

AF00001-1**Comment:**

Based on our review, we rate the DEIS/R as EO-2, Environmental Objections - Insufficient Information. Please refer to the attached 'Summary of EPA Rating Definitions,' found in EPA's Policy and Procedures for the Review of Federal Actions Impacting the Environment (1984). EPA's policy provides for a rating of Environmental Objections (EO) where EPA's review finds that "an action might violate or be inconsistent with achievement or maintenance of a national environmental standard," and in cases where "there are no applicable standards...but there is a potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives." The "2" rating (Insufficient Information) serves to identify additional or clarifying information that FAA should provide in the Final EIS/R (FEIS/R). Issues upon which we base our EO-2 rating include:

(a) The DEIS/R's acknowledgment that all three action alternatives, as well as No Action, cause violations of the National Ambient Air Quality Standards (NAAQS); additional information is needed to determine the project's contribution to the projected NAAQS violations and to assess the effectiveness of associated mitigation;

(b) The DEIS/R's acknowledgment regarding disproportionately high, adverse impacts from aircraft noise to low-income and minority communities; additional information is needed to assess whether other reasonable alternatives and/or associated mitigation can successfully reduce these acknowledged disproportionate effects;

(c) Potential adverse health effects associated with air pollution increases, especially diesel particulates; and

(d) Failure to fully analyze a regionally-based alternative that may reduce disproportionately high, adverse impacts on low-income and minority communities.

These issues are summarized below and described in greater detail in our attached comments.

Response:

Please see Responses to Comments AF00001-2 through AF00001-9 below.

AF00001-2**Comment:**

NAAQS Violations: The DEIS/R projects violations of the NAAQS for at least two criteria air pollutants for the three action alternatives (see p. 4-509). Due to the severity of existing and projected air quality challenges in the South Coast Air Basin, EPA is seriously concerned about Federally-approved actions projected to yield additional air quality burdens. The DEIS/R projects that all three action alternatives (as well as No Action) will cause NAAQS violations in one or more years, i.e., 2004, 2005, and/or 2015. For Alternative C (Proposed Action), the DEIS/R informs us that maximum concentrations for nitrogen dioxide (NO₂) and particulate matter (PM₁₀) are predicted to violate the annual NO₂ NAAQS, and the 24-hour and annual PM₁₀ NAAQS in 2004 and 2005. The PM₁₀ NAAQS are predicted to be exceeded in 2015. Documenting the project's contributions to these projected NAAQS violations, and how they would be successfully mitigated, is a critical consideration in terms of NEPA public disclosure. All affected agencies should participate in developing adequate, enforceable air quality mitigation that can be shown to have quantifiable emissions reductions such that any NAAQS violations are successfully avoided and/or mitigated. Absent this finding in the FEIS/R, the public has no assurance that the project complies with the CAA. EPA will continue working cooperatively with FAA and other parties as planning for this project moves forward.

3. Comments and Responses

Response:

Since publication of the Draft EIS/EIR, Section 4.6, Air Quality, has been revised to include more data regarding mitigation measures, their assumptions and associated control efficiencies. The Supplement to the Draft EIS/EIR addressed mitigation measures in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E. The Final EIS/EIR includes a Mitigation Monitoring Program that describes in greater detail those air quality mitigation measures being carried forward as well as their associated control efficiencies. LAWA intends to adopt and implement all feasible measures to reduce the project's adverse environmental impacts. Please see Topical Response TR-AQ-3 regarding air pollution. Also, please see Response to Comment AF00001-14 regarding the general conformity determination.

AF00001-3

Comment:

We recognize that the DEIS/R identifies areas where mitigation can make a significant difference in the magnitude and occurrence of specific impacts. Recognizing that this project's NEPA documentation needs a more detailed discussion of mitigation measures, we look forward to working with FAA in developing an effective, efficient package of mitigation with respect to air quality impacts. Such mitigation efforts could include diesel retrofits for construction equipment and support vehicles, the use of alternative-fueled vehicles at LAX, and other measures. It is important to involve local communities and local authorities in developing mitigation measures.

Response:

Since publication of the Draft EIS/EIR, Section 4.6, Air Quality, has been revised to include more data regarding mitigation measures, assumptions, and associated control efficiencies. The Supplement to the Draft EIS/EIR addressed mitigation measures in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E. The Supplement to the Draft EIS/EIR includes a revised Mitigation Monitoring and Reporting Program that describes in greater detail those air quality mitigation measures being carried forward as well as their associated control efficiencies. Measures include, but are not limited to: diesel retrofits such as PM filter traps on construction equipment and the use of cleaner-burning diesel fuel such as PurINOx. To the extent possible, on-airport vehicles will be fueled with natural gas or other alternative fuels.

LAWA has worked closely with both the SCAQMD and EPA to develop the list of mitigation measures included in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AF00001-4

Comment:

We note that, based on information in 4.6 (Air Quality), it appears that the project will cause significant emissions, which may make it difficult for FAA to make a positive conformity determination under CAA Section 176(c) and EPA's general conformity regulation. The DEIS/R does not discuss how FAA will address CAA general conformity, including whether an appropriate level of air quality mitigation will help ensure that the project conforms under the CAA. EPA recommends that the FEIS/R address how the project will meet the general conformity regulations.

Response:

The Draft General Conformity Determination for Alternative D was issued on January 9, 2004, pursuant to federal law. The Final General Conformity Determination will be published prior to the publication of the Final EIS/EIR that will be approved by the FAA.

AF00001-5

Comment:

Disproportionately High, Adverse Impacts: Executive Order 12898 requires that Federal agencies identify and address disproportionately high, adverse human health or environmental effects on minority and low-income populations as a result of Federal projects. The U.S. Department of Transportation's

(DOT) Environmental Justice Strategy provides that when such disproportionate impacts are identified, DOT is to "ensure that any of their respective...activities that will have a disproportionately high and adverse effect on minority populations or low-income populations will only be carried out if further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effects are not practicable."

Page ES-46 acknowledges significant, disproportionate impacts to such communities due to aircraft noise, and potentially air quality and health. Pages 4-395 and 40- 396 state that projected increases in aviation activity at LAX would have a disproportionate impact on minority and low-income communities under all three action alternatives, and that noise mitigation may be inadequate to eliminate associated impacts. The DEIS/R informs us that increased emissions of NOx particulate matter and toxic air pollutants could have significant impacts throughout the South Coast Air Basin, and that health effects associated with these pollutants (such as asthma) are more prevalent among low-income and minority populations. According to the DEIS/R, these air quality impacts have the potential to affect minority and low-income individuals "more severely than the general population." Although the DEIS/R refers to mitigation to avoid or minimize adverse impacts, the FEIS/R should identify what mitigation and/or alternatives will be implemented, and determine the extent to which adverse impacts can be reduced or eliminated. We are willing to assist FAA in developing mitigation such as the Environmental Justice Action Plan, which should be developed in close coordination with affected local communities, in keeping with the Council on Environmental Quality's guidance on environmental justice under NEPA.

Response:

With consideration of LAWA Staff's new preferred alternative, Alternative D, which limits growth at LAX to levels similar to what would occur under the No Action/No Project Alternative, and of LAWA's Environmental Justice Program as defined in Section 4.4.3 of the Final EIS/EIR, disproportionate effects on minority and/or low-income communities have been avoided, minimized or offset to the fullest extent practicable. Also note that the mitigation measures contained in the Supplement to the Draft EIS/EIR, including those applicable to noise, land use, air quality and human health, and those most relevant to environmental justice outlined under the Environmental Justice Program, represented new information and more detailed mitigation than presented in the Draft EIS/EIR. Furthermore, subsequent to the publication of the Supplement to the Draft EIS/EIR, additional public outreach was conducted and comments were received that allowed LAWA to expand and refine the Environmental Justice Program presented in the Supplement to the Draft EIS/EIR. This program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, and is further described in Appendix F-A, of this Final EIS/EIR. Findings concerning the extent to which adverse impacts, including those that would have a disproportionately high and adverse effect on minority or low-income populations with mitigation and accounting for proposed benefits, are also presented in this subsection of the Final EIS/EIR. Please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits. Also see Response to Comment AF00001-43.

AF00001-6

Comment:

Other Air Pollutants: The DEIS/R includes a major health effects analysis and we acknowledge this effort. However, the DEIS/R does not satisfactorily address two air pollutants of concern: toxic particulates and acrolein. Page 4-1008 acknowledges that diesel particulates, a State of California-listed carcinogen, account for 70% of the cancer risk due to air pollution in the air basin. Diesel particulate emissions are linked to adverse respiratory effects, e.g., asthma, especially in children of low-income and minority communities. The State of California recently listed acrolein as one of five air toxics significantly impacting children's health. The DEIS/R projects large increases in toxic particulate and acrolein emissions from aircraft, cargo transport, ground service vehicles and construction equipment. The FEIS/R should assess the health impacts of these toxic emissions and the extent to which such impacts will be adequately mitigated.

Response:

Please refer to Responses to Comments AF00001-29 and AF00001-38 regarding diesel particulates and acrolein. Regarding health risks associated with acrolein, please refer to Responses to Comments AL00033-226 and AL00033-346. In addition, please refer to Section 4.24.1 of the Supplement to the Draft EIS/EIR for a reevaluation of chronic and acute hazards for acrolein.

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AF00001-7

Comment:

LAWA's Air Quality and Source Apportionment Study: EPA commends LAWLA for undertaking the Air Quality and Source Apportionment Study of the Area Surrounding Los Angeles International Airport, and we remain committed to our continued role in the completion and implementation of this study. LAWLA's air quality and source apportionment study is designed to remedy deficiencies in current information about LAX's current operations on air quality and surrounding communities. Given the existing and projected air quality impacts associated with LAX, this study is extremely important. The data and analysis that becomes available through this study will facilitate full disclosure of impacts, identify appropriate mitigation measures, and inform the NEPA decision-making process. As it becomes available, FAA should fully integrate the information and analysis of the air quality and source apportionment study in this project's NEPA document and decision-making process.

Response:

Please see Topical Response TR-AQ-2 regarding the Source Apportionment Study.

AF00001-8

Comment:

Alternatives: NEPA requires disclosure of adverse impacts and how such impacts may be avoided or minimized. Since the project's stated purpose is to "respond to local and regional demand for air transportation during...2000-2015" (p. ES-6), we believe the range of fully evaluated alternatives is too narrow. This is critical in light of FAA's recognition of disproportionately high, adverse impacts on minority and low-income communities from aircraft noise, and potentially air quality and health. While the DEIS/R mentions an alternative for other regional airports, FAA determined it is not reasonable. EPA believes there is not sufficient information in the DEIS/R to support this conclusion and strongly recommends that the FEIS/R include an analysis of the extent to which greater use of existing commercial airports in the five-county region may help to meet the project's stated purpose and need while potentially reducing adverse impacts. While new and/or additional information could be presented in the FEIS/R, a supplemental EIS may be more useful and appropriate to present a broader range of fully evaluated alternatives. Given the scope and complexity of managing projected increases in air traffic over the next 15 years in the five-county region, FAA should consider a comprehensive, long-term effort beyond this particular NEPA document to examine strategies to fairly and effectively distribute air traffic at the commercial airports of the five-county region. We believe such an approach is consistent with the recent commitment by the Secretary of Transportation to establish a task force to assess aviation demand and airport capacity in southern California.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR. As indicated in the topical response, subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - is designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP), and shifts the accommodation of future aviation demand to other airports in the region. A Supplement to the Draft EIS/EIR was prepared that provides a comprehensive analysis of Alternative D and was circulated for public review and comment.

AF00001-9

Comment:

Conclusion: As noted, EPA is particularly concerned with the projected NAAQS violations attributable to this project, lack of a detailed plan to avoid and/or mitigate disproportionately high, adverse impacts to minority and low-income populations, potential health effects, and the narrow range of alternatives that were fully evaluated. EPA believes there are serious deficiencies in the information presented in the DEIS/R, which leads to a high level of uncertainty about the magnitude of potential impacts associated

with this project. The findings and recommendations of LAWA's air quality and source apportionment study are especially relevant to FAA's decision-making, and merit careful consideration in this NEPA process. The FEIS/R should include FAA's general conformity determination and related mitigation commitments. No matter what alternative under NEPA is finally selected, including No Action, there are major regional air quality, environmental justice, and other issues needing resolution. Because of the complexity of issues involved in avoiding and/or mitigating the projected NAAQS violations attributable to this project, it is important that such issues be addressed with the involvement and cooperation of all parties (e.g., the public, industry, and Federal, State, regional and local governments), utilizing existing regulatory processes to protect air quality in the South Coast Air Basin. EPA looks forward to working with FAA, LAWA, and Secretary Mineta's Task Force to find an effective, comprehensive approach to air transportation in the region and to address the issues raised by the DEIS/R and the public comment process.

Response:

Comment noted. Please see Responses to Comments AF00001-10 through AF00001-60 below for responses to each of the agency's concerns noted in the comment's Conclusion.

AF00001-10

Comment:

U.S. EPA's Detailed Comments on Draft Environmental Impact Statement/Report (DEIS/R) for Los Angeles International Airport (LAX) Master Plan Improvements - September 24, 2001

INTRODUCTION

EPA 's Comments on the Draft Environmental Impact Statement/Report (DEIS/R)

EPA's comments on the DEIS/R are based upon our review of the document by staff, attendance at the June 9, 2001 public workshop in Inglewood, viewing a video prepared by Los Angeles World Airports (LAWA) and shown at this workshop, and discussions with staff of the Federal Aviation Administration (FAA). We have reviewed information posted by LAWA on its Palmdale and Ontario facilities, and are in discussions with LAWA as it has been developing an air quality and source apportionment study for the airport. EPA raises the following issues in connection with this project and DEIS/R.

Response:

Please see Responses to Comments AF00001-11 through AF00001-60 below.

AF00001-11

Comment:

Public Concerns on the Impacts of LAX and this Project

We recognize that commercial air traffic in the five-county Los Angeles region will continue to grow over the next 15 years, as it will across the nation, and that the purpose of the Master Plan Project is to accommodate a portion of this projected demand. However, it is critical that FAA and other responsible parties acknowledge that daily flight operations at LAX have significant, adverse impacts on adjacent communities, and that the National Environmental Policy Act (NEPA) provides a valuable mechanism to address the serious concerns raised by residents affected by LAX. The DEIS/R recognizes disproportionately high, adverse impacts on minority and low-income communities due to aircraft noise, and potentially air quality and health (e.g., p. ES-46). Many comments raised by residents at the June 9, 2001 Inglewood workshop concerned the environmental impacts of commercial air traffic at LAX and associated questions of equity. Specifically, the contention was raised at the Inglewood workshop that residents in communities adjacent to LAX are more adversely affected by daily aircraft operations than others living in the five-county region served by LAX. The residents' concerns appear validated by wording on page ES-46 about disproportionate effects on low-income and minority communities.

- Recommendation: Although we recognize that residents closer to airports are generally affected in an adverse manner more so than others more distant (especially aircraft noise and emissions from aircraft, airport service equipment, and airport-related vehicular traffic), it is incumbent upon FAA to determine if

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there are practicable or reasonable means to avoid or minimize adverse impacts to residents. The Final EIS/R (FEIS/R) should address this issue.

Response:

As previously indicated, LAWA Staff's new preferred alternative, Alternative D, limits growth at LAX to levels similar to what would occur under the No Action/No Project Alternative. Alternative D also avoids and reduces impacts compared to the other build alternatives, including the magnitude of disproportionate environmental effects on minority and low-income populations. In accordance with CEQA and NEPA and relevant guidance on environmental justice, all feasible mitigation measures and alternatives have been proposed to address the significant environmental impacts of the proposed project, including those that have disproportionately high and adverse effects on minority and low-income communities. It is important to note, as was described in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, that the environmental justice analysis accounts for all relevant mitigation measures set forth throughout Chapter 4 of the EIS/EIR. Additionally, LAWA's Environmental Justice Program as defined in Section 4.4.3 of the Final EIS/EIR, has been developed to go beyond these measures in helping to offset disproportionately high and adverse effects on minority and/or low-income communities to the fullest extent practicable.

AF00001-12

Comment:

AIR QUALITY

Projected Violations of National Ambient Air Quality Standards

EPA objects to the projected violations of the National Ambient Air Quality Standards (NAAQS) for nitrogen dioxide (NO₂), carbon monoxide (CO), and particulate matter (PM₁₀) identified in the DEIS/R. The South Coast Air Basin has one of the most severe air quality problems in the nation. The air basin is a 'nonattainment' area for the NAAQS for ozone, PM₁₀, and CO (p. 4-511). We have objections because the DEIS/R forecasts that each alternative scenario (including No Action) will cause NAAQS violations in one or more years, i.e., 2004, 2005, and/or 2015. We object to these projected NAAQS violations due to their projected local violations and a potential to contribute to long-term, net increases in emissions that incrementally contribute to NAAQS violations, and which may be inconsistent with planning efforts to achieve the NAAQS on a regional basis. The Council on Environmental Quality's NEPA regulations provide that, "Environmental impact statements shall state how alternatives considered in it and decisions based on it will or will not achieve the requirements of sections 101 and 102(1) of the Act [NEPA] and other environmental laws and policies" such as the Clean Air Act (underline added).

With the No Action Alternative, concentrations from on-airport operational sources for CO, NO₂, and PM₁₀, when added to future background levels, are predicted to violate the NAAQS (p. 4-503). Construction-related concentrations of PM₁₀ under No Action, when added to future background levels, are predicted to exceed the NAAQS due to the development of approved projects such as LAX North and Continental City (p. 4-503). Under Alternative A, maximum NO₂ and PM₁₀ concentrations from construction sources, when added to future background levels, are projected to violate the annual NO₂ NAAQS and the 24-hour and annual PM₁₀ NAAQS in 2004 and 2005 (p. 4-505). Under Alternative B, maximum NO₂ and PM₁₀ emissions from construction, when added to future background levels, are predicted to violate the annual NO₂ NAAQS and the 24-hour and annual PM₁₀ NAAQS in 2004 and 2005, with violations of the PM₁₀ NAAQS projected in 2015 (p. 4-507). Under Alternative C (Proposed Action), maximum NO₂ and PM₁₀ concentrations, again added to future background levels, are projected to violate the annual NO₂ NAAQS and the 24-hour and annual PM₁₀ NAAQS in 2004 and 2005, and violations of the PM₁₀ NAAQS are projected in 2015 (p. 4-509).

We are committed to working with FAA and LAWA to ensure that this project's contribution to the NAAQS violations projected in the DEIS/R are successfully avoided and/or mitigated.

- Recommendation: The FEIS/R should document that any projected NAAQS violations from this project will be successfully avoided and/or mitigated. For each alternative (including No Action), the FEIS/R should clarify if the NAAQS for any pollutant would be exceeded only in 2004, 2005 and/or 2015 or if violations would be expected in one or more of the intervening years as well (i.e., 2006 to 2014). All

affected agencies should participate in developing adequate, enforceable air quality mitigation that can be shown to have quantifiable emissions reductions such that projected NAAQS violations are successfully avoided and/or mitigated. Absent such a finding in the FEIS/R, agencies and the public have no assurance that the project meets the requirements of the Clean Air Act (CAA).

Response:

Since publication of the Draft EIS/EIR, Section 4.6, Air Quality, has been revised to include more data regarding mitigation measures, their assumptions and associated control efficiencies. The Supplement to the Draft EIS/EIR addressed mitigation measures in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E. The Final EIS/EIR includes a Mitigation Monitoring Program that describes in greater detail those air quality mitigation measures being carried forward as well as their associated control efficiencies. LAWA intends to adopt and implement all feasible measures to reduce the project's adverse environmental impacts. Please see Topical Response TR-AQ-3 regarding air pollution. Also, please see Response to Comment AF00001-14 regarding the general conformity determination.

AF00001-13

Comment:

Mitigation for Projected NAAQS Violations

Table 4.6-20 presents a summary of the benefits from the quantifiable air mitigation measures. The benefits of air mitigation are significant and may help to reduce or avoid the NAAQS violations projected to occur, including under Alternative C (Proposed Action). Since NAAQS violations are projected, the viability of this project depends upon adequate, enforceable mitigation commitments and their successful implementation.

Technical Report 4 (Air Quality) lists 150 air quality mitigation measures. Some measures are proposed for further evaluation while others are removed from detailed consideration. A number of the measures are beneficial and should be carried forward as the project proceeds, but others appear potentially harmful to air quality (e.g., the proposal for free parking, which contributes to additional use of private vehicles to and from LAX, and thus increased emissions). Others are promising proposals that could be improved or were eliminated from further consideration. We note a mitigation proposal (p. 4-461) that, "A Master Plan Commitment requiring contractors to use low-NOx equipment is proposed to help reduce such emissions, although it would not reduce emissions enough to take them below the threshold of significance."

EPA Region IX received a copy of an 'Air Quality Initiative' for Logan International Airport, prepared by the Massachusetts Port Authority (March 2001), which discusses mitigation that FAA may find useful in preparing the LAX FEIS/R (and general conformity determination). An inter-agency review of air mitigation proposed by FAA for projects under NEPA elsewhere in the nation, especially in nonattainment or maintenance areas, may offer opportunities as this project's NEPA process proceeds. We are committed to working with FAA and LAWA to further evaluate the potential benefits and viability of air mitigation in the DEIS/R, and would participate in any inter-agency review for air mitigation that FAA may undertake.

- Recommendation: The FEIS/R should present FAA's strategy to ensure that NAAQS violations due to this project are fully avoided, including inter-agency coordination efforts and the involvement of local communities in developing mitigation. Because the project results in NAAQS violations, it is essential for the FEIS/R to have adequate, enforceable mitigation ensuring that NAAQS violations are fully avoided.

- The statement that, "A Master Plan Commitment requiring contractors to use low-NOx equipment is proposed" (p. 4-461) should be modified in the FEIS/R to "would be required," with appropriate commitments for implementation in FAA's ROD. The FEIS/R should discuss if using low-NOx equipment is, by itself, sufficient to avoid the projected NAAQS violations or if additional mitigation is needed to fully avoid any violations of the NAAQS due to this project.

Response:

The FAA agrees that quantifiable air quality mitigation measures are the key component to avoiding a NAAQS violation. Further, the Supplement to the Draft EIS/EIR contains a substantially more detailed

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discussion and analysis of the mitigation measures being carried forward for implementation. The proposal regarding the use of CARB-regulated engines is included in this document. Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

Extensive air quality modeling analysis has been completed to ensure that this project does not create a violation of any NAAQS that could have otherwise been avoided. The mitigation component of the Supplement to the Draft EIS/EIR reflected the comments and suggestions received. The Supplement to the Draft EIS/EIR addressed the mitigation analysis in subsection 4.6.8, Mitigation Measures, with supporting technical data and analyses provided in Appendix S-E and Technical Report S-4.

AF00001-14

Comment:

General Conformity

A general conformity determination is needed for ozone, PM10, CO, and NO2 (p. 4-460). This determination would be undertaken by FAA. While we have not seen a draft general conformity determination or a plan as to how FAA intends to make a positive conformity determination, we are very concerned about potential violations of the NAAQS for NO2 and PM10 due to this project, for the three action alternatives. Table 4.6-13 [Unmitigated Peak Construction Air Pollutant Concentrations - Including Background] indicates that there would be violations of the NO2 NAAQS for all alternatives for the Horizon Year 2005, and for the peak construction year (2004). Table 4.6-20 [Mitigated Peak Operational Concentrations from On-Airport Sources - Including Background] indicates that high levels of NO2 (0.043 ppm) exist after mitigation. Although no table presents the mitigated, combined (on-airport, off-airport, and construction) concentrations, NO2 levels will be high, and perhaps violate the Federal standard. It thus appears that further mitigation may be needed to ensure the project's compliance with the NO2 NAAQS.

Due to the projected NAAQS violations, EPA is very concerned that FAA may be unable to make a positive conformity determination for this project. Based on discussions between FAA (David Kessler) and EPA (David Tomsovic) on June 26, 2001, we understand that FAA intends to provide a conformity determination in the FEIS/R, including any mitigation measures necessary to demonstrate general conformity. We understand that LAWA is working with the South Coast Air Quality Management District (SCAQMD) to ensure that anticipated emissions from LAX's Master Plan improvements are taken into consideration in the next Air Quality Management Plan (AQMP), and note that if EPA approves that plan such action would ensure conformity.

- Recommendation: The FEIS/R should include the general conformity determination and related mitigation commitments, with appropriate commitments in FAA's Record of Decision (ROD). We encourage FAA and LAWA to work with the SCAQMD on air quality issues related to this project, as well as with the California Air Resources Board (CARB) and EPA.

Response:

Please see Response to Comment AF00001-4 regarding the general conformity determination.

AF00001-15

Comment:

Transportation Conformity

Page 4-511 indicates that LAWA is working with the SCAQMD and the Southern California Association of Governments (SCAG) to ensure that information developed for the Master Plan is taken into consideration in future proposals of the Regional Transportation Plan (RTP), which will be subject to a transportation conformity determination.

- Recommendation: The FEIS/R should document that elements of this project proposed for funding or approval by the Federal Highway Administration (FHWA) or the Federal Transit Administration (FTA) are consistent with EPA's transportation conformity rule. The FEIS/R should demonstrate that FHWA/FTA-funded or -approved project elements come from a conforming long-range transportation

plan and transportation improvement program (TIP). Furthermore, FHWA/FTA projects in CO and PM10 nonattainment areas need to demonstrate project-level conformity.

Response:

Alternative D, which is the LAWA staff-preferred alternative, does not propose any improvements that require funding or approval by the FHWA or the FTA. Should Alternative D be selected and approved by the Los Angeles City Council and the recommended mitigation measures involving new ramps at I-105 and a new interchange at I-405, the federal environmental review process(es) for those improvements would include a transportation conformity determination. In the event that Alternative A, B, or C were to be selected and approved by the City Council, additional federal environmental review would be necessary, which would also include the required transportation conformity determination.

AF00001-16

Comment:

Air Quality and Source Apportionment Study

LAWA is finalizing an air quality and source apportionment study for LAX, which should be completed in 2002 (p. 4-1008). This study is being developed separately from the Master Plan and is not considered part of the DEIS/R. However, this study's findings and recommendations may have a critical bearing on the current NEPA process, since LAWA's air quality and source apportionment study is designed to provide detailed information on "the role of... LAX in emitting air pollutants and the impact these emissions have on the total concentration of air pollutants in the neighborhoods around LAX." ('Air Quality and Source Apportionment Study of the Area Surrounding Los Angeles International Airport,' November 2000. Prepared for LAWA by Camp Dresser & McKee, Inc). Given the existing and projected air quality impacts associated with this project, the air quality and source apportionment study is extremely important. The findings and recommendations of LAWA's air quality and source apportionment study would serve to facilitate an informed understanding of LAX's contribution to air pollution, and in shaping informed comments from the public on the Master Plan project, its environmental impacts, and appropriate mitigation for criteria and toxic air pollutants. The findings and recommendations of LAWA's air quality and source apportionment study would be a valuable complement to the Human Health Risk Assessment section of the EIS/R. The Council on Environmental Quality emphasizes the value of integrating relevant information into NEPA documents as it becomes available at the various stages of the NEPA process. The Council on Environmental Quality urges Federal agencies' NEPA documents and decisions to reflect the most current data. CEQ informs Federal agencies that, "Decisions [under NEPA] must be supported by the best analysis based on the best data we have or are able to collect." ("Considering Cumulative Effects Under the National Environmental Policy Act," CEQ, 1997, at p. 3). The data and analysis that becomes available through LAWA's air quality and source apportionment study will facilitate full disclosure of impacts, identify appropriate mitigation measures, and inform the NEPA decision-making process.

