitigation measures to address significant impacts that would occur with implementation of the proposed project. In accordance with the requirements of CEQA, a mitigation monitoring and reporting program (MMRP) would be adopted as part of the proposed project approvals, to ensure that implementation of mitigation measures, including applicable Standard Control Measures, is properly monitored and documented. Further discussion of LAWA Standard Control Measures is provided in the Analytical Framework below.
- **Level of Significance After Mitigation** is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant. These "significant unavoidable impacts" are also listed in Chapter 6, Other Environmental Considerations, of this EIR.

### Additional Effects Found Not to be Significant in Initial Study

In accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, further analysis of specific environmental resource areas where it was determined that the proposed project would have no impact or impacts were determined to be less than significant in the Initial Study is not required and is not provided in this EIR. The specific environmental resource areas for which the analysis in the Initial Study determined there would be no impact or impacts would be less than significant and, therefore, are not further analyzed in the EIR, are: Aesthetics, Agriculture and Forestry Resources, Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, and Utilities and Service Systems.

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<sup>32</sup> State of California, *Guidelines for California Environmental Quality Act (State CEQA Guidelines)*, California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387.

<sup>33</sup> City of Los Angeles, *L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles*, 2006.

## Analytical Framework

### Environmental Baseline

Section 15125 of the State CEQA Guidelines requires that an EIR describe the physical environmental conditions in the vicinity of a proposed project "as they exist at the time the notice of preparation is published...." and further states that "[t]his environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."

The Notice of Preparation (NOP) for this EIR was published on April 20, 2017. In accordance with the provisions of CEQA Guidelines Section 15125, 2017 is the baseline year for characterizing existing conditions in the environmental analysis.

### Description of Cumulative Impacts

As defined in the State CEQA Guidelines Section 15355, cumulative impacts are the impacts of the proposed project in conjunction with past, present, and reasonably foreseeable probable future projects. The environmental impacts of the project may be individually minor, but cumulatively considerable when considered in conjunction with other projects.

In accordance with the State CEQA Guidelines Section 15130, the proposed project must be evaluated for cumulative impacts to determine if they would be significant. This EIR provides an analysis of cumulative impacts to environmental resources addressed in this EIR that would be associated with construction of the proposed project in conjunction with other construction projects at LAX.

In accordance with State CEQA Guidelines Section 15130(b), there are essentially two approaches to evaluating cumulative impacts:

- a. List past, present, and reasonably foreseeable probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- b. Summarize projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program.

For purposes of analyzing the proposed project's cumulative impacts to biological resources, cultural resources, and tribal cultural resources, the first approach, the list approach, was used.

Past, present, and reasonably foreseeable probable future projects at LAX that could, in conjunction with the proposed project, result in cumulative impacts to the environmental resources addressed in this EIR are described in Chapter 3, *Overview of Project Setting*, and are listed in Table 3-1 and identified in Figure 3-1; an analysis of cumulative impacts is included within the analysis of each of the three environmental resource areas evaluated in this chapter.

## LAWA Standard Control Measures and Mitigation Measures

Standard Control Measures are measures that implement existing regulations and/or LAWA plans and policies that would reduce or avoid potential environmental impacts. For purposes of this EIR, those Standard Control Measures that are applicable to the impacts of the proposed project are recommended for implementation. An example of a LAWA Standard Control Measure that is applicable to the proposed project is conformance by contractors with LAWA's existing Archaeological Treatment Plan to reduce or avoid potential impacts to previously undiscovered

#### **4. Environmental Impact Analysis**

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archaeological resources that may be encountered during construction activities.<sup>34</sup> LAWA's Archaeological Treatment Plan establishes requirements for monitoring during grading and/or excavation in native and undisturbed soils by a qualified archaeologist and protocols for the identification, evaluation, and recovery of archaeological resources, if discovered. Standard Control Measures are proposed, as warranted, in this EIR as "mitigation measures" to reduce significant impacts.

In addition, project-specific mitigation measures have been proposed to supplement applicable Standard Control Measures to reduce significant impacts to the extent feasible. In accordance with the requirements of CEQA, this EIR describes impacts both with and without mitigation. As such, the analysis under the heading "Impact Analysis" in each section of this chapter identifies the impacts of the proposed project before the application of Standard Control Measures and project-specific mitigation measures. A description of the impacts of the proposed project after application of Standard Control Measures and project-specific mitigation measures is then provided under the "Level of Significance After Mitigation" heading in each section.

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<sup>34</sup> City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005.

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## 4.1 Biological Resources

### 4.1.1 Introduction

This biological resources section addresses the proposed project's impacts on nesting birds/raptors. The existing biological resources conditions in the project area are described, along with the methodology and the regulatory framework that guided the evaluation of biological resources. Potential impacts to biological resources that would result from the proposed project are identified, along with any measures to mitigate significant effects of the proposed project.

Prior to the preparation of this EIR, an Initial Study (included as Appendix A of this EIR) was prepared using the CEQA Environmental Checklist Form to assess potential environmental impacts on biological resources. The Initial Study, provided in Appendix A of this EIR, determined the proposed project would have "no impact" related to five of the biological resource topics identified in the Initial Study Checklist Form and, for this reason, no further analysis of these topics in an EIR was required. The following Initial Study topics related to biological resources do not require any additional analysis in this EIR:

- The potential for a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) was evaluated and determined to have "No Impact" in the Initial Study. The project site and proposed construction staging area west of and adjacent to the project site are located in a highly developed area within the center portion of the west side of LAX that, other than ornamental landscaping, is completely devoid of biological resources. While other areas within the airport boundary contain plant and animal species as well as habitats identified as sensitive, none of the identified sensitive plant or animal species have been identified on the project site or the construction staging area, or in their immediate vicinity. Therefore, the proposed project would have no impacts to sensitive or special status species or habitats.
- The potential for a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS was evaluated and determined to have "No Impact" in the Initial Study. There are no riparian areas or other sensitive natural community at or adjacent to the project site or proposed construction staging area. Therefore, no impacts to any riparian or other sensitive natural community would occur with the implementation of the proposed project.
- The potential for a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means was evaluated and determined to have "No Impact" in the Initial Study. There are no wetland areas at or adjacent to the project site or proposed construction staging area. Therefore, no impacts to any federally protected wetlands as defined by Section 404 of the Clean Water Act would occur with the implementation of the proposed project.
- The potential for conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, was evaluated and determined to have "No Impact" in the Initial Study. As discussed further in Sections 4.1.3.2 and 4.1.5 below, there are a number of non-native ornamental trees located around the perimeter of the CAL GO Building that would be removed as part of the proposed project. However, there are no native trees, including trees protected by City of Los Angeles Ordinance No. 177404 (i.e., oak trees indigenous to California [excluding Scrub Oak], Southern California Black Walnut, Western Sycamore, or California Bay) at or adjacent to the project site or the proposed construction staging area.<sup>35</sup> In addition, none of the ornamental trees located around the perimeter of the CAL GO Building and surface parking area to the west are located within a public right-of-way; therefore, removal of the ornamental trees would not be subject to permitting requirements for street tree removal under

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<sup>35</sup> City of Los Angeles, Ordinance No. 177,404, *Protected Tree Relocation and Replacement*, effective April 23, 2006.

## 4.1 Biological Resources

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Los Angeles Municipal Code, Chapter VI, Sections 62.169 and 62.170. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- The potential for conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan was evaluated and determined to have “No Impact” in the Initial Study. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that includes the project site or proposed construction staging area. The Dunes Specific Plan Area (i.e., Los Angeles/El Segundo Dunes), a designated Los Angeles County Significant Ecological Area, is located in the western portion of LAX, approximately 0.9 mile west of the project site, opposite Pershing Drive. The Dunes area is well removed from the project site and would not be affected by the proposed project. Therefore, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

### 4.1.2 Methodology

The analysis presented in this section incorporates relevant information from the LAX Specific Plan Amendment Study (SPAS) EIR the LAX Landside Access Modernization Program Draft EIR, and the LAX Northside Plan Update EIR, Impacts on biological resources have been previously addressed in these EIRs; therefore, the analysis procedures and data from these other projects were applied as appropriate for the proposed project.<sup>36,37,38</sup>

### 4.1.3 Existing Conditions

#### 4.1.3.1 Regulatory Setting

A review of the various federal, state, regional, and local government regulatory requirements was conducted to identify regulations that provide protection of biological resources. This section summarizes the various regulatory requirements that are relevant to the proposed Project.

#### Federal Endangered Species Act of 1973

The Federal Endangered Species Act (ESA) was enacted in 1973 and is administered by the USFWS.<sup>39</sup> The ESA provides for the conservation of endangered or threatened species and conservation of the ecosystems in which they exist. Floral and faunal species that are listed as federally threatened or federally endangered, or are candidates for listing, are protected under the ESA. Section 9 of the ESA prohibits the taking of species listed by the USFWS as endangered or threatened. As defined by the ESA, “taking” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in such conduct. In recognition that a “take” cannot always be avoided, the ESA includes a provision for incidental take of endangered and threatened species that occurs within the parameters of otherwise lawful activities.

#### Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 et seq.), makes it unlawful to take, capture, kill, attempt to take, capture, or kill, or possess, any migratory birds, parts of migratory birds, or their eggs and nests, except when specifically authorized by the Secretary of the Interior.<sup>40</sup> (16 U.S.C. §§ 703, 704.) The term “take” is defined in federal

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<sup>36</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study*, (SCH 1997061047), Section 4.3 – Biological Resources, January 2013.

<sup>37</sup> Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Section 4.3 - Biological Resources, September 2016.

<sup>38</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Northside Plan Update*, (SCH 2012041003), Section 4.3 – Biological Resources, December 2014.

<sup>39</sup> 16 United States Code, Sections 1531 – 1544, as amended, Endangered Species Act of 1973.

<sup>40</sup> 16 United States Code, Sections 703-712, as amended, *Migratory Bird Treaty Act*.

regulations as meaning, “to pursue, hunt, shoot, wound, kill, capture, or collect or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect.” (50 CFR 10.12.) Many bird species are considered migratory under the MBTA. The migratory bird species protected under the act are listed in 50 CFR 10.13. Disturbances that cause nest abandonment and/or loss of reproductive effort or loss of habitat upon which these birds depend may result in take and would be in violation of the MBTA.

### [FAA Advisory Circular No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports"](#)

Advisory Circular (AC) 150/5200-33B provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports.<sup>41</sup> It also discusses airport development projects (including airport construction, expansion, and renovation) affecting aircraft movement near hazardous wildlife attractants. The AC provides guidance on types of land uses and management of habitat within proximity to airports and prescribes management techniques for airport operators to implement in order to minimize the risk of wildlife and aircraft interactions.

### [California Endangered Species Act](#)

The California Endangered Species Act (CESA) prohibits the taking, importation, or sale of state-listed endangered or threatened species except in compliance with permits or conditions specified in the CESA.<sup>42</sup>

The CESA also authorizes the CDFW to issue permits for incidental take of endangered or threatened species by general development activities, provided that a proposed project will not jeopardize the continued existence of such species and that any of the project's negative effects on those species will be minimized and fully mitigated. CESA authorizes CDFW to enter into a memorandum of understanding with individuals, public agencies, universities, zoological gardens, and scientific or educational institutions to import, export, take, or possess species for scientific, educational, or management purposes.

### [“Fully protected” Species](#)

The California Fish and Game Code classifies some species as "fully protected," and "take" of these species is generally prohibited.<sup>43</sup> In 2011, legislation amended the Fish and Game Code to allow "take" of fully protected species covered under approved natural community conservation plans.

### [California Native Plant Protection Act](#)

The California Native Plant Protection Act (NPPA) includes measures to preserve, protect, and enhance endangered and rare native plants.<sup>44</sup> The list of native plants afforded protection by NPPA includes those listed as endangered and threatened under CESA, although the NPPA definitions of endangered and rare differ from those contained in CESA. However, under California Fish and Game Code Section 2062, any plant species determined by the California Fish and Game Commission (Commission) as “endangered” on or before January 1, 1985 is an endangered species under CESA and, under Section 2067, any plant species determined by the Commission as “rare” is a “threatened species” under CESA. The NPPA specifies that no person shall import into this state, or take, possess, or sell within this state, any endangered or rare native plant, except in compliance with provisions of NPPA.<sup>45</sup> Individual landowners who have been notified by CDFW of the presence of a rare or endangered plant are required to notify CDFW at least 10 days in advance of changing land uses to allow CDFW to salvage any endangered or rare native plant material.<sup>46</sup>

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<sup>41</sup> U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports*, August 28, 2007.

<sup>42</sup> California, Fish and Game Code, Section 2050 et. seq., *California Endangered Species Act*.

<sup>43</sup> California Fish and Game Code, Sections 3511, 4700, 5050, and 5515.

<sup>44</sup> California Fish and Game Code, Sections 1900–1913, *California Native Plant Protection Act*.

<sup>45</sup> California Fish and Game Code, Section 1908, *California Native Plant Protection Act*.

<sup>46</sup> California Fish and Game Code, Section 1913, *California Native Plant Protection Act*.

## 4.1 Biological Resources

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### California Fish and Game Code, Sections 3503, 3503.5, 3513

The California Fish and Game Code also prohibits the destruction of bird nests and eggs (Section 3503), as well as the “take” of birds of prey or destruction of their nests or eggs (Section 3503.5), and the take of migratory nongame birds except as provided by the rules and regulations implementing the MBTA (Section 3513).<sup>47</sup> Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) may violate these sections, and federal law protecting migratory birds.

### Los Angeles Municipal Code, Chapter VI, Sections 62.169 and 62.170

Street trees within the public right-of-way are regulated by the Board of Public Works under the Los Angeles Municipal Code Chapter VI, Sections 62.169 and 62.170. Per Section 62.169, “No person shall plant, remove, destroy, cut, prune or deface or in any manner injure any tree, shrub or plant in any street in the City, without first obtaining a permit to do so from the Board.” Section 62.170 states: “The Board may require, as a condition to any permit to remove or destroy a tree, that the permittee plant another tree of the type and size specified in the permit, within forty (40) days from the date of the issuance of the permit, in place of the tree to be destroyed or removed pursuant to the permit.”

### Los Angeles Protected Tree Ordinance

The City of Los Angeles passed a Protected Tree Ordinance in 2006 to ensure the protection and regulation of removal of protected trees.<sup>48</sup> Protected trees are specified as Southern California native tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree. The protected native tree species are:

- Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*)
- Southern California Black Walnut (*Juglans californica var. californica*)
- Western Sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)

Protected tree removal requires a removal permit by the Board of Public Works. Any act that may cause the failure or death of a protected tree requires inspection by the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division.

### LAX Street Frontage and Landscape Development Plan

The LAX Street Frontage and Landscape Development Plan (“Landscape Development Plan”) provides integrated and coordinated landscape design guidelines for new development along the perimeter of LAX.<sup>49</sup> The Landscape Development Plan includes the objective to promote land use compatibility, particularly between the airport and surrounding land uses to the north and south. The Landscape Development Plan also requires compliance with the Neighborhood Compatibility Program for projects seeking LAX compliance review, which requires community input on landscape design for projects located along the northern and southern boundaries of LAX.<sup>50</sup>

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<sup>47</sup> California Fish and Game Code, Sections 3503, 3503.5, and 3513.

<sup>48</sup> City of Los Angeles, Ordinance No. 177,404, *Protected Tree Relocation and Replacement*, April 23, 2006.

<sup>49</sup> City of Los Angeles, Los Angeles World Airports, Environmental Management Division, *Los Angeles International Airport Street Frontage and Landscape Development Plan Update*, March 2005.

<sup>50</sup> The Neighborhood Compatibility Program is LAX Master Plan Commitment LU-4. See Los Angeles World Airports and Federal Aviation Administration, *LAX Master Plan Final EIS/EIR*, Section 4.2.5, Land Use, Master Plan Commitments, pp. 4-173, 2004.

### LAX Wildlife Hazard Management Plan

The goal of the LAX Wildlife Hazard Management Plan (WHMP) is to minimize the risk to aviation safety, airport structures or equipment, or human health posed by populations of hazardous wildlife on and around the airport.<sup>51</sup> The WHMP identifies hazardous wildlife attractants on or near the airport and the appropriate wildlife damage management techniques to minimize the wildlife hazard. For example, the grass areas between runways are identified as hazardous wildlife attractants at LAX that contain vegetation that are managed under the WHMP to minimize wildlife hazards at LAX. In addition, some prey species around the runways are also actively managed to minimize wildlife hazards under the WHMP. LAX holds a current USFWS Depredation Permit, which allows for the limited take, temporary possession, and transport of migratory birds and nests at the airport to relieve or prevent injurious situations impacting public safety. The U.S. Department of Agriculture Wildlife Services actively manages the airport property to reduce its attractiveness to wildlife species that may pose a safety to airport operations.

#### 4.1.3.2 Existing Conditions

The project site is located in a highly developed area on the west side of LAX. As described in Chapter 3, *Overview of Project Setting*, the project site and adjacent construction staging area are highly developed and/or disturbed and do not contain any sensitive biological resources (i.e., sensitive or special status species or habitats; riparian/wetland areas), or native trees. Further, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applicable to the project area.

#### Birds

Common bird species observed in the project area, as documented in the LAX SPAS EIR, include Cooper's hawk (*Accipiter cooperii*), red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*), killdeer (*Charadrius vociferus*), mourning dove (*Zenaida macrourus*), rock pigeon (*Columba livia*), Anna's hummingbird (*Calypte anna*), northern flicker (*Colaptes auratus*), black phoebe (*Sayornis nigricans*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), European starling (*Sturnus vulgaris*), yellow-rumped warbler (*Setophaga coronata*), white-crowned sparrow (*Zonotrichia leucophrys*), western meadowlark (*Sturnella neglecta*), house finch (*Carpodacus mexicanus*), and the common house sparrow (*Passer domesticus*).<sup>52</sup>

#### Trees

Based on project site observations by the EIR preparers (CDM Smith), approximately 45 non-native ornamental trees (i.e., pine, juniper, bottle brush, American sweet gum, ficus, and olive) ranging in height from 8 feet to 50 feet are located around the perimeter of the CAL GO Building and surface parking area to the west. These trees may be used by migratory or nesting birds/ raptors. None of these trees meet the criteria for being a locally-protected tree, such as native oak, sycamore, or California walnut, under the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the Los Angeles Municipal Code). In addition, as discussed previously, none of the ornamental trees located around the perimeter of the CAL GO Building and surface parking area to the west are located within a public right-of-way; therefore, removal of the ornamental trees would not be subject to permitting requirements for street tree removal under Los Angeles Municipal Code, Chapter VI, Sections 62.169 and 62.170.

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<sup>51</sup> Los Angeles International Airport in cooperation with the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services, *Los Angeles International Airport (LAX) Wildlife Hazard Management Plan*, December 2012.

<sup>52</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study*, (SCH 1997061047), Section 4.3 – Biological Resources, January 2013.

## 4.1 Biological Resources

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### 4.1.4 Thresholds of Significance

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.

This threshold is derived from the *L.A. CEQA Thresholds Guide* and Appendix G of the State CEQA Guidelines relative to biological resource impacts.<sup>53</sup>

### 4.1.5 Impacts Analysis

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 MBTA 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.

### 4.1.6 Cumulative Impacts

Some of the cumulative development projects described in Chapter 3, *Overview of Project Setting*, particularly the LAX Northside Development, which could result in the potential removal of up to 187 trees, and the LAX Landside Access Modernization Program Project, which could result in the removal and/or trimming of up to 875 trees, would result in significant impacts because tree removal or trimming could substantially interfere with the movement of resident or migratory wildlife species.<sup>54,55,56</sup> Other area projects in combination with the proposed project would have a cumulatively significant impact on nesting birds/raptors. The proposed project would result in the removal of relatively few (approximately 45) trees, and the trees that would be removed by the proposed project are located in a highly developed portion of the airport that is actively managed to prevent the presence of wildlife species, including birds. Nevertheless, because the trees on the project site could harbor raptor and other native bird nests, the proposed project's contribution to the cumulatively significant impact would be cumulatively considerable.

### 4.1.7 Mitigation Measures

As indicated in Section 4.1.5, impacts related to migratory or nesting birds/ raptors, would be significant. The following Standard Control Measures are proposed as mitigation measures to reduce the proposed project's significant impacts to nesting birds/raptors.

- **LAX-BR-1 – Conservation of Faunal Resources: Nesting Birds/Raptors:** LAWA shall require construction contractors to implement the following measures:
  - Construction shall be scheduled outside of nesting season for those areas of the project site that have a potential for nesting birds/raptors, if feasible.
  - If construction is scheduled to occur during the nesting season for birds/raptors (generally February 1 to June 30 for raptors and March 15 to August 15 for other birds), vegetation clearing for the proposed project shall be conducted outside the nesting season, if feasible.

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<sup>53</sup> City of Los Angeles, *L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles*, 2006.

<sup>54</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Northside Plan Update*, (SCH 2012041003), Section 4.3 – Biological Resources, December 2014.

<sup>55</sup> Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Section 4.3 - Biological Resources, September 2016.

<sup>56</sup> Potential impacts to nesting birds/raptors associated with tree removals/trimmings for all LAWA projects at LAX, including the LAX Northside Development and the LAX Landside Access Modernization Program Project, would be mitigated in accordance with LAWA standard control measures to reduce such impacts to a level that is less than significant.

- If it is not feasible to schedule vegetation clearing outside of nesting season, then a qualified avian biologist ("biologist") shall inspect the shrubs/trees prior to project activities to ensure that no nesting birds/raptors are present. The qualified avian biologist shall be approved by LAWA, and shall have authority to halt construction activities if nesting birds/raptors are disturbed.
  - If the biologist finds an active nest within the construction area, or in the vicinity, and determines that the nest may be impacted, the biologist shall delineate an appropriate buffer zone; the size of the buffer zone will depend on the species and the type of construction activity. Only construction activities (if any) that have been approved by the biologist will take place within the buffer zone until the young have fledged and are independent of the adults and nest.
  - The biologist shall be present and monitor during construction activities near active nest areas to ensure that no adverse impacts on nesting birds/raptors or young occur. The biologist shall submit weekly reports to LAWA.
  - Appropriate bird exclusion methods shall be used to discourage birds from nesting in construction equipment and facilities, if determined by the wildlife biologist to be necessary. Bird netting shall not be used as an exclusion method in order to avoid potential bird entanglement.
  - These impact avoidance measures shall be coordinated with LAWA's United States Department of Agriculture (USDA) Wildlife Hazard Biologist and will be consistent with FAA AC No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft.
- **LAX-BR-2 – Conservation of Floral Resources: Mature Tree Replacement – Nesting Raptors:** LAWA shall require construction contractors to implement the following measures:
- Prior to construction, affected areas shall be surveyed by a qualified avian biologist (see LAX-BR-1) to identify potential areas for raptor nesting. Results of the survey shall be reported to LAWA.
  - For areas of the project site that have potential for nesting raptors to occur, all mature trees within such areas shall be inspected for current or past raptor nesting activity prior to initiating construction activities during the nesting season (February 1 to June 30).
  - Inspections for signs of raptor nesting may be conducted outside of nesting season. The biologist shall identify active nests, and evidence of past raptor nesting, in mature trees to be removed from the construction area.
  - Results of surveys and inspections shall be reported to LAWA on a timely basis.
  - LAWA shall compensate at a ratio of 2:1 for the loss of mature trees with either active nests or evidence of past raptor nesting, which would occur as a result of implementation of any of the project components. The species of newly planted replacement trees shall be local native tree species to the extent feasible. Each mitigation tree shall be at least a 15-gallon or larger specimen. The replacement trees shall be planted within the boundaries of LAX or at a suitable off-site location. If mitigation occurs within LAX boundaries, the replacement site and tree species will be determined in consultation with LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA AC No. 150/5200-33B "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Management Plan" to avoid increasing wildlife hazards to aircraft.

