

Technical Report
LAX Master Plan EIS/EIR

16b. Public Services Law Enforcement

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Prepared for:

Los Angeles World Airports
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1.0 INTRODUCTION

This report provides background information related to law enforcement in support of the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the LAX Master Plan. This report includes a discussion of the regulatory framework for law enforcement services and descriptions of the agencies which provide law enforcement services within the vicinity of LAX.

2.0 GENERAL APPROACH AND METHODOLOGY

To assess the potential effects of the proposed Master Plan build alternatives on law enforcement services, for the EIS/EIR, baseline conditions are compared with conditions expected with implementation of the No Action/No Project Alternative and three build alternatives. Characterization of the environmental baseline includes a discussion of the regulatory framework for law enforcement services, the agencies that provide law enforcement services at LAX, and a summary of current staffing and facility space. Information on staffing and facility space was obtained from the police departments serving the study area, defined below.

The study area has been defined to include LAX property and areas surrounding LAX property that could be affected by implementation of the proposed Master Plan alternatives. The geographic extent of the study area includes the proposed future boundaries of LAX under the Master Plan build alternatives and areas more remote where project-related traffic congestion could affect response times. The intersections and roadway links evaluated in relation to response times are described in the EIS/EIR, Section 4.3, *Surface Transportation*. The study area is shown in **Figure 1**, LAPD and LAWAPB Facilities at LAX. Although not within the study area, background information is also provided for agencies in surrounding areas that could have secondary responsibilities in the event of a major incident at LAX.

The primary law enforcement agencies that serve LAX are the Los Angeles World Airports Police Bureau (LAWAPB) and the Los Angeles Police Department (LAPD) LAX Detail. The locations of LAWAPB and LAPD LAX Detail police stations are shown in **Figure 1**, LAPD and LAWAPB Facilities at LAX. The LAWAPB and LAPD LAX Detail have established that current and currently authorized staffing levels are adequate to serve existing needs.¹ Because there are no set standards or formulas for estimating long-range staffing needs at LAX, ratios of current staff to annual passengers were used to estimate staffing for both agencies for 2005 and 2015. This approach acknowledges that LAWAPB and LAPD would define their actual staffing needs more specifically through their ongoing assessments of service levels. For purposes of assessing staffing needs for LAWAPB and accounting for a major recent hiring effort, year 2000 staffing levels, in combination with a recent staffing needs assessment, were used for purposes of this analysis rather than a 1996 baseline.

Future facility needs were established based on projected staffing levels and estimates of square footage of facility space required to accommodate additional personnel.² The analysis, for the EIS/EIR, of effects on police vehicle access and response times is based on how airport development, airport generated traffic, and transportation improvements would affect traffic congestion at key intersections within the study area.

3.0 AFFECTED ENVIRONMENT/ENVIRONMENTAL BASELINE

3.1 Regulatory Context

Federal Regulations

Federal Aviation Administration (FAA) Regulations serve as the basis for LAWA's LAX Rules and Regulations Manual. This manual's purpose is to provide a regulatory and safety framework by which LAX may function according to law. The Fire and Safety Section, Section 8, and the Airport Security Section, Section 9, of this manual specifically apply to law enforcement at LAX. Regulatory provisions are set forth in the manual in accordance with resolutions adopted by the Board of Airport Commissioners,

¹ Bangs, John, Captain, LAWAPB Chief of Police, Letter, January 19, 2000.

² The square footage factors used to determine facility space needs are derived from the Los Angeles World Airports Police Bureau, Space Needs Analysis Program Study, October 12, 1998.

16.b Law Enforcement

Administrative Orders of the Executive Director, Directives issued by the Airport Manager and provisions of Federal Aviation Regulations (FAR) Parts 107, 108, 129, and 139. Law enforcement provisions are in accordance with the Uniform Penal Code, federal and state law enforcement service requirements, and all applicable laws, rules and regulations assigned to LAX.