- Recommendation: As it becomes available, FAA should integrate the information and analysis of the air quality and source apportionment study in this project's NEPA document and decision-making process. To the extent it is available, this project's NEPA process should incorporate the findings and recommendations of LAWA's air quality and source apportionment study, which can include appropriate mitigation measures and other commitments in FAA's Record of Decision.

Response:

Please see Topical Response TR-AQ-2 regarding the Source Apportionment Study.

AF00001-17

Comment:

Toxic Particulate Emissions

Page 4-999 states, "with implementation of potential mitigation options, human health risk and hazards estimated for each build alternative would be less than CEQA thresholds of significance." However, the DEIS/R informs the reader that data is insufficient to determine the direct contribution of LAX operations to the most significant human health risks and hazards from air pollution. Information on carcinogenic

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risk from toxic particulate emissions to areas around LAX is not expected until 2002 (p. 4-1008), as part of LAWA's pending 'Air Quality and Source Apportionment Study of the Area Surrounding Los Angeles International Airport.' Page 4-999 indicates that the Human Health Risk Assessment "did not evaluate impacts of toxic air pollutants associated with current airport operations."

We thus question FAA's assertion that health risks and hazards under the build alternatives are less than CEQA's thresholds of significance. Because the analysis of toxic air pollutants and health, including carcinogenic risk, is incomplete, it is premature to assert that health risk and hazards are less than CEQA's thresholds of significance. The absence of such data prevents the reader from determining if there is a link between LAX-related emissions and potential health risks.

- Recommendation: The FEIS/R should address the effects of toxic particulate emissions on the health of residents in communities affected by this project, including low-income and/or minority communities.

Response:

Please refer to Section 4.24.1 of the Supplement to the Draft EIS/EIR as well as Topical Response TR-HRA-4 regarding mitigation measures that address toxic air contaminants and TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities.

LAWA's Air Quality and Source Apportionment Study is independent of the Master Plan. This study has been delayed as a result of the events on September 11, 2001, and no time frame for data collection has been set to date. As currently designed the study will seek to assess the current contribution of airport related emissions to total emissions from all sources in the area, and has no health risk assessment component. Please refer to Topical Response TR-HRA-1 and TR-AQ-2 for further discussion, as well as Section 4.24.1 of the Supplement to the Draft EIS/EIR. Revised estimates of health risks and hazards were presented in Section 4.24.1 of the Supplement to the Draft EIS/EIR.

AF00001-18

Comment:

Mitigation for Toxic Particulate Emissions

We commend FAA on proposed mitigation to reroute cargo trips (p. 4-515) to the extent it reduces emissions and adverse effects upon adjacent communities, and support mitigation to promote cleaner motor vehicle fleets at LAX. Mitigation to reduce emissions could employ cleaner engine technology, engine/unit retirement, particulate trap retrofits and catalytic converter retrofits. We understand that LAX's liquified natural gas/compressed natural gas infrastructure can support alternative fuel applications. LAX's progress in using cleaner-burning fuels, equipment and technologies may result in a major reduction of toxic particulate emissions, thus having a potential to reduce environmental or health risks. This would be consistent with the Council on Environmental Quality's guidance to integrate a broad range of pollution prevention features in NEPA documents and NEPA decisions, and the U.S. Transportation Department's final order implementing the Executive Order on Environmental Justice (mitigation to avoid or reduce disproportionately high, adverse impacts on low-income and/or minority communities).

- Recommendation: If FAA concludes that toxic particulate emissions from this project have a potential adverse effect (including cumulative effect) on environmental quality or health, the FEIS/R should evaluate mitigation not currently in the Proposed Action or alternatives (40 CFR 1502.14(f)). (The methodology by which the conclusions were drawn should be carefully documented). In particular, the FEIS/R should identify feasible mitigation to minimize or offset emissions of toxic particulates from increased cargo transport, ground service vehicles, construction equipment, aircraft, and other sources, including stationary sources. FAA's Record of Decision should "state whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not." (40 CFR 1505.2(c)).

Response:

Please see Topical Response TR-HRA-4 regarding human health mitigation strategies.

An analysis of cumulative effects associated with LAX operations was provided in Section 4.24.1, Human Health Risk Assessment, in the Supplement to the Draft EIS/EIR. All post-mitigation analyses

were revised since publication of the Draft EIS/EIR and were presented in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.9, Level of Significance after Mitigation), of the Supplement to the Draft EIS/EIR.

Mitigation measures currently proposed differ from those under consideration during the preparation of the Draft EIS/EIR. Recommended mitigation measures were identified in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, to reduce impacts from airport operations and construction as well as from regional vehicular traffic under Alternatives A, B, C, and D. The following mitigation measures considered in the analysis include: continued conversion of GSE to alternative fuels, multiple construction-related measures including use of alternative fuels and add-on emission control devices on construction equipment, and expansion of flyaway bus service between LAX and other locations in the South Coast Air Basin using alternative-fueled buses. These measures, in combination with other proposed mitigation measures, would reduce emissions of TAPS during LAX operations and construction primarily by reducing exhaust emissions from mobile sources and reducing traffic congestion near the airport. These recommended mitigation measures would also reduce impacts to human health associated with exposure to TAPs.

Mitigation measure AQ-1 incorporates mitigation measures to address aircraft emissions such as development of methods and/or incentives to encourage and promote reduced-engine taxiing by aircraft moving between runways and terminal gates. Design features incorporated into the alternatives also reduce air quality impacts. For example, runway and taxiway additions and/or modifications variously incorporated into the designs for each of the build alternatives will reduce airfield delay and congestion, thereby improving efficiency of aircraft movement on the airfield and decreasing aircraft taxiing and idling times and emissions. Installation of pre-conditioned air and electrical power hookups at terminal gates would allow airlines to minimize the use of auxiliary power units (on-board turbines).

AF00001-19

Comment:

Emissions Inventory - Methods and Assumptions

As described below, EPA believes that emissions may have been underestimated in the DEIS/R. Underestimating emissions may have implications for the NAAQS violations already projected to occur with this project, the level of mitigation needed to avoid NAAQS violations, and for FAA's conformity determination.

- Recommendation: The FEIS/R should address if project-related emissions may have been underestimated and, as appropriate, identify appropriate corrective measures, including additional mitigation measures.

Response:

It is believed that emissions are appropriately estimated in both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. It was assumed that APU usage at terminal gates will be minimized in the future at LAX with or without the Master Plan; an APU usage rate of seven minutes per LTO was assumed for all alternatives (see the Attachment A (footnote 3) in Technical Report 4 of the Draft EIS/EIR). For the air quality analyses in the Final EIS/EIR, an APU usage rate of 15 minutes per LTO was assumed for all future alternatives. As stated on page 36 in Section 2.3.1 of Appendix S-E of the Supplement to the Draft EIS/EIR, it is LAWA's goal to have all of its aircraft gates at LAX equipped with 400-Hz power and preconditioned air in the near future. This feature will allow aircraft pilots to minimize the use of their aircraft's APU while parked at the gate. FAA, EPA, and LAWA will engage interested parties in an evaluation of all feasible measures for reducing APU emissions at the gates; such measures may include incentive programs and aircraft guidelines restricting APU use at gates when turnaround time exceeds certain limits.

AF00001-20

Comment:

Auxiliary Power Unit (APU) Emissions: The DEIS/R may substantially underestimate emissions from APUs. Apparently all emissions scenarios assume APU use for 7 minutes per landing/takeoff cycle

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(LTO). This assumption may be inconsistent with the latest information on APU use. Even with gate-based electrical power and pre-conditioned air, minimum APU use (per LTO) includes approximately 2 minutes as the aircraft approaches a gate, 10 minutes prior to push-back from the gate, and 5 minutes after the pushback but prior to takeoff (a total time of 17 minutes/LTO). In addition, we understand that, in some circumstances, the APU is not turned off even when gate-based electrical power and pre-conditioned air is available, and the corresponding usage period (per LTO) is 40 minutes for narrow-body aircraft and 60-90 minutes for wide-body aircraft. We attach a copy of a September 29, 2000 letter on APU emissions from Honeywell Engines and Systems to EPA. Honeywell's letter presents recent data on APU operating times and emissions factors.

- Recommendation: FAA should review the information in Honeywell's letter and determine if it is appropriate to revise APU emissions in the FEIS/R. The FEIS/R should present mitigation to minimize APU-related emissions to the fullest extent feasible, e.g., through mechanisms such as conditions in future gate lease agreements and/or incentives to reduce APU emissions.

Response:

The Honeywell letter referenced to by the commentor was originally attached to comment letter AF00001. It is included in this Responses to Comments document as Comment Letter PC02440.

As noted in subsection 4.6.8 of both the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA is committed to providing 400 Hertz electrical ground power and preconditioned air systems at all passenger gates under each scenario analyzed. In addition, the mitigation plan required under CEQA will include LAWA commitment to promote, encourage and incentivize the use of these systems instead of APUs.

The Honeywell letter notes that "airlines have reduced APU operation to minimize fuel and maintenance costs" since 1991. It is anticipated that average APU operating times per LTO will continue to decrease as more gates are installed with preconditioned air and electric power and airlines continue to look for cost-cutting measures. As the Honeywell letter also notes, "the small engine size, high efficiency, low fuel burn, and low emission levels make the APU an extremely low contributor to airport or metropolitan pollution levels." Indeed, the APU emissions represent approximately one percent or less of total on-airport emissions. APU emissions are detailed in Attachment V of Technical Report 4 of the Draft EIS/EIR and Attachment N of Technical Report S-4 of the Supplement to the Draft EIS/EIR.

AF00001-21

Comment:

Aircraft Emissions and Reverse Thrust: Based on information in Technical Appendix G, Page 8, Table 4, it appears that the "reverse thrust" mode of aircraft operation was not included in the emissions estimates for aircraft.

- Recommendation: If "reverse thrust" is commonly used at LAX, any emissions associated with it should be reflected in the aircraft emissions presented in the FEIS/R.

Response:

Emissions associated with the use of reverse thrust on aircraft engines were not quantified. Emission factors have not been developed for reverse thrust, and regulatory guidance for calculation emissions from reverse thrust was not available. The relative time that aircraft use reverse thrust compared to the time spent in other operational modes is minimal, thus emissions for this mode is assumed to have minimal impact on emission inventories. In addition, since runway lengths at LAX are able to accommodate even the largest aircraft, use of reverse thrust would be expected to be minimal. The methodology (specifically the times in mode) used to estimate emissions for the standard aircraft modes (approach, taxi/idle in, taxi/idle out, take off, and climbout) may be considered generally conservative enough to account for potential emissions from use of reverse thrust.

AF00001-22

Comment:

Taxi/Idle Times: Average taxi/idle times at selected California airports are presented on page 13 of a California Air Resources Board (CARB) reference document, 'Air Pollution Mitigation Measures for Airport and Associated Activity' (May 1994). The estimate for LAX is 23.8 minutes per landing-takeoff cycle. The documentation in table 4, Technical Appendix G does not identify the corresponding taxi/idle time-in-mode assumption used for the aircraft emissions estimates in the DEIS/R.

- Recommendation: The FEIS/R should show how the range of values presented for aircraft emissions are consistent with the CARB's reference or indicate the range of values used as well as the source of data from which that range was developed.

Response:

Table S7 of Appendix S-E to the Supplement to the Draft EIS/EIR presents the data and source of the taxi/idle times used in the emissions calculations. Please also see Appendix F-B, Attachment 2.

AF00001-23

Comment:

Entrained Road Dust: Based on information provided in Technical Appendix G, Page 16, it appears that entrained (paved) road dust was not taken into account in the PM10 emissions estimates prepared for off-airport motor vehicle trips. The emissions factors used to estimate LAX-related road dust PM10 emissions should reflect the latest available data, and be consistent with those used for the AQMP and RTP conformity determination. The most current EPA-approved model should be used to estimate mobile source emissions.

- Recommendation: These estimates should be revised for the FEIS/R to include PM10 emissions from motor vehicle activity using approved model and current assumptions.

Response:

Entrained road dust was analyzed for on-airport, on-road sources. In accordance with CEQA guidelines, PM emissions resulting from tire wear were calculated for off-airport, on-road sources in the Draft EIS/EIR and these calculations were updated in the Supplement to the Draft EIS/EIR using the latest available, approved EMFAC model (EMFAC2002). Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR regarding off-airport, on-road emission calculations.

AF00001-24

Comment:

Emissions Impact Evaluation

It is difficult for the reader to draw conclusions about the data presented on various emissions sources in the DEIS/R, in terms of understanding the "entire picture" of emissions at LAX for baseline (1996), as compared to No Action and the three action alternatives in 2005 and 2015. The air quality emissions impact evaluation is divided into three parts: on-airport, off-airport, and construction. While quantification of airport-related emissions necessitates splitting the airport into various source categories, the evaluation of emission impacts under NEPA should consider them in the aggregate when they occur contemporaneously. Off-airport emissions (LAX-related regional traffic) are, or may be, included in a regional transportation conformity determination, and, given that possibility, tracking these emissions separately is warranted. However, the issue of presenting emissions in connection with CAA conformity is different than NEPA's requirement to disclose impacts. While construction-related emissions are generally evaluated separately from operational emissions since they typically occur over a period distinct from operations, construction under Alternatives A, B and C occurs over the entire time covered by the Master Plan, and coincide with changes in emissions from operational sources (e.g., aircraft, vehicular traffic). As such, construction and operational emissions changes contribute to the same

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environmental effects (incremental contribution to regional ozone and PM10 concentrations), and thus should be analyzed together.

- Recommendation: In order to disclose the full emissions impacts to the public, the FEIS/R should provide a table showing total emissions increases and decreases from all sources under all alternatives (including No Action) in 2005 and 2015. This would provide a basis for the public to understand the net change as a percentage of the "carrying capacity" of the South Coast Air Basin.

Response:

Under CEQA, emission thresholds for operational and construction sources are separate. In addition, for regional traffic analyses, emissions are compared against a regional adjusted baseline as described in Section 4.6, Air Quality, of the Draft EIS/EIR. Because of this, the dividing of the emission inventories into the three categories is warranted. For the dispersion analysis, air concentrations for on-airport operational sources and construction related sources were re-analyzed and combined for comparison against the National Ambient Air Quality Standards (AAQS) and California AAQS. Please refer to Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR regarding the methodologies used and the concentration results of the air dispersion modeling.

Analysis of construction and operational emissions for general conformity requirements was also included in the Draft General Conformity Determination published on January 9, 2004. The Protocol for General Conformity Evaluation was provided to U.S. EPA Region 9 (Doris Lo) for review on January 27, 2003. The U.S. EPA indicated that the protocol was acceptable on February 28, 2003.

AF00001-25

Comment:

Although not compiled to show the overall emissions impact, the emissions estimates in the DEIS/R allow us to develop independent estimates of the overall emissions impact of the build scenarios. Based on these emissions estimates, the emissions impact (i.e., net change in emissions under Alternative C compared to No Action) would constitute approximately 0.3% and 1.0% of the "carrying capacity" of volatile organic compounds (VOC) and oxides of nitrogen (NOx), respectively, in the South Coast Air Basin, taking into account emissions changes associated with LAX's on-airport, off-airport, and construction sources in 2015. The emissions impact under Alternatives A and B would be greater. Taking into account the mitigation in the air quality section, the emissions impact under Alternative C appears minimal for VOC but represents approximately 0.4% of the carrying capacity of the region for NOx, and 0.6% for Alternatives A and B.

- Recommendation: We recommend that FAA condition Federal approval of any of the build alternatives on implementation of all feasible air quality mitigation and with a clear commitment that the proposed action is consistent with regional air quality planning efforts.

Response:

Please see Response to Comment AF00001-4 regarding the general conformity determination.

AF00001-26

Comment:

Dispersion Modeling - Methods and Assumptions

Technical Appendix G, Air Quality Impact Analysis, page 25, 2.2.1 Meteorological Data, indicates that only one year of meteorological data was used for dispersion modeling purposes. Where such data is available, five years of representative meteorological data should be used when estimating concentrations with an air quality model (40 CFR Part 51, Appendix W, 9.3.1.2 Length of Meteorological Data).

- Recommendation: The FEIS/R should revise its meteorological input to include five years of data or justify why one year of data was used.

Response:

Appendix W to 40 CFR Part 51, Section 9.3.1.2 states that one year of onsite meteorological data is preferred for use if such data has been subject to appropriate quality assurance procedures. SCAQMD has determined that the one year of meteorological data collected at LAX and used in the dispersion modeling analyses is of adequate quality and is appropriate for use in the dispersion modeling analyses.

AF00001-27

Comment:

Technical Appendix G, Air Quality Impact Analysis, page 26, 2.2.2 Receptors, indicates that all receptor terrain elevations were set to zero meters. Elevated receptors should be included for nearby elevated terrain. Flagpole receptors were not included and may be appropriate for toxic modeling.

- Recommendation: The FEIS/R should address if the receptor spacing of 1,000 meters for ISCST3 for toxic air pollutants is too large, and whether elevated receptors would lead to more accurate estimates.

Response:

The terrain in the vicinity of LAX where maximum concentrations were expected is generally flat. In addition, since many of the sources are at ground level, the assumption of flat terrain is conservative.

The additional fine grid receptor networks, used in the ISCST3 criteria pollutant modeling to further refine those results were also included in the ISCST3 toxic pollutant modeling. These fine grids have receptor spacing of 80 meters.

AF00001-28

Comment:

Technical Appendix G, Air Quality Impact Analysis, 2.4 Future Background Concentrations, indicates that the background concentrations are based on values projected in the SCAQMD 1997 AQMP.

- Recommendation: The FEIS should address if the interpolated values may be optimistic because they seem to assume a linear rate of reduction from base year to attainment year.

Response:

The on-site monitoring station and Hawthorne monitoring station locations are depicted in Figure 4.6-1 of Section 4.6, Air Quality, in the Draft EIS/EIR. The on-site monitoring station was directly downwind of the southern runways and therefore includes impacts from the airport. The Hawthorne monitoring station (SCAQMD monitoring station) is located half a mile south of the eastern end of the airport and would experience airport emission impact under north to north-west wind conditions. Comparison of peak hourly concentrations between the on-site station and the Hawthorne station indicated no substantial difference in peak measurements. Therefore, the use of annual average data from Hawthorne is considered representative of on-airport annual concentrations.

Linear rollback of background concentrations were tabulated according to methods outlined in Chapter II.3 of the LAX Master Plan EIS/EIR Air Quality Modeling Protocol for Criteria Pollutants (Attachment A of Technical Report 4, Air Quality Technical Report, of the Draft EIS/EIR), which was reviewed by FAA and SCAQMD prior to conducting the analyses and review comments were incorporated. This method was used by SCAQMD in the 1997 AQMP to estimate future background concentrations.

Although airport emissions are included in the monitoring data, it was assumed that the existing concentrations did not include these emissions, adding a level of conservatism to the analysis that is not required. Since the background concentrations found at the Hawthorne and on-site monitoring stations likely include a number of airport sources, and these same sources are included in the modeled concentrations, when added they are being counted twice.

The baseline year and future emission inventories were developed from the values in the 1997 AQMP. One modification was made to the AQMD inventories: The aircraft emissions for each year were removed from each inventory, including the baseline, so that changes in aircraft emissions were not

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included in future background concentrations. A large portion of the future emission inventories in the AQMP come from many sources including on-road mobile (cars and trucks). As shown in the AQMP, a substantial portion of emission decreases in future years is due to on-road mobile source emission reductions (1997 AQMP, Appendix 3, Tables A through D). Since on-road mobile emissions likely represent the major impact on measured air quality around the airport, adjusting future concentrations to account for the decrease in emissions is appropriate. To assume no reduction in background concentrations is inconsistent with the State Implementation Plan and is an overly conservative assumption. Linear interpolation is a reasonable method to estimate future concentration.

AF00001-29

Comment:

HUMAN HEALTH RISK ASSESSMENT

Emissions and Public Health

EPA is seriously concerned with two major air pollutants (acrolein and toxic particulates) that were not satisfactorily addressed in the health effects section of the DEIS/R. Page 11 of the Human Health Risk Assessment 1 [Technical Report (14a)] states, "diesel particulates were not included in the TAP (toxic air pollutants) screening analysis...because diesel emission estimates were not available at the time the screening was conducted." An absence of analysis on diesel particulates is a deficiency in terms of NEPA disclosure.

- Recommendation: The FEIS/R should quantify aircraft-related toxic particulate emissions. The FEIS/R should address the relationship between air toxics associated with aircraft emissions and potential health effects (e.g., respiratory effects), including effects to children of low-income and minority communities. This analysis should be integrated in the FEIS/R and, as appropriate, mitigation commitments reflected in FAA's ROD.

Response:

Please refer to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR for a reevaluation of chronic and acute hazards for acrolein. Please refer to subsection 4.24.1.8, Mitigation Measures, of Section 4.24.1 of the Supplement to the Draft EIS/EIR as well as Topical Response TR-HRA-4 for a discussion of mitigation measures that address toxic air contaminants. In addition, please refer to TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities.

The Draft EIS/EIR addressed particulate matter (PM10) in Section 4.6, Air Quality. The parallel section in the Supplement to the Draft provided additional analysis. Human Health Risk Assessment (Section 4.24.1) for the Draft EIS/EIR addressed potential health risks associated with exposure to diesel particulates for the No Action/No Project Alternative as well as for the build alternatives. Potential health risks associated with exposure to diesel particulates are discussed in detail in the Technical Report 14a, Human Health Risk Assessment. Subsection 6.3.2.1, Residents (Adults and Young Children), of the technical report indicated that estimated cancer risks for adults and children are mostly due to predicted exposure to diesel particulates and 1,3-butadiene. Additional information on diesel particulates and human health risks were presented in the Supplement to the Draft EIS/EIR.

Diesel particulate concentrations used to assess possible cancer risks did not include particulate matter from aircraft. This exclusion is justified based on differences in diesel fuel and jet fuel as well as differences in combustion processes. Diesel fuel is a complex mixture of thousands of individual compounds, most with carbon numbers between 10 and 22. Most of these compounds are members of the paraffinic, naphthenic, or aromatic class of hydrocarbons. Generally speaking, more than half of the molecules in diesel fuels contain at least 15 carbon atoms (Chevron, 2000). Jet fuel differs significantly from diesel fuel both physically and chemically, being significantly lighter with shorter carbon chains, smaller molecules (generally), and more uniform composition. Commercial jet fuel is similar to kerosene in composition and contains an array of carbon chain-lengths from 4 to 16 carbons long (ATSDR, 1997).

Diesel engines and jet engines also differ in their combustion mechanisms and fuel combustion efficiencies. Most diesel engines are based on the compression/ignition principle. In a typical four-

stroke compression/ignition four-stroke cycle, air is drawn into the cylinder in the intake stroke and then compressed, creating space for finely atomized diesel fuel to be sprayed into the hot air, initiating auto-ignition of the mixture. During the subsequent power stroke, the expanding hot mixture forces the piston down. The final exhaust stroke purges the burnt gases. The diesel cycle relies upon warm vapor for combustion of fuel injected in pulses into cylinders. As a result, the combustion process is often incomplete or inefficient, creating a large amount of partially oxidized carbon-containing particulate matter in the exhaust. Hazardous components of diesel exhaust include, but are not limited to: benzene, arsenic, nickel, benzo(a)pyrene, 1,3-butadiene, formaldehyde, a variety of hydrocarbons, carbon monoxide, sulfur oxides, nitrogen oxides, and particulate matter (PM). Concentrations of PM and other hazardous components in diesel exhaust vary significantly depending on factors such as engine type and condition, fuel grade, and combustion efficiency.

Toxicological research indicates that the component of diesel exhaust responsible for most toxicological effects is PM (USEPA, 2000). Diesel PM typically consists of a solid core, composed mainly of elemental carbon, with a coating of various organic and inorganic compounds. More than 75 percent of diesel exhaust particles have diameters smaller than 1 micrometer (μm), with typical particles sized between 0.1 and 0.25 μm (CalEPA, 1997). For reference, particles 10 μm and smaller are generally respirable, meaning that they deposit into the deepest and often most sensitive areas of the lung (the alveoli). Particles that deposit in the deep lung are not removed in mucus that protects much of the respiratory tree and may reside in the lung for long periods of time.

According to USEPA's Integrated Risk Information System (IRIS), the systemic (non-cancer) toxicity of diesel emissions is due to the insoluble carbon core of diesel particles. Long-term effects seen with whole diesel are not found or are much less evident in laboratory animals exposed to similar dilutions of diesel exhaust filtered to remove most of the PM. As a result, USEPA's reference concentration (RfC) for diesel exhaust is based entirely upon PM. In addition, the California Air Resources Board (CARB) has identified diesel exhaust PM as a "toxic air contaminant" under the state's air toxics program, based on the information available on cancer and non-cancer health effects. California limited its findings to diesel PM, as opposed to diesel exhaust.

Jet engines operate through use of turbines continuously injected with carefully controlled amounts of fuel. Basically, in a jet turbine engine, turbine blades suck air in at tremendous speeds, causing higher pressure on the inside of the turbine. The engine is so hot (up to 3,500 degrees Fahrenheit) that the fuel ignites in a constant flame. The thrust provides the huge force necessary to propel commercial airliners. The high temperatures and continuous fuel injection act to combust fuel more completely and efficiently than diesel engines. Burning of jet fuel in engines using modern turbine technology creates much less particulate matter than is created during diesel fuel combustion. The combination of different fuel compositions and combustion technologies result in exhausts which differ chemically and physically, and, as a result, toxicologically from diesel exhaust.

Relatively little is currently known about the actual amount of PM present in jet exhaust or especially about the toxicity of jet exhaust. The following is an excerpt from USEPA's 1999 document, Evaluation of Air Pollutant Emissions from Subsonic Commercial Jet Aircraft: "PM emissions result from the incomplete combustion of fuel. High power operation, such as takeoff and climbout, produce the highest PM emission rates due to the high fuel consumption under those conditions. PM emission test data for aircraft engines are sparse, and engine-specific PM emission factors are available for only a few engine models." As a result, PM emission factors are not reported in the document. Estimates of PM emissions for use in this report were made using a variety of sources. No data were available for many types of engines and estimates were based on fuel consumption for similar engines in many cases.

Because of (a) differing fuels, (b) very different combustion processes in jet engines and diesel engines, and (c) to a lesser extent uncertainties in PM emissions from jet engines, extrapolation of PM emissions from diesel exhaust to jet exhaust is not considered appropriate or scientifically justifiable for the LAX Human Health Risk Assessment. A January 2000 CARB Advisory Committee draft report on commercial airport activities states that, when assessing toxic impacts associated with particulate emissions from aircraft, it may not be appropriate to use the CalEPA Unit Risk Factor for diesel PM ($3.0 \times 10^{-4} \mu\text{g}/\text{m}^3$) (CalEPA, 1997). Although PM from jet exhaust is not quantified in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR, various investigations (Spicer et al., 1994) have been performed which provide information about emission factors for other toxic air contaminants in jet exhaust. As a result, carcinogenic risks and hazard quotients are calculated in Section 4.24.1, Human

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Health Risk Assessment, of the Draft EIS/EIR for specific jet exhaust components with known emission factors (e.g., chlorinated dioxins, various PAHs, and 1,3-butadiene).

Agency for Toxic Substances and Disease Registry (ATSDR), "Toxicological Profile for Jet Fuel," CD-ROM, 1997.

CalEPA, "Non-cancer Chronic Reference Exposure Levels (RELs), Air Toxicology and Epidemiology Section, Draft for Public Review," 1997.

Chevron Company, Information about Diesel Fuel Chemistry, Available: <http://www.chevron.com/prodserv/bulletin/diesel> [June 2000].

Spicer et al, "Chemical Composition and Photochemical Reactivity of Exhaust from Aircraft Turbine Engines, *Annalues Geophysicae*," May 25, 1994.

USEPA, "Evaluation of Air Pollutant Emissions from Subsonic Commercial Jet Aircraft," 1999.

USEPA, "Integrated Risk Information System (IRIS) Online Database," 2000.

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Comment:

Methodology in HHRA

The HHRA uses a methodology derived from several different sources developed by EPA, the State of California, or other parties. However, using several different sources complicates an effective interpretation of the analysis in the DEIS/R. We find substantial uncertainty in the validity of FAA's approach and in the results of the risk assessment for the proposed project in reducing cancer or noncancer risks.

- Recommendation: The FEIS/R should address the validity of the HHRA methodology and implications for conclusions under NEPA.

Response:

Health risk assessments are used to determine whether a chemical or chemicals pose a significant risk to human health. Guidance on performing risk assessments is available from a variety of sources. The U.S. Environmental Protection Agency (EPA) alone has multiple guidance documents regarding assessment and characterization of health risks. In addition, many state agencies have developed risk assessment guidance for specific programs. In California, the Office of Environmental Health Hazard Assessment (OEHHA) in the California EPA has the primary responsibility for developing procedures and practices for performing health risk assessments (OEHHA, 2001).

The process of health risk assessment is based on principals that are generally followed by all of the various guidance documents. The risk assessment process is typically described as consisting of four basic steps: hazard identification, exposure assessment, dose-response assessment, and risk characterization (EPA, 1989; OEHHA, 2001).

Hazard identification involves gathering and analyzing the site data relevant to the human health evaluation and identifying the substances present at the site that are the focus of the risk assessment process. The exposure assessment is conducted to estimate the magnitude of actual and/or potential human exposures, the frequency and duration of exposure, and the pathways by which humans are potentially exposed. The dose-response assessment considers the types of adverse health effects associated with chemical exposures, the relationship between magnitude of exposure (dose) and adverse effects (response), and related uncertainties such as the weight of evidence of a particular chemical's carcinogenicity in humans. The risk characterization summarizes and combines outputs of the exposure and toxicity assessments to characterize risk (EPA, 1989; OEHHA, 2001).

It would be difficult to provide guidance that addresses all site circumstances in detail (EPA, 1989). As indicated in OEHHA's Air Toxics Hot Spots Program risk assessment guidance "no one risk assessment procedure or set of exposure variates could perfectly address the many types of stationary facilities in diverse locations in California" (OEHHA, 2002). EPA states that their Risk Assessment Guidance for Superfund (RAGS) is intended to provide a basic framework for health risk assessment and requires the use of professional judgment by individuals with substantial expertise. EPA also indicates that RAGS is not intended as a "cookbook" (EPA, 1989). Similarly, OEHHA's Air Toxics Hot Spots Program risk assessment guidance provides a tiered risk assessment approach to provide flexibility and allow consideration of site-specific differences.

Standardized guidance is not available for evaluation of health risks associated with chemicals released as a result of airport operations. Interpretation and application of risk assessment guidance requires an understanding of the basic principals of risk assessment and the professional expertise to identify appropriate inputs to the process. The risk assessment prepared for the Draft EIS/EIR and Supplement to the Draft EIS/EIR follows the principals of risk assessment to characterize risks and hazards associated with chemicals released as a result of LAX operations. The steps followed in the risk assessment include:

HAZARD IDENTIFICATION

- Identification of emissions sources for toxic air pollutants (TAP) and quantification of TAP emissions for baseline conditions.
- Selection of TAPs of concern through evaluation of toxicity and release quantities.

EXPOSURE ASSESSMENT

- Analysis of exposure pathways of concern for TAPs emitted during LAX operations.
- Identification of an area and human populations around LAX likely to be affected by airport operations.
- Estimation of future TAP emissions associated with each alternative.
- Air dispersion modeling to predict the air quality impacts on- and off-airport.
- Estimation of incremental impacts to air quality of each alternative through comparison with baseline emissions.

DOSE-RESPONSE ASSESSMENT

- Toxicity characterization for TAPs of concern.

RISK CHARACTERIZATION

- Characterization of the potential for incremental human health impacts based on changes in air concentrations for TAPs of concern with the health risk study area.

Because detailed guidance is not available that specifically addresses evaluation of health risks associated with airport operations, LAWA used professional judgment and coordinated with the appropriate federal and state agencies to identify appropriate modeling methodologies, inputs, and exposure variables.

The human health risk assessment presented in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR was based on standard regulatory guidelines, approved scientific methods, and computer models consistent with the protective recommendations of federal and state health agencies. As required by CEQA, the human health risk assessment calculated health risk and hazard for people living in areas where impacts might be highest. The human health risk assessment also assessed risks and hazards for locations throughout a large geographic area that extended into communities adjacent to, and north, east, and south of the airport. The Draft EIS/EIR addressed human health risks in Section 4.24, Human Health and Safety (CEQA) and Technical Report 14a, Health Risk Assessment. The Supplement to the Draft EIS/EIR addressed additional human health risk issues. NEPA does not

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specifically require performance of human health risk assessments; however, the conclusions of the health risk assessment provide information that may be pertinent to NEPA.

EPA. 1989. Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual. Part A. Interim Final. EPA/540/1-89/002. December. Office of Emergency and Remedial Response.

OEHHA. 2001. A Guide to Health Risk Assessment.

OEHHA and ARB. 2002. The Air Toxics Hot Spots Program. Guidance Manual for Preparation of Health Risk Assessments. June 2002.

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Comment:

MATES-II Study

An ambient monitoring study (MATES-II) conducted by the SCAQMD found that the toxic contaminants most often detected at and around the Los Angeles area's ports, airports, and rail facilities consist of benzene, butadiene and elemental carbon (a surrogate for diesel particulates). These toxic contaminants are frequently associated with mobile sources, with the SCAQMD concluding that 90% of the risk in the vicinity of LAX is related to mobile sources (with 80% of risk attributable to diesel emissions). The SCAQMD expressed concern about the concentration and growth of gasoline- and diesel-powered vehicular traffic in and around LAX. It is important to identify LAX-related diesel sources and their environmental impacts (including health effects). The emissions inventory is not explicit about how 'diesel particulate' estimates were made and how such estimates relate to toxics monitoring. The air monitoring study for this NEPA process should, as appropriate, take this data into account.

Response:

Diesel was included in the Draft EIS/EIR as a toxic air pollutant (TAP) of concern because diesel exhaust is expected to be emitted from LAX under the three build alternatives and the No Action/No Project Alternative. Sources of diesel particulates included airport ground service equipment, on-airport diesel truck traffic and construction equipment. Particulate matter present in jet exhaust is not considered chemically, physically, or toxicologically similar to diesel exhaust based on inherent differences in fuel composition, combustion properties, and exhaust composition and toxicity. Therefore, the HHRA considered only diesel exhaust from ground sources (i.e., trucks and buses) in estimating risks. This assumption is supported by the California Air Resources Board Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (2000), which does not include jet engines as a source of diesel emissions. The Risk Reduction Plan lists airport ground support as a source of diesel emissions. Results of the risk assessment indicated that cancer risks were associated primarily with exposure to diesel particulates, 1,3-butadiene, and benzene. Exposure to acrolein was responsible for almost all non-cancer hazard. Additional detail on how diesel particulate estimates were made was provided in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR.

AF00001-32

Comment:

The DEIS/R does not provide a mechanism or timeline to incorporate the results of the air toxics monitoring study, nor do the mitigation measures explicitly address toxics.

Response:

Please see Topical Response TR-HRA-1 and TR-AQ-2 regarding LAX ambient air quality and source apportionment study and Topical Response TR-HRA-4 regarding human health mitigation strategies.

Subsection 4.24.1.8 in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR included for a discussion of mitigation measures that address toxic air contaminants and a timeline for implementation of these measures. Note that mitigation measures that reduce emissions of criteria pollutants in jet exhaust or vehicle exhaust will also reduce emissions of TAPs. Since exhaust is

the major source of all air-borne emissions, such mitigations measures are most important in overall reduction in TAP releases.

AF00001-33

Comment:

- Recommendation: The FEIS/R should, as appropriate, integrate the results of the MATES-II air toxics monitoring study and discuss how FAA would mitigate impacts due to air toxics from this project.

Response:

Please refer to Topical Response TR-HRA-1 regarding the reevaluation of baseline and cumulative risks in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR and Topical Response TR-HRA-4 regarding mitigation strategies for health effects from toxic air contaminants.

MATES-II results were used to estimate background concentrations of TAPs and to estimate the cumulative impacts of airport releases on local air quality. Modeling during the MATES-II study was intended to characterize current basin background risks. If MATES-II underpredicts background concentrations of TAPs in the South Coast Air Basin for the year 2015, cumulative impacts of the build alternatives may be underestimated. However, CARB data indicate that carcinogenic risks have decreased up to 63 percent since 1990 due to decreased air concentrations of TAPs. If continuing progress is made toward reductions in TAP emissions in the South Coast Air Basin, MATES-II could overpredict potential background risks for horizon year 2015. Cumulative risks would also be overestimated.

AF00001-34

Comment:

Disclosure of Health Effects under NEPA

The HHRA (4.24.1) is framed as a 'CEQA-only' requirement. However, many compounds are Federally-listed "hazardous air pollutants" as well. NEPA and CEQA require lead agencies to address environmental impacts, including health effects, in environmental impact analyses. Under CEQ's NEPA Implementing Regulations, "effects" include those on human health, whether direct, indirect or cumulative (40 CFR 1508.8). We recognize that "health risk assessments" per se are not specifically required by NEPA, but rather that a project's potential effects on health are relevant under NEPA, for example, in facilitating effective public disclosure of a project's reasonably foreseeable impacts and identifying mitigation for adverse effects.

- Recommendation: The FEIS/R and ROD should reflect the analysis and conclusions in Chapter 4.24.1, including an appropriate level of mitigation for projected or potential health effects.

Response:

The analysis of, and recommended mitigation measures for (including Master Plan Commitments), human health effects that were presented in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR will be integrated into the Final EIS/EIR. The Record of Decision (ROD) issued by the FAA will reflect the conclusion and mitigation measures, as appropriate.

AF00001-35

Comment:

Impact of Air Toxic Emissions on Children

Executive Order 13045 ("Protection of Children from Environmental Health Risks and Safety Risks") provides that Federal agencies shall ensure that their activities address disproportionate risks to children due to environmental health risks. The DEIS/R uses a one-mile radius for identifying community impacts, which may be arbitrary should it not accurately reflect potential risks or impacts to

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affected populations. However, even in a one-mile zone, the DEIS/R and HHRA do not address potential impacts associated with current operations at LAX and the project on 20 schools and 41 day-care centers within this area.

Response:

Please refer to Topical Response TR-HRA-1 for a discussion of the reevaluation of environmental baseline and to Section 4.24.1 of the Supplement to the Draft EIS/EIR for evaluation of human health risks, including risks to children, based on the revised environmental baseline.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed potential health risks and hazards associated with toxic air pollutant emissions in Section 4.24, Human Health and Safety, with supporting technical data and analyses provided in Technical Report 14 of the Draft EIS/EIR and Technical Report S-9 of the Supplement to the Draft EIS/EIR. These analysis specifically assessed possible impacts to children attending grade schools at locations where predicted impacts to air quality were predicted to be highest. The analysis was carried to the point geographically where incremental impacts could be regarded as negligible. Most of the toxic air pollutant emissions are generated at or near ground level. Therefore, maximum offsite impacts are expected to occur at the fence line. Emissions from LAX would be carried primarily to the east by prevailing winds. As TAPs move downwind, they would be diluted, photodegraded, and/or deposited so that air concentrations would eventually be reduced to negligible amounts. The health risk assessment assessed risks and hazards for locations throughout a large geographic area, extending into communities adjacent to, and north, east, and south of LAX. A Cartesian grid system was used for receptor grid spacing and varied in density as distance from the theme building increased. In addition to the receptor grid, specific receptor locations of regulatory and community concern were identified. These sensitive receptors included schools, hospitals, nursing homes, and day-care facilities. Pollutant concentrations were predicted at all sensitive receptor locations within a radius of 3 kilometers from the LAX theme building. Dispersion and air modeling results were used to identify specific locations representing the most impacted resident, school and worker locations for quantitative risk assessment. Additionally discrete receptors were placed at the deposition monitoring station and project air quality monitoring station locations. Model outputs included maximum one-hour concentrations for evaluation of short-term impacts from airport operations and annual average concentrations for evaluation of chronic health impacts from toxic air pollutants on and near the airport. Cumulative risks for maximally exposed adult and child residents, school children, and in-airport workers were estimated using maximum estimated chemical concentrations in air.

AF00001-36

Comment:

At the June 9, 2001 workshop (Inglewood session), an official of the Lennox elementary school district referenced a study by the UCLA School of Public Health which assessed rates of asthma and other illnesses among children in the Lennox school district, finding higher levels than state-wide averages for Lennox children in this age group. The school district contends that emissions from LAX are a causal link or contributing factor.

Response:

Please refer to Topical Responses TR-HRA-2 and TR-HRA-3, regarding airport emissions and link with adverse health effects and human health impacts, and to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR.

Children living near sources of toxic air pollutants such as freeways and airports may have an increased risk of health effects; however, the expansion of LAX would not increase health risks but through mitigation efforts the total amount of TAPs associated with operations will decrease, and therefore, the incremental impacts associated with expansion will likely be less than those associated with the No Action/No Project Alternative. Decreased emissions estimates are due primarily to increased efficiency of operations that decreases the amount of taxi and idle time for aircraft.

Observations collected during health fairs held at schools in the Lennox School District appear to be equivalent to the "UCLA School of Public Health Study" referred to by the Lennox School District Official. CMSA (Chicano/Latino Medical Student Association) from the UCLA School of Medicine began the Lennox Health Fairs in 1993 in response to the healthcare challenges this community faces. Lennox is a community of approximately 18,000 people located just east of the Los Angeles

International Airport and south of Inglewood. This community has the highest number of children living in poverty in the Los Angeles South Bay Area. Many of the Lennox residents are recent immigrants from Mexico, Guatemala, Nicaragua, El Salvador, and the Pacific Islands; 95 percent of the individuals who come to the health fairs are Spanish speaking only. The Lennox community as a whole is in great need of basic health services and health education.

Members of the CMSA are responsible for planning, coordinating, and running the health fairs, as well as getting supplies and recruiting physicians, nurses and other medical student volunteers needed for the health fairs in the Lennox School District. Two health fairs are held per year at different Lennox community schools. The health fairs transform the entire school into a one-day clinic. The goal of the Lennox Health Fair is to identify and refer for treatment individuals who may need medical or dental services. The fair also teaches local residents about proper health care, health habits, and preventing disease through vaccination and education. In addition, the fair provides children with appropriate role models.

Services provided at the health fairs include: physical examinations, immunizations, vision/hearing testing, glucose testing, hypertension screening, cholesterol testing, anemia testing, HIV education, mammography, prenatal care education, nutrition education, TB screening and education, dental screening and education, and urinalysis testing. Some of the major medical problems encountered at past health fairs included anemia, diabetes mellitus, hypertension, breast lumps, and poor vision.

The Lennox Health Fairs cannot provide any indication of cause and effect relationships. Simple observations of adverse effects cannot be used to establish a link between these effects and any source, including airport emissions. Given the inherent uncertainties associated with effects observed at Lennox Health Fairs and the difficulties posed in trying to tie observed effects to a cause, use of approved risk assessment methodologies is the most appropriate way to evaluate potential health impacts associated with LAX emissions. The Health Fairs are volunteer programs with ad hoc participation/attendance and do not appear to be carried out with the intent to answer questions such as "what is the rate of asthma at this school as compared to other area schools."

AF00001-37

Comment:

- Recommendation: The FEIS/R should justify the one-mile zone for identifying impacts to communities or expand the one-mile boundary, as appropriate. The extent to which these impacts are borne primarily by low-income and minority populations should be addressed in the FEIS/R. The FEIS/R should identify the number of children in this one-mile zone who may be adversely affected, and discuss pertinent studies or data regarding health effects on children at these schools and day-care facilities from current LAX operations or this project.

Response:

Regarding identification of impacts to low-income and minority populations, please refer to Topical Response TR-EJ-1. The Draft EIS/EIR identified maximally exposed individuals (MEI) and sensitive subpopulations, including children in day care centers, preschools, and schools within one mile of the LAX fence line. Risks and hazards to MEI and specific sensitive subpopulations (i.e., school children and children in residential areas) were assessed quantitatively. Methods to estimate exposures and risks for these populations are well defined in guidance. Methods to separately assess exposures and risks for populations in hospitals, nursing homes, and retirement communities have not been defined in guidance. Instead, toxicity criteria (cancer slope factors and reference doses) are defined by CalEPA or USEPA to be protective for sensitive subpopulations of people. Therefore, if these toxicity criteria provide protection for the MEI, sensitive subpopulations should also be protected. Children in day care centers and preschools were not separately evaluated because children in this age range were evaluated as residents living immediately adjacent to the airport. When these children are protected, children in day cares and preschools close to LAX, who spend only part of their day at the school in these locations, will also be protected. Oak Street Elementary and Escuela de Montessori were identified as the schools where the highest concentrations of TAPs released from LAX were predicted; risks and hazards to the school children were evaluated quantitatively.

Although the initial screening risk assessment evaluated MEI and specific sensitive subpopulations within one mile of the LAX fence line, the study area evaluated in the risk assessment for the Draft

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EIS/EIR consisted of a much larger area. The study area to be used in the geographic description of risks was initially defined in the screening assessment. An elliptical area extending 2 km (1.25 mi.) north and south, and 4 km (2.5 mi.) east of the current LAX fence line for the No Action/No Project Alternative was selected as the preliminary study area in the screening level assessment (Attachment B, Screening Level Human Health Risk Assessment). During the risk characterization, it became apparent that the preliminary study area would not include all areas in which cancer risk estimates exceed 10 in one million for the No Action/No Project Alternative. The study area was therefore enlarged to capture all risks above 10 in one million, which added a substantial additional area east of the airport.

For the geographic depiction of risks, estimates of risk and hazard were calculated for each grid node in the air dispersion modeling domain and these estimates were used to generate contours of risks and hazards for communities surrounding LAX. This presentation of risks allows visualization of the area of potential impact and provides a frame of reference for evaluating MEI. Risk analyses are carried to the point geographically where incremental impacts can be regarded as negligible.

We are unaware of any studies or data regarding health effects on children at schools and day-care facilities from current LAX operations. In addition, please refer to Section 4.24.1 of the Supplement to the Draft EIS/EIR which provided an evaluation of risks by community boundary or location.

AF00001-38

Comment:

Potential Effects of Criteria and Toxic Air Pollutants

The DEIS/R addresses criteria pollutants (Chapter 4.6) separately from toxic air pollutants (Chapter 4.24). Of major concern to EPA is a lack of discussion in the DEIS/R on the (potential) interaction between toxic air contaminants (hazardous air pollutants) and criteria air pollutants (e.g., ozone, CO, PM10, NO2) on human health, especially children. This is an important consideration to portray for existing conditions, No Action, and the build alternatives.

- Recommendation: The FEIS/R should address whether these two separate analyses may not accurately depict potential cumulative health risks to affected populations, with particular focus on children's health and health issues for the low-income and minority communities that page ES-46 admits are disproportionately affected by aircraft noise, and potentially for air quality and health effects.

Response:

Criteria pollutants and toxic air pollutants (TAP) are monitored and regulated differently by the federal and state Clean Air Acts (CAA) and other laws (SCAQMD 2002). The Draft EIS/EIR evaluated criteria pollutants and TAP separately based on these differences in regulation as well as the different thresholds that are used to evaluate significant effects for criteria pollutants and TAP.

Criteria pollutants are those pollutants regulated by USEPA or CARB through the use of ambient air quality standards (AAQS), as required by the CAA. These standards have been set at levels to protect human health (primary standard) for even the most sensitive individuals. Currently, attainment of AAQS, even when multiple criteria pollutants are present, is generally considered sufficient to protect human health. NEPA and CEQA thresholds of significance and AAAQS were used in the Air Quality Assessment section of the Draft EIS/EIR to evaluate impacts associated with criteria pollutants. California has a State Implementation Plan (SIP) that provides an attainment strategy to reduce criteria pollutant concentrations to acceptable levels. The Clean Air Act, Section 176, requires that federal actions conform to applicable SIP.

Criteria pollutants evaluated in the Draft EIS/EIR consist of sulfur dioxide (SO2), carbon monoxide (CO), fine particulate matter (PM10), nitrogen dioxide (NO2), and ozone (O3). Criteria pollutant concentrations that exceed AAQS may indicate a potential health risk or hazard. AAQS for these pollutants are based on protection from acute toxicity that may be caused by inhalation exposure. Any potential impacts from criteria pollutants are governed under the CAA. Impacts associated with criteria pollutants are addressed through mitigation strategies that are intended to meet attainment within the air quality management district, as defined in the SIP. The preferred alternative will be evaluated to determine whether it complies with the SIP. Similarly, impacts associated with TAP are addressed

under the state's air toxics program and mitigation measures will be defined in the Final EIS/EIR to address these impacts. Because sources of criteria pollutants and TAPs are very similar, mitigation measures that reduce emissions of the former will also cause reduction in emissions of the latter.

TAP are air pollutants that may pose a potential hazard to human health; however, AAQS and emission control standards have not been established for nearly all of these chemicals. Moreover, many TAPs are "of concern" at levels far below those that cause acute toxic effects. For these chemicals, levels that are considered safe for long-term exposures will also be protective for the short-term. California regulates TAP through its air toxics program. TAP are evaluated using risk assessment; estimated risks and hazards are compared to cancer and hazard thresholds to determine whether an impact is significant. Inclusion of criteria pollutants in the TAP risk assessment process is problematic at this time, since chronic toxicity criteria for these pollutants are not available, and no accepted means to combine acute and chronic effects has been devised.

Section 7.4, Interactions Among Acrolein and Criteria Pollutants, of Technical Report S-9a of the Supplement to the Draft EIS/EIR contains additional discussion of potential health effects associated with exposure to criteria pollutants as well as the potential interaction between TAP and criteria pollutants. The discussion indicated that the five criteria pollutants, SO₂, CO, PM₁₀, NO₂, and O₃, are not considered carcinogens, and have not been considered harmful at levels below AAQS, even for prolonged exposure. Therefore, carcinogenic risks and chronic non-cancer health hazards were unlikely to be underestimated as a result of the separate analysis for the two groups. In addition, the Supplement to the Draft EIS/EIR provided an analysis of acute systemic effects from exposure to TAP and criteria pollutants, as discussed below.

The noncarcinogenic TAP of greatest concern in emissions from LAX is acrolein, which is responsible for almost all chronic non-cancer hazard (i.e., more than 95 percent of total chronic hazard index for all alternatives). Acrolein is a respiratory irritant, as are some of the criteria pollutants (i.e., SO₂, PM₁₀, NO₂, and O₃), and may cause irritation at low concentrations in air. Thus, acrolein will be the major, or even the only, TAP that will be important to consider for acute health impacts. An acute REL has been developed for acrolein. AAQS for SO₂, CO, NO₂, and O₃ were adopted as acute RELs (OEHHA, 1999). Availability of criteria for assessing acute effects for all of these pollutants will allow a more quantitative analysis of the potential for acute impacts.

An analysis using acute RELs is health protective because RELs are intended to protect individuals, even sensitive subpopulations (high risk individuals), from adverse health effects. Highly susceptible or sensitive individuals may include those with increased exposure (e.g., children, adults engaged in physical activity), those undergoing greater physiological change (e.g., children, pregnant women and their fetuses), individuals with impaired physiological conditions (e.g., elderly persons, persons with existing diseases), and individuals with lower levels of protective biological mechanisms due to genetic variability within the population (OEHHA, 2000). AAQS are also established to protect the most sensitive individuals.

Additive acute impacts between acrolein and criteria pollutants that irritate the respiratory system are theoretically possible, and the potential for this interaction will be discussed. Several uncertainties associated with the assumption of additive acute impacts will be included in the discussion. Simultaneous exposures to more than one chemical may cause effects that are equal to, less than, or greater than predicted from effects observed with exposures to individual chemicals. Of the thousands of potential combinations of chemicals in common use, only a small fraction have been tested for the potential that combined exposures could have synergistic or antagonistic properties. The effects of multiple chemical exposures on human health remain an area for future study (OEHHA, 2000).

In addition, noncancer hazard estimates for acrolein (chronic or acute) are uncertain because of the paucity of data on acrolein emissions from jet aircraft engines. Dependence on regulatory databases with estimated acrolein emissions may have substantially overestimated possible releases of acrolein during LAX operations. Some additional information on possible acrolein emissions will be provided in the Supplement to the Draft EIS/EIR. Further, acrolein is not generally recognized as a significant TAP in the South Coast Air Basin, was not addressed in the multiple air toxics exposure study-II (MATES-II) conducted by the South Coast Air Quality Management District (SCAQMD), and is not regularly monitored by any agency in ambient air within the basin.

OEHHA. 2000. Air Toxics Hot Spots Program. Risk Assessment Guidelines. Part III, Technical Support Document for the Determination of Noncancer Chronic Reference Exposure Levels.

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OEHHA. 1999. Air Toxics Hot Spots Program. Risk Assessment Guidelines. Part I, The Determination of Acute Reference Exposure Levels for Airborne Toxicants.

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Comment:

Mitigation for Air Toxic Impacts

Page 4-1000 states, "Under all build alternatives, with implementation of potential mitigation options, some areas immediately east of LAX would experience a slight increase in potential cancer risk and non-cancer hazard; however, anticipated increases would be less than established thresholds of significance."

- Recommendation: The FEIS/R should quantify the extent to which these areas are subject to anticipated increases under the action alternatives, and address feasible mitigation to address such increases. The approach to identify mitigation measures should be consistent with U.S. DOT's environmental justice strategy, since many or most individuals potentially affected would be low-income and/or minority.

Response:

Please refer to TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities.

Mitigation measures currently proposed differ from those under consideration during the preparation of the Draft EIS/EIR. Recommended mitigation measures were identified in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, to reduce impacts from airport operations and construction as well as from regional vehicular traffic under Alternatives A, B, C, and D. These recommended mitigation measures would also reduce impacts to human health associated with exposure to TAPs. The following mitigation measures considered in the analysis include: continued conversion of GSE to alternative fuels, multiple construction-related measures including use of alternative fuels and add-on emission control devices on construction equipment, and expansion of flyaway bus service between LAX and other locations in the South Coast Air Basin using alternative-fueled buses. These measures, in combination with other proposed mitigation measures, would reduce emissions of TAPS during LAX operations and construction primarily by reducing exhaust emissions from mobile sources and reducing traffic congestion near the airport.

All post-mitigation analyses were revised since publication of the Draft EIS/EIR and were presented in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.9, Level of Significance after Mitigation), of the Supplement to the Draft EIS/EIR. As summarized on Table S4.24.1-5, Summary of Incremental Cancer Risks and Incremental Non-Cancer Chronic Human Health Hazards for the LAX Master Plan Post-Mitigation Assessment, in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR, incremental cancer risks for all build alternatives would be less than significant under mitigation conditions in horizon year 2015. Incremental non-cancer chronic health hazards would be significant in horizon year 2015 under mitigation conditions for Alternatives B and C and less than significant for Alternative A. With mitigation, implementation of Alternative D is predicted to result in a beneficial impact for non-cancer chronic hazards. Please refer to figures presenting the geographical extent of incremental cancer risks and health hazards under post mitigation conditions in 2015 for Alternatives A, B, C and D in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR which show levels of significance for areas in the vicinity of the airport. By comparing post mitigation figures to pre-mitigation figures in this document, the extent and effect of recommended mitigation measures on total incremental cancer risk and total incremental non-cancer hazards for areas within the study area is easily seen.

AF00001-40

Comment:

Hazard Ranking Index

The DEIS/R uses a hazard ranking index (HRI) of five or greater as the threshold for significance for health impacts due to toxic air pollutants.

- Recommendation: The FEIS/R should clarify why an HRI of five was used to determine levels of significance for toxic air pollutants.

Response:

Thresholds of significance are quantitative or qualitative measures used to determine whether an environmental effect of a project (e.g., potential risks) would be considered significant. Where possible, validation of the choice of thresholds is provided by federal, state, and local guidelines, particularly the Guidelines for California Environmental Quality Act (State CEQA Guidelines) and related guidance and the Draft Los Angeles CEQA Thresholds Guide, published by the City of Los Angeles Environmental Affairs Department. For environmental disciplines mandated solely by NEPA, thresholds of significance are not included, as they are not required by NEPA. In lieu of federal thresholds, federal standards are used that are relevant to the analysis. These thresholds were subsequently revised and expanded in the Supplement to the Draft EIS/EIR (see Section 4.24.1).

Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.4.1, CEQA Thresholds of Significance), of the Draft EIS/EIR described selection of the cancer and non-cancer thresholds of significance. The threshold of significance for increased incremental cancer risk is 10 in one million. For non-cancer health effects, the threshold of significance is a total incremental chronic or acute hazard index of 5. These thresholds of significance were selected based on South Coast Air Quality Management District (SCAQMD) policies. No regulations exist that establish thresholds of significance for an entire facility such as LAX. The thresholds selected are consistent with the SCAQMD CEQA Handbook (1993) for assessing impacts of new developments as well as recent, publicly available correspondence from SCAQMD.

The SCAQMD Rule 1401 (g)(3) allows for selection of alternate hazard index levels, not to exceed 10. Rule 1402, which is for existing sources and more pertinent to the evaluation at hand, identifies a significant risk level of 5 for total acute and chronic hazard indices. The SCAQMD 1997 Air Quality Management Plan Draft EIR, Chapter 4 - Potential Environmental Impacts and Mitigation Measures, Subchapter 4.4 - Hazard/Human Health Impacts, identifies a threshold of significance for noncancer effects of 5.

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Comment:

ENVIRONMENTAL JUSTICE

Department of Transportation's Final Order on Environmental Justice

The U.S. Department of Transportation's (U.S. DOT) final order on environmental justice (see Federal Register, April 15, 1997, at pp. 18377-18381) identifies the steps that should be taken U.S. DOT and its modal administrations if a disproportionately high, adverse human health or environmental effect on minority or low-income populations is identified, as in this DEIS/R (p. ES-46). U.S. DOT's final order requires that responsible DOT officials

"will ensure that any of their respective...activities that will have a disproportionately high and adverse effect on minority populations or low-income populations will only be carried out if further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effects are not practicable. In determining whether a mitigation measure or an alternative is 'practicable,' the social, economic (including costs) and environmental effects of avoiding or mitigating the adverse effects will be taken into account." (see paragraph 8c of U.S. DOT's final order).

- Recommendation: The FEIS/R should address the recognized disproportionate effects within the framework of U.S. DOT's final order. The FEIS/R should address if, absent a rigorous analysis of non-LAX action alternatives (outlined below), FAA can determine that disproportionate effects are avoided or minimized to the fullest extent practicable.

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Response:

With consideration of LAWA Staff's new preferred alternative, Alternative D, which limits growth at LAX to levels similar to what would occur under the No Action/No Project Alternative, and of LAWA's Environmental Justice Program as defined in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR and Final EIS/EIR, disproportionate effects on minority and/or low-income communities have been avoided, minimized or offset to the fullest extent practicable within the framework of DOT's final order. Also, please see Topical Response TR-EJ-3 regarding environmental justice and regional context.

AF00001-42

Comment:

Council on Environmental Quality's Guidance on Environmental Justice and NEPA

The DEIS/R does not reflect consistency with guidance issued by the Council on Environmental Quality ("Environmental Justice Under the National Environmental Policy Act," CEQ, 1997). CEQ instructs Federal agencies that "mitigation measures identified in an EIS...should reflect the needs and preferences of affected low-income populations (and) minority populations...to the extent practicable." The DEIS/R indicates that mitigation for environmental justice-related impacts (e.g., Environmental Justice Action Plan) has not been determined "pending mitigation program development." Thus, the DEIS/R does not necessarily reflect the "needs and preferences" of low-income and minority communities disproportionately and adversely affected by LAX and/or those who may be so affected under the proposed alternatives or even under No Action. We note a serious level of public concern about daily operations at LAX, and this project, that was expressed by affected residents at the June 9, 2001 Inglewood workshop. We are willing to assist FAA in identifying and developing mitigation such as the Environmental Justice Action Plan, which should be developed in close coordination with affected local communities, in keeping with the Council on Environmental Quality's guidance on environmental justice under NEPA.

- Recommendation: The FEIS/R should address the project's consistency with CEQ's guidance on environmental justice under NEPA, including appropriate commitments in the ROD.

Response:

The reason the Draft EIS/EIR did not include a program with mitigation measures and benefits fully reflective of community input was because the preliminary findings on environmental justice were not known until the document was finalized. It was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected communities and their representatives.

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR. As reflected above, an extensive outreach program was undertaken in association with the project as part of the Environmental Justice Program, consistent with the Council on Environmental Quality's guidance on environmental justice under NEPA. Also, please see TR-EJ-2 regarding environmental justice-related mitigation and benefits.

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Comment:

Assessment of Air Quality-Related Environmental Justice Impacts

Page ES-46 recognizes "disproportionately high and significant adverse human health and environmental impacts on minority and low-income communities due to aircraft noise," and "potential disproportionate impacts associated with air quality and health effects." Although we commend FAA's candor in acknowledging this, we are very concerned about the project in terms of environmental justice. The DEIS/R recognizes "potential disproportionate impacts associated with air quality and health effects." (underline added). However, our review leads to a concern that the project's air quality effects may pose a likelihood of disproportionately high, adverse effects on low-income and minority populations. We believe this is supported by the following: (1) projected NAAQS violations under No Action and the three action alternatives; (2) a possibility that emissions may be underestimated; (3) the HHRA did not evaluate impacts of toxic air pollutants (p. 4-999); (4) the results on carcinogenic risk from toxic particulate emissions are unavailable until 2002 (p. 4-1008); and (5) major uncertainty that mitigation can reduce projected air quality effects to less than significance.

- Recommendation: Based upon an evaluation of factors (1) to (5) immediately above, the FEIS/R should re-examine if existing operations at LAX or this project pose potential or actual disproportionately high, adverse effects on low-income and minority communities due to air quality and health effects, and, as needed, include appropriate commitments in the ROD.

Response:

The analysis in the Supplement to the Draft EIS/EIR addressed the noise and air quality impacts including toxic air pollutants (TAPs). The final Environmental Justice Program for the low-income and minority communities is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR and includes the provision for air toxic/health risk studies. Please see Topical Response TR-EJ-2 for a description of the Environmental Justice Program and Benefits and Topical Response TR-EJ-1 regarding the understating of improvements to be made to LAX for the proposed alternatives. Noise and air quality mitigation measures were provided in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR. Toxic air pollutants are also addressed in Technical Report S-9a of the Supplement to the Draft EIS/EIR. Finally, please see Topical Response TR-AQ-3 regarding the air pollution increase and Topical Response TR-AQ-2 regarding air toxics.

AF00001-44

Comment:

NOISE

Disclosure of Impacts from Aircraft Noise

It is critical that basic data in an EIS be internally consistent and, when data is inconsistent, that there be a brief discussion explaining any inconsistencies. The operational forecasts presented in the DEIS/R are significantly below FAA's current Terminal Area Forecasts. The DEIS/R contains no supporting documentation for the lower numbers presented in the DEIS/R, although FAA's guidance recommends this type of documentation when differences exceed 10%. We find significant differences between FAA's current Terminal Area Forecast and the EIS's forecasts for 2005 and 2015. Page 2-4 presents a discussion of FAA's Terminal Area Forecast, but references operational numbers from FAA's 1998 Terminal Area Forecast. The rationale seems to be that since preparation of the DEIS/R began in 1998, it is appropriate to use 1998 forecasts. While this appears to be a consistent process, the outcome is a DEIS/R that assesses potential impacts (and develops mitigation) based on data that is not the latest and best available. A review of FAA's previous forecasts indicates that aircraft operations continue to increase with each revised forecast.

Response:

The commentor is correct in observing the operational forecasts for each alternative presented in the Draft EIS/EIR are significantly below the Federal Aviation Administration's (FAA) Terminal Area

3. Comments and Responses

Forecast (TAF). The discrepancy between the two forecasts arises from the use of a constrained forecast for each alternative's operational forecast as opposed to an unconstrained forecast for the TAF prepared by FAA. A constrained forecast contemplates that certain facility and/or airspace improvements will not occur, while an unconstrained forecast assumes that all required facility or airspace improvements will be made. Thus, a constrained forecast is lower than an unconstrained forecast because airport capacity is less under a constrained forecast. Please see Section 2.2.1.3 of the Draft EIS/EIR for a more detailed explanation. The development of the constrained forecast for each alternative used in the Draft EIS/EIR is presented in Section 3.3.2 of the Draft LAX Master Plan. Please also see Sections 3.2.4 through 3.2.7 of the Draft EIS/EIR for a more detailed description of improvements for Alternative A, B, and C.

The reference to 1998 TAF in the Draft EIS/EIR is reasonable since the 1998 TAF was the latest and best available at the time when the Draft EIS/EIR was prepared.

AF00001-45

Comment:

A complicating factor is the use of "constrained" and "unconstrained" forecasts (p. ES-9). Page 2-6 discusses constraints that limit existing capacity and the specific use of unconstrained forecasts in Tables 3-1 and 3-2. The DEIS/R's unconstrained forecasts are significantly higher than forecasts used for assessing environmental impacts. The question of what operational forecast is valid (1997 LAX Master Plan, unconstrained forecast, 1998 FAA Terminal Area Forecast, or 2001 FAA Terminal Area Forecast) consequently affects the reliability of the environmental effects analysis. For example, FAA's current Terminal Area Forecast shows 889,665 aircraft operations in 2005 and 1,111,086 aircraft operations in 2015. The DEIS/R uses 784,604 total aircraft operations for 2005 (Alternative C) and 797,249 total aircraft operations for 2015.

Response:

All of the operational forecasts (Master Plan unconstrained and unconstrained forecasts, 1998 and 2001 FAA TAF) are valid forecasts. The LAX Master Plan unconstrained demand forecast was developed and used to determine the facility requirements for LAX. It assumes that all facilities would be provided to serve the market demand. Upon completion of the 2nd iteration of Master Plan alternatives (alternatives that would meet the unconstrained forecast demand) the alternatives were reevaluated, and higher priority was placed on environmental and community objectives over economic and air service objectives. The re-weighting of priorities resulted in "constrained" Master Plan alternatives with constrained activity forecasts because none of the alternatives have sufficient capacity to meet the Master Plan unconstrained forecast demand in 2015 without changes in the activity profiles. The Master Plan alternatives, thus, were designed to maximize the amount of traffic that could be served in the limited space available which in the case of Alternative C, would be 784,604 total aircraft operations in 2005 and 797,249 total aircraft operations in 2015. Please see Section 3.3.2 of the Master Plan for a detailed discussion on development of the constrained forecast for Alternative A, B, and C.

The LAX Master Plan unconstrained forecast and annual FAA Terminal Area Forecasts are unconstrained forecasts and vary in results because of differences in the purpose and scope of the forecast and/or the approach and assumptions. The higher projected MAP in the 1998 FAA forecast than the Master Plan unconstrained forecast is attributed to the straight line forecast methodology used by the FAA. Please see Sections 2.2.3.1, 2.2.1.4 and 2.2.1.5 in the Draft EIS/EIR.

Following the publication of the Draft EIS/EIR, LAWA developed a new alternative that, consistent with public comments calling for a regional approach alternative, is designed to accommodate passenger and cargo activity at LAX that would approximate those of the No Action/No Project Alternative, has fewer environmental impacts, and improves airport safety and security. Assumptions about air service changes associated with Alternative D are described in the Draft Master Plan Addendum, Section 3.3.3, page 3-6.

Alternative D further constrains LAX capacity resulting in the lowest forecast annual passenger total in 2015 among the build alternatives. 784,126 annual operations are forecast for 2015 if the components of Alternative D were constructed. Please see Chapter 3 of the Draft Master Plan Addendum for a detailed description of Alternative D Constrained Activity.

AF00001-46

Comment:

There are numerous data inconsistencies in the DEIS/R. For example, Table 3-2 shows that 2015 Alternative C total aircraft operations as 797,249. Average annual daily aircraft operations would be 2,184 (797,249 divided by 365 days). Table 29, Appendix D, shows 2015 average annual day operations as 2,145. On page 55 of Appendix D, a bracketed sentence shows the 2015 average annual day operations at 2,141, with 814 attributed to average day heavy jet operations. Tabulating the heavy jet operations listed in Table 29, it shows 816 operations, rather than the 814 figure given on page 55 of Appendix D. While it is understandable that, in the process of analysis, there will be a refinement of data, it is important that, when this refinement occurs, the data throughout the DEIS/R should be updated and internally consistent.

Response:

The methodology the commentor used to verify data is inconsistent with the methodology used in the Draft EIS/EIR or Supplement to the Draft EIS/EIR. Please reference Table 3-2, Summary of Activity by Alternatives-2015, in the Draft EIS/EIR. 2015, Alternative C, Total Average Annual Daily Aircraft operations would not be 2,184 (797,249 divided by 365 days). The commentor did not subtract Annual Cancellations (797,249-15,814/365), which provides a total of 2,141. This is the number that the commentor refers to in the bracketed sentence on page 55 of Appendix D, Aircraft Noise Technical Report. Table 29, 2015 Average Annual Day Operations and Fleet Mix Alternative C, in Appendix D, Aircraft Noise Technical Report, shows 2015 average annual day operations as 2,145. It is also footnoted that totals may not add to 100 percent due to rounding. Additionally, please see Table S3-1, Summary of Activity by Alternative-2015, in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR, which numbers have been revised since publication of the Draft EIS/EIR.

Table 29, 2015 Average Annual Day Operations and Fleet Mix Alternative C, in Appendix D, Aircraft Noise Technical Report, shows 816 heavy jet operations, rather than the 814 heavy jet operations. This discrepancy is due to rounding.

AF00001-47

Comment:

- Recommendation: The difference between operational forecasts used in the DEIS/R and Terminal Area Forecasts should be addressed in the FEIS/R since other impacts (e.g., aircraft noise exposure, aircraft/ground traffic emissions, health effects due to air pollutants) are linked to operational forecasts. The FEIS/R should address the consistency of the forecasts with FAA's guidance. The FEIS/R should discuss FAA's recent Airport Capacity Benchmark Report 2001 and its relationship to forecasts used in this DEIS/R.

Response:

Please see Responses to Comments AF00001-44, AF00001-45, and AF00001-46.

The differences between the Master Plan operational forecasts and Terminal Area Forecasts are addressed in the preceding Responses to Comments as the commentor has recommended. In addition, the Draft EIS/EIR addressed the difference between the Master Plan unconstrained forecast and 1998 Terminal Area Forecast (TAF) in Section 2.2.1.3. To follow the set guidelines evaluating reasonable alternatives in the Council on Environmental Quality (CEQ) and the California Environmental Quality Act (CEQA) the constrained activity forecast was used in the Draft EIS/EIR to address potential environmental impacts. Please see Section 3 of the Draft EIS/EIR.

The projected demand growth in the 2001 FAA Airport Capacity Benchmark Report is consistent with the 2000 TAF since it was the latest TAF available at the time when the benchmark reports were prepared.

3. Comments and Responses

AF00001-48

Comment:

Disproportionately High, Adverse Effects from Aircraft Noise

The DEIS/R documents how noise impacts due to existing aircraft operations at LAX have a disproportionately high, significant and adverse effect on low-income and minority populations (e.g., pp. ES-46, 4-411 and 4-412). Although a significant amount of public funds have been expended to mitigate adverse noise effects through soundproofing, a large number of affected residents continue to be adversely affected by jet noise. Page 4-412 estimates that more than 80% of residents adversely affected by aircraft noise at LAX are low-income or minority. Many residents of Inglewood who spoke at the June 9, 2001 workshop expressed their concerns about adverse noise effects, and most of these individuals were from minority populations, principally African-American.

Response:

Comment noted. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR identify disproportionately high impacts on low-income and minority populations related to noise in Section 4.4.3, Environmental Justice.

AF00001-49

Comment:

The noise analysis forecasts the No Action noise contours in 2005 and 2015, and compares the exposures within those contours with exposures projected to occur under Alternative C in 2005 and 2015. It is forecast that 980 additional residents in 2005 (49,980 Alternative C - 49,000 No Action) will be exposed to noise to levels of 65 decibels or greater. In 2015, the difference between No Build and Alternative C is projected to be 230 residents (44,580 Alternative C - 44,330 No Action). In both cases (No Action and Alternative C), there is a significant population already living in areas not compatible with residential use, and that the affected population increases with the Proposed Action.

EPA is concerned that the DEIS/R lacks a clear commitment to implement measures to adequately mitigate noise impacts associated with this project. The "Federal Agency Review of Selected Airport Noise Analysis Issues," Federal Interagency Committee on Noise (FICON - 1992), indicates that "Levels between DNL 65 and 75 dB are considered incompatible with residential or school land uses unless measures are taken to achieve additional noise reduction levels," see page 3-20 of the FICON report). Given the adverse effects due to aircraft noise projected to occur under this project, we recommend that the FEIS/R evaluate the feasibility of a residential acquisition program for residents in the 70 and 75 Day-Night Average Sound Level (DNL) noise contours. A residential acquisition program for residents in the 70 and 75 DNL noise contours should involve affected community members, as well as local officials, in a process that is well-publicized and accessible for the greatest number of residents adversely affected by aircraft noise. A residential acquisition program for residents in the 70 and 75 DNL noise contours should be voluntary (i.e., no involuntary relocations). While it is preferable that non-compatible uses not be within the 65 DNL noise contour, a clear commitment by FAA for acoustical treatment of residences in the 65 DNL contour provides a level of mitigation for indoor noise levels. A valuable reference for facilitating effective public participation is found in CEQ's guidance on environmental justice and NEPA (at III(C)(2), Public Participation, p. 13 of CEQ's guidance).

Additionally, due to major uncertainties in forecasting aircraft operations, we recommend that this project's noise mitigation include certain adaptive features. For example, FAA could commit to conduct noise modeling based on actual operational data one year after the runway elements of this project are completed. This would provide a more accurate measure of aircraft-related noise impacts and identification of noise mitigation for implementation. Future noise modeling could be undertaken when actual operational data indicates that noise contours may have changed to the extent that additional noise mitigation is needed or appropriate.

- Recommendation: An evaluation of the feasibility of specific residential acquisition (for residents in the 70 and 75 DNL contours) and acoustical treatment programs (for residents in the 65 DNL contour) should be analyzed in the FEIS/R and, as appropriate, appropriate commitments included in FAA's

ROD. Any program for residential acquisition should be based on an open, participatory process involving affected residents. The noise mitigation program should include certain adaptive features.

Response:

The above information comparing Alternative C with the No Action/No Project Alternative appears to be based on Table 4.1-19 of the Draft EIS/EIR. Therefore the following clarification to the referenced information is provided. Table 4.1-19 indicates a population of 41,980 residents under Alternative C within the 65 decibels (CNEL) or greater contour and 42,910 residents under the No Action/No Project Alternative in 2005. This results in an overall reduction of 930 residents exposed to the 65 CNEL under Alternative C, compared to the No Action/No Project Alternative in 2005. The reference to 49,980 residents under Alternative C that would be exposed to noise levels of 65 CNEL or greater in 2005 was incorrectly identified in Table 4.1-16 of the Draft EIS/EIR.

Section 4.2.2 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR acknowledged that residential and school uses within the 65 CNEL or greater noise contour are incompatible. A clear commitment to mitigate noise impacts through acoustical treatment or acquisition was provided in the Supplement to the Draft EIS/EIR by revised mitigation measure MM-LU-1, which encourages LAWA to work with other jurisdictions to accelerate the current ANMP. In addition, new mitigation measures MM-LU-2 through MM-LU-5, addressed single event noise levels and noise monitoring. These mitigation measures were presented in their entirety in subsection 4.2.8 of the Supplement to the Draft EIS/EIR. (See also Topical Response TR-LU-5 for additional discussion of noise mitigation.) Regarding residential acquisition within the 70 to 75 CNEL, the primary and preferred method of achieving land use compatibility in the City of Los Angeles, County of Los Angeles, and El Segundo is through residential sound insulation. However, as described in subsection 4.2.3 of the Draft EIS/EIR, under a separate program from the LAX Master Plan, a voluntary acquisition program is currently being implemented by LAWA for the Manchester Square and Belford areas. The Voluntary Residential Acquisition/Relocation Program for the Manchester Square and Belford areas was established based on interest from homeowners and residents who requested that LAWA purchase their property in lieu of soundproofing. If similar interest is expressed in a well defined area that is subject to high noise levels, LAWA would consider the feasibility of additional acquisition programs as allowed for under the ANMP. In addition, Inglewood has historically achieved land use compatibility through recycling. Under Inglewood's Redevelopment Plan for the La Cienega Redevelopment area, North Inglewood Industrial Park Project area, and Century Redevelopment area, acquisition of incompatible residential uses is currently underway. Areas within the La Cienega Redevelopment area are within the 70 to 75 CNEL, based on 1996 baseline and Year 2000 conditions. In addition, Inglewood's Draft Housing Element states that the Century Redevelopment area may be expanded in the future to include more noise-impacted areas south of Century Boulevard.

Regarding noise modeling based on actual operational data one year after the runway elements of the project are complete, this is clarified in Mitigation Measure MM-LU-1 of the Final EIS/EIR, as derived from MM-LU-1 of the Supplement to the Draft EIS/EIR. Actual adjustments to the ANMP contour would be based on measured data presented in on-going quarterly reports prepared by LAWA and submitted to Caltrans and the County of Los Angeles. In addition, the Supplement to the Draft EIS/EIR included new Mitigation Measure MM-LU-5 that would upgrade and expand the current noise monitoring program.

Under Alternatives C and D, the number of dwelling units within the 70 and 75 CNEL contours would decrease compared to 1996 baseline and Year 2000 conditions. As presented in Table 56 in Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR, under Alternative C in 2015, 3,127 dwelling units would be located within the 70 and 75 CNEL contours. As presented in Table S49 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, under Alternative D, 2,387 dwelling units would be located within the 70 and 75 CNEL contours. This compares to 4,236 dwelling units within the 70 and 75 CNEL under 1996 baseline conditions and 4,530 dwelling units within the 70 and 75 CNEL under Year 2000 conditions. (See Table 13 of the Land Use Technical Report of the Draft EIS/EIR and Table S3 of the Supplemental Land Use Technical Report of the Supplement to the Draft EIS/EIR.)

In summary, the recommendations for residential acquisition, acoustical treatment, and future noise monitoring are considered in Mitigation Measure MM-LU-1.

3. Comments and Responses

AF00001-50

Comment:

CUMULATIVE IMPACTS

We find several sections where the EIS's analysis of cumulative impacts should be modified in the FEIS/R.

Response:

Please see Responses to Comments AF00001-51 through AF00001-55 below.

AF00001-51

Comment:

The first area is the cumulative contribution of emissions from LAX (criteria pollutants and air toxics) to the South Coast Air Basin's air quality and the health of residents, both those residing near the airport and those within the larger air basin. As noted in our comment on Potential Effects of Criteria and Toxic Air Pollutants, the DEIS/R analyzes criteria air pollutants separately from air toxics.

Response:

The California Air Resources Board (ARB) released a Neighborhood Assessment Program Work Plan in June 2000. This document recognized that, "from an air quality perspective, evaluating environmental justice issues and identifying differences in impacts among communities will require determining cumulative exposures, which is a technically difficult task." As stated in the work plan, no clear guidance exists as to how to assess air pollution impacts at the neighborhood-scale. One of the objectives of ARB's work plan is to develop guidelines, including technical protocols and methodologies, for conducting neighborhood impact assessments.

In addition, ARB released its "Policies and Actions for Environmental Justice" in December 2001. This document highlights the need to develop technical tools for performing assessments of cumulative emissions, exposure, and health risk on a neighborhood scale. The California EPA Advisory Committee on Environmental Justice met in June 2002 to discuss elements of its Environmental Justice Strategy. One of the elements discussed was the need for research and data collection on cumulative impact assessments. The Neighborhood Assessment Program (NAP) includes the development of tools that can be used to perform assessments of cumulative air pollution on a neighborhood scale. NAP studies are currently being conducted to better understand air quality problems facing low-income, minority communities.

Thus far, ARB has conducted neighborhood scale risk assessments for Wilmington (Los Angeles County) and Barrio Logan (San Diego). Based on these prototypes, ARB is collecting data and developing a modeling protocol that could be used to assess cumulative impacts in other locations. As they become available, the ARB, local air districts, environmental groups, community activists, affected industries and others will be able to use the tools to support evaluations of neighborhood air pollution impacts and reduction strategies.

Given the recognized difficulties and tools available for evaluation of cumulative risk, both within groups of chemicals that have common mechanisms of toxicity and within populations with differential health status and health care availability, the approach provided in the Draft EIS/EIR is appropriate. "LAWA will work in cooperation with the affected communities and appropriate regulatory agencies to support and participate in long-term studies that would contribute to an understanding of these types of environmental impacts." In addition, toxicity criteria used in the Draft EIS/EIR incorporates conservative assumptions designed to protect sensitive individuals.

The Draft EIS/EIR presented an analysis of cumulative health risks for cancer using results of the South Coast Air Quality Management District (SCAQMD) Multiple Air Toxics Exposure Study (MATES-II Study). This study provided estimates of cancer risks due to Toxic Air Pollutants (TAPs) in ambient air for the entire South Coast Air Basin. Thirty TAPs were monitored and evaluated in the MATES-II Study for their contribution to excess lifetime cancer risk within the general population living in the South Coast

Air Basin. Risks calculated in the study were based on data collected from April 1998 through March 1999. This study integrated impacts from freeway systems along with all other sources of toxic air pollutants in the region. The study concludes that the current excess population cancer risk resulting from exposure to TAPs is about 1,400 in one million (1.4×10^{-3}) in the South Coast Air Basin. Particulate matter from diesel-fueled engine exhaust (PM₁₀) was found to be the dominant pollutant, contributing approximately 70 percent of the total risk. The dominant source for diesel-related PM₁₀ within the Basin is mobile sources such as trucks, buses, automobiles, and locomotives. The results of the MATES-II study were used as estimates of background cancer risk in the Draft EIS/EIR. Estimated risks associated with LAX operations were compared to risks associated with other sources to determine the impact of LAX operations on cumulative risks (risks associated with LAX operations plus background risks) for people living in the South Coast Air Basin in Section 6.7, Cumulative Risks Associated with LAX Operations, of Technical Report 14a, Human Health Risk Assessment Technical Report.

An analysis of cumulative health hazards for impacts other than cancer was not provided in the Draft EIS/EIR, but was included in the Supplement to the Draft EIS/EIR. Cumulative impacts of the four build alternatives were evaluated for chronic and acute non-cancer health hazards using data from the U.S. Environmental Protection Agency (USEPA). These data can be used in a general way to illustrate the possible range of relative impacts among the build alternatives, but lack resolution to make predictions of impacts for specific locations around the airport. United States Environmental Protection Agency (USEPA) provides estimates of non-cancer hazards for TAPs in air based on information from the Toxics Release Inventory and other sources, and air dispersion modeling. USEPA predictions were used as estimates of current total impacts from all sources in the vicinity of LAX and thus provided the baseline for assessment of cumulative impacts. Additional detail is provided in Technical Report S-9a, Supplemental Human Health Risk Assessment Technical Report.

The evaluation of criteria pollutants was presented in Section 4.6, Air Quality, of the Draft EIS/EIR and in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR. Estimated criteria pollutant emissions were evaluated for significance by comparing maximum predicted concentrations for each build alternative to ambient air quality standards (AAQS). AAQS define clean air standards and are established by the Federal Government under the Clean Air Act. The human health risk assessment was performed to evaluate potential health risk and hazards associated with TAPs for each Master Plan alternative. TAPs are air pollutants that may pose a potential hazard to human health; however, AAQS and emission control standards have not been established for most of these chemicals. TAPs are evaluated through the risk assessment process and regulated through California's air toxics program. Please refer to Section 7, Uncertainties, in Technical Report S-9a, Supplemental Human Health Risk Assessment Technical Report, of the Supplement to the Draft EIS/EIR for a qualitative discussion of potential interactions among TAPs and criteria pollutants.

AF00001-52

Comment:

The DEIS/R indicates that results of LAWA's study on carcinogenic risk from diesel particulate emissions are not expected until 2002 (p. 4-1008). The cumulative analysis on diesel particulate emissions in the FEIS/R should, to the fullest extent possible, reflect the results of this study, in order to provide accurate public disclosure under NEPA and to afford an opportunity for informed public comment.

Response:

Please refer to Topical Response TR-HRA-1 and TR-AQ-2 regarding LAX ambient air quality and source apportionment study.

The page referenced in this comment (p. 4-1008) occurs in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.3, Affected Environment/Environmental Baseline), of the Draft EIS/EIR. This subsection indicates that LAWA is initiating a study of air quality in the area around LAX, independent of the Master Plan, which will gather air quality data through a 12-month monitoring program and source apportionment analysis. This study has been delayed as a result of the events on September 11, 2001, and no time frame for data collection has been set to date. The Supplement to the Draft EIS/EIR included a reevaluation of the environmental baseline, and included a complete analysis, using current data, of possible impacts of inhalation of diesel particulate matter on human health.

3. Comments and Responses

Revised estimates of diesel cancer risks were presented in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.1), of the Supplement to the Draft EIS/EIR.

AF00001-53

Comment:

Since diesel particulates (a State-listed carcinogen) account for 70% of the cancer risk due to air pollution in the South Coast Air Basin (see p. 4-1008), it is important that this analysis be presented under NEPA. The Council on Environmental Quality informs Federal agencies that, "Decisions [under NEPA] must be supported by the best analysis based on the best data we have or are able to collect." (underline added). Since LAWA is now collecting such data, it seems reasonable for it to be presented within the framework of the current NEPA process, in order for FAA to achieve the best informed decision.

Response:

Please refer to Topical Response TR-HRA-1 and TR-AQ-2 regarding LAX ambient air quality and source apportionment study.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed potential health risks associated with exposure to diesel particulates for the No Action/No Project Alternative as well as for the build alternatives in Section 4.24.1, Human Health Risk Assessment. Potential health risks associated with exposure to diesel particulates are discussed in detail in Technical Report 14a of the Draft EIS/EIR. Subsection 6.3.2.1, Residents (Adults and Young Children), of Technical Report 14a indicates that estimated cancer risks for adults and children are mostly due to predicted exposure to diesel particulates and 1,3-butadiene. Table S8 of Technical Report S-9a of the Supplement to the Draft EIS/EIR provides the calculated cancer risk for TAP emissions associated with Alternative D, including diesel particulates.

AF00001-54

Comment:

As noted, the DEIS/R may underestimate emissions from several sources, such as APUs. To the extent that FAA revises the emissions estimates, this has a bearing on the analysis of cumulative impacts presented in the FEIS/R as well as mitigation measures.

Response:

Please refer to Responses to Comments AF00001-20 and AL00016-50.

AF00001-55

Comment:

- Recommendation: The FEIS/R should address if these separate analyses may potentially underestimate the cumulative health risks to affected populations, with emphasis upon the health of children and potentially affected low-income and minority communities. Of particular concern is a lack of discussion on any potential interaction involving toxic air contaminants (hazardous air pollutants) and criteria air pollutants on health, including children. The FEIS/R should provide the most current analysis of the cumulative risks to health associated with diesel particulate emissions. Lastly, as FAA revises its estimates of emissions of various pollutants, the cumulative effects analysis in the FEIS/R should reflect this information.

Response:

Please refer to Response to Comment AF00001-38. In addition, please refer to Topical Response TR-HRA-1 for a discussion of environmental baseline and to Section 4.24.1 of the Supplement to the Draft EIS/EIR for evaluation of human health risks based on the revised environmental baseline.

AF00001-56

Comment:

OTHER ISSUES

Purpose and Need and Relationship to a Range of Reasonable Alternatives

Pages ES-6 and 2-1 identify three project objectives. The objectives form the basis of the project's statement of purpose and need, specifically, to (1) respond to local and regional demand for air transportation during 2000-2015; (2) ensure that new investments in airport capacity are efficient and cost-effective, maximizing the return on existing infrastructure capital; and (3) sustain and advance the international trade component of the regional economy and the international commercial gateway role of the City of Los Angeles. The manner in which an EIS presents a project's purpose and need under NEPA defines which alternatives are considered as reasonable, and thus fully evaluated in the DEIS/R. CEQ's Regulations state that an EIS shall "rigorously explore and objectively evaluate all reasonable alternatives...." CEQ requires that EISs should "include reasonable alternatives not within the jurisdiction of the lead [Federal] agency."

All three action alternatives fully evaluated are within LAX's physical boundaries. Page ES-7 states that "alternative airports and alternative modes of transportation were evaluated," as were "various aviation activity management or demand management scenarios." The DEIS/R contends, "in all cases, the analyses revealed that the alternatives in these two categories could not reasonably be expected to meet the purpose and needs of the Master Plan and would not eliminate the need for improvements at LAX." However, we are concerned with statements in the DEIS/R that non-LAX action alternatives must assume a "significant amount" of projected operations in order to be fully evaluated. Specifically addressing Ontario and Palmdale, page 3-2 states, "these [two] airports have neither the facilities nor market advantages that would enable them to attract significant amounts of demand away from LAX."

LAWA issued a statement (March 12, 2001) highlighting Ontario's capacity to handle increased air cargo. According to LAWA, "Ontario International is in a strong position to handle more air cargo....The airport [Ontario] is capable of handling much more domestic and international cargo." Information released by LAWA on its Palmdale facility states that "plans for additional facilities have been completed," and that Palmdale has received renewed attention in recent years as a "reliever airport" for LAX. According to LAWA, Palmdale has "ample ramp space for additional planes," and remains "an investment in the future." According to LAWA, plans are underway to build a new cargo ramp and bypass taxiways to improve Palmdale's cargo facilities, and to develop new passenger facilities. These improvements (and future potential) at Ontario and Palmdale are not reflected in the DEIS/R, although they appear capable of helping to respond to the project's purpose and need.

The DEIS/R does not address if an alternative routing a portion of future operations to Ontario, Palmdale and/or other commercial airports in the five-county region was considered by FAA, or if such a scenario could potentially avoid or minimize some of the adverse effects projected to occur. In addition to helping meet the three objectives, such a scenario may reduce adverse effects, e.g., the disproportionately high, adverse environmental justice-related impacts due to aircraft noise. A scenario in which operations are more geographically dispersed may reduce adverse air quality and health effects in the areas around LAX.

A recent Federal court case addressed reasonable alternatives that must be fully evaluated under NEPA, and the extent to which alternatives achieving some (but not all) of a project's purpose and need are viewed as "reasonable." Concerning an EIS prepared by the Federal Highway Administration in California, the 9th Circuit U.S. Court of Appeals ruled,

"Each of the alternatives considered in the FEIS/R achieved the project goals, from traffic delay to safety to environmental impact, in varying degrees. No one alternative fulfilled all the goals completely....These proposals [alternatives analyzed in the EIS] span the spectrum of "reasonable" alternatives and satisfied the requirements of the National Environmental Policy Act." (Carmel-by-the-Sea v. U.S. Department of Transportation, 123 F.3d 1142 (9th Cir., 1997) at p. 1159).

3. Comments and Responses

- Recommendation: FAA's environmental document should address whether an alternative involving Ontario, Palmdale and/or other commercial airports in the five-county region is capable of meeting one or more objectives for this project. The FEIS/R should take a "hard look" at whether an action alternative diverting a portion of operations to other commercial facilities can meet some of the purpose and need, consistent with Carmel-by-the-Sea. The FEIS/R should address the applicability of Carmel-by-the-Sea in presenting the action alternatives for this project. The FEIS/R should reconcile statements in the DEIS/R that other airports in the five-county region can not meet this project's objectives, even though information made available to the public by LAWA indicates that Ontario and Palmdale present opportunities to meet elements of the purpose and need.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. As indicated in the topical responses, all three of the build alternatives analyzed in the Draft EIS/EIR assume that regional airports will accommodate an increasing share of the regional demand in the future, with a resulting reduction in LAX's share of the regional market from 75 percent in 1997 to 67 percent in 2015. The Draft LAX Master Plan assumed that passenger activity at Ontario International Airport would grow from its 1997 activity level of 6.3 MAP to as much as 20.7 MAP (see Table 1-13 of the Draft EIS/EIR). Palmdale Regional Airport, which currently has no scheduled air service, was assumed to accommodate up to 0.7 MAP in 2015. (It should be noted that LAWA is currently in the process of preparing Master Plans for Ontario International and Palmdale Regional airports.) Other airports in the region were also projected to assume an increasing share of the regional demand.

Nevertheless, in response to public comments received on the three alternatives included in the Draft EIS/EIR, subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - is designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP), and shifts the accommodation of future aviation demand to other airports in the region. The environmental impacts of Alternative D were evaluated in a Supplement to the Draft EIS/EIR, which was circulated for public review and comment.

AF00001-57

Comment:

Use of 1996 Data as 'Baseline' for Purposes of NEPA Analysis and Disclosure of Impacts

Data for calendar year 1996 is the "baseline" of existing conditions at LAX. The discussion in any EIS of the existing baseline is designed to help the reader understand existing environmental conditions in order to evaluate, and compare, the relative impacts of the various alternatives. The discussion of the "existing situation" at LAX is what existed five years ago, when aircraft operations were smaller and the fleet had yet to fully convert to quieter aircraft. EPA is concerned because of uncertainties about the continuing validity of basic data (1996) on aircraft operations, and consequent air quality and noise impacts. The use of 1996 as the baseline presents a dated reference that may lack continuing validity. While 1996 data is important as background, it may not provide a clear picture of current conditions at LAX (including cumulative impacts), information that is critical to facilitate informed public disclosure under NEPA.

Likewise, 1996 surface traffic data may not reflect current traffic-related impacts associated with LAX (e.g., air emissions). The Council on Environmental Quality's handbook on assessing cumulative impacts under NEPA urges Federal agencies to have NEPA documents and NEPA decisions that reflect the most current data. CEQ indicates, "Decisions must be supported by the best analysis based on the best data we have or are able to collect" ("Considering Cumulative Effects Under the National Environmental Policy Act," p. 3, CEQ, 1997). Data that is five years old may not be the "best data" when disclosing impacts under NEPA, especially if more current data is available to FAA.

- Recommendation: At a minimum, the FEIS/R should discuss which conclusions would likely change if 2000-2001 noise impact data were presented and analyzed. Whenever feasible, and consistent with CEQ's cumulative assessment handbook, the most current data for flight operations, aircraft mixes,

aircraft noise impacts, air quality impacts, and traffic impacts be presented in the FEIS/R so the public can compare 1996 data to more recent data, and, from this, make an informed judgment on this project.

Response:

The Supplement to the Draft EIS/EIR included a description of the most current environmental conditions that are meaningful and relevant to the analysis of the LAX Master Plan. In instances where these conditions are materially different from those of the 1996 baseline conditions, such differences were described in the Supplement to the Draft EIS/EIR, as were any material differences in the impacts that would result by using the Year 2000 conditions instead of 1996 baseline conditions. Specifically, a detailed analysis of changes in operational conditions at LAX between 1996 and 2000 is provided in Appendix S-B, Existing Baseline Comparison Issues - 1996 to 2000, of the Supplement to the Draft EIS/EIR. Chapter 4 of the Supplement to the Draft EIS/EIR identifies project impacts—including impacts associated with noise and air quality—compared to Year 2000 conditions. Traffic impacts are compared to the Adjusted Environmental Baseline, as discussed in the Introduction to Chapter 4 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and as restated in Topical Response TR-GEN-1. Nevertheless, traffic conditions in the Year 2000 are identified in Section 2.6 of Appendix S-B of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-GEN-1 regarding baseline issues.

AF00001-58

Comment:

Depicting the Consequences of the No Action Alternative

Page 3-25 indicates that a demand of 97.9 million annual passengers (MAP) in 2015 cannot be met by LAX's existing facilities because its airfield, roadways and terminal buildings "would experience complete breakdown." The assertion about a "complete breakdown" is inconsistent with wording (p. 3-60) that 97.9 MAP would result in a "degraded level of service," i.e., increased congestion, crowding and aircraft delays.

- Recommendation: The FEIS/R should clarify if 97.9 MAP in 2015 using existing facilities would result in a "complete breakdown" or a "degraded level of service." If "complete breakdown" is inaccurate, this phrase should be removed from the FEIS/R since it may prevent an objective evaluation of the No Action alternative.

Response:

Comment noted. The Draft EIS/EIR correctly states the ability of the No Action/No Project Alternative to accommodate a passenger activity level beyond 78.7 million annual passengers (MAP) and the language used is consistent to the extent it describes different levels of annual passenger activity served. The Draft EIS/EIR on page 3-25 indicates that the No Action/No Project Alternative would experience complete breakdown if the 2015 demand of 97.9 MAP is placed upon it. The passenger activity associated with the No Action/No Project Alternative is limited by the capacity of the Central Terminal Area curbside and access roadway system. This physical limitation directly affects the level of origin and destination passengers served by the airport. The access system would be in gridlock at this level of activity. The existing terminal, aircraft gates, and runways can individually serve a higher level of passenger activity up to their physical limit. However, the airport system can only serve up to the throughput capacity of its weakest component. At levels of activity greater than 89 MAP (the equivalent passenger activity level of the four-runway system), the capacity of each airport system component in the No Action/No Project Alternative would be exceeded.

AF00001-59

Comment:

Cargo Projections at LAX

There are discrepancies in the data on cargo projections at LAX under the various alternatives and the unconstrained forecast. In terms of cargo activity, page ES-9 indicates an "unconstrained forecast" of 4,172,000 annual tons of cargo in 2015 (compared to 1996 baseline of 1,896,764 million tons of cargo). Alternatives A, B, and C are projected to accommodate identical cargo in 2015, i.e., 4,172,000 tons

3. Comments and Responses

(compared to 3,120,000 annual tons of cargo under No Action in 2015). The unconstrained forecast projects 1,004,591 annual operations in 2015; Alternatives A and B project 935,140 annual operations in 2015; and Alternative C projects 797,249 annual operations in 2015. It is unclear why the unconstrained forecast and Alternatives A, B, and C all project identical volumes of cargo, since annual operations are not identical "across the board." Even different fleet mixes under the three alternatives and the unconstrained forecast would not likely result an identical volume of cargo (4,172,000 tons) for each. A LAWA video shown at the June 9, 2001 public workshop (Inglewood) informed the public that a significant amount of cargo is carried on passenger aircraft, a statement confirmed in a June 18, 2001 discussion between David Kessler (FAA) and David Tomsovic (EPA). It seems reasonable for those viewing LAWA's video to assume that different aircraft operations would yield different volumes for cargo, i.e., the largest cargo tonnage should be under the "unconstrained forecast," Alternatives A and B would display identical cargo volumes, and Alternative C would show the least cargo. This is not the case, however.

- Recommendation: The FEIS/R should explain the apparent discrepancy about the amount of cargo that can be handled at LAX under the three alternatives and the unconstrained forecast. Any implications this may have on aircraft noise impacts should be presented as well.

Response:

Comment noted. Please see Topical Response TR-MP-1 regarding cargo handling. The cargo tonnage volumes and total aircraft operations for the four alternatives are not strictly comparable. For the three build alternatives (A, B, and C), adequate cargo facilities are provided to meet the unconstrained demand of 4.2 MAT. Total aircraft operations vary among the build scenarios because of constraints that impact the level of passenger demand that is served. In all cases, sufficient cargo lift is available in the bellies of passenger aircraft, particularly international, to meet the projected demand for belly cargo. The forecast cargo tonnage for the No Action/No Project Alternative is approximately 3.1 MAT, the constrained capacity of the No Action/No Project cargo facilities. The new Enhanced Safety and Security Plan Alternative, Alternative D, analyzed in the Supplement to the Draft EIS/EIR was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to the No Action/No Project Alternative. Chapter 3 of the Supplement to the Draft EIS/EIR, provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP. Please see Subtopical Response TR-N-6.2 regarding the relationship between air traffic and noise and Subtopical Response TR-N-6.3 regarding the relationship between aircraft size and noise.

AF00001-60

Comment:

COMPREHENSIVE REGIONAL APPROACH

FAA addresses increasing aircraft operations across the nation on an airport-by-airport basis as local airport entities propose specific projects. As aircraft operations and their impacts increase in the Los Angeles metropolitan area, EPA believes the time may be ripe for a comprehensive analysis of how various scenarios can respond to the five-county region's projected aviation needs, by means of a study covering all commercial airports in this five-county region. A viable solution is more likely to be accepted by all affected parties based upon a comprehensive study assessing the air transportation needs of the entire five-county region. This comprehensive study would address the interests and requirements of all parties: the public, the airlines, Federal/State/ local/regional agencies, and airport authorities. While there are no 'easy answers,' and impacts from the region's airports would continue, examining commercial aviation needs on an area-wide scale would inform all parties how the five-county region can accommodate increasing aircraft operations on a comprehensive basis as well as at individual airports. A major inquiry is how public concerns about the 'proportionality of impacts,' (including FAA's recognition of disproportionately high, adverse impacts to low-income and minority communities), and associated questions of equity, can be satisfactorily addressed. A focus of particular concern to EPA is whether total emissions of criteria air pollutants and toxic air pollutants can be reduced via a comprehensive regional analysis.

- Recommendation: We recommend that FAA begin a comprehensive analysis of how various scenarios can respond to the five-county region's projected aviation needs, by means of a study covering all commercial airports in this five-county region. Such an approach is consistent with the

Secretary of Transportation's recent commitment to establish a task force to assess aviation demand and airport capacity in southern California.

Response:

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR deal only with the development of LAX. The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale, and Van Nuys airports. The commentor's recommendation that the FAA conduct a comprehensive analysis of various regional scenarios is beyond the scope of the subject EIS/EIR.

Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AF00002 Milkey, J. U.S. Department of Transportation 9/18/2001

AF00002-1

Comment:

Thank you for the opportunity to review the subject LAX Draft MP and Draft EIS/EIR. We noted that the Draft EIS/EIR did not address the future relocation sites for Coast Guard Air Station (CGAS) Los Angeles and, consequently, did not address possible potential environmental impacts on CGAS. Coast Guard expects that potential environmental impacts at alternative relocation sites will be fully identified and assessed in the Final EIS/EIR.

Response:

Please see Response to Comment AF00002-3.

AF00002-2

Comment:

On May 1, 2001, Coast Guard representatives met with LAX and FAA MP and EIS/EIR coordinators to discuss the proposed Draft MP and EIR/EIS relocation sites for CGAS. Since the proposed CGAS relocation sites are only summarily identified in the Draft MP Appendix O, and since possible impacts associated with this relocation action are not identified in the associated Draft EIS/EIR, specific Coast Guard comments relate only to the Draft MP. The comments below summarize Coast Guard concerns regarding the proposed relocation alternatives as they were discussed in the meeting and in our subsequent contacts with FAA and LAX representatives.

Response:

Comment noted. Please see Responses to Comments below.

AF00002-3

Comment:

1. The proposed Draft MP relocation sites of the CGAS Los Angeles should be based on the following primary Coast Guard requirements:

- Although the CGAS currently operates three HH-65 helicopters, all the future CGAS locations identified in the MP and EIS/EIR must be planned for a new CG aircraft maintenance facility with the future capacity of four HH-60 helicopters.
- The CGAS requires immediate access to an airport taxiway area (1000' x 150') to accommodate helicopter rolling take-offs and landings going in both east and west directions.
- The CGAS requires approximately a 63,000 GSF hangar-facility capable of housing four helicopters. It also requires an aircraft ramp capable to park and refuel all assigned helicopters as well as an additional parking area for transient aircraft (several helicopters and one C-130 aircraft).
- The regular CGAS daily operations will consist of up to five flights per day plus multi-mission flights for operational support.

3. Comments and Responses

Response:

The following describes the location of the CGAS facility under Alternatives A, B, and C.

Alternative A: The proposed CGAS facility would be adjacent to the reconstructed Taxiway A.

Alternative B: The proposed CGAS facility would be adjacent to a proposed Taxiway and Apron area.

Alternative C: The proposed CGAS facility would be adjacent to the reconstructed Taxiway A.

Under Alternative D, the existing CGAS facility would remain at its existing location on the west side of the airport.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR were program level environmental documents intended to analyze the impacts of the LAX Master Plan. It is acknowledged that further documentation may be required to address certain facility and environmental issues in a more specific manner, as necessary and appropriate.

AF00002-4

Comment:

2. After reviewing the Draft MP alternative relocation sites for the CGAS, the Coast Guard has concluded:

- Appendix O of the LAX MP, Alternative A for 2005, erroneously identified the existing CGAS building/hangar size at 39,000 GSF. The correct size is 51,700 GSF.

Response:

The existing Airport Layout Plan (ALP) identifies the area of the building footprint, which is approximately 39,000 square feet. The additional area is contained on other levels within the building footprint and is added to the footprint area to arrive at the total area of 51,700 gross square feet.

AF00002-5

Comment:

- The proposed location in the LAX MP Alternative B for 2015 (along Sepulveda Blvd.) is non-operable for CGAS due to the incompatible air-traffic patterns and restricted site arrangement at the proposed location.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR are program level environmental documents intended to analyze the impacts of the LAX Master Plan. It is acknowledged that further documentation may be required to address certain facility and environmental issues in a more specific manner, as necessary and appropriate.

AF00002-6

Comment:

- A general location within the LAX southern border adjacent to Imperial Avenue may be suitable for CGAS Los Angeles (similar to the proposed LAX MP Alternative A for 2015 and Alternative C for 2015). If selected, this location must conform to the primary CGAS requirements outlined above while more detailed requirements would be developed later during the master planning and EIS/EIR processes. Furthermore, CGAS approach and departure flight corridors must be established to conform to the LAX flight control system and noise abatement policy.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR were program level environmental documents intended to analyze the impacts of the LAX Master Plan. It is acknowledged that further documentation may be required to address certain facility and environmental issues in a more specific manner, as necessary and appropriate.

AF00002-7**Comment:**

3. As discussed at the meeting, all LAX, FAA and Coast Guard representatives are aware that the subject Draft MP and Draft EIS/EIR documentation, due to their complexity, are still far from completion. I request that, the FAA and LAX representatives will need to keep the CG informed and engaged as the master planning and NEPA/CEQA processes unfold. In order to facilitate the CGAS relocation during these processes, the Coast Guard will provide more detailed comments/data to the FAA and LAX representatives on all relevant items regarding CGAS site and facility planning requirements, project phasing/timing impacts, and property ownership and lease requirements.

Response:

Comment noted. The FAA and LAWA are committed to working cooperatively with the Coast Guard and to ensure the USCG is on all notification lists.

AF00002-8**Comment:**

4. Since the CGAS relocation to one of the proposed, new, alternative sites might also produce different environmental impacts on the future CGAS, the Coast Guard expects the Final EIS/EIR to comparatively address impacts at the several sites, e.g., future LAX airport noise impacts. Future LAX airport noise could have a negative environmental impact on the CGAS duty crew contingent that must be berthed at CGAS facility at all times.

Response:

Comment noted. Please see Response to Comment AF00002-3.

AF00002-9**Comment:**

We are looking forward in working with you on the Draft LAX MP and Draft EIS/EIR. My points of contact regarding this matter are Mr. Andrej Skarica, Facility Planner, at (510) 437-5619, and Ms. Carol Meyer, Environmental Engineer, at (510) 437-3511, both from Coast Guard Maintenance and Logistics Command Pacific.

Response:

Comment noted.

AF00003**Sanderson Port,
Patricia****United States Department of the
Interior****9/24/2001****AF00003-1****Comment:**

We have reviewed the Draft Environmental Impact Statement/ Environmental Impact Report (DEIS/EIR) dated January 2001, for the Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Los Angeles, Los Angeles County, California. Our comments are based on review of the biological resources information presented in the DEIS/EIR and supporting technical appendices and our knowledge of biological resources in western Los Angeles.

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GENERAL COMMENTS

According to the DEIS/EIR, the proposed project will impact non-native grasslands, disturbed areas, valley needlegrass grasslands, southern foredune, southern dune scrub, and vernal ponded areas.

Response:

Comment noted.

AF00003-2

Comment:

Federally threatened and endangered species that will or have potential to be impacted by the project include the endangered El Segundo blue butterfly (*Euphilotes battoides allyni*) and Riverside fairy shrimp (*Streptocephalus woottoni*).

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed potential impacts to the El Segundo blue butterfly and the Riverside fairy shrimp in subsection 4.11.6 of Section 4.11, Endangered and Threatened Species of Flora and Fauna. The level of significance following mitigation of these impacts is addressed in subsection 4.11.9 of Section 4.11, Endangered and Threatened Species of Flora and Fauna of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AF00003-3

Comment:

The DEIS/EIR relies on a modified Habitat Evaluation Procedures (HEP) methodology to define biological impacts and develop biological mitigation measures. The modified HEP method used for this analysis is flawed and inappropriate for use in defining biological impacts and developing acceptable mitigation measures.

Response:

Please see Topical Response TR-BC-1 regarding the modified HEP methodology and subsequent definition of impacts and development of mitigation measures.

AF00003-4

Comment:

The DEIS/EIR contains language in virtually all of the biological mitigation measures that limits monitoring and maintenance to "not more than five years." The DEIS/EIR implies that if performance criteria are not met within five years, no further maintenance or monitoring need be performed. If a mitigation site fails to meet acceptable performance standards, the significant impacts of the project would not be reduced below a level of significance. For these reasons, we recommend that all mitigation areas meet acceptable performance criteria before the project proponent is relieved of mitigation responsibility.

Response:

All of the biological mitigation measures present clear performance criteria. Performance criteria are delineated to extend over a 5 year period, which is a reasonable time period for the assessment of mitigation achievement. The statement, "not more than 5 years" refers to this delineation of performance criteria. If these criteria should be achieved in less than 5 years, mitigation responsibilities would be completed. If performance criteria are not met within 5 years, monitoring would continue until performance criteria are met.

AF00003-5

Comment:

Because of the regional significance of declining species and habitats found within the Master Plan boundaries, we recommend that all biological mitigation areas associated with the project, both within and outside of the current preserve area, are protected and managed in perpetuity. The Department would like to work with the project proponents in the design and implementation of a regional preserve system meeting long-term biological goals.

Response:

Local Coastal Programs (LCPs) are the long-term management plans prepared by coastal cities, and subsequently submitted to the California Coastal Commission (CCC) for approval. As of 2003, the City of Los Angeles has not finalized a LCP that addresses the Los Angeles/EI Segundo Dunes. In the absence of a finalized LCP, all development and other land use activities (including restoration) within the Dunes is subject to requirements from the CCC. The Department's request is noted and has been considered.

AF00003-6

Comment:

SPECIFIC COMMENTS

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The HEP analysis presented in the DEIS/EIR does not follow the accepted HEP methodology and is flawed in the following fundamental ways:

a. The DEIS/EIR's HEP is developed based on idealized vernal pool/native grassland landscape characteristics that are not demonstrated as important features for any particular species of interest. The two reference sites chosen as idealized habitats for the analysis of the LAX project are the Santa Rosa Plateau and the Carrizo Plain Natural Area. Both of these sites are inland areas that support some similar types of habitat (grassland, forb, and vernal pool), but their similarity to the historical coastal habitats of the study area is questionable. In fact, they are very dissimilar to the existing condition of the study area and are not at all analogous to southern foredune and southern dune scrub. Rather than focus on how high quality habitats associated with the reference sites might help define the specific habitat requirements of the target species found at LAX, the DEIS/EIR develops a generalized HEP that largely ignores the requirements of the target species. For instance, the analysis quantifies such factors as vernal pool flora, native grasses over 10 percent, and contiguous native habitat over 40 acres, which have very different relevance to species as diverse as the loggerhead shrike (*Lanius ludovicianus*), Riverside fairy shrimp, San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), or Lewis' evening primrose (*Camissonia lewisii*).

b. The HEP analysis arbitrarily assigns values to habitat components without any justification. For example, the category "under regulatory conservation" which measures the strength of environmental land-use laws for a given habitat type and fails to evaluate the quality of the habitat itself, is given twice the importance (0.10) as real habitat components such as "summer dessication" which is critical to the survival of Riverside fairy shrimp. On the other hand, "summer dessication" would not necessarily be an equally important element in consideration of the habitat requirements for the loggerhead shrike, burrowing owl (*Athene cunicularia*), silvery legless lizard (*Anniella pulchra*), etc.

c. The DEIS/EIR inappropriately assigns Habitat Values to all of the study area's different vegetation communities based on one vegetation community/landscape (the idealized reference sites). The artificially constructed habitat value measurements for vernal pools/native grasslands are applied to completely unrelated habitats using the same inappropriate categories. Southern foredune, for example, is downgraded because it does not contain "areas with periods of inundation of equal to or greater than 30 days," a habitat value that does not apply to the sandy substrates of southern foredune habitats. The southern foredune habitat on the EI Segundo dunes, widely acknowledged as some of the highest quality and most diverse examples of its type in southern California, only rates a 0.45 value in the

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analysis because of this misapplication of specific habitat components to unrelated and structurally very different habitats. As a result, the entire project site is given artificially low Habitat Values because many areas do not exhibit "mound-depression microrelief," "native soils with slope less than 10%," "sensitive/listed vernal pool-associated species (reproducing)," etc., that are comparable to a vernal pool landscape. Many of the habitat components listed in Table 4.10-1 are insignificant in the context of assessing the importance of the site's vegetation resources.

d. The HEP used in the DEIS/EIR inappropriately "banks" habitat units of urbanized landscape areas that are subsequently used to downgrade the impacts of the proposed project on unrelated habitats. For example, the DEIS/EIR (Page 4-646) considers future ornamental landscaping within the facility (arbitrarily assigned a value of 2.68 habitat units for 53.6 acres of landscaping) to offset the loss of non-native grasslands and disturbed areas supporting sensitive species.

e. The DEIS/EIR proposes that the restoration of disturbed dune scrub/foredune (Habitat Value of 0.35 according to DEIS/EIR) to southern foredune (Habitat Value of 0.45 according to DEIS/EIR) would result in a mitigation credit value of 0.8 per acre, a higher value than southern foredune or any other existing habitat within the study area. Using the DEIS/EIR's methodology, a change in Habitat Value from 0.35 to 0.45 is a difference of 0.1, not 0.8. Using the DEIS/EIR'S methodology and Table 4.10-1, the restored southern foredune community would "ideally" resemble grassland/vernal pool habitats of Santa Rosa Plateau and Carrizo Plain, an inappropriate and undesirable result.

f. The mitigation ratio of 1:1 (as measured in "Habitat Units" in the DEIS/EIR) results in inadequate compensation for the loss of habitats occupied by sensitive species including the loggerhead shrike, San Diego black-tailed jackrabbit, and western spadefoot toad (*Scaphiopus hammondi*). In the following discussion we will examine the example of the non-native grassland and disturbed/bare ground communities under 2015 Alternative "A". The entire study area contains approximately 704.9 acres of non-native grassland (designated as non-native grassland/ruderal in the DEIS/EIR). Approximately 363.4 acres would be impacted under Alternative A. Using the DEIS/EIR's HEP analysis, this 363.4 acres is equivalent to 54.47 Habitat Units. The DEIS/EIR then combines the impacts for disturbed/bare ground (94.8 acres or 9.48 Habitat Units) with the grassland habitat units ($54.47 + 9.48 = 63.95$ Habitat Units). An arbitrarily assigned credit for future landscaped areas is then subtracted from the total impacts to yield the total Habitat Units of impact ($63.95 \text{ Habitat Units} - 2.68 \text{ Habitat Units}$ (or 53.6 acres of landscaping) = 61.27 Habitat Units). The proposed mitigation plan consists of three components: (1) enhancement of 16.9 acres of non-native grassland to needlegrass grassland; (2) restoration of 18.06 acres of existing roadways within the El Segundo blue butterfly preserve to southern foredune; and (3) enhancement of 74.6 acres of disturbed dune scrub/foredune to southern foredune. Of this total, only 16.9 acres would provide comparable mitigation (enhancement of non-native grassland to native grassland) for losses of 363.4 acres of grassland and 94.8 acres of disturbed habitat supporting sensitive species.

g. Most of the habitats present on LAX are artificially assigned low values, which then are used as the basis for developing mitigation measures. After creating these artificial habitat units, the DEIS/EIR then proposes that units are fully exchangeable, such that impacts to one habitat type, for instance grasslands, could be mitigated through enhancement of different habitat types supporting different species, such as southern foredune. By implying this arbitrary "exchange system" of mitigation, the DEIS/EIR has failed to establish a credible basis for the nexus and proportionality of the mitigation process.

Response:

As stated in the Draft EIS/EIR, the two reference sites were selected because they represent optimal habitats for a multitude of floral and faunal species similar to historical biotic communities present at LAX during the early 1900s, including the presence of vernal pools. The area, referred to as the Los Angeles coastal prairie, was predominantly a coastal grassland containing abundant forbs. Historic maps depict a series of non-drained, impermeable depressions over the entire formation that formed freshwater marshes and a substantial number of vernal pools.^{1,2} The two reference sites, Santa Rosa Plateau in Riverside County and the Carrizo Plain Natural Area in San Luis Obispo County, represent the target biotic community, Valley Needlegrass Grassland/Vernal Pool complex.

Habitat values were assigned to each biotic community based on four habitat variables: topography/hydrology, flora, fauna, and ecosystem functional integrity. These habitat variables were

assumed to be directly related to the food, cover, and reproductive requirements of the target plant and wildlife species, taking into consideration upland areas that serve to support vernal pool habitat.

Ornamental landscaped areas were assigned a low habitat value of 0.05 because they do not support any sensitive species or an abundance of wildlife species. They are not entirely without value, however, and are thus represented. Additionally, new ornamental landscaped areas would consist of, to the greatest extent feasible, plantings of native species. It was not the intent of the Draft EIS/EIR and Supplement to the Draft EIS/EIR to "bank" landscaped biotic communities to lessen project impacts. All build alternatives would have increased landscape areas when compared to baseline conditions.

Disturbed Dune Scrub, as well as all areas subject to restoration, shall be restored to a habitat value of 0.8 or greater, not 0.45. A habitat value of 0.8 is the restoration performance criteria required for completion of mitigation because it is a reasonable level of quality that can be achieved through habitat restoration (a habitat value of 1.0 representing a theoretically perfect habitat). It is desirable to restore the habitat to the highest quality possible, higher than what is currently present anywhere at the Los Angeles/EI Segundo Dunes.

Performance criteria for mitigation for sensitive wildlife species, including the loggerhead shrike, San Diego black-tailed jackrabbit, and western spadefoot toad, were established independently of those for the biotic communities and in coordination with regulatory agencies.

Mitigation for impacts to biotic communities for each Alternative was designed to be practical and appropriate for the project. The Los Angeles/EI Segundo Dunes provide an excellent opportunity for mitigation within a protected area within the Master Plan boundaries and is therefore used to the greatest extent feasible. Both historic and current information on the plant communities present within the Los Angeles/EI Segundo Dunes would be utilized during restoration efforts for Southern Foredune Scrub and Valley Needlegrass Grassland.

Please see Topical Response TR-BC-1 for a more detailed discussion of the HEP methodology.

1. R. Mattoni, 1989. Unnatural Acts: Succession on the El Segundo Sand Dunes in California. H. G. Hughes and T.M. Bonnickson, (eds.) Proceedings from the First SER Conference, Berkeley, CA 1989, Society of Ecological Restoration, Madison, WI 53711.

2. Mattoni, R. 1993. Natural and Restorable Fragments of the Former El Segundo Sand Dunes Ecosystem, J.E. Keeley (ed.). Interface Between Ecology and Land Development in California. Southern California Academy of Sciences, Los Angeles.

AF00003-7

Comment:

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The DEIS/EIR states that occupied habitat for the Riverside fairy shrimp will be replaced at a suitable, alternate location at a ratio of not more than 1:1. Restoration of vernal pools sufficient to support Riverside fairy shrimp is experimental and often unsuccessful. Therefore, mitigation ratios typically vary from 3:1 to 5:1 for impacts to vernal pools depending on the quality of the pools to be disturbed. The "ephemerally wetted areas" on LAX are not high quality vernal pools; however, they do support two species of fairy shrimp and the western spadefoot toad, which require vernal pools for reproduction. Therefore, we recommend that the mitigation for impacts to the pools at LAX be 3:1, at the low end of the typical mitigation range. The surface area of the ponds to be impacted on LAX is 1.3 acres; therefore, the surface area of the mitigation ponds should be 3.9 acres.

Response:

Please see Topical Response TR-ET-2 regarding Riverside fairy shrimp mitigation. In short, LAW and FAA have proposed a mitigation ratio of 3:1 for impacts to ephemerally wetted areas on the LAX airfield containing cysts of the Riverside fairy shrimp.

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AF00003-8

Comment:

In addition, successful creation of functional vernal pool habitat must include provisions for the creation and management of surrounding upland habitats. These upland habitats serve both as buffers and watersheds for created vernal pools. The ratio of upland watershed to pool surface area on natural and successfully created pools is at least 10:1 and often 15:1. Therefore, the amount of land minimally required to support the created pools will be 39 acres. We have recommended splitting this acreage between two or more sites, to increase the chances of successfully restoring the specific conditions which the fairy shrimp and western spadefoot toad require to breed. We recommend that the spadefoot toad mitigation (MM-BC-4, in part) be coordinated with the relocation of vernal pool resources and Riverside fairy shrimp. Buffer areas and the watersheds of vernal pools should be managed in perpetuity for both Riverside fairy shrimp and spadefoot toad.

Response:

Embedded cysts of the Riverside fairy shrimp shall be relocated to a suitable alternate location at a mitigation ratio of 3:1 as determined through coordination with the USFWS. The USFWS has issued a Draft Biological Opinion pursuant to Section 7 of the Federal Endangered Species Act. As a result of extensive coordination and consultation undertaken with the U.S. Army Corps of Engineers and the USFWS, FAA and LAWA have incorporated 12 conservation measures specified in the Draft Biological Opinion. The soils containing cysts of the Riverside fairy shrimp will be relocated to property owned by the FAA and designated a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS. In addition, details of this mitigation effort are documented in the Riverside Fairy Shrimp Conservation Package, developed pursuant to Section 7 consultation between LAWA, FAA, and the USFWS. Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation. Mitigation for potential impacts to the western spadefoot toad shall be coordinated with the relocation of cysts of the Riverside fairy shrimp. The Draft Biological Opinion issued by the USFWS is included as Appendix F-E of this Final EIS/EIR.

AF00003-9

Comment:

We are also concerned about potential impacts to the federally endangered El Segundo Blue butterfly. Alternative A would impact 320 square feet of occupied butterfly habitat. Considering the rarity of the species and its habitat, direct, permanent impacts to southern foredune and dunes scrub communities containing the butterfly should be mitigated at a 5:1 ratio. This would result in the creation of 0.05 acres of suitable habitat. We recommend that this restoration occur in currently unoccupied portions of the dune preserve, such as subsites 45 or 50, or in the 104 acres north of the existing preserve. Impacts to the high density butterfly population in subsite 9 from the proposed ring road and World Way West realignment have not been sufficiently investigated. We recommend further disclosure of the engineering plans being considered for the World Way West interchange area, in order to fully analyze the potential impacts associated with this portion of the proposed project.

Response:

Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly. Mitigation for impacts to habitat occupied by the El Segundo blue butterfly shall be at a ratio of 1:1 in conformance with the Draft Biological Opinion issued by the USFWS pursuant to Section 7 consultation among FAA, LAWA, and USFWS. This restoration would occur at least three years prior to the impact to account for temporal losses of habitat. Restoration would occur in currently unoccupied areas of subsite 23 in the Habitat Restoration Area. Subsite 23 has been determined adequate ecologically to support plantings and relocation of coast buckwheat and butterfly pupae.

Figures 33 through 36 of Appendix J1, Biological Assessment Technical Report, depict a close-up view of the World Way West loop and the Habitat Restoration Area. There would be no direct impacts to the Habitat Restoration Area or the El Segundo blue butterfly. Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsection 4.11.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR discussed indirect impacts to the El Segundo blue butterfly. Section 6.0, Conclusions and

Recommendations in Appendix J1, Biological Assessment, provides a detailed description of the El Segundo Blue Butterfly Construction Avoidance Measure.

AF00003-10

Comment:

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Light emissions are known to disrupt the circadian rhythms of birds, butterflies, small mammals, and other species. This is especially true of nocturnal species, such as the numerous rare, endemic moth species restricted to the dunes. Light emissions along Pershing Drive are currently very low, with only a few street lights present adjacent to the preserve. However, as noted in the DEIS/EIR, several streetlights at the westerly end of World Way West light a wide area of the dunes preserve. The foot-candles emitted by these lights were not measured or analyzed in the DEIS/EIR. The number of additional streetlights proposed for the ring road and the additional infrastructure on the airport are also not disclosed, but the DEIS/EIR estimates that the light reaching the dunes preserve will increase to 0.60 foot-candles. How this figure was reached is not described. In addition, the effects of increased noise levels on sensitive species and habitats are not adequately analyzed in the DEIS/EIR. In addition, research has shown that chronic noise levels can be disruptive to avian species, amphibians, and rodents. We recommend that the Final DEIS/EIR include a more detailed analysis of the biological effects of night lighting and increased noise levels. Mitigation measures to offset potentially significant impacts should also be proposed.

Response:

The comment regarding a more detailed analysis of the biological effects of night lighting and increased noise levels has been noted. Analysis of potential impacts to sensitive species of flora and fauna from light and noise was presented in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The analysis was based on the findings of field investigations and was substantiated with the findings of published literature. The analysis of potential noise impacts was based on the findings documented in Section 4.1, Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR; and Appendix S-C, Supplemental Aircraft Noise Technical Report of the Supplement to the Draft EIS/EIR. Literature reviewed included a literature synthesis compiled by the U.S. Air Force and the U.S. Fish and Wildlife Service and additional literature from the U.S. Fish and Wildlife Service and the Department of Transportation. The analysis of potential indirect impacts from lighting conditions was based on the findings documented in Section 4.18, Light Emissions, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The foot-candles reaching the Habitat Restoration Area from the World Way West lights are described on page 4-823 of Section 4.18, Light Emissions, of the Draft EIS/EIR and range from 0.004 to 0.26 foot-candles. The maximum change in light is calculated at 0.34 for the alternatives, as shown in Table 4.18-1, Estimated 2015 Lighting Change (foot-candles, fc) of the Draft EIS/EIR. The methodology for assessing the change in light from the build alternatives is described in Section 2.0, General Approach and Methodology, and Section 6.0, Environmental Consequences, of Technical Report 9, Light Emissions Technical Report.

AS00001	Buswell, Stephen	State of California	7/20/2001
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AS00001-1

Comment:

In summary, the January 2001 Draft EIR/EIS for the proposed LAX 2015 Master Plan does not adequately address traffic impacts and deficiencies. The document does not provide sufficient project detail for transportation improvements within the State right-of-way

Response:

Appendix K, Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements, provides additional detail on transportation improvements within State rights-of-way. In addition, major improvements such as the LAX Expressway will require separate environmental documents before construction can begin. Alternative D, analyzed in the Supplement to the Draft EIS/EIR, does not include an LAX Expressway.

3. Comments and Responses

AS00001-2

Comment:

and does not adequately identify the funding sources associated with implementing these projects.

Response:

A specific funding plan has not yet been prepared for the Master Plan; however, it is anticipated that a joint funding effort will be pursued, involving Federal and State grants and other efforts. Much of the project will likely be funded with airport-generated revenues, such as concession fees, landing fees, revenue bonds, leases, and passenger facility charges (PFCs). It is not anticipated that any local tax revenue would be used for this project. Also, please see Topical Response TR-ST-2 regarding the airport's funding abilities outside of the airport.

AS00001-3

Comment:

Additional environmental documents will be required for individual transportation projects that are proposed within the State right-of-way.

Response:

Comment noted.

AS00001-4

Comment:

Any work within or adjacent to the state highway right-of-way, either existing or proposed, will require an encroachment permit from Caltrans. The permit application will need to include all pertinent analysis, reports, and plans to allow for a comprehensive review of the work proposed and its impact to the State highway right-of-way. In addition, for projects with an anticipated cost of over \$1 million within the State highway right-of-way, a PSR will also be necessary.

Response:

LAWA and LADOT are aware of the need for further analysis and coordination with Caltrans in the planning and implementation of improvements to State highways and freeways, including possible Project Study Reports. Subsequent project-level studies and environmental documentation are anticipated. LAWA and LADOT will coordinate with Caltrans when such studies, encroachment permits and other actions become necessary.

AS00001-5

Comment:

Following are the comments for the LAX 2015 Master Plan transportation and circulation mitigation projects:

Response:

Please see Responses to Comments below.

AS00001-6

Comment:

I. General EIR/EIS Comments

A. Due to the complexity of the proposed State Route 1 improvements, the proposed estimated construction time at 2-3 years does not appear to be feasible.

Response:

This comment does not identify a specific environmental issue addressed in the Draft EIS/EIR. Please refer to Topical Response TR-APPK-1 regarding the refined analysis of LAX Expressway and State Route 1 impacts, and also Topical Response TR-APPK-2, concerning property acquisition and relocation associated with the LAX Expressway and State Route 1.

AS00001-7

Comment:

B. Right of Way (R/W) lines should be considered for display in the final EIR/EIS.

Response:

The level of detail of the figures in the Draft EIS/EIR is sufficient to meet the requirements of a program-level analysis under CEQA and NEPA. However, the information the commentor requests would be made available during project design.

AS00001-8

Comment:

C. The ground transportation projects need to be included in the Regional Transportation Plan (RTP), Regional Transportation Improvement Program (RTIP) and State Implementation Plan (SIP) so as to ensure FHWA air quality standards are met.

D. In reference to the air space underneath the Route 105 Freeway, Caltrans expects to continue utilizing this space.

Response:

All of the background transportation improvements assumed in the analysis are consistent with the Regional Transportation Plan, the Regional Transportation Improvement Program, and local transportation improvement plans, and are consistent with the State Implementation Plan. New projects identified as mitigation measures will be brought before the appropriate regional and state agencies for inclusion into their respective plans and programs following adoption of the Master Transportation Plan. If it becomes desirable for air space underneath the I-105 Freeway to be used in implementing a mitigation measure, LAWA, LADOT and other agencies as appropriate will coordinate with Caltrans to obtain permission or to find a suitable alternative.

AS00001-9

Comment:

E. The following transportation projects should be identified as LAX 2015 Master Plan mitigation projects:

1. State Route 1 Projects (Appendix K)
 - a. Diamond Interchange, Segment A, B, C
 - b. Urban Interchange, Segment A, B, C
 - c. North Tunnel (Century Blvd/Westchester Pkwy)
 - d. Century Blvd. Interchange
2. State Route 1 projects listed in the EIR/EIS, Table 4.3.2-28
3. LAX Expressway
4. The ring road and connections with State highway facilities
5. Metro Green Line LRT to LAX
6. Route 405/105 direct freeway HOV connectors

3. Comments and Responses

7. Extension of Route 105 to Pershing Drive

Response:

These are all project components for Alternatives A, B, and C, as summarized in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR. Therefore, they would not be identified as mitigation projects.

AS00001-10

Comment:

F. Caltrans is concerned about the increase in air cargo truck trips and impacts on the regional freeway system during peak commute periods. Please indicate the impacted I-405 and I-105 Freeway ramps along with the projected air cargo truck volumes. Intersection analysis for these freeway ramps will be needed.

Response:

Please see detailed individual response.

AS00001-11

Comment:

G. Please provide justifications for the number of lanes proposed on the LAX Expressway.

Response:

The purpose of the proposed LAX Expressway is to alleviate airport-related traffic in the neighboring communities and better separate the airport-related traffic from the non-airport traffic on I-405. The number of lanes proposed for the LAX Expressway at the preliminary, program-level stage of analysis (as described in Appendix K of the Draft EIS/EIR) was based upon the known existing levels of traffic congestion along I-405 in the LAX vicinity and the need to expand capacity of the facility to meet future traffic demand. The limited availability of adjacent right-of-way presents constraints for expanding the facility beyond the conceptual footprint depicted in the Draft EIS/EIR. As such, the number of lanes proposed represents the maximum number of lanes that would possible fit into the conceptual footprint. If an alternative to the LAX Master Plan is adopted that includes the proposed LAX Expressway as a project component, then a project-specific traffic analysis which details the existing and future (no build condition) traffic demands along the proposed LAX Expressway corridor would be presented in a Caltrans Project Study Report (PSR). The PSR would include a full discussion and justification of purpose and need for the number of lanes of the proposed LAX Expressway. Please refer to Topical Response TR-APPK-1. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

AS00001-12

Comment:

H. The EIR/EIS should include a discussion on the following issues: flood control channel, Caltrans I-405 Transportation Concept Report (TCR), Railroad Overhead, utilities, access point issues of the proposed LAX Expressway, right-of-way impacts, etc.

Response:

Appendix K of the Draft EIS/EIR does not provide for a project level or detailed analysis of the proposed LAX Expressway impacts in relation to the facilities and I-405 TCR noted by the commentor. As such, only a programmatic level of analysis is included in Appendix K to identify potential issue areas requiring further analysis if the LAX Expressway is ultimately adopted and carried forward as an LAX Master Plan project element. If an LAX Master Plan alternative that includes the LAX Expressway project component is ultimately adopted, a more detailed CEQA review will be conducted in support of the PSR required by Caltrans. The Caltrans PSR and Project Report would include design plans that address roadway elevations, setbacks, and landscape buffer areas, railroad overhead, utilities, access point issues, and precise right-of-way needs in sufficient detail as to conduct the supplemental CEQA

analysis for the LAX Expressway. Please refer to Topical Response TR-APPK-1 for clarification of supplemental analysis at the project-specific level stage. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

AS00001-13

Comment:

I. The EIR/EIS has not provided sufficient geometric detail for the proposed improvements. Therefore, it should be noted that the document does not constitute geometric approval or environmental approval for any specific work to be done on the State Highway System.

Response:

Comment noted. Please refer to Topical Response TR-APPK-1 regarding refined analysis of LAX Expressway and State Route 1 (SR-1) impacts.

AS00001-14

Comment:

J. Please explore options with the LADOT on diverting traffic/motorists in order to relieve congestion along Routes 10 and 405, emphasizing on La Cienega Blvd., which is an existing alternate route between Route 10 and Route 405.

Response:

Finding alternatives to reduce congestion on I-10 and the portion of I-405 near I-10 is beyond the scope of the LAX Master Plan. The figures in Technical Report 3b, Attachment B show that very few airport trips travel westbound on I-10 to I-405, and vice-versa. Therefore airport traffic is not a notable contributor to the congestion referenced in this comment.

AS00001-15

Comment:

K. For the LAX Expressway alternative, the precise viable roadway alignments and associated right-of-way requirements should be incorporated in the final EIS/EIR.

Response:

Appendix K of the Draft EIS/EIR describes conceptual roadway alignments of the proposed LAX Expressway in Section 3.1, LAX Expressway and Alternatives. Figures 3.1-1 through 3.1-10 in this section display property parcels likely to be affected by right-of-way requirements of LAX Expressway alternatives 2 and 3. Section 5.1, Land Use, of Appendix K of the Draft EIS/EIR describes the number and type of potentially affected parcels by land use type affected by the proposed LAX Expressway alignments.

Regarding the request for documentation of precise alignments and right-of-way requirements of the LAX Expressway, please refer to Topical Response TR-APPK-1.

AS00001-16

Comment:

II. EIR/EIS Section Comments

A. Section 4.2.3

Hazardous Materials. Based on the project description contained in the status report dated March 23, 2001, two alternatives are proposed for the LAX Expressway: (1) connect the expressway at the Hughes Parkway Interchange, and (2) connect to the Route 90/I-405 Interchange. The Expressway will be located to the east of Route 405 and eventually cross over to west of Route 405, connect with the

3. Comments and Responses

Ring Road parallel and south of Arbor Vitae Street. It is also our understanding that Caltrans' role for this project is to provide oversight. As an oversight agency, Caltrans involvement was discussed in Section 4.23.5. In the Master Plan Commitments there is discussion of LAWA's commitments to implement remediation, existing remediation efforts (HM- 1), and the addressing of hazardous materials during construction (HM- 2). The report indicated that property would be acquired during the process. Some of the properties were known or suspected to be contaminated. During the December 14, 2000 meeting, it was mentioned that the acquisition of properties would be the responsibility of LAWA. Unless otherwise advised, it is our understanding there will be no transfer of properties, having the presence of hazardous waste, to Caltrans Right of Way.

Response:

As was stated within Master Plan Commitment HM-1 (refer to pages 4-599 and 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR), properties to be acquired as part of the Master Plan undergoing remediation will be evaluated. The projected time to complete remediation will be assessed and LAWA will coordinate with the land owner and agency with jurisdiction to ensure that remediation is completed prior to demolition and construction activities. In cases where remediation cannot be complete prior to demolition and construction activities, LAWA will take appropriate measures to stop migration and will reinstate remediation following completion of construction. Nonetheless, LAWA will notify the Department of Transportation if a property requiring further remediation is transferred to the Caltrans right of way.

AS00001-17

Comment:

B. Section 4.3.2

1. From the three Master Plan build alternatives, the No Additional Runway Alternative (C) would have the best off-airport traffic performance.

2. If Alternative (C) is adopted, a traffic study summary will need to be prepared for Alternative (C) showing but not limited to the following:

a. Updated traffic volumes for year 2001 (i.e., intersection, street link, freeway segment, and freeway ramp).

b. Adjusted Environmental Baseline traffic volumes for year 2005 (i.e., intersection, street link, freeway segment, and freeway ramp).

c. Adjusted Environmental Baseline traffic volumes for year 2015 (i.e., intersection, street link, freeway segment, and freeway ramp).

d. Traffic distribution for Adjusted Environmental Baseline for year 2005/2015 with a legend indicating the change in trends of Social Demands and Economic Development.

e. Proposed LAX expansion project traffic volumes (i.e., intersection, street link, freeway segment and freeway ramp).

f. Existing 2001 geometric configurations as follows:

i. Intersection- Lane movements

ii. Street Link- Number of lanes

iii. Freeway segment- Number of lanes + HOV lanes

iv. Freeway ramp- Number of lanes

g. Regional Roadway Improvements for Adjusted Environmental Baseline for year 2005/2015 (i.e., intersection, street link, freeway segment, and freeway ramp).

h. Mitigation measures/roadway improvements (i.e., intersection, street link, freeway segment, and freeway ramp).

i. Existing 2001 Level of Service (i.e., intersection, street link, freeway segment, and freeway ramp).

j. Adjusted Environmental Baseline Level of Service for year 2005/2015 (i.e., intersection, street link, freeway segment, and freeway ramp).

k. Level of Service after proposed LAX expansion project completion (i.e., intersection, street link, freeway segment, and freeway ramp).

l. Level of Service after mitigation measures implementation (i.e., intersection, street link, freeway segment, and freeway ramp).

- m. Future projected traffic volumes for Adjusted Environmental Baseline for year 2005/2015 (i.e., intersection, street link, freeway segment and freeway ramp).
- n. Location of future projects.

3. Note that tables need to be prepared as necessary for comparative analysis.

Response:

All of the information requested in this comment was provided in the Draft EIS/EIR, Supplement to the Draft EIS/EIR, technical reports, and appendices. The year of the existing conditions data in the documentation, however, is 1996 rather than 2001. As specified by CEQA Guidelines, the existing environmental conditions considered for the CEQA impacts analysis are normally defined as those that exist at the time the Notice of Preparation is issued. For the LAX Master Plan EIS/EIR analysis, the year of the existing conditions analysis is the last full year before the 1997 Notice of Preparation. Details of intersection geometrics and turning movements, street link capacities and volumes, freeway segment capacities and volumes, and freeway ramp capacities and volumes are provided in Technical Report 3b, Attachments C, D, E, and G. These details include existing, 2005 and 2015 scenarios both with and without the project, and include the changes in demand/LOS due to the project. Trends in regional social demands and economic development are included in Technical Reports S-2b and 3b, Section 2.3. Trends in airport traffic demand are described in detail in Technical Reports S-2a and 3a, and further described in Technical Report 3b, Section 3. Details regarding proposed mitigation measures on intersections, street links, freeway segments and freeway ramps, together with the levels of service after mitigation are shown in Attachment E of Technical Reports 3b and S-2b. The distribution of airport traffic is shown in Technical Reports S-2b and 3b, Attachment B. Summaries of these data were provided in several tables in the Draft EIS/EIR, Supplement to the Draft EIS/EIR, and in Technical Reports S-2b and 3b.

AS00001-18

Comment:

C. Section 4.6

The LAX Master Plan's air quality analyses recognizes compliance with both SIP requirements as well as Clean Air Act general conformity requirements. Presumably, such recognition ensures a measure of consistency in the data rendering.

D. Section 4.6.3.3

This paragraph should probably be revised or updated. The reference to the 1994 SIP is not clear, particularly since the applicable SIP for the SCAG region is the 1997 SIP. In addition, the best estimate of this paragraph should be revised.

Response:

The reference in subsection 4.6.3.3 of the Draft EIS/EIR was intended solely to identify the point of origin of the "consultative process." This process resulted in a Memorandum of Understanding (MOU) being signed in December 2002 between CARB and major commercial airlines serving the South Coast Air Basin to reduce emissions from ground support equipment (GSE). In the Supplement to the Draft EIS/EIR, this MOU was assumed to be in place in the 2015 planning horizon for the air quality analyses for all LAX Master Plan alternatives (including the No Action/No Project Alternative). At the time of publication of the Supplement to the Draft EIS/EIR, the applicable SIP varied by pollutant: the ozone SIP was based on the 1997 AQMP and the 1999 amendment to the 1997 AQMP; the carbon monoxide SIP was based on the 1997 AQMP; the PM10 SIP was based on the 1997 AQMP, amendments to the 1997 AQMP submitted in 1998, 1999, and further modifications to the 1997 AQMP submitted in a status report to EPA in 2002; and the NO2 SIP was based on the 1997 AQMP. Please see Response to Comment AF00001-4 regarding the general conformity determination.

AS00001-19

Comment:

E. Section 4.6.7.2

3. Comments and Responses

Construction: Relative to air quality, in addition to the Playa Vista Project, the realignment of SR-1 should also be noted since there would be construction-related emissions.

Response:

As was discussed in subsection 4.6.7.2 of the Draft EIS/EIR, construction emissions associated with the Alternatives A, B, and C, in conjunction with probable future projects would be significant. Although not specifically noted in subsection 4.6.7.2, the SR-1 realignment would occur in the same time period as the LAX Master Plan, as discussed in Section 5.5.5 of Appendix K of the Draft EIS/EIR. Construction emissions for SR-1 realignment are included in Section 5.5 of Appendix K of the Draft EIS/EIR.

AS00001-20

Comment:

III. Technical Report 2b

A. Add and analyze the following State roadway segments:

1. Manchester Avenue between Sepulveda Boulevard and I-405. It will be re-stripped by the City of Los Angeles.
2. Lincoln Boulevard (SR-1) North of Manchester Avenue. The impact at this location will be mitigated by the Arbor Vitae project.
3. Sepulveda Boulevard (SR-1) between Rosecrans Avenue and Century Boulevard will be widened by the Playa Vista Project.

B. Add the following state highway segments for accident analysis (It is not possible to analyze the projected accident rate, however, it is expected that safety will be further enhanced and the accident rate will be reduced as a result of funding improvements proposed):

1. Sepulveda Blvd./I-105 off-ramp, n/o Imperial Hwy.
2. Nash St./I-105 WB off-ramp - Imperial Hwy.
3. La Cienega Blvd./I-405 SB ramps, n/o Century Blvd.
4. SR- I/between Century Blvd. and Imperial Hwy.

C. Below are existing airport activities that do not coincide with the 11:00 - 12:00 Noon peak hour:

1. Section 7.3.1.3 LAX Cargo and Ancillary trips: Figure II-7.8 shows the peak hour from 12:00 - 2:00 PM.
2. Section 7.3.1.4 Passenger and Visitor Parking Facilities: Figure II-7.shows the peak hour from 5:00 - 6:00 PM.
3. Section 7.3.1.5 Employee Parking Facilities: Figure II-7.10 shows the peak hour from 2:00 - 3:00 PM.

Response:

A.1. Five intersections were analyzed on Manchester Boulevard between Sepulveda Boulevard and I-405. The results are tabulated in Technical Reports S-2b and 3b, Attachments C through G. A.2. Three intersections and two links were analyzed on Lincoln Boulevard north of Manchester Boulevard. The results are tabulated in Technical Reports S-2b and 3b, Attachments C through G. A.3. Seven intersections and one link were analyzed on Sepulveda Boulevard between Rosecrans Avenue and Century Boulevard. The results are tabulated in Technical Reports S-2b and 3b, Attachments C through G. B.(1. through 4.) All of these ramps were included in the analysis, and the results of the analyses are tabulated in Technical Reports S-2b and 3b, Attachments C-G. C. (1. through 3.) As described in Sections 4.3.1 and 4.3.2 of the Supplement to the Draft EIS/EIR and the Draft EIS/EIR, and again in Technical Reports S-2a, S-2b, 3a and 3b, traffic analysis of the LAX Master Plan has been conducted for three peak hours. The AM commute peak hour is 8:00-9:00 on a non-summer weekday. The PM commute peak hour is 5:00-6:00 PM on a non-summer weekday. These two peak hours are mandated by the traffic impact analysis guidelines of the City of Los Angeles. The analysis goes beyond these mandates and analyzes a third peak hour. This third peak hour is when total airport-related trip generation is at its highest, between 11:00 AM and noon on a Friday during the busiest month of the year (August). These three peak hours represent the hours with the greatest potential for project impacts. The AM and PM commuter peak hours represent the hours with highest regional

highway system traffic. The airport peak hour represents the hour of maximum total airport trip generation. It is true that some airport uses have a different peak hour than the hour selected, just like some highways have a different peak hour from the regional commute peaks. Yet by selecting the hour of highest total airport trip generation, the worst case scenario is defined, and the maximum number of project impacts can be identified.

AS00001-21

Comment:

D. We are aware that the noon peak period is for arrivals and departures, however, traffic peak period on mainline highway as well as around the airport may not be the same as the peak for the airport. We would like to have further justification for use of the Noon Peak period.

Response:

Full documentation of the peaking characteristics of airport trips as well as the surrounding roadway network is provided in detail in the Draft LAX Master Plan (dated November 7, 2000), Chapter 2, Existing Conditions Working Paper (dated April 19, 1996). This documentation is part of the Draft EIS/EIR documents. The AM and PM commute peak hours are the hours with highest traffic volumes on the surrounding roadway network consistent with the LADOT guidelines for traffic impact analyses. They occur at 8:00-9:00 AM and 5:00-6:00 PM on non-summer weekdays. The airport peak hour is not required by the LADOT guidelines, but has been added in this case. The airport peak hour is the hour with the highest total airport vehicle trip generation, as determined in the document identified above. It occurs between 11:00 AM and 12:00 noon during the month of August. See also Topical Response TR-ST-2 regarding seasonal variations in airport trips.

AS00001-22

Comment:

E. Note that Section 7.3.2.3 Result of Survey shows 30% or more of motorist responding, they used "Nash Street at the westbound I-105 off-ramp". However, Sepulveda Boulevard at the westbound I-105 off-ramp is the primary off-ramp being used by motorists for LAX.

Response:

Section 7.3.2.3 of Technical Report 2b reports that of those people who passed through the westbound I-105 off-ramp at Nash Street, 30 percent or more were traveling to or from LAX during either the AM or PM peak hour. This does not mean that 30 percent or more of all airport trips used that ramp. The Sepulveda/I-105 off-ramp may well have a higher percentage of airport trips. This ramp was not included in the survey, however, because it was considered unsafe to ask the surveyors to walk along the exit ramp to conduct the survey at that location.

AS00001-23

Comment:

F. The peak period at Nash Street westbound off-ramp is about 7:30 to 8:30 AM. Most of the traffic using Nash Street is not airport traffic (they are employees who work in Kilroy Airport Center and at aerospace companies). The survey should be conducted at location(s) where traffic is heading to the airport.

Response:

The point of the analysis described in Section 7.3.2 of Technical Report 2b was to determine how closely the LAX Ground Access Model estimated airport trips at various locations throughout the study area. A survey of drivers was taken at these various locations to obtain a database against which the model estimates could be compared. The locations included areas with high airport traffic and areas with relatively fewer airport trips. The intersection of Imperial Highway and Nash Street near the I-105 westbound off-ramp was one of these locations, and the data obtained included traffic volumes on all approaches. The results of the survey indicated that airport traffic using the I-405 westbound off-ramp and approaching this intersection from the north represented about 32 percent of total traffic during the

3. Comments and Responses

morning peak period. This means that 68 percent (more than two-thirds) of the traffic was not destined for the airport at that time. The survey includes many other locations, with higher locations of airport trips in some locations and lower percentages of airport trips in other locations.

AS00001-24

Comment:

G. Table II-7.6, 1996 Weekday LOS

1. The table shows the following six freeway ramps operating at LOS=E or worse. Please note the following proposed improvements (to be implemented in the near future):

- a. No. 12, I-405 NB off-ramp at Manchester Blvd. (will be widened under State contract).
- b. No. 13, I-405 SB on-ramp at Manchester Blvd. (will be re-stripped for ultimate improvement by State contract).
- c. No. 26, City of Hawthorne (will widen I-405 SB on-ramp at El Segundo Blvd).
- d. No. 31, I-105 EB on-ramp at Imperial Highway.
- e. No. 32, I-105 WB off-ramp at Sepulveda Blvd. (it will be widened to three lanes by State contract).
- f. No. 35, I-105 WB off-ramp at Nash St. (will be widened by State contract).

2. The table also shows the following three freeway mainline segments operating at LOS=F (0) or worse. Please note the following proposed improvements (to be implemented in the near future):

- a. I-405 N/O Venice Blvd. (will be widened by State contract).
- b. I-405 N/O La Tijera Blvd. (will be widened by Arbor Vitae project).
- c. I-405 S/O Rosecrans Ave. (will be widened by City of Hawthorne).

3. The table indicates that the freeway segment of "Interstate 405 south of Rosecrans Avenue" is currently operating at LOS=F(0) during AM, PM and Airport peak hours. Caltrans is planning to construct HOV lanes at this segment of the freeway in the near future.

Response:

The ramp improvements identified may widen or add lanes on a portion of a ramp, but they appear not to add to the critical number of lanes as the ramp connects to the freeway. As such, the improvements would not increase ramp capacity and therefore would not affect the analysis performed for the LAX Master Plan.

The mainline improvements identified all appear to widen the freeway cross-section, but not the number of through lanes. As such, the improvements would not affect roadway capacity and therefore would not affect the analysis performed for the LAX Master Plan.

The HOV lanes planned for I-405 were fully incorporated into the analysis of future year scenarios, and are identified as future improvements in Table 2.3 of Technical Report 3b.

AS00001-25

Comment:

H. Note that Section 4.3.2 EIR/EIS "Off-Airport Surface Transportation" does not show the impact of the proposed project (LAX expansion) at the above critical ramps or the 38 ramps that were analyzed in Table II-7.6.

I. Section 4.3.2 also does not show the impact of the proposed project (LAX Expansion) at the freeway mainline segments. The freeway widening will take place by State contract within the next two years.

Response:

Impacts to the freeway ramps are quantified in Attachment D to Technical Report 3b of the Draft EIS/EIR and Attachment D to Technical Report 2b of the Supplement to the Draft EIS/EIR. Impacts to the freeway mainline are quantified in Attachments D and G to Technical Report 3b of the Draft EIS/EIR and Attachments D and G to Technical Report 2b of the Supplement to the Draft EIS/EIR. Freeway

widening and freeway ramp improvement projects under state contract, together with all regional transportation improvements included in the STIP, were assumed to be in place as baseline assumptions for all future year forecasts.

AS00001-26

Comment:

J. Please identify the Thresholds of Significance for ramps and mainline segments.

Response:

Freeway segments and ramps were analyzed as part of the Congestion Management Program (CMP) for Los Angeles County, which is included in Technical Reports 3b, Off-Airport Surface Transportation Technical Report, and S-3b, Supplemental Off-Airport Surface Transportation Technical Report.

AS00001-27

Comment:

Also identify mitigation measures if the proposed project will impact any of the analyzed ramps and freeway segments.

Response:

Ramps and freeway segments are addressed in the Congestion Management Program, summarized in Technical Report 3b, Off-Airport Ground Access and Mitigation Measures, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report. These impacts would be largely mitigated with CMP credits from the project.

AS00001-28

Comment:

K. Also analyze freeway segment I-105 west of the I-405 and identify mitigation measures if the proposed project impacts any of the analyzed freeway mainline segments (the Sepulveda Blvd. off-ramp will be widened to make three lanes and an auxiliary lane will be added in two phases from I-405 to Sepulveda Blvd. by State contract).

Response:

Freeway widening and freeway ramp improvement projects under state contract, including improvements to I-105 and the westbound Sepulveda Boulevard off-ramp, together with all regional transportation improvements included in the STIP, were assumed to be in place as baseline assumptions for all future year forecasts.

AS00001-29

Comment:

L. Due to ambient increase of traffic volumes and traffic demand generated by the proposed LAX expansion, the need for an HOV connector from I-405 northbound to I-105 westbound should continue to be investigated.

Response:

Early in the development of Alternatives A, B, and C, HOV lanes were considered along the extension of I-105 to the west terminal. Ramps between the new I-105 HOV lanes and the I-405 HOV lanes to the south were considered at that time. After some of the early findings were obtained, however, it was determined that the benefits of these particular HOV lanes would not justify their costs. The HOV lanes were therefore removed from the project definition for Alternatives A, B, and C, and were not considered in the analysis of Alternative D. For Alternatives A, B, and C, ramps between the I-105 extension and I-405 to the south were modified such that both the mainline lanes and the HOV lanes have direct ramps to the I-105 extension. This accomplishes the same advantages for HOVs as the previously considered

3. Comments and Responses

HOV ramps had accomplished. As a mitigation to Alternative D, this traffic would be accommodated via a new I-405 interchange opposite Lennox Boulevard, and HOV lanes would be not necessary.

AS00001-30

Comment:

M. The freeway mainline segment of "Interstate 105 west of Interstate 405" is currently experiencing heavy congestion during peak hours and the need for mitigation is deemed necessary. Please investigate the following mitigation measures:

1. Widening or restriping the I-105 connectors at Imperial Hwy from two to three lanes.
2. Widening or restriping Imperial Hwy at I-105 from three to four lanes, thus, eliminating merged lanes. The I-105 Freeway terminus at Imperial Highway should be widened to Pershing Drive, possibly becoming part of the State Highway System.

Response:

The improvements identified would likely mitigate existing congestion; however, the Draft EIS/EIR and Supplement to the Draft EIS/EIR were intended to identify mitigation for project impacts only, not existing congestion unrelated to the project. These improvements were not deemed necessary to mitigate project impacts. Also, please see Topical Response TR-ST-4 regarding existing congestion.

AS00001-31

Comment:

N. Please provide traffic model result information. Also compare the results of your model with no change in existing traffic patterns.

Response:

Summary tables comparing the results of future year traffic model runs to existing conditions were provided in Table 4.3.2-3 on page 4-289 of the Draft EIS/EIR. Additional summaries of future year model results were provided in Tables 4.3.2-5 on page 4-295 and 4.3.2-6 on page 4-296. Summary tables comparing results of future year traffic model runs to existing conditions were also provided in Table S4.3.2-2 on page 4-252, and Table S4.3.2-3 on page 4-253, of the Supplement to the Draft EIS/EIR. Similar tables were also shown for Alternative D in Section 4.3.2 of the Supplement to the Draft EIS/EIR.

AS00001-32

Comment:

IV Appendix G

A. Section 3.2.1 and 3.2.2

SCAG's proposed 2001 RTP uses EMFAC7G as does the 1997 AQMP, and the 2000/01 RTIP, the LAX Master Plan incorporates emissions data that is derived from the use of EMFAC 2000 model. The regional plans and programs have not yet used this particular model to determine emissions inventories. The modeling scenarios become somewhat blurred when trying to determine projected model outputs when different models have been used. The Plan acknowledges that the estimates of future emissions are conservative estimates, however, given that different assumptions of variables tend to yield different emissions estimates for the various pollutants, how significant would the differences in the outcomes be?

Response:

In the Supplement to the Draft EIS/EIR, the air quality analyses for all alternatives were updated and adjusted to account for on-road emissions based on EMFAC2002, the CARB- and EPA- approved motor vehicle emissions inventory model for SIP development. At the time of publication of the Supplement to the Draft EIS/EIR, the Draft 2003 AQMP (made available for public review in February

2003) was developed using EMFAC2002 and the Draft 2004 RTP was being developed using EMFAC2002.

AS00001-33

Comment:

V Appendix K

A. General Comments

1. Are there any paleontology issues involved in the excavation of this project?

Response:

According to previous studies conducted for the LAX airport, paleontological resources are known to exist within and in the vicinity of the airport boundaries. Though project specific studies along the I-405 and SR-1 have not been conducted, it is prudent to assume at the programmatic level stage that such resources may exist in the vicinity of these proposed project areas. In fact, the nearest paleontological resource known to exist is within one-mile of the I-405 and approximately ¾ mile from the proposed SR-1 re-alignment. The significance of impact on paleontological resources resulting from excavation associated with either of the off-airport roadway improvement projects cannot be determined at this time. Supplemental studies will be conducted as part of the Caltrans Project Development process and CEQA review analysis at the project level. Please refer to Topical Response TR-APPK-1 for clarification and timing of additional studies. In addition, these later studies may include the mitigation measures already recommended in subsection 4.9.2.8, Mitigation Measures in Section 4.9.2, Paleontological Resources of the Supplement to the Draft EIS/EIR.

AS00001-34

Comment:

2. The golf course and Youth Park were not mentioned. Please explain their involvement with the project.

Response:

The golf course (i.e., Westchester Golf Course) and the youth park (i.e., Carl E. Nielsen Youth Park) are discussed in Attachment 4 of Appendix K of the Draft EIS/EIR. As stated in the attachment, both the golf course and the youth park are owned by LAWA and therefore not considered a Section 4(f) resource.

AS00001-35

Comment:

B. Section 3.1

As the S/B Route 405 experiences heavy traffic volumes from the I-10 interchange (4 miles north of the proposed expressway), further analysis will be needed to determine the optimal I-405 access point at the northern terminus for the LAX Expressway. The additional analysis will need to evaluate the LAX Expressway and I-405 connections in the vicinity of Venice Blvd. for both the southbound and northbound directions. In addition, traffic mitigation measures will need to be implemented to fully benefit from the proposed expressway.

Response:

Comment noted. Please see Responses to Comments AL00018-13 and AL00018-129. Also, please refer to Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR for a summary of Master Plan commitments and mitigation measures related to on- and off-airport surface transportation.

3. Comments and Responses

AS00001-36

Comment:

C. Section 3.2

1. LAWA needs to arrange for the City of Los Angeles to construct as a city street any new alignments of Lincoln Blvd. Additionally, LAWA needs to request the City of Los Angeles to accept State relinquishment Sepulveda Blvd. from the Route 105 Freeway to Lincoln Blvd and of Lincoln Blvd. to the Santa Monica city limits.
2. LAWA needs to have the State Legislature remove the specified segment of Lincoln Blvd. from the State Highway system.
3. The alignment of new roadway or the realignment of existing roadway needs to be precisely delineated to enable the parties involved to determine the extent of clean up needed in order to proceed.

Response:

Comment noted. Should SR-1 improvements be included as a project component of an adopted LAX Master Plan alternative, such jurisdictional issues would be addressed during future project design phases and negotiations with Caltrans as part of the Project Development process. Please refer to Topical Responses TR-APPK-1 and TR-APPK-2.

AS00001-37

Comment:

D. Section 3.2.2

Alternative 2 - Diamond Interchange: Need to have more discussion on the right of way impacts and effects to business, residential, utility, etc.

Response:

Alternative 2 Diamond Interchange right-of-way impacts and effects upon businesses, residences, and public facilities are addressed in Section 5.1.2.2, Alternative 2 (Diamond Interchange) and Alternative 3 (Urban Interchange), of Appendix K of the Draft EIS/EIR. Should SR-1 improvements be included as a project component of an adopted LAX Master Plan alternative, a more precise determination of right-of-way impacts would be addressed during future project design phases and project-specific CEQA review. Please refer to Topical Responses TR-APPK-1 and TR-APPK-2.

AS00001-38

Comment:

E. Section 4.3

1. Please clarify the health risks involved under the social and economic section.

Response:

A discussion of health risks associated with the proposed off-airport roadway improvements is provided in Sections 5.3.1.3, Health Risk, and 5.3.2.3, Health Risk, of Appendix K of the Draft EIS/EIR. Such risks may include cancer, respiratory irritation and other lung disorders from toxic air pollutants emitted by passing vehicles in close proximity to sensitive receptors, such as residences, hospitals, schools, daycares, libraries, churches, etc. Alternative D, the Enhanced Safety and Security Plan, evaluated in the Supplement to the Draft EIS/EIR, does not include the LAX Expressway.

AS00001-39

Comment:

2. Table 4.3-3, please specify the impacts to Century Blvd. and to the church.

Response:

Specific analysis of the noted land uses would occur with future project-specific analysis if the LAX Expressway is ultimately adopted as a component of the LAX Master Plan. Refer to Topical Response TR-APPK-1 for an explanation of the programmatic level of analysis provided in Appendix K of the Draft EIS/EIR and a description of the more detailed project-level analysis that would be undertaken in the future if the LAX Expressway is adopted as a component of the LAX Master Plan.

The socioeconomic and land use impact analysis presented in Appendix K of the Draft EIS/EIR (for the proposed off-airport transportation improvements) identifies parcels as 'potentially affected' if they would conceivably be acquired in full or in part. Acquisition would be considered a direct impact, whereas, impacts from traffic, traffic noise, light/glare, shade/shadow, air pollution, etc. would be considered indirect.

According to a review of Assessor Parcel Number records, there is property that extends from Osage Avenue to the ROW of the I-405, a portion of which is crossed over by the proposed LAX Expressway (under the Alternative 2 design). This property supports a church and is noted in Table 4.3-3 of Appendix K of the Draft EIS/EIR. If the proposed LAX Expressway is ultimately adopted as a component of an LAX Master Plan alternative, there is a potential that acquisition of a portion of the church property would be necessary. In such a case, the remaining church property would likely be subject to shade/shadow effects during the day, and light/glare effects during the evening after construction of the proposed LAX Expressway. Increases in traffic noise levels would be mitigated through the construction of sound barrier walls proposed south of La Tijera Boulevard.

Properties along Century Boulevard involving partial or full acquisition are listed in Table 4.3-3 of Appendix K of the Draft EIS/EIR. These properties would likely qualify for assistance through the final Relocation Plan developed specifically for the LAX Master Plan EIS/EIR. Please refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

AS00001-40

Comment:

F. Section 4.4

The section on Pedestrian and Bicycle Facilities makes reference to several documents or "Plans" but does not cite the author or dates associated with these documents. The last paragraph in this section is also unclear.

Response:

The citation for reference to Chapter IX (Bicycle Plan) of the Transportation Element of the Citywide General Plan Framework for the City of Los Angeles and to the Revised Bicycle Plan Citywide Bikeway System Westside Area is: City of Los Angeles. 1996. Bicycle Plan, City of Los Angeles General Plan, Transportation Element Chapter IX. August 6, 1996. The noted citations are included in this Final EIS/EIR. The Citywide General Plan Framework does not contain a Recreation Element. The discussion on Policy 1.1.4 of the Bicycle Plan (1996) regarding the need for a public hearing in the event that a Class II bike path would be removed as a result of a project, was provided to establish that a public hearing would not be required for impacting the bike path along Westchester Parkway. The proposed Westchester Southside project, a component of Alternatives A, B, and C, would provide for replacement and comparable bike paths as the existing Class II bike path along Westchester Parkway.

3. Comments and Responses

AS00001-41

Comment:

G. Section 4.5

1. Table 4.5-1 and 4.5-2, please show the NAAQS for CO 8-hour average as 9 ppm instead of 9.0 ppm.

Response:

The requested revision is noted. In response, Table 4.5-1 (page 34) and Table 4.5-2 (page 35) of Appendix K of the Draft EIS/EIR have been revised and is included in this Final EIS/EIR.

AS00001-42

Comment:

2. The PM10 Hotspot analysis is missing. FHWA currently requires projects in PM10 non-attainment areas to have localized impact analysis. This project is a non-exempt project and is located in PM10 non-attainment area. Hence, a PM10 analysis is required.

Response:

On September 12, 2001, the FHWA published a guideline document entitled "Guidance for Qualitative Project Level "Hot Spot" Analysis in PM10 Nonattainment and Maintenance Areas." This guideline document was developed specifically for project-level impact analyses. The air quality analysis for the proposed LAX Expressway and SR-1 improvements as presented in Appendix K of the LAX Master Plan Draft EIS/EIR is intended to provide a program-level analysis. The analysis contained in Appendix K was conducted in compliance with the FHWA standards, which follow the regulatory requirements of NEPA. At the programmatic stage in the planning process, the alignments and design plans for the proposed LAX Expressway and SR-1 improvements are conceptual. A project-level analysis of PM10 impacts associated with the improved LAX Expressway and SR-1 operations cannot be concluded until engineering characteristics and project-specific details are fully developed. It is expected that a project-level PM10 impact analysis would be conducted at the individual design and planning stage. Note that the FHWA guideline was published after the analysis was completed in November 2000.

In addition, please refer to Topical Response TR-APPK-1 for additional information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR.

AS00001-43

Comment:

H. Section 4.6

The noise levels approach or exceed the respective FHWA Noise Abatement Criteria (NAC) for some areas adjacent to the proposed LAX Expressway. The locations of sound walls for these areas should be identified.

Response:

Preliminary noise abatement recommendations are discussed in Section 5.6.1.1, Noise Abatement, of Appendix K of the Draft EIS/EIR. Within Section 5.6.1.1, Noise Abatement, Figures 5.6-1 and 5.6-2 identify proposed locations for soundwall barriers along the LAX Expressway. This analysis will be refined with future project-level environmental analysis of the proposed LAX Expressway improvements. Please refer to Topical Response TR-APPK-1.

AS00001-44

Comment:

I. Section 4.9

1. Under the Wetlands and Waters of the United States heading, it may not be necessary to describe a wetland area that ultimately would not be subjected to adverse effects as a result of the project.

2. There is mention of 51 sites that are considered wetlands located in the LAX airfield operations, but no impacts to the wetlands are mentioned. Please explain.

Response:

With respect to comment 1., the description of wetland areas was included in the existing conditions section because of the existence of potential wetlands near the proposed SR-1 realignment. As indicated in Section 4.12, Wetlands, of the Draft EIS/EIR, the Argo Ditch, located north of Runway 24R, is considered "a palustrine (marshy, swampy) emergent wetland with a saturated/semi-permanent seasonal water regime" (page 4-731). The Argo Ditch is immediately adjacent to the existing SR-1 roadway. As was described in subsection 4.12.2, General Approach and Methodology, of the Draft EIS/EIR, a jurisdictional delineation of the Argo Ditch was completed in support of emergency channel maintenance activities in October 1997. The U.S. Army Corps of Engineers (USACOE) exerted jurisdiction over isolated wetlands in the Argo Ditch that resulted from a lack of routine operations and maintenance activities over an approximate 20-year period. The USACOE authorized emergency operations and maintenance activities pursuant to Nationwide Permit No. 31. The permanent removal of isolated wetland and riparian vegetation was mitigated through an off-site mitigation program. The USACOE determined that, upon completion of emergency operations and maintenance activities, the Argo Ditch would no longer be subject to its jurisdiction pursuant to Section 404 of the Clean Water Act. This activity was authorized, and clearance was completed as an independent activity; it is not subject to further evaluation or considerations under this Master Plan.

With respect to comment 2., 51 sites were identified as potential wetlands in the LAX airfield operations areas (AOA). These 51 sites are located over one mile from the proposed SR-1 realignment project site. Those sites identified as jurisdictional under USACOE and the California Department of Fish and Game were presented in subsection 4.12.3, Affected Environment/Environmental Baseline, of the Draft EIS/EIR. Unavoidable direct impacts to certain wetlands would occur as a result of implementing Alternatives A, B, and C, and are not a result of the proposed off-airport roadway improvements, including the SR-1 realignment and Expressway project components.

AS00001-45

Comment:

J. Section 4.13

Based upon further conversations with the California Coastal Commission (CCC), this project is located outside of the Coastal Zone. However, due to potential impacts to public access to the Coastal Zone, the CCC has indicated that a Federal Consistency review by the CCC may be required for this project.

Response:

The California Coastal Commission (CCC) was provided the opportunity to comment on the Draft EIS/EIR and no such comment was received specifically addressing the need to conduct a Federal Consistency review of the proposed project. However, the CCC was informally consulted at the time the original programmatic analysis was prepared. From documented communication, the CCC claimed that no impacts to the coast would occur from the project if access to the coast via Westchester Parkway would remain open (Personal Communication, CCC 2000). Neither the proposed LAX Expressway nor the SR-1 improvement project area lie within the coastal zone as defined in Section 4.13 of Appendix K. Direct access to the coastline from the I-405 is predominantly via Imperial Highway on the south and Culver Boulevard on the north. Westchester Parkway ends at Pershing Drive at which point commuters would head north to Culver Boulevard. The proposed realignment of SR-1 with Westchester Parkway would continue to support travel along Westchester Parkway to Pershing Drive

3. Comments and Responses

as it currently exists, thereby maintaining access to the Coastal Zone. The project, in and of itself, would not promote any additional trips to the coast. Though traffic impacts are anticipated during construction activities, the impact is not considered substantial in that it would be short-term in nature. Rather, the proposed SR-1 realignment would ultimately improve circulation and access to the coast in the long-term. Nevertheless, at the project level analysis stage, a more detailed assessment of coastal access during construction will be conducted. At that time, the need for a Federal Consistency review will be confirmed with the CCC.

AS00001-46

Comment:

K. Section 4.15.2

1. In what project area is the Merle Norman Headquarters complex?

Response:

The term project area is not clear; however, the Merle Norman Headquarters complex is located within the Area of Potential Effects (APE) for the LAX Master Plan. Its location was shown in Figure 4.9.1-1, in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Draft EIS/EIR. As discussed on page 4-591 of the Draft EIS/EIR and on page 37 of Technical Report I - Section 106 Report, this property is eligible for the National Register of Historic Places under Criterion C because of its distinctive architectural style and design utilized in an industrial type building. The analysis goes on to state that this property is also eligible for the California Register and as a City of Los Angeles Historic-Cultural Monument. Section 4.9.1

AS00001-47

Comment:

2. Please clarify the impacts to the four pre-historic sites (archeological). Are they within the APE?

Response:

It is unclear which four prehistoric sites are in question. However, as was noted in Section 4.9.1 the Draft EIS/EIR, there are four prehistoric sites within the APE which were previously identified prior to the archaeological survey conducted for the Draft EIS/EIR. None of these sites were determined to be eligible for federal, state, or local listing due to lack of substantial integrity. Because of their ineligibility for any type of formal designation, these four sites would not be significantly impacted by the proposed project.

AS00001-48

Comment:

Photographs of the buildings or sites, which are eligible for or listed with, the National Registry of Historic Places should be included.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed historic/architectural and archaeological/cultural resources in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, and in Section 4.8, Department of Transportation Act, Section 4(f), with supporting technical data, including photographs, provided in Appendix I, Section 106 Report, and Appendix S-G, Supplemental Section 106 Report.

AS00001-49

Comment:

L. Section 4.16.1

Please specify the volumes of contaminated soils.

Response:

The specific volume of contaminated soils is not known at this time. At the programmatic level of analysis, only areas of contamination have been identified and located. At the time of the Caltrans Project Development process and CEQA review analysis, a Phase II site assessment will be conducted to determine the quantity and limits of the contaminated soil which will ultimately be used in the CEQA analysis and in the development of site specific mitigation measures. Please refer to Topical Response TR-APPK-1 for clarification on additional analysis associated with the LAX Expressway and State Route 1 improvements. Alternative D, the Enhanced Safety and Security Plan, evaluated in the Supplement to the Draft EIS/EIR, does not include the LAX Expressway.

AS00001-50

Comment:

M. Section 4.16.2.2

How will the soil and ground water contamination site along the underground storage tanks be mitigated, and explain the no adverse impacts caused by hazardous waste?

Response:

The contaminated soil and ground water site located at the north end of the proposed bridge structure that carries the runway over Sepulveda Boulevard under the proposed Master Plan will be mitigated in conformance with Master Plan Commitments HM-1, Ensure Continued Implementation of Existing Remediation Efforts, and HM-2, Handling of Contaminated Materials Encountered During Construction, as stated in Section 4.23, Hazardous Materials, of the Draft EIS/EIR. Implementation of these measures will ensure that no adverse hazardous waste impacts would occur. The need for such measures would be further determined as part of project-specific analyses conducted as part of the Caltrans Project Development Process, as design elements are refined. Please note that Alternative D, Enhanced Safety and Security Plan, LAWA's preferred alternative, does not include the proposed LAX Expressway or ring road as project components.

AS00001-51

Comment:

N. Section 4.17.1

What action needs to be taken regarding the "views of / from the road"?

Response:

Actions to be taken to minimize view impacts 'of the road' include ensuring that construction materials are appropriate and in-line with existing materials so as not to create an adverse visual contrast. Actions to be taken to minimize view impacts 'from the road' include limiting the length of sound barrier walls to strictly those areas requiring noise abatement. More specific action to be taken regarding 'views of/from the road' are to be identified in the detailed visual analysis to be prepared for the proposed Expressway and SR-1 improvements at the project level environmental review stage for ultimate project level approval. The detailed visual analysis requirement has already been recommended as a design mitigation measure under the Environmental Action Plan. Please note that Alternative D, Enhanced Safety and Security Plan, now LAWA's preferred alternative, does not include the proposed LAX Expressway as a project component.

Also, please refer to Topical Response TR-APPK-1 for additional discussion on the need for supplemental studies and analysis.

3. Comments and Responses

AS00001-52

Comment:

O. Section 4.17.2.2

In the visual section, the photos are not clearly defined. Please clarify.

Response:

Please see Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, in this Final EIS/EIR for descriptions of the photographs that are included in Appendix K. As stated in Appendix K (p. 60), "views of the road" were the more dominant factor in assessing visual impacts given the presence of sensitive view receptors, such as the Hillside Memorial Park & Mortuary, school, church and residences. Upon implementation, the proposed LAX Expressway would not physically alter the park or its ancillary features, hence, "views of the road" was determined to be the more appropriate application for the analysis. Construction of the proposed LAX Expressway would not physically change the aesthetic appeal of the park. It should also be noted that Alternative D described in the Supplement to the Draft EIS/EIR does not include the proposed LAX Expressway or ring road. Alternative D is LAWA staff's preferred alternative. A follow-up reconnaissance visit to the proposed LAX Expressway alignment under Alternative 3 was conducted on August 2, 2002, to determine with greater certainty whether or not "views of the road" (i.e., of the park waterfall and memorial) would be obstructed. This reconnaissance focused primarily on the northernmost terminus of the proposed Expressway under Alternative 3 as well as the Memorial Park. Views of the Memorial Park heading northbound and southbound would be obstructed. The impact is not considered adverse in that the proposed Expressway would reach heights that would allow for commuters to see past or below the proposed expressway structure. In addition, the Park is oriented towards the northwest which would require northbound travelers to avert their line of sight directly to the east. On the other hand, views of the Park are more apparent and direct to southbound commuters on I-405. The significance and magnitude of this impact would be determined by subsequent analysis at the project design phase when sufficient details of the proposed Expressway would be available. Results, including photographs, of the follow-up reconnaissance conducted on August 2, 2002 are included as Attachment 3, LAX Expressway Photographs, of this Final EIS/EIR.

AS00001-53

Comment:

P. Section 5.3.1.5

Need to expand the discussion to summarize the findings of a Relocation Impact Report on residential units and businesses. This report should also be one of the APPENDIXES of the EIS/EIR. In addition, our Right of Way Division would like to review a copy of this report for compliance.

Response:

Please refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues. If the proposed LAX Expressway and SR-1 improvements are adopted as part of an LAX Master Plan alternative, a Relocation Impact Report would be prepared, in accordance with Caltrans standards, after detailed engineering and design phases are completed for the facilities. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

AS00001-54

Comment:

Q. Section 5.3.2.3

Please clarify the health risks involved under the social and economic section.

Response:

Please see Response to Comment AS00001-38.

AS00001-55

Comment:

R. Section 5.3.2.5

Please explain in more detail the relocation of businesses and residences and the overall impact this project will have on the relocation.

Response:

Please see Response to Comment AS00001-53.

AS00001-56

Comment:

S. Section 5.3.3

The Environmental Justice Program and the data involved should be included in this document. Executive Order 12898 "Environmental Justice" should also be addressed in detail.

Response:

The Environmental Justice Program was described in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR. Though it is not specifically called out in Appendix K as its own subsection, the data upon which an environmental justice impact analysis can be conducted was included in Table 4.3-2 of Appendix K. In response, page 25 of Appendix K has been revised to include a summary of the Environmental Justice Program as described in the Supplement to the Draft EIS/EIR; this revision will be included in this Final EIS/EIR.

In addition, Executive Order 12898 is discussed in detail in Section 4.3.1, General Approach of the Social and Economic Section (4.3), of Appendix K. The discussion can be found on pages 25 and 26.

AS00001-57

Comment:

T. Section 5.6.2

Best Management Practices should be used in mitigation for construction noise abatement.

Response:

Please refer to Topical Response TR-APPK-1 for information about the current and future environmental impact analysis (to include refined noise impacts analysis) of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR. As indicated on page 94 of Appendix K, Section 5.6.4, Construction Noise, the potential noise from construction was found to be a substantial and unavoidable impact. Mitigation measures proposed for construction noise (subsection 4.1.8.3, Construction Equipment Noise, of the Supplement to the Draft EIS/EIR) include many of the controls suggested in this comment such as MM-N-7, Noise Control Devices (including barriers), MN-N-9, Program Maintenance, MN-N-10, Equipment Replacement, and MN-N-11, Construction Scheduling. Specific construction noise mitigation measures would be developed when a preliminary design for the LAX Expressway becomes ripe for consideration.

Please also see Responses to Comments AL00018-15, AL00018-69, and AL00018-89.

3. Comments and Responses

AS00001-58

Comment:

U. Section 5.8.2.1

Please clarify how alternative 2 or 3 will decrease average annual pollution loading to the water quality.

Response:

The methodology for the water quality analysis and the calculation of estimated storm water runoff pollutant loads is detailed in subsection 4.8.1, General Approach (under Section 4.8, Water Quality), of Appendix K of the Draft EIS/EIR. As stated in the last paragraph on page 100 (under subsection 5.8.2.1) of Appendix K, "The implementation of either Alternative 2 or Alternative 3 is likely to decrease average annual pollutant loading since a nominal reduction in impervious surface is achieved by removing slightly more paved surface...than would be added in widening Westchester Parkway." In summary, the conclusion regarding a reduction in average annual pollutant loading is realized in the comparison of Alternatives 2 and 3 to the environmental baseline condition (Alternative 1), which assumes the widening of Westchester Parkway. Finally, please see Topical Response TR-APPK-1 regarding impacts associated with the LAX Expressway and State Route 1.

AS00001-59

Comment:

V. Section 5.10.22

1. Will there be any impacts to native plants and trees?

Response:

There are no native plants that exist within the footprint of either the proposed expressway alternatives or the proposed SR-1 realignment alternatives. Therefore, no impacts to native plants are anticipated. Under both Alternative 2 and 3 of the proposed expressway, trees would be removed to accommodate the proposed elevated viaduct, however, they are considered ornamentals. There will be no direct or indirect impacts to native plants and trees in that the area targeted for development. The vacant lot to the north of Westchester Parkway consists primarily of ruderal grasses and weeds. There are no native plants or trees within the existing right-of-way.

AS00001-60

Comment:

2. Please explain the "may effect" on the burrowing owls, red-tailed hawks, and migratory raptors nesting and foraging sites located in the vacant lots to the north of the airport.

Response:

Burrowing owls, red-tailed hawks and other migratory raptors "may be affected" by conversion of the vacant lot to the north of Westchester Parkway along SR-1 because under existing conditions the open space may support small burrowing mammals and reptiles upon which these birds feed. During the field survey, one red-tailed hawk was observed in the vicinity. However, in light of the area's size, its isolation from similar habitat, and the intense development adjacent to the vacant lot, the loss of this foraging habitat would not be considered significant or adverse. Similarly, only two trees were observed on-site with the potential to provide nesting habitat. The elimination of these trees "may affect" raptors during the breeding season; however, no nesting raptors were observed. Alternative D does not include the proposed LAX Expressway and ring road; therefore, it would not affect these vacant lots.

AS00001-61**Comment:**

3. What was the duration of the survey conducted at these vacant lots since it was mentioned that there was no observation of nesting and foraging? Migration may be necessary.

Response:

The field survey was completed in one day. Two eucalyptus trees were observed on-site and a red-tailed hawk was observed in the vicinity of the site. If an alternative to the LAX Master Plan is adopted that includes the LAX Expressway as a project component, then a project-specific analysis would be conducted based on refined design elements to assess the need, if any, for such mitigation. Please note that Alternative D, Enhanced Safety and Security Plan, now LAWA's preferred alternative, does not include the proposed LAX Expressway as a project component.

AS00001-62**Comment:**

4. How was it determined that these lots are inadequate for nesting and foraging?

Response:

These lots were determined to be inadequate for nesting and foraging based on the natural history, habitat, feeding, cover, territory and home range requirements of the different types of avian species known to frequent the area. Given the relatively small size of the vacant parcel, its proximity to intense development, and the absence of nests during the field visit, the vacant parcel has minimal habitat value.

AS00001-63**Comment:**

W. Section 5.10.4

Please provide a conclusion as to the impacts that may or may not occur.

Response:

Conversion of the vacant parcel to the north of Westchester Parkway would result in the loss of potential foraging habitat for resident and migratory bird species. However, its loss is not considered significant or adverse and hence, no direct or indirect significant or adverse impacts to such species are anticipated.

AS00001-64**Comment:**

X. Section 5.15.2.1

For the implementation of the LAX Master Plan alternatives, discussion of mitigation is needed for the tunneling of Sepulveda on Archeological sites.

Response:

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR provided mitigation measures for unanticipated discoveries of archaeological resources, including those which may be encountered by the tunneling of Sepulveda Boulevard under Alternative C. Any grading and/or excavation activities proposed as part of the LAX Master Plan within the existing or future LAX boundaries would be monitored by a qualified archaeologist as described in Mitigation Measure MM-HA-5, described on page 4-438 in Section 4.9.1, of the Supplement to the Draft EIS/EIR.

3. Comments and Responses

AS00001-65

Comment:

Y. Attachment 2

It is recommended that commercial zoned areas adjacent to the freeway and of frequent outdoor human use, be identified and investigated for roadway traffic noise impacts.

Response:

During the field investigation conducted for the noise impact analysis presented in Appendix K of the Draft EIS/EIR, commercially zoned areas adjacent to the I-405 freeway were searched for having frequent human use (such as employee break or recreation areas). No such uses were found in the potentially impacted LAX Expressway project area. These findings will be refined and updated with future project-level environmental analysis of the proposed LAX Expressway improvements. Please refer to Topical Response TR-APPK-1.

AS00002

Jeché, Harlan

State of California

7/16/2001

AS00002-1

Comment:

1) The draft EIR needs to briefly identify and determine whether historic uses at the project site had resulted in any release of hazardous wastes/substances, such as aviation lubes, oils, or chemicals e.g. BTEX, TCE,PCE, and others related to the operations and maintenance at the project area for the proposed alternatives.

Response:

Please see Table S4.23-1, Soil and Groundwater Contamination and Remediation Status, in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR, for a summary of known past and present contamination within the Master Plan boundaries. Contaminants such as BTEX, solvents, oils, metals and other fuels were identified with respect to their location and prospective impact from the Master Plan alternatives. The assessment or remedial status was also described as documented in LAWA's Underground Tanks and Hazardous Substances (UTAHs) Program and agency database reports provided by Vista Information Solutions for the Draft EIS/EIR and Environmental Data Resources (EDR) for the Supplement to the Draft EIS/EIR.

AS00002-2

Comment:

2) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

Response:

Please see subsection 4.23.3, Affected Environment/Environmental Baseline, Hazardous Materials Contamination and Remediation, Regulating Authorities in Section 4.23, Hazardous Materials, of the Draft EIS/EIR, for a description of the reporting mechanism for notification and governmental agencies typically providing oversight for hazardous material concerns. The mechanism to initiate any required investigation and/or remediation is defined on a case-by-case basis depending on the medium released and the potential impact. The Draft EIS/EIR and Supplement to the Draft EIS/EIR are overall program-level documents; additional environmental documents are anticipated to be prepared as further levels of detail are defined regarding site-specific remediation requirements. Agencies that may be involved are listed on page 2 of the Preface to the Draft EIS/EIR, and include, but are not limited to the U.S. Environmental Protection Agency, California Coastal Commission, California Air Resources Board, Department of Toxic Substances Control, and the Regional Water Quality Control Board.

AS00002-3**Comment:**

3) According to the draft EIR (page 4-18), there is a possibility for a potential release due to the use or destruction of the non-renewable resources, such as asbestos, lead, PCB's, and lead-based paint. In considering this, there should be a plan included in the draft EIR clarifying the sampling and/or analysis of these hazardous materials prior to the demolition and construction.

Response:

As described in Section 4.23, Hazardous Materials (subsection 4.23.6), of the Draft EIS/EIR, an assessment of potential exposure to hazardous building materials is required by law prior to demolition. The assessment includes identification of potential hazardous building materials to be encountered during demolition, engineering and work practice controls, personal protective equipment for workers and medical monitoring requirements. The measures required will vary with the type of building materials encountered. Compliance with Federal, State and local regulations would prevent the exposure of construction workers or the general public to hazardous building materials in excess of regulatory levels.

AS00002-4**Comment:**

4) If during construction of the project, soil and/or groundwater contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exists, the draft EIR should include a plan identifying how any required investigation and/or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

Response:

As described within Master Plan Commitment HM-2 (refer to page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR), LAWA will develop a program to coordinate all efforts associated with handling contaminated materials encountered during construction to ensure that all contaminated soils and/or groundwater are appropriately handled. Identification of appropriate regulatory agencies and notification procedures will be included within the plan as required by local, state and federal hazardous materials requirements. In addition, all construction contractors will be required to prepare site-specific Health and Safety Plans prior to the initiation of grading or excavation. In the event that any threshold of significance listed in Section 4.23, Hazardous Materials (subsection 4.23.4.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR is exceeded due to the discovery of soil or groundwater contaminated by hazardous materials, LAWA will notify the lead agency(ies) with jurisdiction and take immediate and effective measures to ensure the health and safety of the public and workers, and to protect the environment.

AS00003**Kenny, Michael****Air Resources Board****9/24/2001****AS00003-1****Comment:**

Mitigation Measures

The proposed Master Plan provides an important opportunity to make LAX a model airport from the standpoint of clean air technologies. In terms of the Master Plan, now is the time to design for zero- and near-zero emission technologies wherever possible. LAWA should use the cleanest possible technologies and designs for all emission sources and then mitigate, to the maximum extent possible, any remaining emissions. While we recognize that LAWA is not building an entirely new airport from the ground up, the scale of the project gives LAWA the opportunity to incorporate effective new strategies to minimize air pollution impacts.

3. Comments and Responses

The Master Plan includes an extensive list of air quality mitigation measures. These include measures already in place, measures included in the master plan, measures under evaluation, and measures not selected. This approach enhances the ability to review the considerable number of options. We support the measures that LAWA intends to implement and believe LAWA's commitment to evaluate additional measures is appropriate and necessary. In considering additional measures, we believe all measures labeled for evaluation should be pursued, unless LAWA demonstrates that the measure is not feasible or has a negative impact. ARB staff is available to work with LAWA staff on these assessments.

We strongly support LAWA's steps to reduce the impacts of diesel particulate emissions during the construction process and in daily operations. Ultimately, all diesel vehicles and equipment on the airport should use either: (1) alternative fuels or (2) the combination of low-sulfur diesel fuel and particulate filters approved by ARB. We commend LAWA on the recent decision to move to low sulfur diesel fuel for ground support operations.

We also encourage you to reconsider the discarded measure to provide free travel on the Green Line to and from LAX, or an alternative that could similarly increase the use of mass transit for passenger access. Another measure not selected, providing incentives for the use of low-emission vehicles to transport cargo to and from the airport, may also offer emission reduction benefits.

Response:

LAWA is implementing all state-of-the-art equipment and building designs wherever technologically feasible. The Supplement to the Draft EIS/EIR included revised data relative to feasible mitigation measures and their control efficiencies. A revised air quality mitigation measure has been carried forward as well as its associated control efficiencies. LAWA intends to adopt and implement all feasible measures to reduce the project's adverse environmental impacts. To minimize the adverse impacts caused by the use of diesel fuel, during construction the project would use utility-produced electricity to the extent possible and, when on-site generators are used, employ low-emitting diesel fuel and particulate traps.

LAWA does not anticipate offering free travel on the Green Line for employees at this time. However, an incentive to use public transportation is an important component in LAWA's trip reduction plan. LAWA has successfully achieved its rideshare goal: an Average Vehicle Ridership (AVR) target of 1.5 as required by SCAQMD Rule 2202.

AS00003-2

Comment:

Community Impacts

Given the scale of the project, it is important that the DEIS/DEIR assess and characterize the potential community health impacts as clearly as possible.

Response:

Cancer risks and chronic non-cancer hazards in the Draft EIS/EIR were presented graphically as risk or hazard isopleths. These isopleths provided an illustration of how risk and hazard might be distributed in communities around the airport. Additional clarification is provided in the Supplement to the Draft EIS/EIR about risks and hazards for individual communities. Risk and hazard isopleths based on residential exposure were presented on maps that identify community boundaries. