
LAX Secured Area Access Post Project

Statement of Overriding Considerations

The Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Los Angeles International Airport (LAX) Secured Area Access Post (SAAP) Project at LAX (or Airport), pursuant to the California Environmental Quality Act (CEQA). On January 4, 2018, LAWA published the Final EIR for the LAX SAAP Project.

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

The new SAAP facility would have a land footprint of approximately 1,200 feet by 150 feet, consisting primarily of paved areas with various pieces of equipment to control access (gates, traffic lights, signage, vehicle arrest systems, security fencing, etc.), vehicle inspection equipment (license plate readers, under-vehicle scanners, etc.), and facilities and shelter for inspection staff, including two canopy structures spanning the width of the first and last inspection stations, and two guard station buildings, one at each of the first and last inspection stations. Each guard house would be approximately 350 square feet (SF) and would include monitoring equipment and a restroom facility. Construction of the new SAAP would require the demolition and removal of the former Continental Airlines (CAL) General Office (GO) Building, which is vacant, and its associated facilities (the pedestrian bridge between the CAL GO Building and the American Airlines Engineering Building to the south, and pedestrian access point infrastructure [i.e., concrete walks, asphalt pavement, curbs and gutters, retaining walls, trees, and planter areas surrounding the CAL GO Building]).

The LAX SAAP Project EIR identified significant adverse environmental impacts that would result from the implementation of the LAX SAAP Project that cannot be mitigated to a level that is less than significant by the implementation of feasible mitigation measures or alternatives. The unavoidable significant impacts from the LAX SAAP Project occur with respect to historical resources due to the demolition of the former CAL GO Building which is individually eligible for listing in the California Register of Historical Resources and as a Los Angeles Historic-Cultural Monument and is also 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 result in a significant and unavoidable cumulatively considerable impact due to the combined impacts of the LAX SAAP Project and other cumulative projects at LAX. Specifically, the LAX Landside Access Modernization Program would have a significant and unavoidable visual impact to the Theme Building (eligible for listing in the National Register, listed in the California Register, and a designated City of Los Angeles Historic-Cultural Monument), and the United Airlines East Aircraft Maintenance and Ground Service Equipment Project would result in the demolition of two hangars associated with the Intermediate Terminal Facility (eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument). Together, these projects would result in a significant cumulative impact on historical resources at LAX, and the contribution of the LAX SAAP Project (i.e., the direct impact to the CAL GO Building) to this impact would be cumulatively considerable. Additional information and specific findings regarding this impact are provided in the *California Environmental Quality Act Findings - LAX Secured Area Access Post Project*, as required by State CEQA Guidelines Section 15091.

State CEQA Guidelines Section 15093(b) provides that, when a public agency approves a project that will result in significant impacts that are identified in the Final EIR but are not avoided or substantially lessened to a less than significant impact, the agency must state in writing the specific reasons to support its decision based on the Final EIR and/or other information in the whole administrative record. If the specific economic, legal, social, technological or other benefits of a proposed project outweigh its unavoidable adverse environmental impacts, the adverse effects may be considered “acceptable.” LAWA, as the Lead Agency for the LAX SAAP Project EIR, adopts the following Statement of Overriding Considerations.

Based on the substantial evidence in the whole of the administrative record for the LAX SAAP Project, the Board of Airport Commissioners hereby finds, concludes, and determines that the unavoidable significant adverse environmental impacts associated with the construction of the LAX SAAP Project are acceptable in light of the following specific economic, operational, legal, technological or other project benefits. Each project benefit described below constitutes an overriding consideration warranting approval of the LAX SAAP Project, independent of other benefits, despite the proposed project's significant unavoidable impact.

A. Economic Benefits Associated with the LAX SAAP Project at LAX

Jobs and commerce are direct economic benefits attributable to LAX. As an international port for passengers, cargo, and freight, LAX provides a foundation for businesses that depend on passenger and cargo operations and logistics. In this regard, LAX is a vital component of the local, regional, and state economy. As the international gateway to the western United States, LAX has long been a major supporter of the Southern California economy through employment and generation of taxes and other revenue, and by facilitating the efficient movement of people, goods, and services. Construction of the LAX SAAP Project would allow for the continued safe and secure daily operations at LAX, and thereby help maintain the airport's economic contribution in Southern California. Also, construction activity associated with the LAX SAAP Project would promote economic growth over the 13-month construction period in terms of spending by workers and the provision of goods and services in support of construction.

B. Operational Efficiency Benefits Associated with the LAX SAAP Project

A new fully functional SAAP is needed on the west side of LAX to replace SAAP 5, which was displaced by the MSC North Project, and SAAP 21, which was removed in May 2017 to enable the full build-out of WAMA. Currently, with the closure of SAAP 21, there is no fully functional SAAP on the west side of the airport; access to the AOA is provided by several other full-access SAAPs that are located around the AOA perimeter. The SAAP Project would provide 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. Further, the new SAAP would provide vehicular 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.

C. Sustainability and Environmental Benefits Associated with the LAX SAAP Project

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

The SAAP Project would 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. The new SAAP would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy. Per this policy, non-building projects, such as runways, taxiways, and civil infrastructure, which are not typically eligible for U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) certification, are required to meet the

Los Angeles Green Building Code (LAGBC) Tier 1 requirements, unless exempted by LAWA's Sustainability Review Committee. These LAGBC standards are based on the California Green Building Code (CALGreen). Projects that are not able to pursue LEED® Silver certification or better, or LAGBC Tier 1 or better, are required to comply with LAWA's Sustainable Design & Construction Requirements. The proposed project would achieve, at a minimum, LAGBC Tier 1 conformance or would comply with LAWA's Sustainable Design & Construction Requirements through environmentally-sensitive features including, but not limited to, the types described below.

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. The new 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 new SAAP would provide a fully functional, secured access point onto the AOA on the west side of LAX. The new SAAP would be the sole full-access SAAP on World Way West and would replace SAAP 5, which was displaced in January 2016 by the MSC North Project, and SAAP 21, which was taken out of service by Phase 2 of the WAMA Project in May 2017. After SAAP 21 closed, access to the AOA continues to be provided by several other full-access SAAPs that are located around the AOA perimeter. With the closure of SAAP 5 and SAAP 21, vehicles currently access the AOA through 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 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. Adding a new SAAP on the western side of the airport would decrease the total vehicle miles traveled by vehicles accessing the western portion of the AOA, and thereby would result in more efficient consumption of energy resources, decreased consumption of fossil fuels, and decreased emissions of criteria pollutants and greenhouse gases (GHG).

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