### 4.1.8 Level of Significance After Mitigation

With implementation of Standard Control Measures (Mitigation Measures) LAX-BR-1 and LAX-BR-2, significant impacts to migratory or nesting birds/raptors, would be reduced to a level that is less than significant and the contribution of the proposed project to significant cumulative impacts to migratory or nesting birds/raptors would not be cumulatively considerable because these measures would prevent substantial interference with the movement of resident or migratory wildlife species through protecting migratory or nesting birds/raptors and providing replacement habitat.

## **4.1 Biological Resources**

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## 4.2 Cultural Resources

### 4.2.1 Introduction

This cultural resources section addresses proposed project impacts on historical resources, archaeological resources, paleontological resources, and disturbance of human remains (hereafter referred to as ‘cultural resources’). The potential for the proposed project to result in impacts to tribal cultural resources is evaluated in Section 4.3, *Tribal Cultural Resources*, of this EIR.

The existing cultural resources in the project area are described below, along with the methodology and the regulatory framework that guided the evaluation of cultural resources. Impacts to cultural resources that would result from the proposed project are identified, along with any measures to mitigate significant effects of the proposed project if needed.

### 4.2.2 Methodology

#### 4.2.2.1 Historical Resources

A historic resources assessment was performed by Historic Resources Group (HRG) personnel who meet the Secretary of the Interior’s Professional Qualification Standards in the disciplines of architectural history and history. Historical resources considered include prehistoric or historic buildings, sites, districts, structures, or objects that meet criteria of significance as established by the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and local jurisdictions. Their evaluation of historic significance was based on a review of existing historic designations, research of the relevant historic contexts, and analysis of the eligibility criteria and integrity thresholds for listing in the National Register or California Register, or as a City of Los Angeles Historic-Cultural Monument (LAHCM). The historical resources assessment utilized a two-step methodology involving research and field investigation.

The research component of the assessment used primary and secondary sources related to the development history of Los Angeles International Airport (LAX) and its immediate surrounding area. Sources included historic building permits, photographs, aerial photographs, and site plans; published local histories; previous environmental review documents and historic resources evaluations for LAX; California State Historic Resources Inventory (HRI) for Los Angeles County; and California Department of Parks and Recreation HRI Forms.

HRG performed on-site inspections of the project site and surrounding area in 2015 and 2016. Their fieldwork focused on the assessment of historic integrity and the identification of character-defining features for structures located on or adjacent to the project site that could be affected by the proposed project (see Appendix B-1).

#### 4.2.2.2 Archaeological and Paleontological Resources

Record searches performed for previous and current projects associated with LAX were reviewed to determine if previously recorded archaeological sites and paleontological occurrences have been found within LAX or in the surrounding vicinity that require evaluation and treatment.<sup>57,58</sup> The results provide a basis for assessing the sensitivity of the cultural resources study area for additional and buried archaeological and paleontological resources, as well as human remains.

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<sup>57</sup> City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

<sup>58</sup> 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 I, Archaeological and Paleontological Resources Assessment Report, Prepared by PCR Services Corporation, September 2016. Available:[http://connectinglax.com/files/LAMP\\_DEIR\\_Appendix%20I.pdf](http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf).

## 4.2 Cultural Resources

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In addition, a Sacred Lands File (SLF) records search for the project site was commissioned through the California Native American Heritage Commission (NAHC) to determine whether any Native American cultural resources in the NAHC database were located within the project site or within a half-mile radius. The results of the SLF records search for the project site are included in Section 4.3, *Tribal Cultural Resources*, of this EIR.

### 4.2.3 Existing Conditions

#### 4.2.3.1 Regulatory Context

Cultural resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification and, in certain instances, protection of cultural resources. Additionally, state and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act of 1966, as amended (NHPA; 54 United States Code 300101 et seq.); California Environmental Quality Act (CEQA); California Register of Historical Resources (Public Resources Code 5024.1); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171 et seq.) are the primary federal, state, and local laws governing and affecting preservation of cultural resources of national, state, regional, and local significance.<sup>59</sup>

Cultural resources regulations address historical, archaeological, paleontological resources, and human remains.

##### 4.2.3.1.1 Federal

##### National Register

The National Register of Historic Places (National Register) was established by the NHPA as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."<sup>60</sup> The National Register recognizes properties that are significant at the national, state, and/or local levels. To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The National Register has established four Criteria for Evaluation to determine the significance of a resource:

1. It is associated with events that have made a significant contribution to the broad patterns of our history;
2. It is associated with the lives of persons significant in our past;
3. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
4. It yields, or may be likely to yield, information important in prehistory or history.<sup>61</sup>

Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years in age must meet one or more of the above criteria. However, the National Register does not prohibit the consideration of properties less than 50 years in age whose exceptional contribution to the development of American history, architecture, archaeology, engineering, and culture can clearly be demonstrated. In addition to meeting the Criteria for Evaluation, a property must have integrity. "Integrity is the ability of a property to convey its significance."<sup>62</sup>

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<sup>59</sup> Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171 et seq., *Cultural Heritage Ordinance*, effective April 2, 2007. Available: <http://preservation.lacity.org/sites/default/files/Cultural%20Heritage%20Ordinance.pdf>.

<sup>60</sup> 36 Code of Federal Regulations, Section 60.2, *Effects of Listing under Federal Law*.

<sup>61</sup> U.S. Department of Interior, National Park Service, *National Register Bulletin 16, How to Complete the National Register Registration Form*, revised 1997. Available: <https://www.nps.gov/Nr/publications/bulletins/pdfs/nrb16a.pdf>. This bulletin contains technical information on comprehensive planning, survey of cultural resources, and registration in the National Register.

<sup>62</sup> U.S. Department of Interior, National Park Service, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, 1995, p. 44. Available: <https://www.nps.gov/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf>.

According to National Register Bulletin 15, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.

To retain historic integrity, a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.<sup>63</sup>

In assessing a property's integrity, the National Register criteria recognizes that properties change over time; therefore, it is not necessary for a property to retain all of its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.<sup>64</sup>

### NHPA Section 106 Consultation

Section 106 of the NHPA requires federal agencies to take into account the effects of their “undertakings” on historic properties, and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is implemented in ACHP regulations (36 Code of Federal Regulations [CFR] Part 800). Federal agencies typically address compliance with the requirements of Section 106 concurrent with the National Environmental Policy Act (NEPA) environmental review process for proposed projects. For undertakings at U.S. airports, including LAX, the FAA is responsible for fulfilling the requirements of Section 106. The responsible FAA official is also the agency official (see 36 CFR Section 800.2(a)) for Section 106 coordination.<sup>65</sup>

Under Section 106 consultation, the federal agency first determines whether a proposed project is an undertaking that could affect historic properties. An undertaking is defined in Section 106 as a “project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval” (36 CFR Section 800.16(y)). Historic properties are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register (36 CFR Section 800.16(l)(1)). If the agency's undertaking could affect historic properties, the agency determines the scope of appropriate identification efforts and then proceeds to identify historic properties in the area of potential effect (APE). The agency reviews background information, consults with the State Historic Preservation Officer (SHPO), and conducts additional studies as necessary. Section 106 review gives equal consideration to listed properties and unlisted properties meeting National Register criteria.

If the federal agency finds that historic properties are present, it proceeds to assess possible adverse effects. The agency, in consultation with the SHPO, makes an assessment of adverse effects on the identified historic properties. Adverse effects occur when an undertaking may directly or indirectly alter characteristics of a historic property that qualify it for inclusion in the National Register. Examples of adverse effects include physical destruction or damage; alteration not consistent with the Secretary of the Interior’s Standards; relocation of a property; change of use or physical features of a property’s setting; and visual, atmospheric, or audible intrusions. If a property is restored, rehabilitated, repaired, maintained, stabilized, remediated or otherwise changed in accordance with the Secretary of the Interior’s Standards (see description below), then it will not be considered an adverse effect.

If the federal agency and SHPO agree that there would be no adverse effect, the agency proceeds with the undertaking and any agreed-upon conditions. If they find that there would be an adverse effect, the federal agency

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<sup>63</sup> U.S. Department of Interior, National Park Service, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, 1995, p. 44. Available: <https://www.nps.gov/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf>.

<sup>64</sup> "A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register." U.S. Department of Interior, National Park Service, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, 1995, p. 46. Available: <https://www.nps.gov/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf>.

<sup>65</sup> U.S. Department of Transportation, Federal Aviation Administration, *1050.1F Desk Reference*, July 2015.

## 4.2 Cultural Resources

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begins consultation to seek ways to avoid, minimize, or mitigate the adverse effects. The federal agency then consults with SHPO and other parties. The ACHP may participate in consultation in some circumstances. Consultation usually results in a Memorandum of Agreement, which outlines agreed-upon measures that the agency will take to avoid, minimize, or mitigate the adverse effects. In some cases, the consulting parties may agree that no such measures are possible, but that the adverse effects must be accepted in the public interest.

### Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) are intended to promote responsible preservation practices that help protect irreplaceable cultural resources. They are neither technical nor prescriptive, and cannot be used to make essential decisions about which features of the historic building should be saved and which can be changed. However, once treatment is selected—preservation, rehabilitation, restoration, or reconstruction—the Standards provide treatment approaches and philosophical consistency to the work. Choosing the most appropriate treatment for a building requires careful decision making about a building's historical significance as well as taking into account a number of other considerations, including relative importance in history, physical condition, proposed use, and mandated code requirements.

Rehabilitation, the most common treatment, is the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values. The Standards for Rehabilitation are as follows:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.<sup>66</sup>

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<sup>66</sup> U.S. Department of Interior, National Park Service, *Secretary of the Interior's Standards for Rehabilitation*. Available: <https://www.nps.gov/tps/standards/rehabilitation.htm>, accessed September 4, 2016.

### Department of Transportation Act, Section 4(f)

Section 4(f) of the Department of Transportation (DOT) Act, which is codified and renumbered as Section 303(c) of 49 United States Code, provides that the Secretary of Transportation will not approve any program or project that requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance or land from an historic site of national, State, or local significance as determined by the officials having jurisdiction thereof, unless there is no feasible and prudent alternative to the use of such land and such program, and the project includes all possible planning to minimize harm resulting from the use.<sup>67</sup>

For Section 4(f) purposes, the term “use” not only includes actual physical takings of Section 4(f) lands but also adverse indirect impacts, or constructive use. Constructive use only occurs if Section 4(f) lands are substantially impaired by a proposed action or its alternatives, which includes substantially diminishing the activities, features, or attributes of the Section 4(f) resource that contribute to its significance or enjoyment.

### Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and Tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

#### 4.2.3.1.2 State

##### Office of Historic Preservation

The Office of Historic Preservation (OHP), an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also carries out the duties as set forth in the Public Resources Code and maintains the California Historical Resources Information System (CHRIS) and the California Register. The SHPO is an appointed official who implements historic preservation programs within the state's jurisdiction. CEQA requires project CEQA documents to identify, analyze, and provide feasible mitigation for substantial adverse impacts that may affect the significance of identified historical resources.

##### California Register and California Environmental Quality Act

The California Register was created by Assembly Bill 2881, which was signed into law on September 27, 1992. The California Register is “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”<sup>68</sup> The criteria for eligibility for the California Register are based on National Register criteria.<sup>69</sup> Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.<sup>70</sup> Per OHP's Instructions for Recording Historical Resources, physical evidence of human activities more than 45 years old may be recorded for purposes of inclusion in OHP's filing system although, similar to the National Register, resources less than 45 years old may also be filed.<sup>71</sup>

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<sup>67</sup> U.S. Department of Transportation, Federal Aviation Administration, Office of Environment and Energy, *Order 1050.1F, Desk Reference*, July 2015. Available: [http://www.faa.gov/about/office\\_org/headquarters\\_offices/apl/enviro\\_policy\\_guidance/policy/faa\\_nepa\\_order/desk\\_ref/media/desk-ref.pdf](http://www.faa.gov/about/office_org/headquarters_offices/apl/enviro_policy_guidance/policy/faa_nepa_order/desk_ref/media/desk-ref.pdf).

<sup>68</sup> California Public Resources Code, Section 5024.1(a).

<sup>69</sup> California Public Resources Code, Section 5024.1(b).

<sup>70</sup> California Public Resources Code, Section 5024.1(d).

<sup>71</sup> California Office of Historic Preservation, *Instructions for Recording Historical Resources*, March 1995.

## 4.2 Cultural Resources

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The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- California Points of Historical Interest (CPHI) that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.<sup>72</sup>

Other resources that may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Categories 1 through 5; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.<sup>73</sup>

To be eligible for the California Register, an historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, an historical resource must retain enough of its historic character or appearance to be recognizable as an historical resource and to convey the reasons for its significance.<sup>74</sup> Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. It is possible that an historical resource may not retain sufficient integrity to meet the criteria for listing in the National Register but may still be eligible for listing in the California Register.<sup>75</sup>

Under CEQA, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."<sup>76</sup> This statutory standard involves a two-part inquiry. The first part is a determination of whether the project involves an historical resource. If it does, the inquiry addresses whether the project may cause a "substantial adverse change in the significance" of the resource. State CEQA Guidelines Section 15064.5 provides that, for the purposes of CEQA compliance, the term "historical resources" shall include the following:<sup>77</sup>

- A resource listed in, or determined to be eligible by, the State Historical Resources Commission for listing in the California Register.

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<sup>72</sup> California Public Resources Code, Section 5024.1(d).

<sup>73</sup> California Public Resources Code, Section 5024.1(e).

<sup>74</sup> 14 California Code of Regulations, Chapter 11.5, Section 4852(c), *Types of Historical Resources and Criteria for Listing in the California Register of Historical Resources*.

<sup>75</sup> 14 California Code of Regulations, Chapter 11.5, Section 4852(c), *Types of Historical Resources and Criteria for Listing in the California Register of Historical Resources*.

<sup>76</sup> California Public Resources Code, Section 21084.1.

<sup>77</sup> 14 California Code of Regulations, Section 15064.5(a), *Determining the Significance of Impacts to Archaeological and Historical Resources*.

- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements in Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat such resources as significant for purposes of CEQA unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets one of the criteria for listing on the California Register.
- The fact that a resource is not listed in or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

Under CEQA, generally a project that follows the Secretary of the Interior's standards shall be considered to have mitigated a significant impact on the historical resource to a level that is less than significant. CEQA Guidelines Sections 15064.5(b)(3), 15126.4(b)(1).

### California Health and Safety Code 7050.5

California Health and Safety Code Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

### Public Resources Code Section 5097.98

Section 5097.98 of the California Public Resources Code stipulates that whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 24 hours of their notification by the NAHC. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

#### 4.2.3.1.3 Local

#### City of Los Angeles Conservation Element of the General Plan

The Conservation Element includes provisions, policies, and objectives for the preservation and protection of paleontological, archaeological, and historical sites. Chapter II, Section 3 of the City of Los Angeles General Plan Conservation Element (adopted 2001) contains the following objectives and policies applicable to the proposed project:

## 4.2 Cultural Resources

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- Objective: Protect the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes.
- Policy: Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.

Chapter II, Section 5 of the City of Los Angeles General Plan Conservation Element (adopted 2001) contains the following objectives and policies applicable to the proposed project:

- Objective: Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.
- Policy: Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.

### City of Los Angeles Cultural Heritage Ordinance

The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962 (Los Angeles Administrative Code, Section 22.130) that defines LAHCMs for the City. According to the ordinance, LAHCMs are sites, buildings, or structures of particular historical or cultural significance to the City of Los Angeles in which the broad cultural, economic, or social history of the nation, state, or community is reflected or exemplified, including sites and buildings associated with important personages or that embody certain distinguishing architectural characteristics and are associated with a notable architect. LAHCMs are regulated by the City's Cultural Heritage Commission and the City Council.

The City of Los Angeles Cultural Heritage Ordinance establishes criteria for designating local historical resources as LAHCMs. Pursuant to the Ordinance, an LAHCM is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles that meets one or more of the following criteria:

1. Reflects or exemplifies the broad cultural, economic, or social history of the nation, state, or community.
2. Is identified with historic personages or with important events in the main currents of national, state, or local history.
3. Embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style, or method of construction
4. Is a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

### City of Los Angeles Historic Preservation Overlay Zone

The City of Los Angeles enacted the Historic Preservation Overlay Zone (HPOZ) Ordinance in 1979, which is a planning tool that enables the designation of historic districts. An HPOZ is an area of the city that is designated as containing structures, landscaping, natural features, or sites having historic, architectural, cultural, or aesthetic significance. While most districts are primarily residential, many have a mix of single-family and multi-family housing, and some include commercial and industrial properties. Individual buildings in an HPOZ need not be of landmark quality on their own. It is the collection of a cohesive, unique, and intact collection of historic resources that qualifies a neighborhood for HPOZ status.

### LAX Preservation Plan<sup>78</sup>

LAWA recognizes that LAX contains unique historic resources and is committed to preserving its historic resources in a methodical and thoughtful manner. To that end, LAWA has developed a Preservation Plan for LAX resources that identifies all historic resources on LAX property; identifies historic resources that LAWA commits to preserving; provides guidance on the rehabilitation of historic buildings, structures, objects, and sites located on LAX property;

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<sup>78</sup> 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.

and creates a process for review of future projects with respect to historic resources. LAWA has committed to utilizing the LAX Preservation Plan to assist LAWA in preserving and evaluating its historic resources appropriately.

LAWA has identified five buildings, one structure, and one object that will be preserved on LAX property. These historical resources are as follows:

- Hangar One
- The Theme Building
- 1961 Airport Traffic Control Tower (ATCT)
- The Proud Bird Restaurant
- Quonset Hut
- World War II Munitions Bunker
- Terminal 6 Sign Tower

None of the above seven historical resources are located in the vicinity of the proposed project site.

The remaining historical resources on LAX property and under LAWA jurisdiction identified as historically significant in the LAX Preservation Plan consist of three individually eligible resources (two of which are the CAL GO Building and the CAL Training Center Building, discussed in Section 4.2.3.2.1 below), two small historic districts (one of which is the Continental Airlines Complex, discussed in Section 4.2.3.2.1 below), and one contributor to an off-site historic district. LAWA has determined that commitment to the long-term preservation of these remaining historical resources has the potential to substantially interfere with continued airport operations due to issues such as their location, size, building type, or type of construction. Although not identified for preservation, the LAX Preservation Plan includes procedures for implementation of projects that involve the rehabilitation, reuse, alteration, or demolition of the remaining historically significant resources. For any project that requires either extensive alteration (such that the resource would no longer convey its historic significance) or demolition, notification to the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR) is required. Submitted plans to the OHR must include a documentation plan to fully document the historic resource prior to alternation or demolition. OHR shall review and submit any written comments within 15 working days from the date the documents were received.

### LAX Archaeological Treatment Plan

Los Angeles World Airports (LAWA) prepared an Archaeological Treatment Plan (ATP) to ensure the long-term protection and proper treatment of archaeological discoveries of federal, state, and/or local significance that may be encountered during LAX Master Plan implementation.<sup>79,80</sup> LAWA also requires compliance with the ATP for all non-LAX Master Plan development projects at LAX that involve grading and/or excavation in native and undisturbed soils. The ATP establishes requirements for monitoring during grading and/or excavation in native and undisturbed soils by a qualified archaeologist and protocols for the identification, evaluation, and recovery of archaeological resources, consistent with federal and state requirements, if such resources are discovered.

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<sup>79</sup> City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005. Available: [http://www.lawa.org/uploadedFiles/OurLAX/Past\\_Projects\\_and\\_Studies/Past\\_Publications/Archaeological\\_Treatment\\_Plan.pdf](http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Archaeological_Treatment_Plan.pdf).

<sup>80</sup> The ATP was prepared in accordance with the LAX Master Plan Mitigation Monitoring and Reporting Program but is applicable to all projects at the airport with the potential to affect archaeological resources.

## 4.2 Cultural Resources

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### LAX Paleontological Management Treatment Plan

LAWA prepared a Paleontological Management Treatment Plan (PMTP) to ensure the proper treatment of paleontological resources that may be encountered during LAX Master Plan implementation.<sup>81,82</sup> The PMTP focuses on the identification, recovery, proper treatment, and long-term protection and archival conservation of expected and unexpected paleontological discoveries of federal, state, and/or local significance that may be encountered during LAX Master Plan implementation. LAWA also requires compliance with the PMTP for all non-LAX Master Plan development projects at LAX that involve excavation in native and undisturbed soils. In the event that paleontological deposits are encountered, the PMTP is used as a guideline for the evaluation, treatment and archival conservation of such resources consistent with federal and state requirements.

#### 4.2.3.2 Baseline Conditions

##### 4.2.3.2.1 Historical Resources

#### Setting

##### Early Land Use and Airport Development

As outlined in the historic resources assessment (see Appendix B-1), the land currently occupied by LAX, prior to its development as an airport, was part of Rancho Sausal Redondo, which had been granted to Antonio Ygnacio Avila by the Mexican government in 1837. Typical of the Spanish and Mexican land grant ranchos, the land was used for cattle ranching and sheep grazing. After the Mexican-American War (1846-1848) and subsequent annexation of California by the United States, the Rancho Sausal Redondo changed hands a number of times. In 1894, 2,000 acres of the original Rancho Sausal Redondo ranch was leased to local farmer Andrew B. Bennet, which became known as the Bennett Rancho. The City of Los Angeles leased 640 acres of the Bennett Rancho in 1928 to operate Mines Field. In 1928, the Los Angeles Department of Airports (DOA) was established to administer the airport. The airport constructed its first permanent building -- Hangar One -- in 1929 and development continued that year with the construction of administrative offices, a runway, and additional hangars.

Although intended as a regional airport for commercial air service, the Los Angeles Municipal Airport serviced only private pilots, flying schools, and small aircraft manufacturers for several years. In 1935, the airport was improved with grading, runway construction, and a new sewer line under the direction of the Emergency Relief Administration. Two years later, the airfield was further improved under the Works Progress Administration. Plans to further upgrade for commercial airline services were halted with the onset of World War II. The federal government took control of the airport in January of 1942 and it was turned over for military use for the duration of the war.

During the war, the DOA was able to secure commitments from the major American commercial airlines to relocate to Los Angeles Municipal Airport after the war with the creation of a master plan for improvements to the airport. The plan included expansion of the airfield and construction of new terminals and administration buildings. Voters approved a bond measure to fund the improvements in 1945 and temporary facilities for the airlines -- referred to as the "Intermediate Facilities" -- were soon constructed. By 1947, six major airlines were operating at the airport. In 1949, the airport was officially named "Los Angeles International Airport" after the Civil Aeronautics Administration determined the airport suitable for international, intercontinental, and non-stop domestic flights.

In 1956, a new master plan for a "Jet Age" airport was developed by an architectural joint venture of architecture firms Welton Beckett and Associates and Pereira and Luckman, with Pereira and Luckman joined by Paul R. Williams.

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<sup>81</sup> City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Paleontological Management Treatment Plan*, prepared by Brian F. Smith and Associates, revised December 2005. Available: [http://www.lawa.org/uploadedFiles/OurLAX/Past\\_Projects\\_and\\_Studies/Past\\_Publications/Paleontological\\_Management\\_Treatment\\_Plan.pdf](http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Paleontological_Management_Treatment_Plan.pdf).

<sup>82</sup> The PMTP was prepared in accordance with the LAX Master Plan Mitigation Monitoring and Reporting Program but is applicable to all projects at the airport with the potential to affect paleontological resources.

Their innovative scheme incorporated a U-shaped access road flanked by six ticketing buildings that, in turn, were connected via subterranean passageways to remote satellite buildings containing the actual boarding gates. Passenger amenities were located in the individual satellites. The center of the "U" contained parking, an administrative building surmounted by a state-of-the-art airport traffic control tower (ATCT) at the extreme east end of the site, an eye-catching Theme Building restaurant in the center of the site, and support facilities, including a cooling tower, utility plant, and service building, located west of the Theme Building. Inspired by the aesthetics of the Jet Age, the Theme Building quickly became an internationally recognized symbol and centerpiece of the new airport, distinguished by its parabolic arches from which a flying-saucer-shaped restaurant was suspended.

Implementation of the master plan began in 1957 with the construction of field improvements and runway extensions. This was quickly followed by the necessary excavations for the underground components. The final phase included the construction of the terminal buildings and the ATCT, which was completed in 1961. On January 13, 1962, the Theme Building opened to the public.

### Continental Airlines Corporate History

In 1934, Varney Speed Lines, a mail and passenger air transport service based in the Southwest, established a route out of El Paso, Texas through New Mexico and Colorado. The airline was renamed "Continental Air Lines" (later changed to "Continental Airlines") in 1936 and, in 1937, its headquarters was relocated to Denver. During World War II, Continental provided transport of military personnel and equipment and Continental's repair and maintenance facilities in Denver were used to convert airplanes for the Army Air Force. Profits from the war effort funded the purchase of additional aircraft and added routes in Missouri, Kansas, Oklahoma, Texas, and New Mexico. By 1945, Continental provided service to 26 cities and employed nearly 400 people.

In 1953, Continental acquired Pioneer Airlines, which operated in Texas and New Mexico. The acquisition nearly doubled the total number of cities serviced by Continental. Two years later, the airline added service between Los Angeles and Chicago and placed orders for Boeing 707 aircraft, the first jet-powered aircraft for the company. Continental also pioneered the practice of repairing and maintaining their aircraft at night allowing them to keep their jets in continuous service. This maintenance schedule became known as "progressive maintenance" and was eventually adopted by every airline. Continental proved itself to be a formidable player in the airline industry and was reporting record profits by 1960.

In 1963, Continental relocated its headquarters from Denver to Los Angeles. The facility at LAX included corporate offices, system operations control, the central maintenance facility, a flight kitchen, training center, and Los Angeles crew bases. It was at this time that Continental became a truly "international" airline. From its west coast facility, Continental provided extensive cargo and troop transport throughout the Vietnam War and established service to Micronesia through its Air Micronesia subsidiary, which included service to Hawaii. Chartered services to European cities were also added.

In 1978, the Airline Deregulation Act introduced a free market in the American commercial airline industry by removing federal government control over fares, routes, and market entry of new airlines. Deregulation greatly increased the number of flights and reduced fares as the airline industry became more competitive.

After a contentious battle with Continental management, Continental was acquired by Texas International in 1982 and subsequently moved its headquarters to Houston after 19 years at LAX. In May 2010, United Airlines and Continental Airlines Inc., announced a \$3-billion merger that created the world's largest airline at the time. The combined airline was now competitive in all the major American domestic markets, and serviced hundreds of destinations in Asia, Europe, and South America. The "Continental" name was dropped in favor of the United brand name when the final switchover happened on March 2, 2012.

## 4.2 Cultural Resources

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### Project Site and Surrounding Area Development – 1963-1980

As noted above, Continental Airlines relocated their corporate headquarters from Denver to LAX in 1963. The Continental headquarters was located west of the main LAX Central Terminal Area, on the south side of World Way West in the west-central portion of the airport property. Prior to Continental Airlines' relocation, a food service preparation building or "Flight Kitchen," a service building including two service hangar bays, and the associated concrete and asphalt apron, were developed between 1956 and 1962.

In 1963, the Continental Airlines General Office (CAL GO) Building was constructed north of the Flight Kitchen and service building, facing World Way West. The CAL GO Building was designed by Los Angeles architect Edward Augustus Grenzbach in a Mid-century Modern style with a rectangular plan and a flat roof. Construction included an attached one-story cafeteria building at the southeast corner of the CAL GO Building; an open-air, concrete patio directly south of the CAL GO Building; and an enclosed second-floor pedestrian bridge connecting the CAL GO Building to the service complex.

A training center building for Continental Airlines was constructed in 1966 west of the CAL GO Building facing World Way West. The two-story Training Center Building was also designed by Edward Augustus Grenzbach in a Mid-century Modern style with a rectilinear plan and a flat roof.

Improvements developed by Continental Airlines between 1963 and 1972 included the addition of Hangar Bay No. 3 (1965), shops and offices (1965), additions to the existing maintenance/engineering offices (1966), Hangar Bay No. 4 (1967), flight kitchen addition (1968), and Hangar Bays No. 5 and 6 (1971-1972). A variety of tenant improvements, repairs, and alterations have been completed since that time.

An aerial photograph showing the Continental Airlines facilities at LAX circa April 1976 is provided in **Figure 4.2-1**.

### **Eligible Historical Resources**

Eligible historical resources located on, and in the vicinity of, the project site are identified in **Table 4.2-1** and shown on **Figure 4.2-2**. Each of these resources is further described below.

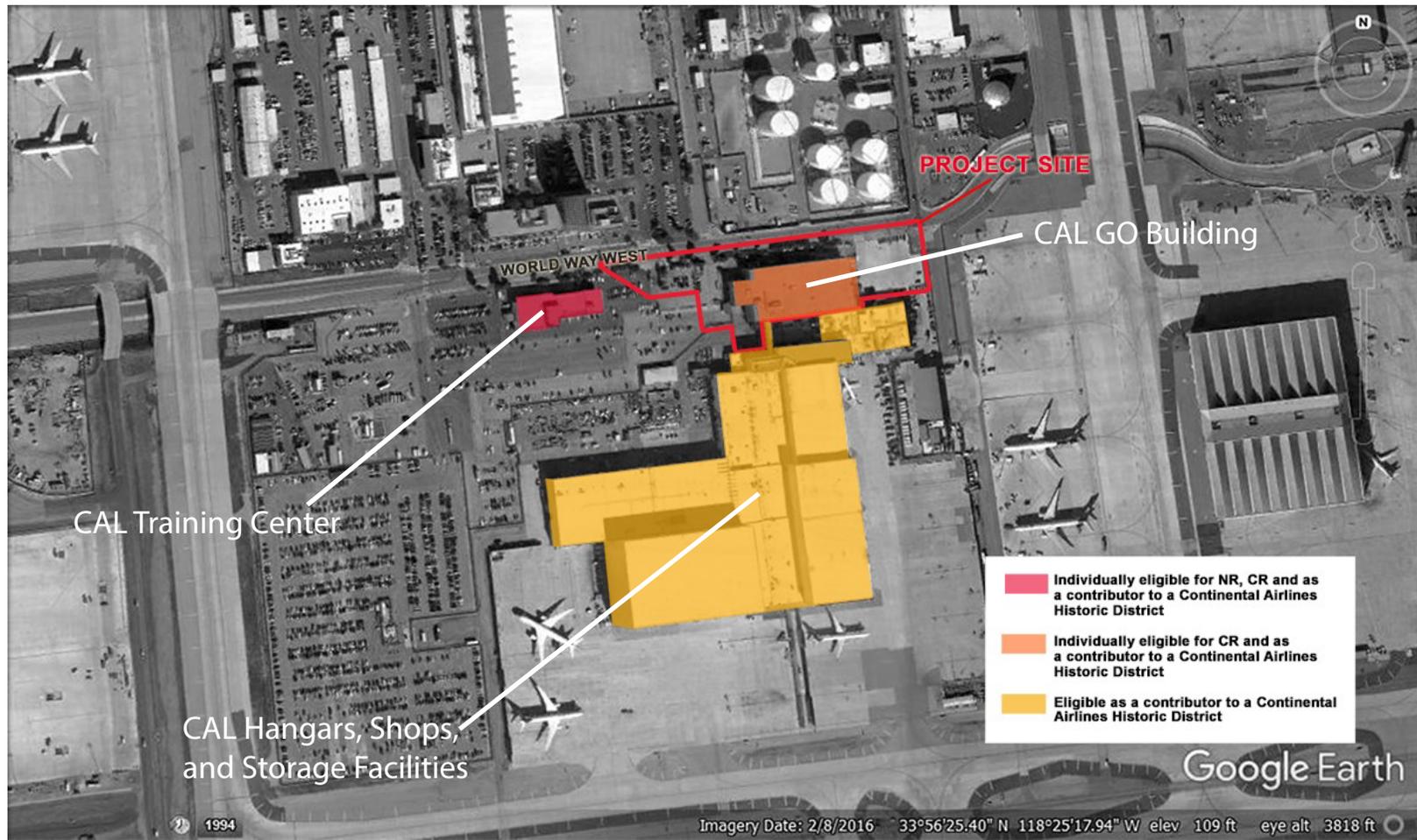


Source: Flight Path Museum Archives.  
Prepared by: CDM Smith, May 2017.

**LAX Secured Area Access Post Project**

**Aerial Photograph of  
Continental Airlines Facilities (1976)**

Figure  
**4.2-1**



Source: Historic Resources Group, March 2017.  
 Prepared by: CDM Smith, May 2017.

**LAX Secured Area Access Post Project**

**Historic Resources in the Project Vicinity**

Figure  
**4.2-2**

Property	Location	Year Built	NR	CR	LAHCM
Continental Airlines General Office Building <sup>1</sup> - 7270 World Way West	On Project Site	1963	Ineligible	Eligible	Eligible
Continental Airlines Training Center Building <sup>1</sup> - 7320 World Way West	West of Project Site	1966	Eligible	Eligible	Eligible
Continental Airlines Hangars, Shops, and Storage Facilities <sup>2</sup> - 7260, 7280, and 7300 World Way West	South of Project Site	1963-1972	Ineligible	Ineligible	Ineligible
Continental Airlines Complex – All buildings identified above (7270, 7320, 7260, 7280, and 7300 World Way West)	Buildings on, West, and South of Project Site	1963-1972	Ineligible	Eligible	Eligible
<p>Source: Appendix B-1 of this EIR.</p> <p>Notes:</p> <ol style="list-style-type: none"> <li>Also a contributor to a potential historic district, the Continental Airlines Complex, eligible for the California Register and as a Los Angeles Historic-Cultural Monument.</li> <li>Although the Continental Airlines Hangars, Shops, and Storage Facilities are not historically significant individually, together they are considered a contributor to a potential historic district, the Continental Airlines Complex, eligible for the California Register and as a Los Angeles Historic-Cultural Monument.</li> </ol> <p>Key:</p> <p>NR = National Register of Historic Places.            CR = California Register of Historical Resources.            LAHCM = Los Angeles Historic-Cultural Monument.</p>					

**Historical Resources Located on the Project Site**

**Continental Airlines General Office Building - 7270 World Way West (1963)**

The project site contains one building, the former CAL GO Building, located at 7270 World Way West (see **Figure 4.2-3**). As noted in the previous section, the CAL GO Building was designed by Los Angeles architect Edward Augustus Grenzbach and was constructed in 1963. It is Mid-century Modern in style with a rectangular plan and a flat roof. It is two stories in height over a semi-subterranean parking garage. The primary (north) façade is a symmetrical composition of eleven bays of two-story, metal-framed glazed curtain walls between projecting concrete piers that continue above the roof line. Similarly, the curtain wall mullions extend above the roof line and below the elevated first floor line. The open semi-subterranean garage is screened with chain link fencing.

There is a double floating staircase with concrete treads and a metal balustrade centered on the north façade. The staircase originally accessed the building’s primary entry although the original entry doors have been removed and the openings glazed. The former entry landing is surmounted by a metal canopy sculpture suspended over the landing. Entitled “Free Form of Future Flight,” the canopy sculpture was made by artist Russell Holmes and installed July 1963, according to a plaque affixed to the wall nearby.

The secondary (east and west) façades are finished primarily in full-height panels of yellow glazed ceramic tile; the panels are separated by metal channels. There is an entrance recessed on the east façade. The entrance consists of a pair of fully-glazed metal doors in a full-height, metal-framed glazed curtain wall with a decorative metal *brise-soleil*. Metal-framed, sliding glass doors open to a projecting second-story covered balcony at the southeast corner of the building. The balcony has a cement plaster parapet and cantilevered soffit, and a metal guardrail. There is a large, rectangular addition on the west façade. The south façade is finished primarily in cement plaster with metal expansion joints. There is a cafeteria and kitchen building attached to the southeast corner of the CAL GO Building.



Continental Airlines General Office Building (2016)  
Looking southeast to north and west facades



Continental Airlines General Office Building (2016)  
North (primary) facade details

Source: Historic Resources Group, March 2017.  
Prepared by: CDM Smith, May 2017.

**LAX Secured Area Access Post Project**

**Continental Airlines GO Building Photographs**

Figure  
4.2-3

The interior of the CAL GO Building has been extensively altered through numerous tenant improvement projects. The interior spaces are composed primarily of gypsum board partitions and suspended acoustical tile ceilings. They are mostly undistinguished and are in poor condition.

The CAL GO Building is significant under National Register Criterion A and California Register Criterion 1 as an aviation property associated with the rapid development of commercial aviation in the years after World War II, which had prompted advances in aircraft design and technology. It is also significant under National Register Criterion C and California Register Criterion 3 as an aviation property that embodies the distinctive characteristics of Mid-century Modern architecture, which reflects the period during which LAX was developed. The building was designed and built for Continental Airlines and served as the company's national headquarters during the time it played a formative role in the development and growth of LAX and the airline industry. The development of the complex from 1963 through 1982 reflected the commercial success of Continental Airlines, and the building's Mid-century Modern style, incorporating the company's black, white, and gold corporate colors, established Continental's corporate identity on the West Coast. Due to alterations, the CAL GO Building does not appear to retain sufficient integrity for listing in the National Register; however, it retains sufficient integrity to convey its historical significance and therefore retains its eligibility for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument.

The CAL GO Building is also a contributor to a California Register-eligible historic district that includes the attached associated complex of hangars, shops, and storage facilities (7260, 7280, and 7300 World Way West) and the nearby Training Facility at 7320 World Way West (discussed below).

### Historical Resources Located in the Near Vicinity of the Project Site

#### *Continental Airlines Training Center Building - 7320 World Way West (1966)*

The Continental Airlines Training Center Building, shown in **Figure 4.2-4**, is located west of the project site and CAL GO Building at 7320 World Way West. It was designed by Los Angeles architect Edward Augustus Grenzbach and was constructed in 1966. The building is Mid-century Modern in style with a rectilinear plan and a flat roof. There is a central penthouse at the rear (south) portion of the roof. The building is two stories in height and is composed of two volumes, a square volume to the west and a rectangular volume to the east. It sits on a concrete podium with a wide plaza accessed by concrete steps at the northwest corner. The steps are anchored on the west by a raised planter and on the east by a stone-veneered monument sign. The building's primary (north) façade is asymmetrically composed of three sections. The west portion consists of a metal colonnade with a recessed metal-framed glazed curtain wall behind. The colonnade has a cement plaster ceiling with large, round, recessed light fixtures and terminates in a solid projecting wall veneered in yellow glazed ceramic tile. The central portion of the north façade consists of a two-story metal-framed glazed curtain wall. The east portion is an unarticulated wall of painted concrete masonry units. The east, south, and west façades are of painted concrete masonry units.

The former flight simulator space is a large, two-story interior volume at the northwest corner of the building with one wall finished in yellow glazed ceramic tile continued from the exterior, large recessed circular light fixtures, and interior metal-framed glazed openings at the second-floor level. A second two-story interior volume contains a portion of fuselage used for flight crew training.

The Training Center Building is individually significant under National Register Criterion A, California Register Criterion 1, and local Historic-Cultural Monument criteria, as an aviation site associated with the rapid development of commercial aviation in the years after World War II. It is also significant under National Register Criterion C, California Register Criterion 3, and local Historic-Cultural Monument criteria as an aviation property that embodies the distinctive characteristics of Mid-century Modern architecture, which reflects the period during which LAX was developed. The building was designed and built for Continental Airlines and served as the company's national training headquarters during the time it played a formative role in the development and growth of LAX and the airline industry. The development of the complex reflected the commercial success of Continental Airlines, and the Training Center Building's Modern style, incorporating the company's black, white, and gold corporate colors, established Continental's corporate identity on the West Coast. The building is an airline-specific property type and



Continental Airlines Training Center (2013)  
Looking east to primary north facade



Continental Airlines Training Center (2013)  
Looking north to south facade

Source: PCR Services Corporation, September 2013.  
Prepared by: CDM Smith, May 2017.

**LAX Secured Area Access Post Project**

**Continental Airlines  
Training Center Building Photographs**

Figure  
**4.2-4**

two of its interior spaces, the flight simulator and the crew training space with its partial fuselage, represent rare and unique uses. It retains a high degree of integrity and therefore is eligible for listing in the National Register, the California Register, and as a City of Los Angeles Historic-Cultural Monument.

The Training Center Building is also a contributor to a California Register-eligible historic district that includes the nearby CAL GO Building at 7270 World Way West and the attached associated complex of hangars, shops, and storage facilities at 7260, 7280, and 7300 World Way West. (See below)

### ***Continental Airlines Hangars, Shops, and Storage Facilities – 7260, 7280, and 7300 World Way West (1963-1972)***

The Continental Airlines complex of hangars, shops, and storage facilities is located immediately south of, and attached to, the company's GO Building. The complex includes a pre-existing Flight Kitchen, Hangar Bays 1 and 2, and associated concrete and asphalt apron, developed between 1956 and 1962 before Continental's occupancy; and improvements developed by Continental Airlines between 1963 and 1972 including Hangar Bay No. 3 (1965), shops and offices (1965), additions to existing maintenance/engineering offices (1966), Hangar Bay No. 4 (1967), flight kitchen addition (1968), and Hangar Bays No. 5 and 6 (1971-1972). A variety of tenant improvements, repairs, and alterations have been completed since that time. The buildings are utilitarian structures with rectangular plans and flat roofs (see **Figure 4.2-5**).

The hangars, shops, and storage facilities are not historic individually; however, the facilities together are a contributor to a California Register-eligible historic district that includes the attached CAL GO Building (7270 World Way West) and the nearby Training Facility at 7320 World Way West. (See below)

### ***Continental Airlines Complex***

The CAL GO Building (7270 World Way West), the Training Center Building (7320 World Way West), and the hangars, shops, and storage facilities (7260, 7280, and 7300 World Way West) together form a historic district that is significant under National Register Criterion A, California Register Criterion 1, and local Historic-Cultural Monument criteria, as an aviation property associated with the rapid development of commercial aviation in the years after World War II, which had prompted advances in aircraft design and technology. The complex was designed and built for Continental Airlines and served as the company's national headquarters during the time it played a formative role in the development and growth of LAX and the airline industry. The development of the complex from 1963 through 1972 reflected the commercial success of Continental Airlines during those years. Due to alterations after Continental's occupancy, including an addition to the CAL GO Building and alteration of the Flight Kitchen, the complex no longer retains sufficient integrity for listing in the National Register. In addition, the period of significance (1965-1982, reflecting Continental's occupancy) extends within the last 50 years. However, the Continental Airlines Complex historic district retains sufficient integrity to convey its historic significance, and the California Register is generally less exacting regarding integrity. Therefore, the Continental Airlines Complex is eligible for designation at the state and local levels.

#### **4.2.3.2.2 Archaeological and Paleontological Resources**

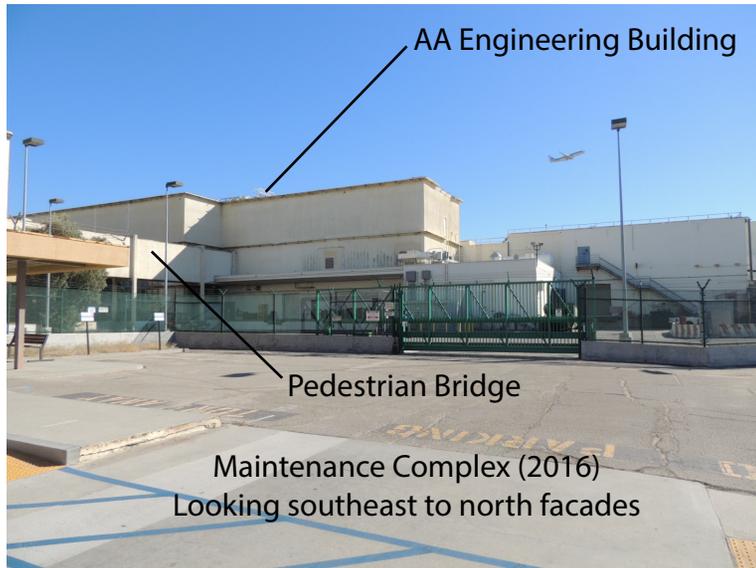
##### **Setting**

##### **Paleoindian Period (ca. 13,000-11,000 Years Before Present [YBP])**

Little is known of Paleoindian peoples in southern California, and the cultural history of this period follows that of North America in general. The earliest radiocarbon dates from the Paleoindian Period in North America come from the Arlington Springs Woman site on Santa Rosa Island. These human remains date to approximately 13,000 YBP.<sup>83</sup> Lifeways during the Paleoindian Period were characterized by highly mobile hunting and gathering. Prey included

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<sup>83</sup> Johnson, John R., Thomas W. Stafford, Jr., Henry O. Ajie, and Don P. Morris, *Arlington Springs Revisited, Proceedings of the Fifth California Islands Symposium*, edited by David R. Brown, Kathryn C. Mitchell and Henry W. Chaney, pp. 541-545, Santa Barbara Museum of Natural History, Santa Barbara, 2002.



Source: Historic Resources Group, March 2017.  
Prepared by: CDM Smith, May 2017.

**LAX Secured Area Access Post Project**

**Continental Airlines Hangars,  
Shop, and Storage Facilities Photographs**

Figure  
4.2-5

megafauna such as mammoth and technology included a distinctive flaked stone toolkit that has been identified across much of North America and into Central America. They likely used some plant foods, but the Paleoindian toolkit recovered archaeologically does not include many tools that can be identified as designed specifically for plant processing.<sup>84</sup>

### Archaic Period (ca. 11,000-3,500 YBP)

The earliest Archaic Period lifeways in inland southern California have been given the name San Dieguito tradition, after the San Diego area where it was first identified and studied.<sup>85</sup> Characteristic artifacts include stemmed projectile points, crescents, and leaf-shaped knives, which suggest a continued subsistence focus on large game, although not megafauna of the earlier Paleoindian period. Milling equipment appears in the archaeological record at approximately 7,500 years ago.<sup>86</sup> Artifact assemblages with this equipment include basin millstones and unshaped manos, or grinding slabs used to process small, hard seeds from plants, projectile points, flexed burials under cairns, and cogged stones, and have been given the name La Jolla Complex (7,500–3,000 YBP). The transition from San Dieguito lifeways to La Jolla lifeways appears to have been an adaptation to drying of the climate after 8,000 YBP, which may have stimulated movements of desert peoples to the coastal regions, bringing millstone technology with them. Groups in the coastal regions focused on mollusks, while inland groups relied on wild-seed gathering and acorn collecting.

### Late Prehistoric Period (ca. 3,500 YBP-A.D. 1769)

Cultural responses to environmental changes around 4,000–3,000 YBP included a shift to more land-based gathering practices. This period was characterized by the increasing importance of acorn processing, which supplemented the resources from hunting and gathering. The period after A.D. 1400 was identified as the San Luis Rey complex.<sup>87</sup> San Luis Rey I (A.D. 1400–1750) is associated with bedrock mortars and millstones, cremations, small triangular projectile points with concave bases, and Olivella beads. The San Luis Rey II (A.D. 1750–1850) period is marked by the addition of pottery, red and black pictographs, cremation urns, steatite arrow straighteners, and non-aboriginal materials.<sup>88,89</sup> Work at Cole Canyon and other sites in southern California suggest that this complex, and the ethnographically described lifeways of the native people of the region, were well established by at least 1,000 YBP.<sup>90</sup>

### Ethnographic Setting - The Gabrielino

At the time of contact, the Native Americans subsequently known as the Gabrielino occupied lands around LAX; their territories comprised nearly the entire basin comprising the counties of Los Angeles and Orange. They belonged to the Takic family of the Uto-Aztecan linguistic stock. Named after the Mission San Gabriel, the Gabrielino are considered to have been one of the two wealthiest and largest ethnic groups in aboriginal southern California, the other being the Chumash in the Santa Barbara Channel region.<sup>91</sup>

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<sup>84</sup> 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 I, Archaeological and Paleontological Resources Assessment Report, Prepared by PCR Services Corporation, September 2016. Available: [http://connectinglax.com/files/LAMP\\_DEIR\\_Appendix%20I.pdf](http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf).

<sup>85</sup> Warren, Claude N, "Cultural Tradition and Ecological Adaptation on the Southern California Coast", in *Archaic Prehistory in the Western United States*, C. Irwin-Williams, ed, pp. 1-4, *Eastern New Mexico University Contributions in Anthropology*, Portales, 1968.

<sup>86</sup> Moratto, Michael J., *California Archaeology*, Academic Press, San Diego, p. 158, 1984.

<sup>87</sup> Meighan, C.W, "A Late Complex in Southern California Prehistory," *Southwestern Journal of Anthropology* 10:215–227, 1954.

<sup>88</sup> Meighan, C.W, "A Late Complex in Southern California Prehistory," *Southwestern Journal of Anthropology* 10:223, 1954.

<sup>89</sup> Keller, Jean K. and Daniel F. McCarthy, "Data Recovery at the Cole Canyon Site (CA-RIV-1139), Riverside County, California," *Pacific Coast Archaeological Society Quarterly*, 25(1):6, 1989.

<sup>90</sup> Keller, Jean K. and Daniel F. McCarthy, "Data Recovery at the Cole Canyon Site (CA-RIV-1139), Riverside County, California," *Pacific Coast Archaeological Society Quarterly*, 25(1):80, 1989.

<sup>91</sup> Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC:

## 4.2 Cultural Resources

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The Takic-speaking ancestors of the Gabrielino arrived in the Los Angeles basin around 1500 BC and spread throughout the area, displacing a preexisting Hokan-speaking population.<sup>92</sup> The first Spanish contact with the Gabrielino took place in 1520, when Juan Rodriguez Cabrillo arrived on Santa Catalina Island. In 1602, the Spanish returned to Santa Catalina under Sebastián Vizcaíno, and in 1769, Gaspar de Portolá made the first attempt to colonize Gabrielino territory. By 1771, the Spanish had built four missions, and the decimation of the Gabrielino had already begun.<sup>93</sup> European diseases and conflicts among the Gabrielino population, as well as conversion to Christianity, carried a toll in their numbers, traditions, and beliefs.

Although determining an accurate account of the population numbers is difficult, Bean and Smith state that, by AD 500, the Gabrielino established permanent settlements and their population continued to grow.<sup>94</sup> Early Spanish accounts indicate that the Gabrielino lived in permanent villages with populations ranging from 50 to 200 individuals. The Gabrielino population surpassed 5,000 people by around 1770.

The Gabrielino practiced different subsistence strategies that included hunting, fishing, and gathering. Hunting activities on land were carried out with the use of bow and arrow, deadfalls, snares, and traps. Smoke and throwing clubs also were used to assist with the hunt of burrowing animals. Aquatic animals were hunted with harpoons, spear-throwers, and clubs. Although most fishing activities took place along rivers and from shore, open water fishing trips between mainland and the islands also took place using boats made from wood planks and asphaltum. The Gabrielino fishing equipment included fishhooks made of shells, nets, basketry traps, and poison substances obtained from plants.<sup>95</sup>

The Gabrielinos were involved in trade among themselves and with other groups. Coastal Gabrielinos exchanged steatite, shell and shell beads, dried fish, sea otter pelts, and salt with inland groups for acorns, seeds, obsidian, and deerskins.<sup>96</sup> During the late prehistoric period, the principal trade item, both among the Gabrielino and for export to other groups, was steatite. Also known as soapstone or soaprock, major outcroppings of steatite are found on Santa Catalina Island. Steatite was widely used among the Gabrielino to make arrow straighteners and artistic or ritualistic objects. In addition, this rock was used in the making of functional objects for food preparation such as bowls, mortars, pestles, and comals, or griddle.<sup>97</sup> Archaeological data indicate that a steatite “industry” developed prehistorically on the island that involved the large-scale trade of both raw materials and finished artifacts to mainland communities.<sup>98</sup>

### Previously Recorded Archaeological Resources

The LAX Master Plan Final EIR identified 36 previously recorded archaeological sites within a radius of approximately two miles of LAX, including eight sites located on LAX property.<sup>99</sup> None of the eight sites identified on LAX property is located within the boundaries of the project site or in the immediate vicinity.

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Smithsonian Institution, p. 538, 1978.

<sup>92</sup> Sutton, Mark Q., "People and Language: Defining the Takic Expansion into Southern California," *Pacific Coast Archaeological Society Quarterly*, 41(2&3): 31-93, 2009.

<sup>93</sup> Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, pp. 540-541, 1978.

<sup>94</sup> Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 540, 1978.

<sup>95</sup> Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 546, 1978.

<sup>96</sup> Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 547, 1978.

<sup>97</sup> Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 547, 1978.

<sup>98</sup> Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 547, 1978.

<sup>99</sup> City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

Results of the records search conducted for the LAX Landside Access Modernization Program from the South Central Coastal Information Center (SCCIC) indicated no archaeological resources have been recorded at or within a half-mile radius of the proposed SAAP project site.<sup>100</sup> The project site is a highly disturbed area that has long been, and is currently being, used for airport uses. Any resources that may have existed on the site at one time are likely to have been displaced and, as a result, the overall sensitivity of the site with respect to buried resources is low.

The results of the SLF records search for the project site through the NAHC are included in Section 4.3, *Tribal Cultural Resources*, of this EIR. As discussed therein, the SLF records search by the NAHC did not indicate the presence of Native American cultural resources from the NAHC archives within the project area or surrounding vicinity.

### Previously Recorded Paleontological Resources

The LAX property lies in the northwestern portion of the Los Angeles Basin, a broad structural syncline with a basement of older igneous and metamorphic rocks overlain by thick younger marine and terrestrial deposits. The older deposits that underlie the LAX area are assigned to the Palos Verdes Sand formation. The Palos Verdes Sand formation is one of the better-known Pleistocene age deposits in southern California. The unit was deposited in a shallow sea that covered the region some 124,000 years ago. These deposits have a high potential for yielding unique paleontological deposits. The Palos Verdes Sand formation covers half of the LAX area, beginning at Sepulveda Boulevard and extending easterly beyond the airport.<sup>101</sup>

The records search conducted for the LAX Landside Access Modernization Program from the Vertebrate Paleontology Department at the Natural History Museum of Los Angeles County (NHMLAC) indicated that there were no known paleontological localities within the vicinity of the proposed project.

### 4.2.4 Thresholds of Significance

A significant impact on cultural 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.
- 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.
- Disturbance of any human remains, including those interred outside of formal or dedicated cemeteries.

These thresholds are derived from Appendix G of the State CEQA Guidelines.

In addition, the following thresholds related to historical resources from the L.A. CEQA Thresholds Guide are applicable to the proposed project:<sup>102</sup>

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<sup>100</sup> The study area for the archaeological and paleontological resources assessment for the LAX Landside Access Modernization Program included areas within the CTA, some of which are adjacent to the project site; refer to Figure 2 in 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 I, Archaeological and Paleontological Resources Assessment Report, prepared by PCR Services Corporation, September 2016. Available: [http://connectinglax.com/files/LAMP\\_DEIR\\_Appendix%20I.pdf](http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf).

<sup>101</sup> City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.2 – Paleontological Resources, April 2004.

<sup>102</sup> City of Los Angeles, *L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles*, 2006.

## 4.2 Cultural Resources

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A project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance would occur if the project would involve:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and [historical/architectural] significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

### 4.2.5 Impacts Analysis

#### 4.2.5.1 Historical Resources

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. LAVA 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 this 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 this 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.

### 4.2.5.2 Archaeological Resources

The cultural resource records search indicated that 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.<sup>103</sup> 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.

### 4.2.5.3 Paleontological Resources

The paleontological resources records search indicated that no previously recorded vertebrate fossil localities from the NHMLAC database are located within the project area (including the project site and construction staging area).<sup>104</sup> 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.

### 4.2.5.4 Human Remains

As discussed in Section 4.3, *Tribal Cultural Resources*, of this EIR, an SLF search from the NAHC did not find any records pertaining to the presence of Native American cultural resources from the NAHC archives within the project area or surrounding vicinity (although the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources). As stated above, the project area (including the project site and construction staging areas) is located within a highly urbanized area and has been subject to disturbance by airport operations and development. Thus, surficial human remains resources that may have existed at one time have likely been displaced by these disturbances. While discovery of human remains in artificial fill deposits within the project area is unlikely, proposed excavations could impact previously unknown buried human remains. However, LAWA would comply with guidance as to the treatment of any human remains that are encountered during construction excavations, including the procedures outlined in Sections 7050.5(b) and (c) of the State Health and Safety Code, and Sections 5097.94(k) and (i) and Sections 5097.98(a) and (b) of the Public Resources Code. Therefore, through compliance with state and local regulations, impacts from disturbance of any human remains, including those interred outside of formal or dedicated cemeteries, would be less than significant.

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<sup>103</sup> 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 I, Archaeological and Paleontological Resources Assessment Report, Prepared by PCR Services Corporation, September 2016. Available: [http://connectinglax.com/files/LAMP\\_DEIR\\_Appendix%20I.pdf](http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf).

<sup>104</sup> 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 I, Archaeological and Paleontological Resources Assessment Report, Prepared by PCR Services Corporation, September 2016. Available: [http://connectinglax.com/files/LAMP\\_DEIR\\_Appendix%20I.pdf](http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf).

### 4.2.6 Cumulative Impacts

The cumulative impacts analysis evaluates the impacts of the project on cultural resources in conjunction with past, present, and reasonably foreseeable probable future projects, as listed in Table 3-1. The implementation of the project, when combined with these other projects, could result in cumulative impacts to cultural resources if the combined impacts would exceed the identified thresholds of significance.

#### 4.2.6.1 Historical Resources

As noted in Section 4.2.5.1, the proposed project would result in a significant impact to an historical resource, the CAL GO Building, by resulting in the demolition of the building. In addition, demolition of the CAL GO Building would result in the loss of a primary contributing building to the potential Continental Airlines Complex historic district, substantially reducing the integrity of the district. This would be a significant impact to the potential Continental Airlines Complex historic district. The proposed project would not result in significant impacts to the Training Center Building or to the Continental Airlines Hangars, Shops, and Storage Facilities by themselves.

None of the cumulative projects listed in Table 3-1 is located in proximity to the historical resources located on or near the project site and identified in Table 4.2-1, namely the CAL GO Building; the Training Center Building; the Continental Airlines Hangars, Shops, and Storage Facilities; or the Continental Airlines Complex (see Figure 3-1). Therefore, no cumulative impacts to these historical resources would occur. However, other historical resources at the airport would be affected by cumulative projects at LAX. Specifically, three historical resources at LAX, other than the CAL GO Building, have the potential to be affected by cumulative projects at LAX, including the Theme Building, the 1961 ATCT, and the Intermediate Terminal Facility. The Theme Building is eligible for listing in the National Register, is listed in the California Register, and is a designated LAHCM. The 1961 ATCT does not appear to be eligible for the National Register or the California Register, but has been determined to be eligible for local listing as an LAHCM. The Intermediate Terminal Facility does not appear to be eligible for the National Register, but has been determined to be eligible for listing in the California Register and as an LAHCM.<sup>105</sup>

The Theme Building and 1961 ATCT are both located in the LAX Central Terminal Area (CTA). A number of cumulative project listed in Table 3-1 are located in the CTA and would involve exterior improvements or new construction, including the LAX Bradley West Project, Terminal 1.5 Project, Terminals 2 and 3 Modernization Project, Concourse 0, and LAX Landside Access Modernization Program. None of the cumulative terminal improvement projects would result in a direct physical impact to the Theme Building or 1961 ATCT. The LAX Bradley West Project is not located in proximity to the 1961 ATCT and would not contribute to cumulative impacts to this resource. However, the LAX Bradley West Project is visible from, and within view of, the Theme Building. The Bradley West Project is compatible with the historic materials, features, size, scale and proportion, and massing of the Theme Building and would not contribute to cumulative impacts to this historical resource.<sup>106</sup>

The LAX Landside Access Modernization Program would result in a significant impact to the Theme Building as a result of the construction of the Automated People Mover (APM) guideway and pedestrian walkway. The LAX Landside Access Modernization Program would not result in physical alteration of the structure and materials of the Theme Building, therefore, the Theme Building would remain eligible for listing in the National Register, a listed resource in the California Register, and a designated LAHCM. However, while the physical materials and form of the Theme Building would remain intact, alteration of its surroundings by the LAX Landside Access Modernization Program would result in “material impairment” as defined by CEQA, because unique features of its architectural design as well as its original function would be substantially obscured, reducing its ability to convey its historic significance. With implementation of mitigation for the LAX Landside Access Modernization Program (Mitigation Measure MM-HR (LAMP)-1), impacts to the Theme Building would be reduced, but not to a level that would be less than significant. In connection with its approval of the LAX Landside Access Modernization Program,

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<sup>105</sup> 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.

<sup>106</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study*, (SCH 1997061047), Chapter 5, Cumulative Impacts, January 2013.

the Board of Airport Commissioners found that there are no other feasible measures that could be adopted to reduce impacts to the Theme Building further while still achieving the objectives of the LAX Landside Access Modernization Program.<sup>107,108</sup> In addition, other cumulative terminal improvement projects, namely the LAX Terminal 1.5 Project and the LAX Terminals 2 and 3 Modernization Project, would contribute to a cumulative impact to the Theme Building. These two projects propose new passenger processing buildings in the CTA, north of the Theme Building and across World Way. Although it was determined that neither project would have a project-specific impact on the Theme Building, the combination of the LAX Landside Access Modernization Program, the LAX Terminal 1.5 Project, and the LAX Terminals 2 and 3 Modernization Project would result in a significant cumulative impact on the Theme Building.<sup>109,110</sup>

The LAX Landside Access Modernization Program has the potential to result in a significant impact to the 1961 ATCT. Demolition of the adjacent two-story Administration Building and construction of the APM guideway have the potential to damage or destroy character-defining features of the 1961 ATCT, which would result in a substantial adverse change in the significance of this historical resource. However, with implementation of mitigation for the LAX Landside Access Modernization Program (Mitigation Measure MM-HR (LAMP)-2), impacts to the 1961 ATCT would be reduced to a level that is less than significant. The LAX Terminal 1.5 Project and the LAX Terminals 2 and 3 Modernization Project are not located in proximity to the 1961 ATCT and would not contribute to cumulative impacts to this historical resource. The Concourse 0 project would be located across World Way from the 1961 ATCT. Due to the distance of the Concourse 0 project from the 1961 ATCT, construction activities associated with this project would not have the potential to damage or destroy features of the 1961 ATCT and would not contribute to cumulative impacts to the 1961 ATCT. Moreover, the 1961 ATCT no longer retains integrity of setting, therefore, the improvements associated with these projects would not result in impacts to the 1961 ATCT.

The United Airlines East Aircraft Maintenance/Ground Support Equipment (GSE) Project would require the demolition of the existing buildings. The environmental documentation for the United Airlines project is currently underway. For purposes of this EIR, it is assumed that impacts to this historical resource from the United Airlines project will be determined to be significant and unavoidable. No other cumulative projects would contribute to impacts to the Intermediate Terminal Facility.

The proposed project is located on the west side of the airport and would not have a direct or indirect impact on the Theme Building, the 1961 ATCT, or the Intermediate Terminal Facility. However, as indicated in Section 4.2.5, the proposed project would have a significant impact on the CAL GO Building, which is another historical resource associated with the history and development of LAX. The combination of the proposed project and other cumulative projects at LAX, most notably the LAX Landside Access Modernization Program as well as the United Airlines East Aircraft Maintenance/GSE Project, would result in a significant cumulative impact on historical resources at LAX and the contribution of the proposed project (i.e., the direct impact to the CAL GO Building) to this impact would be cumulatively considerable. As discussed in Section 4.2.3.1.3 above, in 2016, LAWA prepared the LAX Preservation Plan.<sup>111</sup> The preservation plan identified all historic resources located on the LAX property and designated certain historic resources for preservation. The Plan is intended to “serve as the framework for the future repair, maintenance, and alteration of historic resources located on the LAX property and guide the planning of future projects.” The Preservation Plan identifies five buildings, one structure, and one object that will be preserved. These

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<sup>107</sup> City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH No. 2015021014), Section 4.4, Cultural Resources, September 15, 2016.

<sup>108</sup> City of Los Angeles, Los Angeles World Airports, *California Environmental Quality Act Findings, LAX Landside Access Modernization Program*, February 2017. Available: [http://www.lawa.org/connectinglax/files/LAX\\_LAMP\\_CEQA-Findings\\_20160216\(SECURED\).pdf](http://www.lawa.org/connectinglax/files/LAX_LAMP_CEQA-Findings_20160216(SECURED).pdf).

<sup>109</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport Terminal 1.5 Project Final Initial Study/Mitigated Negative Declaration*, November 2016.

<sup>110</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport Terminals 2 and 3 Modernization Project Notice of Preparation and Initial Study*, August 2016.

<sup>111</sup> 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.

## 4.2 Cultural Resources

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include the Theme Building and the 1961 ATCT. The CAL GO Building is not identified for preservation, nor is the Intermediate Terminal Facility. However, as discussed in Section 4.2.3.1.3 above, any project at LAX, including the proposed SAAP, that requires extensive alteration or demolition of the CAL GO Building would require LAWA to notify the OHR and submit plans that include a documentation plan to fully document the CAL GO Building. LAWA has committed to utilizing the LAX Preservation Plan to assist LAWA in preserving and evaluating its historic resources, which would reduce impacts to historical resources at LAX that would be affected by the proposed project and other cumulative projects at LAX discussed above (i.e., the Theme Building, 1961 ATCT, Intermediate Terminal Facility, and CAL GO Building).<sup>112</sup>

### 4.2.6.2 Archaeological Resources, Paleontological Resources, and Human Remains

Excavation associated with other development projects at or near LAX has the potential to encounter previously undiscovered archaeological or paleontological resources or human remains, which could result in cumulative impacts to these resources. No known archaeological resources, paleontological resources, or human remains are located on, or adjacent to, the proposed project site. 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. Thus, surficial archaeological resources, paleontological resources, and human remains that may have existed at one time have likely been displaced by these disturbances. While discovery of archaeological resources, paleontological resources, or human remains in artificial fill deposits within the project area is unlikely, excavations associated with the proposed project could occur below the fill levels could impact unique archaeological resources, unique paleontological resources, or human remains that have not been disturbed or displaced by previous development. As identified in Sections 4.2.5.2 and 4.2.5.3, the potential for the proposed project to adversely affect previously unknown unique archaeological or paleontological resources could be significant. As discussed in Section 4.2.5.4, with compliance with existing regulatory procedures governing the treatment of human remains encountered during construction, the impacts of the proposed project on human remains would be less than significant.

With respect to archaeological and paleontological resources, the same potential for encountering previously undiscovered archaeological and unique paleontological resources that is associated with the proposed project exists for other cumulative projects at LAX that would include construction excavations. These potential impacts could be cumulatively significant when viewed in combination. The proposed project's contribution to significant cumulative impacts to archaeological and paleontological resources, without mitigation, would be cumulatively considerable.

With respect to human remains, guidance as to the treatment of human remains that could be encountered during construction excavations, such as the procedures outlined in Sections 7050.5(b) and (c) of the State Health and Safety Code, and Sections 5097.94(k) and (i) and Sections 5097.98(a) and (b) of the Public Resources Code, would apply to cumulative projects as well as to the proposed project. With compliance with these regulations, cumulative impacts from disturbance of any human remains, including those interred outside of formal or dedicated cemeteries, would be less than significant.

## 4.2.7 Mitigation Measures

### 4.2.7.1 Historical Resources

As indicated in Section 4.2.5.1, impacts of the proposed project on historical resources would be significant. The following mitigation measure is proposed to reduce significant impacts to historical resources.

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<sup>112</sup> City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Section 4.4, Cultural Resources, p. 4.4-55, September 2016.

- **MM-HR (SAAP)-1. Conformance with LAWA’s LAX Preservation Plan.**

Prior to initiation of any demolition activities, LAWA shall notify the City of Los Angeles Department of City Planning’s Office of Historic Resources (OHR) and shall submit the Historic Building Documentation report for the CAL GO Building.

As discussed in Section 4.2.5.1 above, the proposed project would require the demolition of the former 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. Demolition of an historical resource cannot be mitigated to a less-than-significant level (Public Resources Code [PRC] Section 15126.4(b)(2)). However, pursuant to the PRC, 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. According to the California Office of Historic Preservation, “CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of significance. In this context, recordation serves a legitimate archival purpose.”<sup>113</sup> When data recovery is the only feasible mitigation, studies shall be deposited with the applicable CHRIS Information Center. As discussed in Section 4.2.5.1 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), 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 to these regulatory requirements, Mitigation Measure MM-HR (SAAP)-1 would require conformance with LAWA’s LAX Preservation Plan, which, as discussed in Section 4.2.3.1.3 above, requires that, for any project that would involve extensive alteration or demolition of the CAL GO Building, LAWA shall notify the OHR and submit plans that include a documentation plan to fully document the CAL GO Building. In the case of the CAL GO Building, the documentation has already been implemented; therefore, LAWA will submit the completed documentation to OHR. No additional mitigation is available to address the impact to the CAL GO Building.

### 4.2.7.2 Archaeological Resources

As indicated in Section 4.2.5.2, impacts of the proposed project on archaeological resources could be significant, if previously unknown resources are encountered during construction. The following Standard Control Measures are proposed as mitigation measures to reduce significant impacts to archaeological resources.

- **LAX-AR-1. Conformance with LAWA’s Archaeological Treatment Plan.**

Prior to initiation of any project-related grading or excavation activities, LAWA shall retain an on-site Cultural Resource Monitor (CRM), as defined in LAWA’s Archaeological Treatment Plan (ATP), who will determine if the proposed project is subject to archaeological monitoring. Monitoring, if required, will be subject to the provisions identified below.<sup>114</sup>

**Monitoring Requirements.** In accordance with the ATP, the CRM will compare the known depth of redeposited fill or disturbance to the depth of planned grading activities, based on a review of construction plans that provide details about the extent and depth of project-related grading and other development-related data, such as geotechnical investigations that include soils borings and delineation of subsurface strata types. If the CRM determines that all or specific portions of the proposed project area warrant archaeological monitoring during grading activities, a qualified archaeologist shall be retained by LAWA to inspect excavation and grading activities that occur within native material.

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<sup>113</sup> State of California, Office of Historic Preservation, *How Can Substantial Adverse Change be Avoided or Mitigated?* Available: [http://ohp.parks.ca.gov/?page\\_id=21727](http://ohp.parks.ca.gov/?page_id=21727), accessed May 22, 2017.

<sup>114</sup> City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005. Available: [http://www.lawa.org/uploadedFiles/OurLAX/Past\\_Projects\\_and\\_Studies/Past\\_Publications/Archaeological\\_Treatment\\_Plan.pdf](http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Archaeological_Treatment_Plan.pdf).

## 4.2 Cultural Resources

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**Identification, Evaluation, and Recovery.** Should archaeological resources be discovered, preservation in place is the preferred manner for mitigating impacts to archaeological sites. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

**Reporting and Curation.** Reporting shall be completed in conformance with the guidelines set forth by the Office of Historic Preservation for Archaeological Research Management Reports and requirements established in the ATP. Proper curation and archiving of artifacts shall be conducted in accordance with industry and federal standards and as outlined in the ATP.

- **LAX-AR-2. Archaeological Resources Construction Personnel Briefing.**

Prior to initiation of grading activities, LAWA shall require the consulting archaeologist to provide construction personnel with a briefing in the identification of archaeological resources and in the correct procedures for notifying the relevant individuals should such a discovery occur.

### 4.2.7.3 Paleontological Resources

As indicated in Section 4.2.5.3, impacts of the proposed project on paleontological resources could be significant, if previously unknown resources are encountered during construction. The following Standard Control Measures are proposed as mitigation measures to reduce significant impacts to paleontological resources.

- **LAX-PR-1. Conformance with LAWA's Paleontological Management Treatment Plan (PMTP).<sup>115</sup>**

Prior to initiation of grading activities, LAWA shall retain a professional paleontologist. If the project site is determined to exhibit a high potential for paleontological resources, paleontological monitoring shall be conducted by a professional paleontologist. If the project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP.

**Monitoring Requirements.** In accordance with the PMTP, LAWA shall supply the paleontological monitor (PM) with a construction schedule and any construction, grading, excavation and/or shoring plans, along with access to relevant geotechnical studies prior to the initiation of ground-disturbing activities. If excavation activities are scheduled to go below the documented level of fill materials, paleontological monitoring shall be initiated when formational sediments are expected to be reached by earthmoving activities.

**Identification, Evaluation, and Recovery.** The PM or PM designee shall identify, evaluate, and recover paleontological resources in accordance with the relevant provisions of the PMTP.

- **LAX-PR-2. Paleontological Resources Construction Personnel Briefing.**

Prior to initiation of grading/ground-disturbing activities, LAWA shall require the PM or PM designee to brief project engineers, project inspectors, construction foreman, drillers and heavy equipment operators in the identification of fossils or fossiliferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur.

### 4.2.7.4 Human Remains

As indicated in Section 4.2.5., impacts from disturbance of any human remains would be less than significant; therefore, no mitigation measures are required.

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<sup>115</sup> City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Paleontological Management Treatment Plan*, prepared by Brian F. Smith and Associates, revised December 2005. Available: [http://www.lawa.org/uploadedFiles/OurLAX/Past\\_Projects\\_and\\_Studies/Past\\_Publications/Paleontological\\_Management\\_Treatment\\_Plan.pdf](http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Paleontological_Management_Treatment_Plan.pdf).

## **4.2.8 Level of Significance After Mitigation**

### **4.2.8.1 Historical Resources**

Implementation of Mitigation Measure MM-HR (SAAP)-1 would address significant 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, but would not reduce impacts 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.

### **4.2.8.2 Archaeological Resources**

With implementation of Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2, potentially significant impacts to archaeological resources that are historical resources or unique archaeological resources would be reduced to a level that is less than significant and the contribution of the proposed project to potentially significant cumulative impacts on archaeological resources would not be cumulatively considerable.

### **4.2.8.3 Paleontological Resources**

With implementation of Standard Control Measures (Mitigation Measures) LAX-PR-1 and LAX-PR-2, potentially significant impacts to unique paleontological resources would be reduced to a level that is less than significant and the contribution of the proposed project to potentially significant cumulative impacts on unique paleontological resources would not be cumulatively considerable.

### **4.2.8.4 Human Remains**

Impacts from disturbance of human remains would be less than significant.

## **4.2 Cultural Resources**

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## 4.3 Tribal Cultural Resources

### 4.3.1 Introduction

This section addresses the proposed project impacts on tribal cultural resources. The existing tribal cultural resources in the project area are described below, along with the methodology and the regulatory framework that guided the evaluation of tribal cultural resources. Impacts to tribal cultural resources that would result from the proposed project are identified, along with any measures to mitigate significant effects of the proposed project if needed.

### 4.3.2 Methodology

A Sacred Lands File (SLF) records search for the project site was requested from the California Native American Heritage Commission (NAHC) to determine whether any Native American cultural resources in the NAHC database were located within the project site or within a half-mile radius. An SLF records search is one tool a lead agency can use to determine whether tribal cultural resources may exist within the vicinity of a project. The results of the SLF records search are discussed in Section 4.3.3.2.2 below.

As discussed in Section 4.3.3.1.1 below, Assembly Bill 52 (AB 52) establishes a consultation process between California Native American tribal governments and lead agencies applicable to any project for which a Notice of Preparation, Notice of Intent to Adopt a Mitigated Negative Declaration, or Notice of Intent to Adopt a Negative Declaration is filed on or after July 1, 2015. In accordance with AB 52, when LAWA initiated preparation of the Notice of Preparation for the proposed project, LAWA had not received a written request from any tribe indicating its wish to be notified of projects within its traditionally and culturally affiliated areas, as required by Public Resources Code Section 21080.3.1(b). Nevertheless, in a letter dated November 24, 2015, NAHC recommended that, as an AB 52 best practice, agencies should initiate consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions.<sup>116,117</sup> LAWA initiated the proposed project prior to the July 1, 2016 date by which NAHC was required to provide each tribe with a list of all public agencies that may be lead agencies under CEQA within the geographic area with which the tribe is traditionally and culturally affiliated. In light of the timing of project initiation, LAWA initiated consultation with tribes identified by NAHC in accordance with NAHC-suggested “best practice” procedures. The results of the consultation process, which is intended to fulfill “best practices” as recommended by NAHC, is discussed in Section 4.3.3.2.3 below.

### 4.3.3 Existing Conditions

#### 4.3.3.1 Regulatory Context

##### 4.3.3.1.1 Assembly Bill 52

AB 52, approved by Governor Brown on September 25, 2014, establishes a new category of resources in CEQA called “tribal cultural resources” that considers tribal cultural values in addition to scientific and archaeological values when determining impacts and mitigation. Further, AB 52 establishes a consultation process between California Native American tribal governments and lead agencies applicable to any project for which a Notice of Preparation, Notice of Intent to Adopt a Mitigated Negative Declaration, or Notice of Intent to Adopt a Negative Declaration is filed on or after July 1, 2015.

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<sup>116</sup> Wood, Rob, Associate Environmental Planner, State of California Native American Heritage Commission, Letter to Angelica Espiritu, City of Los Angeles, Los Angeles World Airports, *RE: Los Angeles International Airport (LAX) Terminal 1.5 Project, City and County of Los Angeles*, November 24, 2015.

<sup>117</sup> Although the subject of the November 24, 2015 letter from NAHC was the LAX Terminal 1.5 Project, in a subsequent electronic mail message received from NAHC on January 14, 2016, NAHC indicated that their November 24, 2015 correspondence could be used for other LAX projects. See Wood, Rob, Associated Environmental Planner, State of California Native American Heritage Commission, Electronic Mail Message to Robin Ijams, CDM Smith, *Subject: RE: AB 52 Local Government Tribal Consultation List Request for LAX Projects*, January 14, 2016.

### 4.3 Tribal Cultural Resources

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Section 1 of AB 52 states the legislature's intent as follows:

"In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of the Legislature, in enacting this act, to accomplish all of the following:

- (1) Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
- (2) Establish a new category of resources in the California Environmental Quality Act called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
- (3) Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
- (4) Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Because the California Environmental Quality Act calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources.
- (5) In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in the California Environmental Quality Act environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decisionmaking body of the lead agency.
- (6) Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to the California Environmental Quality Act (Division 13 (commencing with § 21000) of the Public Resources Code).
- (7) Ensure that local and tribal governments, public agencies, and project proponents have information available, early in the California Environmental Quality Act environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.
- (8) Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
- (9) Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment."<sup>118</sup>

Tribal cultural resources, as defined in Public Resources Code Section 21074, are 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 either:

- 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 Public Resources Code Section 5024.1(c). In applying the

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<sup>118</sup> State of California, Governor's Office of Planning and Research, *Discussion Draft Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA*, May 2015. Available: [https://www.opr.ca.gov/docs/DRAFT\\_AB\\_52\\_Technical\\_Advisory.pdf](https://www.opr.ca.gov/docs/DRAFT_AB_52_Technical_Advisory.pdf).

criteria set forth in Public Resource Code Section 5024.1(c) for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

The specific steps and timelines governing the notice and consultation process under AB 52 are as follows:

- “1) The Native American Heritage Commission will provide each tribe with a list of all public agencies that may be lead agencies under CEQA within the geographic area with which the tribe is traditionally and culturally affiliated, the contact information of those public agencies, and information on how the Tribe may request consultation. This list must be provided on or before July 1, 2016 (Public Resources Code Section 5097.94(m)).
- 2) If a tribe wishes to be notified of projects within its traditionally and culturally affiliated area, the tribe must submit a written request to the relevant lead agency (Public Resources Code Section 21080.3.1(b)).
- 3) Within 14 days of determining that a project application is complete, or to undertake a project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects as described in step 2, above. That notice must include a description of the project, its location, and must state that the tribe has 30 days to request consultation.
- 4) If it wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification described in step 3, above. The tribe’s response must designate a lead contact person. If the tribe does not designate a lead contact person, or designates multiple people, the lead agency shall defer to the individual listed on the contact list maintained by the Native American Heritage Commission.
- 5) The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation.
- 6) Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (Public Resources Code Section 21080.3.2(b)(1) and (2)). Note that consultation can also be ongoing throughout the CEQA process.”<sup>119</sup>

### 4.3.3.2 Baseline Conditions

#### 4.3.3.2.1 Previously Recorded Archaeological Resources

The LAX Master Plan Final EIR identified 36 previously recorded archaeological sites within a radius of approximately two miles of LAX, including eight sites located on LAX property.<sup>120</sup> None of the eight sites identified on LAX property are located within the boundaries of the project site or in the immediate vicinity.

Results of the records search conducted for the 2017 LAX Landside Access Modernization Program from the South Central Coastal Information Center (SCCIC) indicated that no archaeological resources have been recorded at or within a half-mile radius of the proposed SAAP project site.<sup>121</sup> The project site is a highly disturbed area that has long been, and is currently being, used for airport uses. Any resources that may have existed on the site at one time are likely to have been displaced and, as a result, the overall sensitivity of the site with respect to buried resources is low.

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<sup>119</sup> State of California, Governor’s Office of Planning and Research, *Discussion Draft Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA*, May 2015. Available: [https://www.opr.ca.gov/docs/DRAFT\\_AB\\_52\\_Technical\\_Advisory.pdf](https://www.opr.ca.gov/docs/DRAFT_AB_52_Technical_Advisory.pdf).

<sup>120</sup> City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

<sup>121</sup> The study area for the archaeological and paleontological resources assessment for the LAX Landside Access Modernization Program included areas within the western portion of LAX, some of which are in close proximity to the project site; refer to City of Los Angeles, *Los Angeles World Airports, Draft Environmental Impact Report for the Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix I, *Archaeological and Paleontological Resources Assessment Report*, prepared by PCR Services Corporation, September 2016. Available: [http://connectinglax.com/files/LAMP\\_DEIR\\_Appendix%20I.pdf](http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf).

## 4.3 Tribal Cultural Resources

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### 4.3.3.2.2 Sacred Lands File Search

As noted in Section 4.3.2, an SLF records search for the project site was requested from the NAHC. On February 17, 2017, the NAHC indicated that the SLF records search was completed with negative results. The NAHC results also noted, however, that the absence of resource information in the SLF inventory does not preclude the discovery of cultural resources within any project area.<sup>122</sup>

### 4.3.3.2.3 AB 52 Tribal Consultation

As discussed in Section 4.3.2 above, when LAWA initiated preparation of the Notice of Preparation for the proposed project, LAWA had not received a written request from any tribe indicating its wish to be notified of projects within its traditionally and culturally affiliated areas, as required by Public Resources Code Section 21080.3.1(b). Nevertheless, consistent with NAHC-suggested “best practice” procedures, letters were sent via certified mail on May 27, 2016 to the six Native American individuals and organizations identified by the NAHC in November 2015 as being affiliated with the vicinity of the project area to request information or concerns they may have about Native American cultural resources that may be affected by the proposed project.<sup>123,124,125</sup> Each Native American group and/or individual listed was sent a project notification letter and map and was asked to convey any knowledge regarding prehistoric or Native American resources (archaeological sites, sacred lands, or artifacts) located within the project area or surrounding vicinity. The letter included information such as project location, a brief description of the proposed project, and results of a previous cultural resources assessment conducted at LAX. A response was received on May 28, 2016 from one Native American tribe. That response did not identify any known tribal cultural resources that may be affected by the proposed project but did state that there is a possibility that unknown, yet significant, cultural resources could be encountered during ground disturbance activities. Per the mutual agreement of LAWA and the tribe in a telephone conversation and via electronic mail, formal consultation, which was initiated to fulfill the intent of Public Resources Code Section 21080.3.1(b), concluded on May 30, 2017.

### 4.3.4 Thresholds of Significance

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

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<sup>122</sup> Totton, Gayle, Associate Governmental Program Analyst, State of California Native American Heritage Commission, Letter to Robin Ijams, CDM Smith, *RE: Proposed LAX Secured Area Access Post Project, City of Los Angeles; Los Angeles County, California*, February 17, 2017.

<sup>123</sup> Public Resources Code Section 21080.3.1(c) states “To expedite the requirements of this section, the Native American Heritage Commission shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated with the project area.”

<sup>124</sup> Per the notification steps specified in AB 52, the NAHC is required to provide each tribe with a list of all public agencies that may be lead agencies under CEQA within the geographic area with which the tribe is traditionally and culturally affiliated, the contact information of those public agencies, and information on how the Tribe may request consultation. This list must be provided on or before July 1, 2016 (Public Resources Code Section 5097.94(m)). If a tribe wishes to be notified of projects within its traditionally and culturally affiliated area, the tribe must submit a written request to the relevant lead agency (Public Resources Code Section 21080.3.1(b)). Although not required by AB 52, in accordance with “best practice” suggested by NAHC to ensure that tribes are consulted, on May 27, 2016, LAWA sent letters of “Formal Notification of Determination of a Decision to Undertake a Project and Notification of Consultation Opportunity” for the proposed project to the Gabrielino/Tongva tribes and the Soboba Band of Mission Indians.

<sup>125</sup> Per an electronic mail message received from NAHC on January 14, 2016, the Native American consultation list received from NAHC for the LAX Terminal 1.5 Project on November 24, 2015, was approved for use for the proposed project.

- 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.

This threshold is derived from Public Resources Code Section 21074, Section 5020.1(k), and Section 5024.1.

### 4.3.5 Impacts Analysis

As noted in Section 4.3.3.2.3, there are no known tribal cultural resources, as defined in Public Resources Code Section 21074, on the project site or the proposed construction staging area, or in their immediate vicinity. The project site and the proposed construction staging area are highly disturbed. In accordance with “best practice” suggested by NAHC to ensure that tribes are consulted commensurate with the intent of AB 52, LAWA sent letters of “Formal Notification of Determination of a Decision to Undertake a Project and Notification of Consultation Opportunity” to California Native American tribes with a traditional or cultural affiliation with the geographic area of the proposed project, as identified by the NAHC. Although LAWA received one response to LAWA’s initial request for consultation, no Native American tribes have identified any known tribal cultural resources that may be affected by the proposed project. As noted under Section 4.3.3.2.3 above, the one response received from a Native American tribe did not identify any known tribal cultural resources that may be affected by the proposed project. Per the mutual agreement of LAWA and the tribe in a telephone conversation and via electronic mail, formal consultation, which was initiated to fulfill the intent of Public Resources Code Section 21080.3.1(b), concluded. Based on the previously-described baseline conditions and consultation, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource as 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.

As described above, 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 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.

### 4.3.6 Cumulative Impacts

The cumulative impacts analysis evaluates the impacts of the project on tribal cultural resources in conjunction with past, present, and reasonably foreseeable probable future projects at LAX, as listed in Table 3-1. The implementation of the project when combined with these other projects could result in cumulative impacts to tribal cultural resources if the combined impacts would exceed the identified threshold of significance.

There are no known tribal cultural resources on, or adjacent to, the proposed project site. 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. As discussed in Section 4.3.5, the discovery of tribal cultural resources within the project site is unlikely. However, proposed excavations that would occur below the fill levels could impact previously unknown tribal cultural resources. Therefore, impacts of the proposed project on tribal cultural resources would be significant.

### 4.3 Tribal Cultural Resources

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Table 3-1 identifies other projects and improvements at LAX. None of the cumulative projects would result in a direct physical impact to any known tribal cultural resources. The same potential for encountering previously undiscovered tribal cultural resources that is associated with the proposed project exists for other cumulative projects at LAX that would include construction excavations. 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. Thus, surficial Tribal cultural resources that may have existed at one time have likely been displaced by these disturbances. However, proposed excavations that would occur below the fill levels could impact previously unknown tribal cultural resources. These potential impacts would be cumulatively significant when viewed in combination. The proposed project's contribution to significant cumulative impacts to tribal cultural resources, without mitigation, would be cumulatively considerable.

#### 4.3.7 Mitigation Measures

As indicated in Section 4.3.5, impacts to tribal cultural resources would be significant. Standard Control Measures (Mitigation Measures) LAX-AR-1, Conformance with LAWA's Archaeological Treatment Plan (ATP), and LAX-AR-2, Archaeological Resources Construction Personnel Briefing, are proposed as mitigation measures to reduce significant impacts to archaeological resources and would also reduce the potential significant impacts on tribal cultural resources.<sup>126</sup> Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2 require conformance with LAWA's ATP, 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 ATP includes protocols for Native American monitoring in the event of the discovery during construction of an archaeological resource or discovery of Native American remains.

#### 4.3.8 Level of Significance After Mitigation

With implementation of Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2, potentially significant impacts to tribal cultural resources would be reduced to a level that is less than significant and the contribution of the proposed project to potentially significant cumulative impacts on tribal cultural resources would not be cumulatively considerable.

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<sup>126</sup> City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005.

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## 5. ALTERNATIVES

### 5.1 Introduction

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

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

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

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

### 5.2 Significant Impacts of the Project

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

### 5.3 Project Objectives

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

The objectives of the proposed project are to:

- Provide a new fully functional SAAP on World Way West to replace SAAP 5 and SAAP 21, which were taken out of service by recent construction projects on the west side of LAX;
- Allow for a new SAAP at a location that is generally central to the western portion of the AOA to provide a more direct path of travel to the north and south airfields, as well as airside access to the terminal area;
- Locate and design a new SAAP to provide access that connects with the existing AOA vehicle service road system in a manner that supports safe and efficient vehicle movement within the AOA, consistent with the mission of LAX Airfield Operations;
- Provide a state-of-the-art SAAP to serve as a prototype for any future SAAPs and/or improvements to existing SAAPs at LAX;
- Effectively reuse the project site -- which currently contains a building that is uninhabitable due to age (does not comply with current building codes), disrepair, and the presence of hazardous material -- for an AOA-related use that fulfills LAWA's strategic goal of innovating to enhance security, efficiency, and effectiveness; and
- Redevelop the project site in a manner that is consistent with LAWA's Design and Construction Handbook, specifically the definition of sustainability as the "triple bottom line" consisting of social, economic, and environmental considerations.

### 5.4 Alternatives Considered and Rejected

#### 5.4.1 Alternative Airport Locations

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

## 5.4.2 Alternative West Side Sites

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

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

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

## 5.5 Alternatives Carried Forward for Further Consideration

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

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

### 5.5.1 Alternative 1: No Project – No Build

Under Alternative 1, none of the proposed improvements would occur. The project site would remain in its existing physical condition. The CAL GO Building would not be demolished. However, the building would remain uninhabitable due to its poor condition, the presence of hazardous materials, and the fact that the primary building systems do not comply with current building codes. Under this alternative, no new SAAP would be constructed on the west side of LAX.



**LAX Secured Area Access Post Project**

**Alternative West Side Sites Not Evaluated in the EIR**

Figure  
5-1

### 5.5.2 Alternative 2: Alternative Site

Under Alternative 2, a new SAAP would be constructed along Maintenance Road south of World Way West. The SAAP would include the same footprint, facilities, and equipment as the proposed project (see **Figure 5-2**). Vehicles would access the Maintenance Road South Site via World Way West. After undergoing screening, vehicles would be discharged onto the service road that is located between Taxiways C and B. Development of a SAAP at the alternative site would result in the removal of some parking spaces from the existing tenant employee parking lot that is located immediately east of Taxilane AA and immediately north of Taxiway C.

### 5.5.3 Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site

Under Alternative 3, the CAL GO Building would be rehabilitated to bring it to a habitable state for reuse. This would entail removal of all hazardous materials, including asbestos containing materials (ACM), lead containing surfaces (LCS), mold, polychlorinated biphenyls (PCBs), and mercury. In addition, all primary building systems, including electrical, HVAC (heating, ventilation, and air conditioning), plumbing, fire/life safety, and elevators, would be brought up to code. Implementation of Alternative 3 would require that the interior of the building be stripped to the original steel core. All interior building components – including flooring, walls, ceiling tiles, insulation, etc. – would be removed and entirely replaced. In addition, exterior portions of the building that are in disrepair would be repaired. A use for the rehabilitated building has not been identified at this time. If the building were to be used for non-BOA functions (such as office or administrative space), additional improvements would be required to ensure a secure BOA perimeter. These improvements would include blocking all access points from the CAL GO Building to adjacent buildings, including the AA Engineering Building and the AA OSF. Ancillary structures, such as the pedestrian bridge between the CAL GO Building and the AA Engineering Building, and the stairwell structure located between the southeast corner of the CAL GO Building and the northeast corner of the OSF basement, may need to be removed or altered. Non-secure building ingress would need to be reestablished and modifications to the existing perimeter fence may be required.

Under this alternative, in addition to the rehabilitation of the CAL GO Building described above, a new SAAP would be constructed at the alternative site identified in Alternative 2.<sup>127</sup>

## 5.6 Evaluation of Project Alternatives

### 5.6.1 Alternative 1 (No Project – No Build)

#### 5.6.1.1 Environmental Impact Evaluation

##### Biological Resources

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

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<sup>127</sup> 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.



### **Cultural Resources**

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

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

### **Tribal Cultural Resources**

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

### **Energy and Conservation**

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

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

### **Other Environmental Resources**

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

## 5. Alternatives

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

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

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

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 be 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.<sup>129</sup>

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

## 5.6.2 Alternative 2 (Alternative Site)

### 5.6.2.1 Environmental Impact Evaluation

#### Biological Resources

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

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

<sup>129</sup> 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](https://www.lawa.org/uploadedFiles/LAX/pdf/Aero_Newsletter_201611.pdf), accessed May 18, 2017.

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

### Cultural Resources

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

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

### Tribal Cultural Resources

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

### Energy and Conservation

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

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

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

## 5. Alternatives

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

### Other Environmental Resources

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

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

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

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

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

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

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

#### 5.6.3.1 Environmental Impact Evaluation

##### Biological Resources

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

##### Cultural Resources

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

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

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<sup>130</sup> 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>.

## 5. Alternatives

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

### Tribal Cultural Resources

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

### Energy and Conservation

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

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

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

### **Other Environmental Resources**

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

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

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

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

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

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

## 5. Alternatives

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

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

### 5.7 Environmentally Superior Alternative

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

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

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

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

Table 5-1 Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project				
Environmental Resource	Proposed Project Impact	Alternative 1: No Project-No Build	Alternative 2: Alternative Site	Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site
<b>Biological Resources</b>				
	Less Than Significant with mitigation	No Impact	No Impact	No Impact
<b>Cultural Resources</b>				
Archaeological/ Paleontological Resources	Less Than Significant with mitigation	No Impact	Less Than Significant with mitigation	Less Than Significant with mitigation
Historical Resources	Significant and Unavoidable	No Impact	No Impact	Beneficial Impact
<b>Tribal Cultural Resources</b>				
	Less Than Significant with mitigation	No Impact	Less Than Significant with mitigation	Less Than Significant with mitigation
<b>Energy Impacts and Conservation</b>				
Wasteful, Inefficient or Unnecessary Consumption	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
Reliance on Fossil Fuels	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
<b>Other Environmental Resources: Air Quality and Greenhouse Gas Emissions</b>				
	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant

Source: CDM Smith, 2017.

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

**5. Alternatives**

Table 5-2 Summary of Project's and Alternatives' Responsiveness to Project Objectives				
Objective	Does the Project or Alternative Meet the Objective?			
	Proposed Project	Alternative 1: No Project-No Build	Alternative 2: Alternative Site	Alternative 3: Rehabilitate CAL GO Building and Build a New SAAP at the Alternative Site
Provide a new fully functional SAAP on World Way West to replace SAAP 5 and SAAP 21, which were taken out of service by recent construction projects on the west side of LAX.	Yes	No	Partially	Partially
Allow for a new SAAP at a location that is generally central to the western portion of the AOA to provide a more direct path of travel to the north and south airfields, as well as airside access to the terminal area.	Yes	No	No	No
Locate and design a new SAAP to provide access that connects with the existing AOA vehicle service road system in a manner that supports safe and efficient vehicle movement within the AOA, consistent with the mission of LAX Airfield Operations.	Yes	No	No	No
Provide a state-of-the-art SAAP to serve as a prototype for any future SAAPs and/or improvements to existing SAAPs at LAX.	Yes	No	Yes	Yes
Effectively reuse the project site - which currently contains a building that is uninhabitable due to age (does not comply with current building codes), disrepair, and the presence of hazardous material - for an AOA-related use that fulfills LAWA's strategic goal of innovating to enhance security, efficiency, and effectiveness.	Yes	No	No	Partially
Redevelop the project site in a manner that is consistent with LAWA's Design and Construction Handbook, specifically the definition of sustainability as the "triple bottom line" consisting of social, economic, and environmental considerations.	Yes	NA	Partially	Partially

Source: CDM Smith, 2017.

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## 6. OTHER ENVIRONMENTAL CONSIDERATIONS

### 6.1 Significant Unavoidable Impacts

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including impacts that can be mitigated but not reduced to a level that is less than significant. Chapter 4 of this EIR provides detailed analyses of the environmental topics identified in the Initial Study, prepared in April 2017, as having the potential to result in significant impacts with the implementation of the proposed project. The following identifies the impact that cannot be mitigated to a level that is less significant (although with implementation of a mitigation measure the impact would be reduced).

- Cultural Resources
  - Demolition of the former Continental Airlines (CAL) General Office (GO) Building which is individually eligible for listing in the California Register of Historical Resources and as a Los Angeles Historic-Cultural Monument. The CAL GO Building is also a contributor to the potential Continental Airlines Historic District which is eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument.

Section 4.2 identifies a mitigation measure that would address this impact, but would not reduce it to a level that is less than significant. No additional feasible mitigation measures are available that would avoid this impact or reduce it to a level that is less than significant.

In addition to identifying the significant unavoidable impacts of the proposed project, Section 15126.2(b) of the State CEQA Guidelines also recommends that an EIR describe the reasons why the project is being proposed, notwithstanding the significant unavoidable impacts associated with the project. As discussed in Chapter 2, *Project Description*, 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.

### 6.2 Significant Irreversible Environmental Changes

According to the State CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed project. Specifically, as stated in Section 15126.2(c) of the State CEQA Guidelines:

## 6. Other Environmental Considerations

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“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The project site is already dedicated to airport uses. However, 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 6.5 below for a discussion of energy impacts and conservation.

As described in Chapter 2, *Project Description*, the proposed new SAAP would be designed and constructed in accordance with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code (CALGreen), and would achieve, at a minimum, LAGBC Tier 1 conformance through environmentally-sensitive features.<sup>131,132</sup> 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.

### 6.3 Growth Inducing Impacts

Section 15126.2(d) of the State CEQA Guidelines requires an EIR to discuss the ways the proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

#### 6.3.1 Project Characteristics

The proposed project is to construct a new SAAP to provide a fully functional, secured access point onto the AOA on the west side of LAX. As discussed in Chapter 2, *Project Description*, a new SAAP is needed on the west side to replace SAAP 5 which was displaced by the Midfield Satellite Concourse (MSC) North Project, and SAAP 21 which was taken out of service by Phase 2 of the West Aircraft Maintenance Area (WAMA) Project. The proposed project would not affect the number of passengers served by the airport or the number or type of aircraft operations.

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<sup>131</sup> City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended.

<sup>132</sup> 24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*.

### 6.3.2 Economic 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).

The project would not increase existing passenger capacity or the number of aircraft operations at LAX. 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.

### 6.3.3 Removal of an Obstacle to Growth

As described in Chapter 2, *Project Description*, the proposed project would not increase existing passenger capacity or the number of aircraft operations at LAX. 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. Existing adjacent uses include: the LAX Fuel Farm and LAWA administrative offices/vehicle parking to the north and northwest, respectively; a remain overnight (RON) aircraft parking area to the east; the American Airlines (AA) Operations Support Facility (OSF), AA Engineering Building, United Airlines Maintenance Hangar, and Los Angeles Fire Department (LAFD) Fire Station 80/Aircraft Rescue and Firefighting Facility (ARFF) to the south; and the former CAL Training Building (vacant) to the west.

## 6.4 Less Than Significant Effects

This EIR concludes that impacts from implementation of the proposed project on human remains and tribal cultural resources would be less than significant.

In addition, an Initial Study was prepared for the proposed project and is included as Appendix A of this EIR. Based on the environmental analysis contained in the Initial Study, LAWA determined that the proposed project would result in “no impact” or a “less than significant impact” in the following subject areas:

- Aesthetics;
- Agriculture and Forestry Resources;
- Air Quality;
- Biological Resources (except for interference with wildlife movement or corridors);
- 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.

## 6. Other Environmental Considerations

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Since it was determined that the effects on these resource areas from the implementation of the proposed project would be “no impact” or “less than significant impact,” these environmental topics were not evaluated further in this EIR. This methodology is consistent with Section 15063(c)(3) of the State CEQA Guidelines. Pursuant to Section 15128 of the State CEQA Guidelines, the various possible project effects found not to be significant are discussed in the Initial Study. No additional potentially significant impacts were identified during the circulation of the Notice of Preparation for public and agency comments.

### 6.5 Energy Impacts and Conservation

#### 6.5.1 Introduction

CEQA Guidelines Appendix F requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing wasteful, inefficient, and unnecessary consumption of energy. It provides lists of energy impacts and conservation measures that may be applicable and relevant to particular projects.

In addition, Public Resources Code Section 21100(b)(3) states that an EIR shall include “mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.” Similarly, CEQA Guidelines Section 15126.4(a)(1)(C) states that “Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.”

The following additional information is provided about the proposed project’s energy consumption and energy efficiency measures.

#### 6.5.2 Energy Demand

Short-term energy demand would result from construction of the proposed project. This would include energy demand from worker, vendor, and haul vehicle trips as well as construction equipment usage. Long-term energy demand would result from operation of the proposed project. This would include energy demand from electricity and diesel fuel usage, as well as energy demand related to the consumption of water. The proposed project would not require/use natural gas.

##### 6.5.2.1 Construction Activities

###### 6.5.2.1.1 Worker, Vendor, and Haul Vehicle Trips

Worker, vendor, and haul trips have been estimated based on the construction schedule assumptions used in the preparation of the project air quality and greenhouse gas (GHG) impacts analyses. Demolition and construction of the proposed project is estimated to take approximately 13 months. Vendor trips are based on construction vendor trip data provided by CalEEMod defaults.<sup>133</sup> Fuel consumption from worker and vendor trips were estimated by converting the total carbon dioxide (CO<sub>2</sub>) emissions from each phase of construction to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. The conversion factor for gasoline is 8.91 kilograms (kg) CO<sub>2</sub> per gallon (kg CO<sub>2</sub>/gal) and the conversion factor for diesel is 10.15 kg CO<sub>2</sub>/gal.<sup>134</sup> Worker vehicles were assumed to be fueled by gasoline and vendor/hauling vehicles were assumed to be diesel.

Calculations for total worker, vendor, and hauler fuel consumption are provided in **Table 6-1**, **Table 6-2**, and **Table 6-3**. Total gasoline consumption from worker trips is estimated to be 4,601 gallons and total diesel consumption from construction-related truck deliveries and hauls combined is estimated at 37,591 gallons.

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<sup>133</sup> California Air Resources Board, *California Emissions Estimator Model, Version 2013.2.2*. Available: <http://www.caleemod.com/>, accessed November 12, 2015.

<sup>134</sup> U.S. Energy Information Administration, *Voluntary Reporting of Greenhouse Gases Program*. Available: <http://www.eia.gov/oiaf/1605/coefficients.html>, accessed January 19, 2017.

**Table 6-1**  
**Construction Worker Gasoline Demand**

Phase	Trips	Trip Length (miles)	CO <sub>2</sub> Worker Trips (MT)	kg CO <sub>2</sub> /Gal	Gasoline Demand (Gal)
Demolition	653	29	7	8.91	786
Site Preparation	33	29	<1	8.91	33
Grading	675	29	7	8.91	786
Building Construction	2,513	29	24	8.91	2,694
Paving	180	29	2	8.91	190
Architectural Coating	113	29	1	8.91	112
<b>Total</b>			<b>42</b>	<b>8.91</b>	<b>4,601</b>

Source: CDM Smith, June 2017.

**Notes:**

Trips are round trips. Number of trips is a function of *Worker Trip Numbers* (daily one-way trips) and *Number of Days* (duration of each phase) listed in Section 3.0 of Appendix A-1, subsections *Trips and VMT* and *Construction Phase*, respectively. Trip lengths are twice the *Worker Trip Length* detailed in Section 3.0 of Appendix A-1, subsection *Trips and VMT*.

**Abbreviations:**

kg – kilogram

CO<sub>2</sub> – carbon dioxide

MT – metric tons

Gal – gallons

## 6. Other Environmental Considerations

**Table 6-2  
Construction Off-Site Deliveries and Hauling Diesel Demand**

Phase	Trips	Trip Length (miles)	CO <sub>2</sub> Off-Site Deliveries & Hauling (MT)	kg CO <sub>2</sub> /Gal	Diesel Demand (Gal)
Demolition	423	70	48	10.15	4,729
Site Preparation	0	0	0	10.15	0
Grading	2,750	70	315	10.15	31,035
Building Construction	972	14	19	10.15	1,827
Paving	0	0	0	10.15	0
Architectural Coating	0	0	0	10.15	0
<b>Total</b>			<b>382</b>	<b>10.15</b>	<b>37,591</b>

Source: CDM Smith, June 2017.

**Notes:**

Trips are round trips. Number of trips for all phases (except for *Building Construction*) is half of *Hauling Trip Numbers* (which lists total one-way trips) listed in Section 3.0 of Appendix A-1, subsection *Trips and VMT*. Number of trips for the *Building Construction* phase is a function of *Vendor Trip Numbers* (daily one-way trips) and *Num[ber of] Days* (duration of each phase) listed in Section 3.0 of Appendix A-1, subsections *Trips and VMT* and *Construction Phase*, respectively. Trip Lengths are twice the *Vendor Trip Length* or *Hauling Trip Length* detailed in Section 3.0 of Appendix A-1, subsection *Trips and VMT*.

**Abbreviations:**

kg – kilogram  
 CO<sub>2</sub> – carbon dioxide  
 MT – metric tons  
 Gal – gallons

Phase	Pieces of Equipment per Phase	CO <sub>2</sub> Off-Road Equipment (MT)	kg CO <sub>2</sub> /Gal	Gallons of Diesel
Demolition	6	158	10.15	15,567
Site Preparation	5	6	10.15	591
Grading	6	123	10.15	12,118
Building Construction	9	80	10.15	7,882
Paving	8	15	10.15	1,478
Architectural Coating	1	2	10.15	197
<b>Total</b>		<b>384</b>	<b>10.15</b>	<b>37,833</b>

Source: CDM Smith, June 2017.

Notes:

*Pieces of Equipment* are summed from *Amount* [Offroad Equipment] for each phase detailed in Section 3.0 of Appendix A-1, subsection *Construction Phase*.

Abbreviations:

kg – kilogram

CO<sub>2</sub> – carbon dioxide

MT – metric tons

Gal – gallons

### 6.5.2.1.2 Construction Equipment Usage

Diesel fuel consumption by construction equipment was estimated based on the construction schedule and equipment usage assumptions used in the preparation of the project air quality and GHG analyses. Fuel usage was estimated by converting the total CO<sub>2</sub> emissions from each construction phase using the conversion factor for CO<sub>2</sub> to gallons of diesel. The conversion factor for diesel is 10.15 kg/MT CO<sub>2</sub>/gal. Construction equipment was assumed to be diesel.

Calculations for total construction equipment diesel consumption are provided in Table 6-3. Total diesel consumption, including both deliveries and hauling demand shown above (Tables 6-2) and equipment demand shown in Table 6-3, is estimated to be 75,424 gallons across all construction phases.

### 6.5.2.2 Operational Activities

As discussed in Chapter 2, *Project Description*, the proposed project would not increase existing passenger capacity, affect aircraft operations, or increase long-term employment opportunities at LAX. Moreover, the proposed project would not alter vehicle activity at the airport. The proposed project would affect the location and process by which vehicles accessing the AOA are screened, but would not result in an increase in the number or type of vehicles that would utilize the new facility. Existing operations at the new SAAP would be the same as at the former SAAP (SAAP 21). Moreover, as described in Section XVI of the Initial Study (provided in Appendix A of this Draft EIR), although the AOA access point would be relocated half a mile to the east of the location of the former SAAP 21, because vehicles would travel to all parts of the AOA once they have passed through the SAAP, the total vehicle miles traveled with implementation of the proposed project is not expected to change from baseline conditions at

## 6. Other Environmental Considerations

the time of the publication of the Notice of Preparation.<sup>135</sup> For these reasons, operational fuel demands would be similar to baseline conditions, and were not quantified for this analysis.

However, operation of the proposed project’s buildings and equipment would increase energy demand. Energy (electricity) demand associated with operation of this equipment was calculated and the results are discussed below. The energy use calculations for the proposed project are included in Appendix A-3 of the Initial Study, which itself is provided in Appendix A of this EIR. The calculations for future energy demand account for current regulatory requirements pertaining to energy efficiency and conservation.

Electricity would be required to provide energy to the proposed project for indoor and outdoor lighting, building cooling and heating, building appliances, security-related equipment, and water heating. Baseline energy demand was estimated based on existing generator size and usage. Future energy demand was estimated using a combination of energy demand at the former SAAP 21 and vendor information for the security equipment, including equipment characteristics, number of units, and assumptions regarding future usage (see Appendix A-3 of the Initial Study). The annual direct project electricity demand would be approximately 148,362 kilowatt hours per year (kWh/yr), which is an increase of 16,962 kWhr per year over baseline electricity demand. Increases in short- and long-term energy demand under the proposed project are summarized in **Table 6-4**. Similar to the manner in which construction-related GHG emissions were amortized over the project lifetime (i.e., 30 years) and then added to annual operational emissions (see Section VII.a. of the Initial Study, which is provided in Appendix A), the energy demand associated with project construction was amortized over a 30-year period so as to integrate construction-related energy demand with the annual operational energy demand.<sup>136</sup>

Activity	Gasoline (gal/yr)	Diesel (gal/yr)	Electricity (kWh/yr)
<b>Construction (Amortized over 30 Years)</b>			
Worker	153	–	–
Vendor	–	61	–
Hauler	–	1,192	–
Equipment	–	1,261	–
<b>Operations</b>			
Direct Electricity	–	–	16,962
<b>Total</b>	<b>153</b>	<b>2,524</b>	<b>16,962</b>

Source: CDM Smith, June 2017.

Abbreviations:

gal/yr– gallons per year

kWh/yr – kilowatts hours per year

<sup>135</sup> Even though vehicles would travel half a mile farther east to reach the SAAP, under existing conditions many of those vehicles would have traveled easterly after entering SAAP 21. In these cases, the location of the proposed SAAP would not increase the total vehicle miles traveled as compared to baseline conditions, it would simply relocate the trips from airfield roads to World Way West. Moreover, because the location of the proposed SAAP is more central to the AOA than SAAP 21, travel distances by some vehicles would be reduced over baseline conditions.

<sup>136</sup> As described in Section VII, *Greenhouse Gas Emissions*, of the Initial Study, which is provided in Appendix A of this EIR, GHG emissions associated with construction of the proposed project were amortized over the lifetime of the proposed project, which is assumed to be 30 years.

### 6.5.3 Energy Conservation

The new SAAP would comply with current state water and energy efficiency standards and regulations pursuant to the California Building Code (CBC), California Green Building Standards Code (CALGreen), and LAGBC that would reduce long-term energy demand. Compliance with these requirements would reduce wasteful, inefficient, and unnecessary consumption of energy over the long-term. Specific project features that would reduce energy consumption are discussed in Chapter 2, *Project Description*, and include efficient lighting fixtures and controls with occupancy sensors to reduce energy consumption during off-peak hours; heating, ventilation, and air conditioning controls that would reset temperatures to maximum efficiency; and incorporation of coated glass that minimizes heat gain, where possible. To conserve potable water, 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.

The following presents various regulations and programs applicable to the proposed project that would reduce energy demand associated with project construction and operation. The calculations for future energy demand with implementation of the proposed project, presented in Section 6.5.2.2 above, take into account many of the requirements listed below.

#### 6.5.3.1 General Regulations, Plans, and Policies

##### 6.5.3.1.1 State Regulations, Plans, and Policies

###### California Green Buildings Standards Code

The 2016 California Green Buildings Standards Code (CALGreen) is found in Title 24, Part 11 of the California Code of Regulations (CCR).<sup>137</sup> The purpose of CALGreen is to “improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices.”<sup>138</sup> These sustainable construction standards apply to a number of categories, including energy and water efficiency. As with the Title 24 Building Energy Efficiency Standards (24 CCR Part 6), discussed in Section 6.5.3.2.1 below, CALGreen identifies mandatory building measures and voluntary measures that may be incorporated into the design of buildings. CALGreen contains requirements for exterior lighting and bicycle parking, and requires that every new building constructed in California reduce water consumption by 20 percent. CALGreen also requires that nonresidential buildings larger than 10,000 square feet be subject to mandatory inspections of energy systems (e.g., heat furnace, air conditioner, and mechanical equipment), in accordance with Section 120.8 of the Building Energy Efficiency Standards, to ensure that all are working at their maximum capacity and according to their design efficiencies.

##### 6.5.3.1.2 Local Regulations, Plans, and Policies

###### Green LA

In May 2007, the City of Los Angeles introduced *Green LA – An Action Plan to Lead the Nation in Fighting Global Warming* (Green LA).<sup>139</sup> Aimed at reducing the City’s GHG emissions by 35 percent below 1990 levels by 2030, the plan calls for an increase in the City’s use of renewable energy to 35 percent by 2020 in combination with promoting water conservation, improving the transportation system, reducing waste generation, greening the ports and airports, creating more parks and open space, and greening the economic sector. Green LA identifies objectives and actions in various focus areas, including airports. The goal for Los Angeles’ airports is to “green the airports,” and the following actions related to energy consumption are identified: 1) fully implement the Sustainability

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<sup>137</sup> 24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*.

<sup>138</sup> 24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*, Section 101.2.

<sup>139</sup> City of Los Angeles, *Green LA - An Action Plan to Lead the Nation in Fighting Global Warming*, May 2007. Available: [http://environmentla.org/pdf/GreenLA\\_CAP\\_2007.pdf](http://environmentla.org/pdf/GreenLA_CAP_2007.pdf), accessed January 19, 2017.

## 6. Other Environmental Considerations

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Performance Improvement Management System (discussed below); 2) develop and implement policies to meet U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) green building rating standards in future construction; and 3) increase use of alternative fuel sources, increase water conservation, and reduce energy needs.<sup>140</sup>

### Climate LA

In 2008, the City of Los Angeles followed up Green LA with an implementation plan called *Climate LA – Municipal Program Implementing the Green LA Climate Action Plan* (Climate LA).<sup>141</sup> A Departmental Action Plan for LAWA is included in Climate LA, which identifies goals to reduce CO<sub>2</sub> emissions 35 percent below 1990 levels by 2030 at LAX and the other LAWA airport (Van Nuys Airport), implement sustainability practices, and develop programs to reduce the generation of waste and pollutants. Actions are specified in a number of areas, including buildings and facilities, and construction.

### Executive Directive No. 10

In July 2007, Mayor Antonio Villaraigosa issued Executive Directive No. 10 regarding environmental stewardship practices.<sup>142</sup> Consistent with the goal specified in Green LA to make the City of Los Angeles a worldwide leader in green buildings, Executive Directive No. 10 requires that City departments, including LAWA, create and adopt a "Statement of Sustainable Building Policies," which should encompass sustainable design, energy and atmosphere, materials, and resources, water efficiency, landscaping, and transportation resources. In addition, City departments and offices must create and adopt sustainability plans that include procedures, programs, and policies that are designed to improve internal environmental efficiency. Finally, City departments are required to submit annual sustainability reports to the Mayor for review.

### City of Los Angeles Green Building Code (LAGBC)

In December 2013, the Los Angeles City Council approved Ordinance No. 182,849, which updated Chapter IX of the Los Angeles Municipal Code (LAMC) by amending certain provisions of Article 9 to incorporate by reference portions of the 2013 CALGreen Code and also added other conservation-related measures to the LAGBC for residential and non-residential development. The requirements of the adopted LAGBC, as updated (2017), apply to new building construction, building renovations, and building additions within the City of Los Angeles.<sup>143</sup> Key measures in the LAGBC related to energy use that apply to nonresidential buildings include a requirement that energy conservation for new buildings must meet or exceed California Energy Commission (CEC) requirements set forth in the California Building Energy Efficiency Standards.

All building projects in the City of Los Angeles are subject to the LAGBC, which is enforced by the Los Angeles Department of Building and Safety (LADBS). Given that the LAGBC has replaced LEED® in the LAMC, LAWA has based its new sustainable construction standards on the mandatory and voluntary tiers defined in the LAGBC. All building projects with an LADBS permit-valuation over \$200,000 shall achieve LAGBC Tier 1 conformance, to be certified by LADBS inspector during final plan check (on the issued building permit) and validated by the LADBS inspector during final inspection (on the Certificate of Occupancy). Tier 1 refers to specific practices that are to be incorporated into projects to achieve enhanced construction levels by incorporating additional green building measures.

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<sup>140</sup> City of Los Angeles, *Green LA - An Action Plan to Lead the Nation in Fighting Global Warming*, May 2007. Available: [http://environmentla.org/pdf/GreenLA\\_CAP\\_2007.pdf](http://environmentla.org/pdf/GreenLA_CAP_2007.pdf), accessed January 19, 2017.

<sup>141</sup> City of Los Angeles, *Climate LA - Municipal Program Implementing the Green LA Climate Action Plan*, 2008.

<sup>142</sup> City of Los Angeles, Office of the Mayor, Antonio R. Villaraigosa, Mayor, *Executive Directive No. 10, Subject: Sustainable Practices in the City of Los Angeles*, July 18, 2007.

<sup>143</sup> City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended.

### Sustainable City pLAn

In 2014, Mayor Eric Garcetti launched LA's first-ever Sustainable City Plan ("pLAn"). The pLAn is a comprehensive and actionable policy roadmap that prepares the City for an environmentally healthy, economically prosperous, and equitable future for all.<sup>144</sup> Mayor Garcetti released the pLAn in April 2015, along with a corresponding Executive Directive (Executive Directive No. 7) that incorporates the pLAn into city-wide management.<sup>145</sup> The framework of pLAn is organized into three sections – environment, economy, and equity – addressing a total of 14 topics, each of which sets forth a vision of things to be accomplished in the next 20 years and highlighting near- and long-term outcomes. With respect to the environment, the topics are local water, local solar, energy-efficient buildings, carbon and climate leadership, and waste and landfills. Through the pLAn, Mayor Garcetti committed the City to becoming a national leader in carbon reduction and climate action by eliminating coal from the City's energy mix, prioritizing energy efficiency, and inspiring other cities to take similar action.

### LAWA Sustainability Plans and Guidelines

LAWA adopted the Sustainability Performance Improvement Management System (SPIMS) in August 2007 as a tool for identifying sustainability objectives, implementing actions to achieve the objectives, establishing targets, and continually monitoring progress. This was followed by LAWA's Sustainability Plan, developed in April 2008, which describes LAWA's sustainability practices and sets goals and actions that LAWA will undertake to implement its long-term objectives and targets.<sup>146</sup>

In 2008, LAWA developed *Sustainable Airport Planning, Design and Construction Guidelines for Implementation on All Airport Projects*, which were subsequently updated in 2009 and 2010.<sup>147</sup> These guidelines were developed to provide a comprehensive set of performance standards focusing on sustainability specifically for airport projects on a project-level basis. Based on these guidelines, LAWA implemented numerous steps to increase its sustainability practices related to daily airport operations. Among the actions that LAWA undertook was the purchase of renewably-generated Green Power from the Los Angeles Department of Water and Power (LADWP) and the reduction of electricity consumption by installing energy-efficient lighting.<sup>148</sup>

Subsequently, LAWA consolidated its design standards into the LAWA Design and Construction Handbook (DCH), which includes sustainable guidelines for all construction projects. These DCH Sustainability Guidelines replace the previously-adopted sustainability-related guidelines. In accordance with the DCH Sustainability Guidelines, LAWA measures its sustainable performance in accordance with social, economic, and environmental impacts. The current Sustainability Guidelines are consistent with the LAGBC, which, as noted above, requires that all building projects with an LADBS permit-valuation over \$200,000 achieve LAGBC Tier 1 conformance, to be certified by an LADBS inspector during final plan check (on the issued building permit) and validated by the LADBS inspector during final inspection (on the Certificate of Occupancy).<sup>149</sup>

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<sup>144</sup> City of Los Angeles, Office of the Mayor, Mayor Eric Garcetti, *Sustainable City pLAn, Transforming Los Angeles, Environment - Economy - Equity*, April 2015. Available: [http://www.lamayor.org/sites/g/files/wph446/f/landing\\_pages/files/The%20pLAn.pdf](http://www.lamayor.org/sites/g/files/wph446/f/landing_pages/files/The%20pLAn.pdf).

<sup>145</sup> City of Los Angeles, Office of the Mayor, Mayor Eric Garcetti, *Executive Directive No. 7, Subject: Sustainable City pLAn*, April 8, 2015. Available: [https://www.lacity.org/sites/g/files/wph281/f/Executive\\_Directive\\_No.\\_7\\_Sustainable\\_City\\_pLAn.pdf](https://www.lacity.org/sites/g/files/wph281/f/Executive_Directive_No._7_Sustainable_City_pLAn.pdf).

<sup>146</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Plan*, April 2008. Available: [http://www.laxsustainability.org/documents/Final\\_Sustainability\\_Plan.pdf](http://www.laxsustainability.org/documents/Final_Sustainability_Plan.pdf), accessed January 19, 2017.

<sup>147</sup> City of Los Angeles, Los Angeles World Airports, *Sustainable Airport Planning, Design and Construction Guidelines for Implementation on All Airport Projects, Version 5.0*, February 2010.

<sup>148</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

<sup>149</sup> 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>.

## 6. Other Environmental Considerations

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### LAWA Energy Efficiency Programs

As noted above, LAWA has developed a number of initiatives that incorporate energy efficiency practices into airport facilities and programs. Although not directly related to the proposed project, these initiatives demonstrate LAWA's commitment to energy conservation. These initiatives include, but are not limited to, the following:

- **LAWA's Clean Fleet Program.** LAWA introduced alternative fuel technology to its fleet in 1993. LAWA currently operates the nation's largest alternative-fuel airport fleet, consisting primarily of compressed natural gas (CNG), liquefied natural gas (LNG), propane, full-electric, and hybrid-electric vehicles. In the coming years, LAWA intends to replace its standard gasoline engine vehicles and some retired CNG vehicles with electric vehicles. LAWA is also embarking on a campus-wide electric vehicle (EV) infrastructure study to support greater deployment of EV vehicles.
- **Solar Feasibility Study.** In 2015, LAWA launched a solar feasibility study for LAX to identify locations for the installation of photovoltaic solar energy at LAX to replace or supplement the use of purchased electricity.<sup>150</sup>
- **Green Power Purchase.** As previously noted, LAWA has been purchasing green power from LADWP for several years. More specifically, LAWA voluntarily purchased 19.1 million kilowatt-hours (kWh) of green power in 2015, which equates to 10.4 percent of the total energy consumed at LAX.<sup>151,152</sup> As of February 8, 2017, and for several years prior, LAWA has made the "EPA Green Power Partnership, Top 30 Local Government" list.<sup>153</sup>
- **Lighting Retrofit Projects.** LAWA continues to replace lights and fixtures that serve terminals, streets, parking lots, and the airfield at LAX with a mix of energy efficient equipment.<sup>154</sup> This project will continue for several years.
- **Energy Efficiency Projects.** LAWA continues to upgrade air handling equipment and perform regular maintenance to improve energy efficiency of air handling units. LAWA replaces old computers and related equipment with Energy Star-certified office equipment.
- **The Utility Monitoring Infrastructure Project (UMIP).** LAWA is in the midst of a program to add sub-meters for utilities across the LAX campus. One of the goals of the project is to allow LAWA to monitor energy usage at each of its facilities at the building level. Currently, LAWA is able to monitor electricity and natural gas consumption via the utility providers' invoices and meters, but these meters do not always correspond to a single structure.
- **Central Utility Plant.** LAWA recently replaced the Central Utility Plant (CUP) at LAX. The new CUP, which received LEED® Gold certification, is a state-of-the-art computerized facility that provides heating and cooling for the Central Terminal Area at LAX, and includes a co-generation system that simultaneously generates electrical power and steam. This process is anticipated to reduce fuel usage by at least 30 percent compared to separate electricity and heating processes. LAWA and LADWP estimated that the plant saved approximately 4,548,729 kWh of electricity in 2015, with an associated reduction in GHG emissions.<sup>155</sup>

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<sup>150</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

<sup>151</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

<sup>152</sup> LAWA also purchased green power in 2016; however, the year-end total has not yet been tabulated.

<sup>153</sup> U.S. Environmental Protection Agency, Green Power Partnership, *Top 30 Local Government (as of February 8, 2017)*. Available: [https://www.epa.gov/sites/production/files/2017-02/documents/top30localgov\\_feb2017.pdf](https://www.epa.gov/sites/production/files/2017-02/documents/top30localgov_feb2017.pdf).

<sup>154</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

<sup>155</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

### Other Local Conservation Initiatives

LADWP provides several programs for energy customers in Los Angeles to conserve energy. These programs include, but are not limited to, a commercial lighting incentive, commercial water conservation rebate, and the Green Power for a Green L.A. program.

### 6.5.3.2 Electricity Efficiency

#### 6.5.3.2.1 Electricity-Related Regulations, Plans, and Policies

##### Federal Regulations, Plans, and Policies

##### Federal Energy Policy and Conservation Acts

The Federal Energy Policy and Conservation Act of 1975, the Federal Energy Policy Act of 2005, and the Energy Independence and Security Act of 2007 require the U.S. Department of Energy (DOE) to set electrical efficiency standards of various appliances, fixtures, and equipment. This has included standards for general service lighting that will require lightbulbs to consume 60 percent less energy by 2020. This standard is leading to the phasing out of incandescent lightbulbs to be replaced by more efficient lighting.

##### State Regulations, Plans, and Policies

##### Title 24 Energy Standards

*California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6), often referred to as Title 24 energy standards, were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. The latest amendments were made in June 2015 and went into effect on January 1, 2017. The premise for the standards is that energy efficient buildings require less electricity, natural gas, and other fuels. The standards include provisions applicable to all buildings and include mandatory requirements for efficiency and design of systems, equipment, and appliances. The standards include requirements for space conditioning (cooling and heating), water heating, and indoor and outdoor lighting systems and equipment. In addition, the standards call for further energy efficiency measures that can be provided through a choice between performance and prescriptive compliance approaches.

##### Renewable Portfolio Standard

Senate Bill 1078 (SB 1078; Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, the Governor signed Executive Order S-14-08, which expands the State's Renewable (Energy) Portfolio Standard (RPS) to 33 percent renewable power by 2020. On September 15, 2009, the Governor issued Executive Order S-21-09 requiring the California Air Resources Board (CARB), under its AB 32 authority, to adopt regulations to meet a 33 percent RPS target by 2020. The CARB regulations would use a phased-in or tiered requirement to increase the amount of electricity from eligible renewable sources over an eight-year period beginning in 2012. CARB adopted the regulations in September 2010.

In March 2011, the Legislature passed SB XI-2, which was signed into law by the Governor the following month. SB XI-2 requires utilities to procure renewable energy products equal to 33 percent of retail sales by December 31, 2020, and also established interim targets: 20 percent by December 31, 2013, and 25 percent by December 31, 2016. SB XI-2 also applies to publicly-owned utilities in California. SB 350 of 2015 (Chapter 547, Statutes of 2015) increased the renewable portfolio standard to 50 percent by the year 2030.

## 6. Other Environmental Considerations

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### Local Regulations, Plans, and Policies

#### Los Angeles Department of Water and Power Plan

LADWP provides electricity to the City of Los Angeles. In 2016, LADWP adopted a new Power Integrated Resource Plan (Power IRP), a 20-year energy resource planning document.<sup>156</sup> This plan provides a framework for LADWP to meet the future energy needs of the City in a cost-effective, reliable, and environmentally sensitive manner. The plan includes updated renewable energy requirements, electrical load forecasts, and revenue and rate impacts. Within the Power IRP, LADWP outlines adequate electricity supply and transmission capability to meet the needs of its customers within the Los Angeles area, including LAX, through 2035. The Power IRP includes updated renewable energy requirements, electrical load forecasts, revenue and rate impacts, and the integration of public input. In addition, the IRP examines various scenarios for reducing GHG emissions through various scenarios of RPS, local solar, energy storage, and transportation electrification, along with early coal replacement and increased energy efficiency. The plan also includes a path to meet the goal of accelerating RPS to 55 percent of its total provided power by 2030, and 65 percent by 2036.

#### **6.5.3.2.2** Electricity Supply and Infrastructure in the Project Area

Electrical power within the City of Los Angeles, including LAX, is supplied by LADWP, which serves approximately 3.8 million people. LADWP obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power. Its current system capacity is 7,880 megawatts (MW). LADWP does not forecast that peak demand will reach capacity through 2040. LADWP has committed to increasing the share of renewable energy and promoting increased energy efficiency and conservation by its customers. Diversification of LADWP's energy portfolio, increasing electricity from renewable energy, and new customer energy efficiency measures will help meet all of the City's needs through LADWP's Power IRP planning horizon of 2036.

According to the most recent data available from LADWP, the utility provider for the City of Los Angeles, approximately 21 percent of its electricity purchases in 2015 were from eligible renewable sources.<sup>157</sup> LADWP has adopted a number of initiatives to increase its use of renewable energy resources to support the goal of reducing GHG emissions, reducing reliance on fossil fuels, and meeting state mandates requiring all utilities to provide 33 percent of their energy from renewable resources by 2020, increasing to 55 percent by 2030 and to 65 percent by 2036.<sup>158</sup>

Electricity is primarily used at LAX for lighting, cooling, and equipment operation in buildings, and for airfield lighting and operations. Electricity is also used indirectly in the delivery, treatment, and distribution of water used by at the Airport and the treatment of wastewater. Total electricity consumption for LAX was approximately 184,400 MWh for 2015.<sup>159</sup> This represents a 13.5 percent decrease compared to 2014. In 2015, LAWA completed construction of a new highly energy-efficient Central Utility Plant (CUP) to replace LAX's 50-year old CUP. The new CUP became fully operational in September 2015. The new CUP utilizes co-generation technology to produce and deliver heating and cooling. Natural gas powers two combustion turbine generators to generate electricity, which is used to power multiple chillers. A pair of steam generators captures and reuses the heat exhaust from the combustion for heating. The new CUP is 25 percent more energy efficient and more environmentally-friendly than the former facility. LAWA

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<sup>156</sup> City of Los Angeles, Department of Water and Power, *2016 Power Integrated Resource Plan*, December 2016. Available: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=a45a10fj4\\_17&\\_afLoop=428720973103184](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=a45a10fj4_17&_afLoop=428720973103184), accessed June 1, 2017.

<sup>157</sup> City of Los Angeles, Department of Water and Power, *2016 Power Integrated Resource Plan*, December 2016. Available: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=a45a10fj4\\_17&\\_afLoop=428720973103184](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=a45a10fj4_17&_afLoop=428720973103184), accessed June 1, 2017.

<sup>158</sup> City of Los Angeles, Department of Water and Power, *2015 Power Integrated Resource Plan*, December 2015. Available: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=a45a10fj4\\_17&\\_afLoop=428720973103184](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=a45a10fj4_17&_afLoop=428720973103184), accessed January 19, 2017.

<sup>159</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

and LADWP estimated that the plant saved approximately 4,548,729 kWh/year in 2015. The new CUP is considered the first sustainable utility plant at a U.S. airport.<sup>160</sup>

### 6.5.3.2.3 Applicability to the Proposed Project

Estimated electricity demand associated with the proposed project is provided in Table 6-4. Moreover, as demonstrated in Section 6.5.3.1.2, LAWA has an ongoing commitment to increasing energy efficiency and implementing energy conservation measures to reduce wasteful, inefficient, and unnecessary consumption of energy at its airports, including electricity. The proposed project would be required to implement the applicable measures set forth in the regulations, plans, and policies described in Sections 6.5.3.1 and 6.5.3.2.1 above to reduce electricity usage. Specifically, the proposed project would achieve, at a minimum, LAGBC Tier 1 conformance through environmentally-sensitive features including, but not limited to, the types described previously. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of electricity.

### 6.5.3.3 Water Efficiency

#### 6.5.3.3.1 Water-Related Regulations, Plans, and Policies

##### State Regulations, Plans, and Policies

##### Water Supply Planning

The State of California's Urban Water Management Planning Act of 1984 requires all public water suppliers that provide municipal and industrial water to more than 3,000 customers, or supply more than 3,000 acre-feet per year (AF/Y) of water, to prepare and adopt an Urban Water Management Plan (UWMP). The UWMP must be prepared every five years and submitted to the Department of Water Resources (DWR) for review. An UWMP is intended to forecast future water demand and supply under normal and dry conditions. The Urban Water Management Planning Act has been modified several times in response to water shortages, droughts, and other factors. The Water Conservation Act of 2009 amended the Urban Water Management Planning Act to call for a statewide reduction of 20 percent in urban water use by the year 2020.

LADWP adopted a new UWMP in June 2016, which serves as a master plan for water supply and resources management consistent with the City's goals and policy objectives.<sup>161</sup> As indicated in the UWMP, LADWP develops long-term water projections based on growth in water use for the entire service area. The current UWMP evaluates a water system facing drought conditions and responds to policy actions, such as Mayor Eric Garcetti's Executive Directive No. 5, Emergency Drought Response, and the Sustainable City pLAN.<sup>162,163</sup> The UWMP promotes investment in conservation, recycling, and local source development, and calls for a 25 percent reduction in per capita water use by 2035.<sup>164</sup> The UWMP discusses conservation strategies to help achieve this goal. The UWMP concludes that LADWP has available supplies to meet all projected demands under three hydrologic scenarios analyzed in the UWMP.

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<sup>160</sup> City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: [http://www.laxsustainability.org/documents/Sustainability\\_Report\\_2015.pdf](http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf), accessed August 25, 2016.

<sup>161</sup> City of Los Angeles, Department of Water and Power, *Urban Water Management Plan 2015*, adopted June 7, 2016.

<sup>162</sup> City of Los Angeles, Office of the Mayor, Mayor Eric Garcetti, *Executive Directive No. 5, Emergency Drought Response – Creating a Water Wise City*, October 14, 2014.

<sup>163</sup> City of Los Angeles, Office of the Mayor, Mayor Eric Garcetti, *Sustainable City pLAN, Transforming Los Angeles, Environment - Economy - Equity*, April 2015. Available: [http://www.lamayor.org/sites/g/files/wph446/f/landing\\_pages/files/The%20pLAN.pdf](http://www.lamayor.org/sites/g/files/wph446/f/landing_pages/files/The%20pLAN.pdf), accessed January 19, 2017.

<sup>164</sup> City of Los Angeles, Department of Water and Power, *Urban Water Management Plan 2015*, adopted June 7, 2016.

## 6. Other Environmental Considerations

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### Los Angeles Municipal Code

The LAMC includes several ordinances to reduce water consumption that are applicable to the proposed project. Ordinance No. 172,075 (Chapter XII, Article II, of the LAMC), adopted in 1998, requires all building owners to install low-flow water closets (with a maximum flow of 3.5 gpm) and urinals (with a maximum 1.5 gallons per flush) prior to obtaining building permits.<sup>165</sup>

The City adopted the Water Efficiency Requirements Ordinance (Ordinance No. 180,822) in 2009 and the Green Building Ordinance (Ordinance No. 182,849) in 2013, which established more stringent requirements for water conservation including use of high efficiency fixtures whenever new fixtures are installed in new and existing buildings.<sup>166,167</sup> On June 6, 2016, the City adopted Ordinance No. 184,248, which establishes citywide water efficiency standards and requires implementation of water-saving systems and technologies in buildings and landscapes.<sup>168</sup>

#### 6.5.3.3.2 Water Supply and Infrastructure in the Project Area

LADWP is responsible for supplying, treating, and distributing water for domestic, industrial, agricultural, and firefighting purposes within the City. The LADWP obtains its water supplies from three major sources: (1) the Owens Valley and Mono Basin via the Los Angeles Aqueduct (LAA); (2) northern California and Colorado River imports purchased from the Metropolitan Water District of Southern California (MWD); and (3) local groundwater basins. In addition, some wastewater within the LADWP service area is recycled for reuse as irrigation or industrial water, or for use in seawater intrusion barriers used to protect groundwater supplies. The average distribution of sources during 2010–2015 was 57 percent purchased from MWD, 29 percent from the LAA, 12 percent from local groundwater, and 2 percent from recycled water.<sup>169</sup>

LADWP has set a goal of supplying 8 percent of water demand from recycled water by 2035. In fiscal year 2014/2015, LADWP provided 35,091 AF of recycled water for municipal, industrial, and environmental uses.<sup>170</sup> Reclaimed water in the LAX area is provided by the West Basin Municipal Water District's (WBMWD) Edward C. Little Water Recycling Facility (ECLWRF). The ECLWRF is a tertiary treatment plant and has a capacity of 62.7 million gallons per day (mgd), approximately 70,233 AF/Y.<sup>171</sup> As described above, the latest LADWP UWMP concludes that LADWP has available water supplies to meet projected demands through a 25-year planning period.

#### 6.5.3.3.3 Applicability to the Proposed Project

As discussed in *Section XVIII, Utilities and Service Systems*, of the Initial Study (included in Appendix A of this EIR), the proposed project would not result in an increase in water use. The proposed project would be required to comply with applicable measures set forth in the regulations and plans described in Sections 6.5.3.1 and 6.5.3.3.1 above to reduce water consumption. As described previously, bathrooms at the new SAAP would be designed with low- and ultra-low-flow systems. This would result in a reduction in energy demand to supply, treat, and convey water and wastewater. Additionally, recycled water would be used for construction-related dust control and construction equipment washing when feasible. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary energy use associated with increases in water demand and wastewater generation.

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<sup>165</sup> City of Los Angeles, Ordinance No. 172,075, Chapter XII, Article II, 1998.

<sup>166</sup> City of Los Angeles, Ordinance No. 180,822, Chapter XII, Article V, *Water Efficiency Requirements*, 2009.

<sup>167</sup> City of Los Angeles, Ordinance No. 182,849, Chapter IX, Article 9, *California Green Building Standards Code*, 2013.

<sup>168</sup> City of Los Angeles, Ordinance No. 184,248, Chapter IX, Articles 4 and 9, *Water Efficiency Standards*, June 6, 2016.

<sup>169</sup> City of Los Angeles, Department of Water and Power, *Urban Water Management Plan 2015*, adopted June 7, 2016.

<sup>170</sup> City of Los Angeles, Department of Water and Power, *LADWP Recycled Water Annual Report Fiscal Year 2015-16*, August 2016.

<sup>171</sup> West Basin Municipal Water District, *2015 Urban Water Management Plan*, June 2016.

### **6.5.3.4 Transportation and Construction Equipment Fuel Efficiency**

#### **6.5.3.4.1 Fuel Efficiency-Related Regulations, Plans, and Policies**

##### **Federal Regulations, Plans, and Policies**

##### **Fuel Efficiency Standards for Passenger Cars and Light-Duty Trucks**

In April 2010, the U.S. Environmental Protection Agency (USEPA) and National Highway Traffic Safety Administration (NHTSA) finalized standards for new (model year 2012 through 2016) passenger cars, light-duty trucks, and medium-duty passenger vehicles to reduce GHG emissions and improve fuel economy. If all the necessary emission reductions were made from fuel economy improvements, the standards would correspond to a combined fuel economy of 30.1 miles per gallon (mpg) in 2012 and 35.5 mpg in 2016.<sup>172</sup> The agencies issued a joint Final Rule for a coordinated National Program for model years 2017 to 2025 light-duty vehicles on August 28, 2012 that would correspond to a combined fuel economy of 36.6 mpg in 2017 and 54.5 mpg in 2025.<sup>173,174</sup>

##### **Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles**

In August 2011, the USEPA and NHTSA announced a program to reduce GHG emissions and to improve fuel efficiency for medium- and heavy-duty vehicles (model years 2014 through 2018). The program was projected to result in a reduction in fuel consumption ranging from 6 percent to 23 percent in model year 2017, depending on the vehicle type.<sup>175</sup> It was estimated that the standards would reduce oil consumption by 530 million barrels over the life of the affected vehicles.<sup>176</sup> In August 2016, EPA and NHTSA finalized Phase 2 standards for medium- and heavy-duty vehicles through model year 2027, based on advanced cost-effective technologies. This project is expected to reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.<sup>177</sup>

##### **Fuel Efficiency Standards for Construction Equipment**

The federal government sets fuel efficiency standards for nonroad diesel engines that are used in construction equipment. The regulations, contained in 40 CFR Parts 1039, 1065, and 1068, include multiple tiers of emission standards. Most recently, EPA “adopted a comprehensive national program to reduce emissions from nonroad diesel engines by integrating engine and fuel controls as a system to gain the greatest emission reductions. To meet these

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<sup>172</sup> U.S. Environmental Protection Agency, *Regulatory Announcement: EPA and NHTSA Finalize Historic National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks*, April 2010. Available: <https://nepis.epa.gov/Exe/tiff2png.cgi/P100AKHW.PNG?-r+75+-g+7+D%3A%5CZYFILES%5CINDEX%20DATA%5C06THRU10%5CTIFF%5C0001131%5CP100AKHW.TIF>, accessed November 18, 2015.

<sup>173</sup> U.S. Environmental Protection Agency, *Regulatory Announcement: EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Trucks*, August 2012. Available: <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF>, accessed June 9, 2017.

<sup>174</sup> The 2012 standards are currently under review by USDOT and USEPA. See U.S. Environmental Protection Agency, *EPA to Reexamine Emission Standards for Cars and Light Duty Trucks – Model Years 2022-2025*, March 15, 2017. Available: <https://www.epa.gov/newsreleases/epa-reexamine-emission-standards-cars-and-light-duty-trucks-model-years-2022-2025>, accessed June 9, 2017.

<sup>175</sup> TransportPolicy.net, *U.S.: Heavy-duty: Fuel Consumption and GHG*, updated July 14, 2016. Available: [http://www.transportpolicy.net/index.php?title=US:\\_Heavy-duty:\\_Fuel\\_Consumption\\_and\\_GHG](http://www.transportpolicy.net/index.php?title=US:_Heavy-duty:_Fuel_Consumption_and_GHG), accessed June 9, 2017.

<sup>176</sup> U.S. Environmental Protection Agency, *Regulatory Announcement: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles*, August 2011. Available: <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100BOT1.PDF?Dockey=P100BOT1.PDF>, accessed June 9, 2017.

<sup>177</sup> U.S. Environmental Protection Agency, *Regulatory Announcement: EPA and NHTSA Adopt Standards to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond*, August 2016. Available: <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P7NL.PDF?Dockey=P100P7NL.PDF>, accessed June 9, 2017.

## 6. Other Environmental Considerations

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Tier 4 emission standards, engine manufacturers will produce new engines with advanced emission control technologies.”<sup>178</sup>

### State Regulations, Plans, and Policies

#### California Assembly Bill 1493 (AB 1493) – Pavley

Enacted on July 22, 2002, AB 1493, commonly known as the Pavley law (named for the then-Assembly Member who sponsored the bill), required CARB to develop and adopt regulations that will lead to a reduction in GHGs emitted by passenger vehicles and light-duty trucks. Subsequent regulations adopted by CARB, often referred to as the Pavley regulations, apply to 2009 through 2016 vehicles. CARB estimated that the regulation would reduce GHG emissions from the light-duty and passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030, compared to recent years.<sup>179</sup> In 2011, the U.S. Department of Transportation, USEPA, and California announced a single timeframe for proposing fuel and economy standards for model year 2017 through 2025, thereby aligning the Pavley standards with the federal standards for passenger cars and light-duty trucks.<sup>180</sup>

#### California Advanced Clean Cars Program

In January 2012, CARB approved a new emissions-control program for vehicles of model years 2017 through 2025. The program combines the control of smog, soot, and GHGs into a single package of standards called the Advanced Clean Cars Program (13 CCR Sections 1962.1 and 1962.2). The Advanced Clean Cars requirements include new GHG standards for model year 2017 to 2025 vehicles.

The Advanced Clean Cars Program also includes amendments to the low emission vehicle (LEV) amendments (referred to as the LEV III amendments; (13 CCR Section 1900 et seq.), zero emission vehicle regulations, and the Clean Fuels Outlet Regulation. The LEV III regulations are aimed at reducing criteria pollutant and GHG emissions from light- and medium-duty vehicles. The ZEV regulation requires manufacturers to produce an increasing number of the very cleanest cars available. These zero-emission vehicles, which include battery electric, fuel cell, and plug-in hybrid electric vehicles, including battery electric, fuel cell, and plug-in hybrid electric vehicles. The Clean Fuels Outlet regulation is designed to ensure that fuels such as electricity and hydrogen are available to meet the fueling needs of the new advanced technology vehicles as they come to market.<sup>181, 182</sup>

#### 6.5.3.4.2 Applicability to the Proposed Project

##### Construction

Estimated construction-related fuel consumption is provided in Tables 6-1, 6-2, 6-3, and 6-4. Federal and state regulations and programs aimed at increasing vehicle fuel efficiency would apply to construction vehicles associated with the proposed project. Moreover, as demonstrated in Section 6.5.3.1.2, LAWA has an ongoing commitment to increasing energy efficiency and implementing energy conservation measures to reduce wasteful, inefficient, and unnecessary consumption of energy at its airports, including during construction. Construction equipment used for the proposed project would be required to comply with federal and state fuel efficiency standards. In addition,

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<sup>178</sup> U.S. Environmental Protection Agency, *Regulations for Emissions from Vehicles and Engines Homepage. Regulations for Emissions from Heavy Equipment with Compression-Ignition (Diesel) Engines*. Available: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-emissions-heavy-equipment-compression>, accessed July 19, 2017.

<sup>179</sup> California Air Resources Board, *Fact Sheet: Climate Change Emission Control Regulations*, December 10, 2004. Available: [https://www.arb.ca.gov/cc/ccms/factsheets/cc\\_newsfs.pdf](https://www.arb.ca.gov/cc/ccms/factsheets/cc_newsfs.pdf).

<sup>180</sup> California Environmental Protection Agency, Air Resource Board, *EPA, DOT and California Align Timeframe for Proposing Standards for Next Generation of Clean Cars*, January 24, 2011. Available: <http://www.arb.ca.gov/newsrel/newsrelease.php?id=181>, accessed November 19, 2015.

<sup>181</sup> California Air Resources Board, *Advanced Clean Cars Program Homepage*. Available: <https://www.arb.ca.gov/msprog/acc/acc.htm>, accessed January 18, 2017.

<sup>182</sup> California Air Resources Board, *News Release: California Air Resources Board Approves Advanced Clean Car Rules*, January 27, 2012. Available: <https://www.arb.ca.gov/newsrel/newsrelease.php?id=282>.

Standard Control Measure LAX-AQ-1 (Construction-Related Air Quality Standard Control Measures), intended to reduce construction-related air quality impacts, would also reduce fuel consumption of construction equipment. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary energy use associated with construction activities.

### Operation

As discussed in Chapter 2, *Project Description*, the proposed project would not increase the number of passengers or aircraft operations at LAX, and would not increase long-term employment opportunities. Moreover, the proposed project would not increase the number, or alter the type, of vehicles accessing the AOA. As a result, federal and state regulations and programs pertaining to increased vehicle fuel efficiency do not apply to the proposed project's operations.

#### 6.5.3.5 Summary

As described above, 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 reducing 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.

#### 6.5.4 Cumulative Impacts

As discussed in Chapter 4, *Environmental Impact Analysis*, cumulative impacts can be analyzed using either a "list" or "plan" approach. Using a "list" approach, in Chapter 3, *Overview of Project Setting*, Table 3-1 identifies other past, present, and reasonably foreseeable probable future projects at LAX. As with the proposed project, these other development projects would be required to comply with the energy conservation and renewable energy programs described earlier in this section. For example, new buildings would be required to meet energy consumption standards prescribed for new structures in Title 24, and all LAX development projects would comply with LAWA's Sustainability Plan. Therefore, there would be no significant cumulative impacts related to wasteful, inefficient, or unnecessary energy use, or increased reliance on fossil fuels.

Cumulative impacts on energy supply and distribution facilities caused by regional growth are best assessed using a "plan" approach. LADWP has forecasted future utility demand in the Power IRP and concluded that excess capacity exists over the planning horizon through 2040.<sup>183</sup> Based on the demand growth forecast, significant cumulative utility impacts on supply and distribution capabilities or on new supply facilities and distribution infrastructure are unlikely; thus, cumulative impacts on energy supply and distribution facilities caused by increased energy demand would be less than significant.

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<sup>183</sup> City of Los Angeles, Department of Water and Power, *2015 Power Integrated Resource Plan*, December 2015. Available: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=a45a10fj4\\_17&\\_afLoop=428720973103184](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=a45a10fj4_17&_afLoop=428720973103184), accessed January 19, 2017.

### 6.6 Modifications to Standard Control Measures

The Initial Study for the proposed project, published on April 20, 2017, included standard control measures for air quality and transportation/traffic. The Initial Study found that impacts to air quality, greenhouse gas emissions, and transportation/traffic would be less than significant and that no mitigation was required. Nevertheless, LAWA would implement standard control measures to reduce emissions and traffic impacts associated with the proposed project. Subsequent to publication of the Notice of Preparation/Initial Study, LAWA modified the text of these standard control measures. None of the modifications diminish the scope or effectiveness of the measures. Moreover, as none of the measures was proposed for the purpose of addressing significant impacts, the modifications do not alter the conclusions of the analysis provided in the Initial Study. The modifications are provided below. Deletions are shown in strikethrough and additions are shown in italics and underline.

1. Measure 1e of Standard Control Measure LAX-AQ-1 on page 45 of the Initial Study is hereby revised as follows. The parenthetical statement was deleted as it simply provides technical information regarding Tier 4 engines and does not relate to the effectiveness of the measure. The text at the end of the measure was deleted because the assessment of equipment availability, equipment fleet mixtures, and best available control devices would occur on an ongoing basis (as opposed to on an annual basis) as new pieces of equipment are periodically added through the course of construction. The assessment would be reviewed and approved by LAWA. None of the revisions below diminish the effectiveness of the standard control measure.

All diesel-fueled equipment used for construction will be outfitted with the best available emission control devices, where technologically feasible, primarily to reduce emissions of diesel particulate matter (PM), including fine PM (PM<sub>2.5</sub>), and secondarily, to reduce emissions of NO<sub>x</sub>. This requirement shall apply to diesel-fueled off-road equipment (such as construction machinery), diesel-fueled on-road vehicles (such as trucks), and stationary diesel-fueled engines (such as electric generators). ~~(It is unlikely that this measure will apply to equipment with Tier 4 engines, as these engines typically already incorporate the best available emission control devices.)~~ The emission control devices utilized in construction equipment shall be verified or certified by California Air Resources Board or US Environmental Protection Agency for use in on-road or off-road vehicles or engines. ~~For multi-year construction projects, a reassessment of equipment availability, equipment fleet mixtures, and best available emissions control devices shall be conducted annually for equipment newly brought to the project site each year.~~

2. Measure 1j of Standard Control Measure LAX-AQ-1 on page 45 of the Initial Study is hereby revised for clarification purposes as follows:

Every effort shall be made to utilize grid-based electric power at any construction site, where feasible. Grid-based power can be from a direct hookup or a tie in to electricity from power poles. If diesel- or gasoline-fueled generators are necessary, generators using "clean burning diesel" (*i.e., ultra-low sulfur diesel – ULSD*) fuel and exhaust emission controls shall be utilized.

3. Measure 1m of Standard Control Measure LAX-AQ-1 on page 45 of the Initial Study is hereby revised for clarification purposes as follows:

The contractor or builder shall designate a person or persons to ensure the implementation of all components of the construction-related air quality measures through direct inspections, record reviews, and investigations of complaints.

4. Measure 1q of Standard Control Measure LAX-AQ-1 on pages 46 through 48 of the Initial Study is hereby revised as follows. The text deleted in this mitigation measure pertains to implementation details that would be monitored as part of the Mitigation Monitoring and Reporting (MMRP) compliance (*i.e.*, details regarding means and methods by which various aspects of the mitigation measures would be monitored and enforced). These implementation details will be included in the MMRP that will be developed for the proposed project, under "Actions Indicating Compliance." The deleted text in Tables A and B of the measure

## 6. Other Environmental Considerations

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simply explains what is already self-evident in the text of the measure and in Tables A and B, and is therefore unnecessary. None of the revisions below diminish the effectiveness of the standard control measure.

The on-road haul truck and off-road construction equipment requirements set forth in Air Quality Standard Control Measures 1o and 1p above shall apply unless any of the following circumstances exist and the Contractor provides a written finding consistent with project contract requirements that:

- The Contractor does not have the required types of on-road haul trucks or off-road construction equipment within its current available inventory and intends to meet the requirements of the Measures 1o and 1p as to a particular vehicle or piece of equipment by leasing or short-term rental, and the Contractor has attempted in good faith and due diligence to lease the vehicle or equipment that would comply with these measures, but that vehicle or equipment is not available for lease or short term rental within 120 miles of the project site, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 1q) apply.
- The Contractor has been awarded funding by SCAQMD or another agency that would provide some or all of the cost to retrofit, repower, or purchase a piece of equipment or vehicle, but the funding has not yet been provided due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and due diligence to lease or short-term rent the equipment or vehicle that would comply with Measures 1o and 1p, but that equipment or vehicle is not available for lease or short term rental within 120 miles of the project site, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 1q) apply.
- Contractor has ordered a piece of equipment or vehicle to be used on the construction project in compliance with Measures 1o and 1p at least 60 days before that equipment or vehicle is needed at the project site, but that equipment or vehicle has not yet arrived due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and due diligence to lease or short-term rent a piece of equipment or vehicle to meet the requirements of Measures 1o and 1p, but that equipment or vehicle is not available for lease or short term rental within 120 miles of the project, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 1q) apply.
- Construction-related diesel equipment or vehicle will be used on the project site for fewer than 20 calendar days per calendar year. The Contractor shall not consecutively use different equipment or vehicles that perform the same or a substantially similar function in an attempt to use this exception (Measure 1q) to circumvent the intent of Measures 1o and 1p.
- Documentation of good faith efforts and due diligence regarding the above exceptions shall include written record(s) of inquiries (i.e., phone log[s]) to at least three (3) leasing/rental companies that provide construction related on road trucks of the type specified in Measure 1o above (i.e., medium duty and larger diesel powered trucks with a gross vehicle weight rating of at least 14,001 pounds) or diesel powered off road construction equipment such as the types to be used by the Contractor, documenting the availability/unavailability of the required types of trucks/equipment. LAWA will, from time to time, conduct independent research and verification of the availability of such vehicles and equipment for lease/rent within a 120-mile radius of LAX, which may be used in reviewing the acceptability of the Contractor's good faith efforts and due diligence.

In any of the situations described above, the Contractor/ Subcontractor shall provide the next cleanest piece of equipment or vehicle as provided by the step down schedules in Table A for Off-Road Equipment and Table B for On-Road Equipment.

## 6. Other Environmental Considerations

Nothing in the above shall require an emissions control device (i.e., VDECS) that does not meet OSHA standards.

Table A Off-Road Compliance Step Down Schedule*		
Compliance Alternative	Engine Standard	CARB-verified DECS (VDECS)
1	Tier 4 interim	N/A**
2	Tier 3	Level 3
3	Tier 2	Level 3
4	Tier 1	Level 3
5	Tier 2	Level 2
6	Tier 2	Level 1
7	Tier 3	Uncontrolled
8	Tier 2	Uncontrolled
9	Tier 1	Level 2
** Tier 4 (interim or final) or 2007 model year equipment not already supplied with a factory-equipped diesel particulate filter shall be outfitted with Level 3 VDECS.		
Equipment less than Tier 1, Level 2 shall not be permitted.		

Table B On-Road Compliance Step Down Schedule*		
Compliance Alternative	Engine Model Year	CARB-verified DECS (VDECS)
1	2007	N/A**
2	2004	Level 3
3	1998	Level 3
4	2004	Uncontrolled
5	1998	Uncontrolled
**2007 Model Year equipment not already supplied with a factory-equipped diesel particulate filter shall be outfitted with Level 3 VDECS.		
Equipment with a model year earlier than Model Year 1998 shall not be permitted.		

\* How to use Table A and Table B: For example, if Compliance Alternative #1 is required by this policy but Contractor cannot obtain an off road vehicle that meets the Tier 4 interim standard (Compliance Alternative #1 in Table A) and meets one of the above exceptions, then Contractor shall use a vehicle that meets the next compliance alternative (Compliance Alternative #2) which is a Tier 3 engine standard equipped with a Level 3 VDECS. Should Contractor not be able to supply a vehicle with a Tier 3 engine equipped with a Level 3 VDECS in accordance with Compliance Alternative #2 and has satisfied the requirements of one of the above exceptions as to Contractor's ability to obtain a vehicle meeting Compliance Alternative #2, Contractor shall then supply a vehicle meeting the next compliance alternative (Compliance Alternative #3), and so on. If Contractor is proposing an exemption for on road equipment, the step down schedule in Table B should be used. Contractor must demonstrate that it has satisfied one of the exceptions listed above before it can use a subsequent Compliance Alternative. The goal of this requirement is to ensure that Contractor has exercised due diligence in supplying the cleanest fleet available.

Nothing in the above shall require an emissions control device (i.e., VDECS) that does not meet OSHA standards.

5. Standard Control Measure LAX-ST-1 on pages 98 through 100 of the Initial Study is hereby revised as follows. Deleted text in the first paragraph pertains to the specifics of the CALM process, and not the effectiveness of the measure.

- **LAX-ST-1. Construction Traffic Management Plan**

Prior to initiation of construction, LAWA shall require contractors to complete a construction traffic management plan (CTMP). The CTMP shall include a description and illustrations of how the contractor will manage all construction related traffic during both peak and off-peak traffic periods. The CTMP shall detail the haul routes, locations for variable message and other signs, construction deliveries, construction employee shift hours and parking locations, any lane striping changes and traffic signal modifications, and shuttle system operations, if any. The CTMP shall require approval of the LAWA Construction and Logistics Management (CALM) Team prior to implementation. ~~The CALM Team approval process shall include multiple reviews addressing technical, scheduling and safety related issues. Depending on the complexity and/or anticipated impacts to traffic flow, detailed review meetings with the contractor may be required. Contractor compliance shall be monitored throughout the project.~~ LAWA shall require contractors to implement and comply with the following CTMP measures to reduce construction-related traffic impacts associated with projects at LAX, including:

**a. Construction Deliveries**

Construction deliveries requiring lane closures shall receive prior approval from the CALM Team. Construction notification of deliveries requiring lane closures shall be made in writing (a minimum of seventy-two (72) hours in advance, unless otherwise coordinated with the CALM Team prior to the required closure(s) when a 72-hour advance written notification is not feasible) in order to allow for any modifications to approved traffic detour plans. Delivery permits from all applicable local agencies shall be obtained thirty (30) days prior to any delivery requiring a lane closure, as feasible. ~~To the extent possible, construction deliveries within the CTA requiring lane closures shall be scheduled during overnight hours (1:00 a.m. to 7:00 a.m.) to minimize impacts to Airport operations.~~

**b. Designated Truck Delivery Hours**

To the extent possible, truck deliveries of bulk materials such as aggregate, bulk cement, dirt, etc. to the project site, and hauling of material from the project site, shall be scheduled during off-peak hours to avoid the peak commuter ~~and Airport~~ traffic periods on designated haul routes. Peak commuter traffic periods are between 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m. Monday through Friday. All deviations to these requirements shall be approved in writing by the CALM Team prior to actual site deliveries.

**c. Construction Employee Shift Hours**

To the extent possible, the beginning and ending times of work shifts that avoid peak commuter traffic periods (7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m. Monday through Friday) shall be established. (This measure may not apply to swing shifts.) To avoid peak commuter traffic, work periods may be extended to include weekend and multiple work shifts, when necessary.

**d. Designated Truck Routes**

For dirt, aggregate, bulk cement, and all other materials and equipment, truck deliveries to the LAX area shall be on designated routes only (freeways and non-residential streets).

Designated truck routes shall be limited to:

## **6. Other Environmental Considerations**

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- Aviation Boulevard (Imperial Highway to Manchester Boulevard)
- Manchester Boulevard (Aviation Boulevard to I-405)
- Florence Avenue (Aviation Boulevard to I-405)
- La Cienega Boulevard (north of Imperial Highway)
- Pershing Drive (Westchester Parkway to Imperial Highway)
- Westchester Parkway (Pershing Drive to Sepulveda Boulevard)
- Century Boulevard (Sepulveda Boulevard to Aviation Boulevard)
- Sepulveda Boulevard (Westchester Parkway to Imperial Highway)
- Imperial Highway (Pershing Drive to I-405)
- I-405
- I-105

### **f. Stockpile Locations**

All stockpile locations shall be pre-approved by LAWA and its CALM Team. Stockpile locations/laydown/staging areas shall be accessed by construction vehicles with minimal disruption to adjacent public streets.

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## 7. LIST OF PREPARERS, PARTIES TO WHOM SENT, LIST OF REFERENCES, NOP COMMENTS, AND LIST OF ACRONYMS

This chapter contains the following information:

- List of Preparers
- Parties to Whom Sent
- List of References
- Notice of Preparation Comments
- List of Acronyms

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**7. List of Preparers, Parties to Whom Sent, References, NOP Comments, and Acronyms**

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## 7.2 Parties to Whom Sent

Following is a list of the parties to whom copies of this Draft EIR were sent for review or to whom notice of the availability of this Draft EIR was sent. In addition to the parties listed below, the notice of availability was sent to on-airport tenants.

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### 7.3 List of References

All documents listed below are available for public inspection at the following location:

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

14 California Code of Regulations, Chapter 11.5, Section 4852(c), *Types of Historical Resources and Criteria for Listing in the California Register of Historical Resources*.

14 California Code of Regulations, Section 15064.5(a), *Determining the Significance of Impacts to Archaeological and Historical Resources*.

16 United States Code, Sections 703-712, as amended, *Migratory Bird Treaty Act*.

16 United States Code, Sections 1531-1544, as amended, *Endangered Species Act of 1973*.

24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*.

## **7. List of Preparers, Parties to Whom Sent, References, NOP Comments, and Acronyms**

---

36 Code of Federal Regulations, Section 60.2, *Effects of Listing under Federal Law*.

Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, pages 538-547, 1978.

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### 7.4 Notice of Preparation Comments

A Notice of Preparation (NOP) and Initial Study (IS) were circulated for public review from April 20, 2017 to May 22, 2017. Comment letters received from public review of the NOP/IS are listed below. Copies of the April 20, 2017 NOP/IS and the comment letters are included in Appendix A of this Draft EIR.

#### Comments on NOP and Initial Study

##### Commentor

##### Date of Correspondence

California Native American Heritage Commission (NAHC) – Gayle Totton	April 25, 2017
South Coast Air Quality Management District (SCAQMD) – Lijin Sun	May 12, 2017
Bourgeois, Joe	May 5, 2017

### 7.5 List of Acronyms

AA	American Airlines
AA OSF	American Airlines Operations Support Facility
AB	Assembly Bill
AC	Advisory Circular
ACHP	Advisory Council on Historic Preservation
ACM	asbestos containing materials
A.D.	anno Domini
ADA	Americans with Disabilities Act
ADG	Aircraft Design Group
AF/Y	acre-feet per year
AOA	Airport Operations Area
APE	area of potential effect
APM	Automated People Mover

**7. List of Preparers, Parties to Whom Sent,  
References, NOP Comments, and Acronyms**

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AQ	Air Quality
ATCT	Airport Traffic Control Tower
ATP	Archaeological Treatment Plan
BOAC	Board of Airport Commissioners
CAL	Continental Airlines
CAL GO	Continental Airlines General Office Building
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Code
California Register	California Register of Historical Resources
CALM	Coordination and Logistics Management
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CO <sub>2</sub>	carbon dioxide
CONRAC	Consolidated Rental Car Facility
CPHI	California Points of Historical Interest
CRM	Cultural Resource Monitor
CTA	Central Terminal Area
CTMP	Construction Traffic Management Plan
CUP	Central Utility Plant
dB	decibel
DCH	LAWA Design and Construction Handbook
DOA	Los Angeles Department of Airports
DOE	U.S. Department of Energy
DOT	Department of Transportation
DWR	Department of Water Resources
ECLWRF	Edward C. Little Water Recycling Facility
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ESA	Endangered Species Act
EV	electric vehicle
FAA	United States Department of Transportation Federal Aviation Administration
gal/yr	gallons per year
GHG	greenhouse gas
GSE	Ground Support Equipment
HABS	Historic American Buildings Survey
HPOZ	Historic Preservation Overlay Zone
HRG	Historic Resources Group
HRI	Historic Resources Inventory
HVAC	heating, ventilation, and air conditioning
I-105	Interstate 105
I-405	Interstate 405
IS	Initial Study
ITF	Intermodal Transportation Facility

## **7. List of Preparers, Parties to Whom Sent, References, NOP Comments, and Acronyms**

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kg	kilograms
kWh	kilowatt hours
kWh/yr	kilowatt hours per year
LAA	Los Angeles Aqueduct
LADBS	Los Angeles Department of Building & Safety
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code
LAHCM	Los Angeles Historic-Cultural Monument
LAMC	Los Angeles Municipal Code
LAWA	Los Angeles World Airports
LAWAPD	Los Angeles World Airports Police Division
LAX	Los Angeles International Airport
LCS	lead containing surfaces
LEED®	U.S. Green Building Council's Leadership in Energy and Environmental Design
LEV	low emission vehicle
LNG	liquefied natural gas
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
mpg	miles per gallon
MSC	Midfield Satellite Concourse
MT	metric tons
MW	megawatts
MWD	Metropolitan Water District of Southern California
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	California Native American Heritage Commission
National Register	National Register of Historic Places
NHMLAC	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NOx	nitrogen oxides
NOP	Notice of Preparation
NPPA	California Native Plant Protection Act
OHP	Office of Historic Preservation
OHR	Office of Historic Resources
OSHA	Occupational Safety and Health Act
PCBs	polychlorinated biphenyls
pLAn	City of Los Angeles Sustainable City Plan
PM	Paleontological Monitor
PM	particulate matter
PM10	particulate matter up to 10 micrometers in size
PM 2.5	particulate matter up to 2.5 micrometers in size, also known as fine particulate matter
PMTP	Paleontological Management Treatment Plan
Power IRP	Power Integrated Resource Plan
RON	remain overnight
RPS	Renewable Portfolio Standards
SAAP	Secured Area Access Post
SB	Senate Bill

**7. List of Preparers, Parties to Whom Sent,  
References, NOP Comments, and Acronyms**

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SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SF	square feet
SHPO	State Historic Preservation Officer
SLF	Sacred Lands File
SPAS	LAX Specific Plan Amendment Study
SPIMS	Sustainability Performance Improvement Management System
TBIT	Tom Bradley International Terminal
UMIP	Utility Monitoring Infrastructure Project
U.S.	United States
U.S.C	United States Code
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VDECS	verified retrofits for off-road diesel vehicles
WAMA	West Aircraft Maintenance Area
WBMWD	West Basin Municipal Water District
WHMP	Wildlife Hazard Management Plan
YBP	years before present