Certification requirements for the airport are specified in FAR 139, and the airport maintains a security program pursuant to FAR 107. Security provisions are defined in Section 9, "Airport Security," of the LAX Rules and Regulations Manual. LAX is required to provide law enforcement officers adequate in number to support its security program and passenger screening system (FAR 107.15). Federal regulations also delineate the general standards for training, authority and conduct of law enforcement officers (FAR 107.17), and procedures to be used with respect to security threats and training requirements (FAR 108). FAR 107.17's regulations include: 1) descriptions of the authority of law enforcement officers used by the airport operator; 2) requirements of the officer's identifiability; 3) training in the use of firearms, treatment of persons subject to inspection, detention, or search in a courteous manner; 4) the responsibilities of the officer under the airport's approved security program; and 5) administrative requirements. These regulations also codify compliance, oversight and access requirements under FAR 108.27-108.33.

FAR 139.325 specifies the responding agencies and duties required under an airport emergency plan. The emergency plan for LAX comprises Section 5, Emergency Procedures, of the LAWA Rules and Regulations Manual. Operations of foreign air carriers in the United States are also addressed (FAR 129). Foreign carriers are required to operate in accordance with procedures and practices prescribed by the Administrator of the Airport for U.S. carriers (FAR 129.19). Provisions for foreign carrier security programs and access, baggage control and access, and emergency procedures, and for notification of air piracy or bomb threats, and screening standards are described under FAR 129.25. X-ray equipment used to inspect checked and carry-on articles is required to comply with U.S. F.D.A. standards; in addition, prohibitions of and exceptions to carriage of weapons on board are addressed under FAR 129.27.

The FAA periodically reviews airport standards to ensure compliance with FAA regulations. Non-compliance with FAA regulations regarding police protection and security could result in the loss of the LAX operating permit.

Because LAX is a port of entry into the United States, LAX serves as an enforcement point for 19 USC, regulating duties and procedures for import and export of goods under the Secretary of the Treasury's authority. Drug enforcement and various criminal enforcement activities, including international as well as national issues, are regulated by the Department of Justice and are subject to enforcement at LAX.

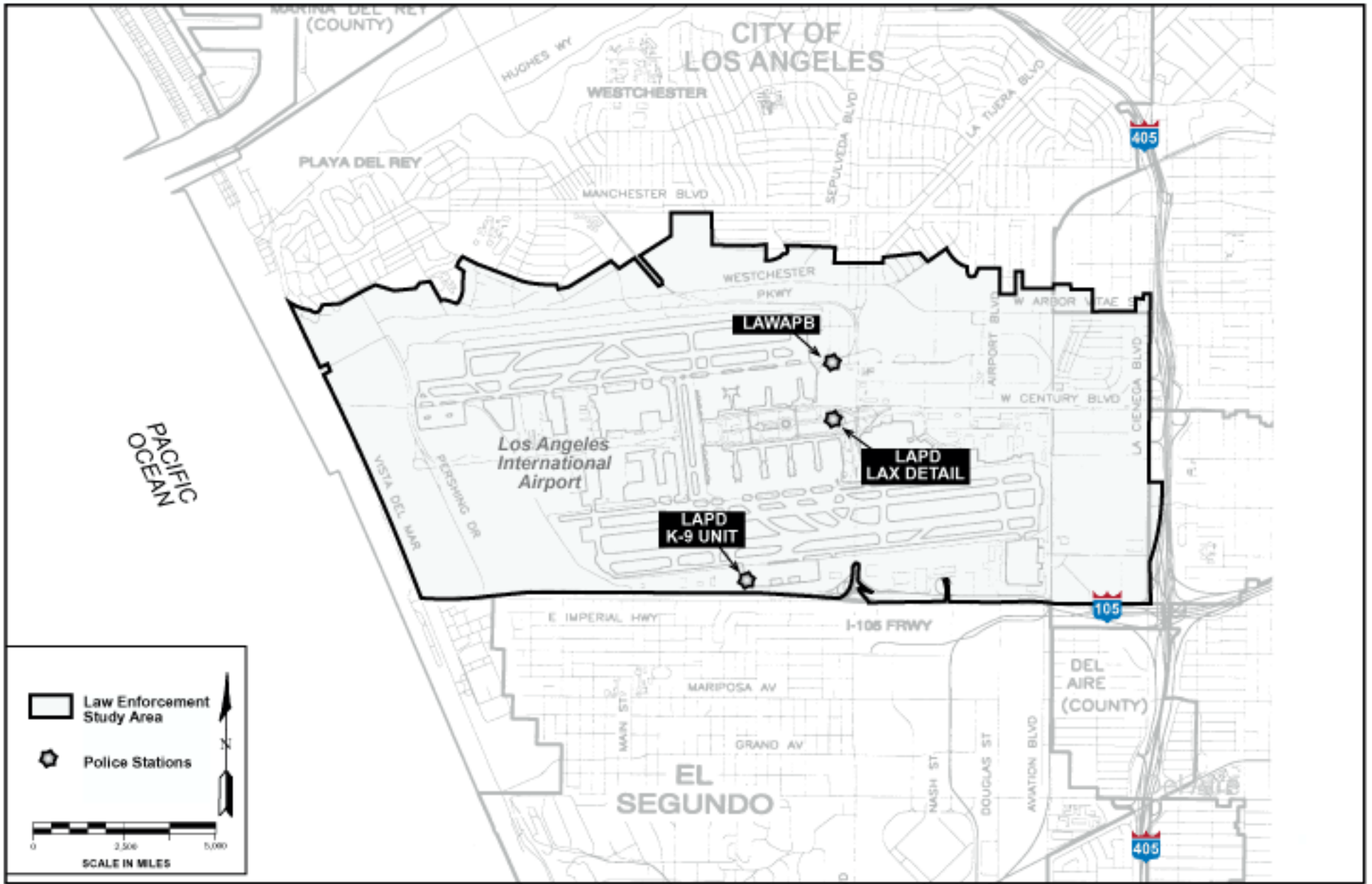
State Regulations

All law enforcement agencies within the State of California are organized and operate in accordance with the applicable provisions of the California Penal Code which, among other things, set forth the authority, rules of conduct, and training for peace officers. All sworn municipal and county police officers are state peace officers. However, peace officer status does not extend to airport security officers. Security officers may, however, make private person (citizen) arrests as delineated in Section 837 of the California Penal Code.

County Regulations

The County of Los Angeles is required by state law to organize a formal mutual aid agreement between all police departments within its jurisdiction. This agreement is set forth in the Mutual Aid Operations Plan for Los Angeles County. The Mutual Aid Operations Plan is comprised of two parts. First, it is a reciprocal agreement between signatory agencies (in this case, the County of Los Angeles and city or other local police departments) to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. Any formal mutual aid requests by any police department within Los Angeles County are made with the Los Angeles County Sheriff's Department (LACSD). However, additional informal agreements may be made directly between the police agencies involved. The second part of the Mutual Aid Operations Plan recognizes the peace officer status of every member agency's personnel while operating under this agreement.

The Mutual Aid Operations Plan as a formal agreement has been signed by the Chief of Police of every police department within the County, including the Chief Officer for the LADAPB. The Mutual Aid Operations Plan provides a structure of response should an emergency at LAX arise which requires



**Los Angeles International Airport
Master Plan**

**LAPD and LAWAPB Facilities
at LAX**

**Figure
1**

immediate response by more law enforcement personnel than would be available to the LAPD and LADAPB using all other available resources.

City Regulations

Memorandum of Agreement

A Memorandum of Agreement (MOA) between LAWA (then the Department of Airports) and the LAPD was signed by the Executive Director of LAWA and the Chief of Police for the City of Los Angeles on October 12, 1988. This agreement identifies that the responsible facility manager for LAX is LAWA under the FAA and provides for cooperative law enforcement efforts of the LADAPB and LAPD. It identifies the specific responsibilities and reporting procedures and provides for a coordinated effort between LADAPB and LAPD staff at both the Van Nuys and LAX airport facilities. The MOA serves to ensure that, in the event of an emergency, a formal means of requesting and providing additional aid to any signatory agency is in place. This means that LAWA can request and is entitled to receive aid from the LAPD if supplementary law enforcement personnel are needed to control an emergency situation, and that the LAPD has the same entitlements. Both the LAWAPB and LAPD recognize that the MOA is in need of updating and efforts have been initiated to this end. Depending on the outcome of the update to the MOA, the roles of LAWAPB and LAPD in carrying out law enforcement activities at LAX may be subject to change.

In compliance with the provisions of the *Standardized Emergency Management System*, response to incidents at LAX is approached from a “Unified Command System” concept. In a “Unified Command System,” the agency in charge (e.g., LAWAPB, LAPD, FBI, DEA, etc.) is determined on a case-by-case basis depending on the nature and location of the incident.

Rules and Regulations Manual

LAWA’s Rules and Regulations Manual provides specific rules and guidelines regarding airport emergencies and situations at LAX that would involve federal or local law enforcement agencies. The rules and guidelines outlined in the Emergency Procedures section pertains to the FAA Control Tower, the Federal Bureau of Investigation (FBI), the Los Angeles Police Department (LAPD), the Los Angeles World Airports Police Bureau (LAWAPB), and LAX Airfield Operations.

The LAWAPB is required to support the Airport’s security program as specified in the Rules and Regulations Manual. The LAWAPB operates according to the policies and guidelines of FAA mandates, including operation and oversight of the passenger screening system as required by FARs 107.15, 107.25, 108, 129.26, and 129.31. The LAWAPB has the power to authorize its Watch Commanders and Section Managers to respond to specific emergency assistance requests, subject to staff, vehicle and equipment availability.

The LAX Rules and Regulations Manual states that initial coordination of emergency response agencies is under the authority of the LAWA Superintendent of Airfield Operations. This authority at the scene is limited to cases where an emergency is not within the authority and responsibility of the LAPD, LAFD, or the FBI. In cases where the Operations Superintendent has not immediately responded, or where the FBI or LAPD are involved, the LADAPB supervisor is in charge of the scene.

3.2 Existing Conditions

U.S. Government

U.S. Customs Service

Under authority of 19 USC §66, the U.S. Customs Service performs its duties at LAX in compliance with the directives of the Secretary of the Treasury, controlling import and export of goods. Under circumstances related to immigration issues, U.S. Customs Service is authorized as an identifying agency for emergency personnel. The U.S Customs Service is located in the Tom Bradley International Terminal at 380 World Way. The Customs Service performs its duties at LAX, controlling import and export of goods as required by Customs Regulations.

Department of Justice

The U.S. Department of Justice has jurisdiction over the Federal Bureau of Investigation (FBI) and the Drug Enforcement Agency (DEA). Offices of the Department of Justice are located at LAX.

16.b Law Enforcement

Drug Enforcement Agency

Enforcement operations include the Drug Enforcement Agency (DEA), regulated under the Department of Justice Drug Enforcement Administration. The DEA is the lead agency responsible for the development of overall Federal drug enforcement strategy. The DEA is located at General Services Administration at 402 World Way, along with assigned LAPD staff. In accordance with the DEA mission statement, it performs aspects of its primary responsibilities for investigation and preparation for prosecution of major violators of controlled substances at LAX, as well as seizure of assets derived from, traceable to, or intended to be used for illicit drug trafficking.

Federal Bureau of Investigation

Current investigative programs under Federal Bureau of Investigation (FBI) authority include applicant matters, civil rights, counter-terrorism, financial crime, foreign counterintelligence, organized crime and drugs, and violent crimes and major offenders. The FBI may be in charge of an emergency response and is listed as a participating agency in the LAX Rules and Regulations Manual guidelines for law enforcement. In cases of bombings or bomb threats, the senior FBI officer, or LAPD officer is given command of the scene. The office of the FBI duty agent is located on site at LAX and is fully staffed.

County of Los Angeles

Los Angeles County Sheriff's Department

The Los Angeles County Sheriff's Department (LACSD) operates a station in Lennox located at 4331 Lennox Boulevard. This station employs approximately 200 sworn police officers serving the unincorporated communities of the County that surround LAX, including Athens, Del Aire, Lennox, and Ladera Heights. The LACSD has mutual aid agreements with surrounding law enforcement agencies. In addition, as state law mandates that mutual aid assistance be organized at the county level, any formal mutual aid requests by any police department within Los Angeles County are made with the LACSD.

In addition, the LACSD operates ocean going vessels and helicopters as well as communications, scuba, and firefighting equipment that can be utilized for aircraft disasters at sea. Additional information related to fire and emergency services is provided in Technical Report 15a, *Fire Protection*.

City of Los Angeles

The LAWAPB and the LAPD both serve the LAX site. The LAWAPB provides law enforcement services, traffic enforcement, security services, and emergency response on airport property, whereas the LAPD retains primary duties to provide criminal investigation and enforce penal provisions of City, State, and Federal, codes. All LAWAPB and LAPD officers, with the exception of the LAWAPB security officers, are sworn peace officers and have the power to arrest. LAWAPB security officers do not have peace officer status, but they can make citizen's arrests.³ LAPD and LAWAPB facilities are shown on **Figure 1**, LAPD and LAWAPB Facilities at LAX.

The Los Angeles Department of Airports Police Bureau

The LAWAPB's authority and limits of police powers are defined in the *Airport Police Bureau Manual* and FAR 107 (14 CFR Part 107). The LAWAPB is responsible for crime prevention, suppression, detection, general public assistance, airport security, traffic control and enforcement, and parking enforcement. Off-site police assistance is provided under prescribed circumstances. The LAWAPB contains two divisions: Patrol Services and Traffic Services.

The Patrol Services Division of the LAWAPB includes security officers, whose responsibilities focus on maintaining posts throughout airport property, checking the perimeter fence once per shift, patrolling the International Terminal, responding to illegal attempts to enter the airfield, and checking parking lots, unattended vehicles, and unattended bags. Personnel from the Patrol Services Division also investigate reports of guns or other illegal contraband at the baggage screening stations, which are staffed by private security companies. Pursuant to FAA regulations, the LAWAPB must respond to an incident call within five minutes under general conditions and within two minutes when heightened security is declared. The

³ The Memorandum of Agreement between the Los Angeles World Airports and The Los Angeles Police Department, I. Authority and Responsibility notes: "Peace officer status does not extend to Security Officers of the Los Angeles World Airports. Security Officers may, however, make private person arrests as delineated in Section 837 of the California Penal Code" (page 3, signed October 12, 1988).

Traffic Services Division is responsible for traffic control, parking enforcement in the terminal areas, and commercial vehicle (e.g., buses and taxis) enforcement.

The LAWAPB is in the process of hiring 304 sworn police officers, 136 security officers, 136 traffic officers, and 77 support personnel, for a total of 653 staff members.⁴ Fifty-nine motor vehicles serve the department, and 10 bicycles are used for traffic control in parking structures. LAWAPB has stated that with the filling these 653 positions, staffing will be considered adequate to serve current levels of activity at LAX.⁵

Preliminary crime investigation for approximately 97 percent of all incidents at LAX is conducted by the LAWAPB. Investigative follow-up procedures involve the LAPD LAX Detail. The majority of crimes reported at LAX are property theft and vehicle burglary. In 1996, a total of 2,992 crimes were reported at LAX, including 2,071 thefts.

The LAWAPB occupies 19,600 SF of permanent structure, northeast of Terminal Building 1. One modular building (7,000 SF) and two emergency trailers (1,200 SF total) are also provided for staff. In addition, two trailers (5,040 SF total) and a modular complex (30,000 SF) are planned under existing conditions.⁶ However, the LAWAPB has indicated that existing and planned facility space is not sufficient to support current needs; based on a 1998 Space Needs Analysis Program (SNAP) study.⁷ This SNAP study and LAWAPB assessments form the basis in this analysis for establishing existing facility needs and for projecting future staffing and facility needs.

Los Angeles Police Department

The LAPD, represented on airport property by the LAX Detail, is required by City mandate to provide law enforcement within the boundaries of the City of Los Angeles, which includes LAX. The LAPD retains its primary duty to enforce the penal provisions of the City, State, and Federal governments, in comparison to the LAWAPB's charge to maintain airport security, crime prevention, suppression, detection, and traffic control and enforcement.⁸ The LAPD is charged, in accordance with the MOA, with primary responsibility for the investigations of all crimes at LAX.⁹ The LAPD assists LAX Drug Enforcement Agency (DEA) staff, by providing K-9 officer services through canine patrols and criminal investigation through the detail assigned to LAX. (As shown in Figure 4.26.2-1, LAPD and LAWAPB Facilities at LAX, the K-9 units are located in separate facilities along the southern boundary of the airport.) In addition to crime investigation, the LAPD can be called upon to provide additional officers at any time to secure an area and provide crowd and traffic control if the LAWAPB does not have sufficient personnel. When required during emergencies, the LAPD LAX Detail can request support from the Pacific, Southwest and 77th Divisions of the LAPD.

The LAPD LAX Detail occupies one triple-wide trailer (2,268 SF) that provides administrative space and one singlewide trailer (540 SF) at 802 World Way. **Table 1**, Existing On-Airport Law Enforcement Staffing and Facility Space, presents existing on-site police and security personnel and facility space. The LAPD LAX Detail comprises 49 officers who are assigned from the Pacific Division, located at 12312 Culver Boulevard.

⁴ Bangs, John, Captain, LAWAPB Chief of Police, Letter, January 19, 2000.

⁵ Ibid.

⁶ Ibid.

⁷ Bangs, John, Captain, LAWAPB Chief of Police, Letter, January 19, 2000.

⁸ Memorandum of Agreement Between The Los Angeles Department of Airports and The Los Angeles Police Department, October 12, 1988, p. 2.

⁹ Memorandum of Agreement between the Los Angeles Department of Airports and The Los Angeles Police Department, II. General Responsibilities, LAPD Responsibility, October 12, 1988, p. 4.

16.b Law Enforcement

Table 1

Existing On-Airport Law Enforcement Staffing and Facility Space

Department	Current Sworn Officer Staff ¹	Existing Facility Space (SF)
LAWAPB Police	304	62,840
LAWAPB Security	136	(included above)
LAPD LAX Detail	49	2,808
LAPD LAX Detail K-9	5	(included above)
Total On-Airport	494	65,648

¹ Authorized sworn police officers and security personnel, excluding support staff.

Source: PCR, 2000.

City of El Segundo

The El Segundo Police Department employs 90 personnel, operates 50 to 60 vehicles, and occupies a 28,000-SF headquarters building at 348 Main Street. The Department's service area boundaries correspond with the City of El Segundo jurisdictional boundaries. The Department does not have a mutual aid agreement with the LADAPB. However, the two forces do conduct joint training exercises.

City of Inglewood

The Inglewood Police Department employs 217 sworn personnel and 98 civilian personnel at its 30,000 SF facility, located at One Manchester Boulevard. The Department operates a total of 140 vehicles, including motorcycles and vans. The Department currently does not operate any substations, however consideration is being given to establish a new main facility near Hollywood Park. Mutual assistance agreements exist between the Inglewood Police Department, South Bay Agencies and LACSD. A Mutual Assistance Agreement does formally exist between the Inglewood Police Department and the LAPD at LAX.

In case of an immediate emergency response, the Inglewood Police Department would respond directly to the aid of the LADAPB, as supported by formal mutual aid agreements. The LADAPB arranges airport emergency exercises on an informal basis with the Inglewood Police Department. Informal plans are being made to improve communications between both departments.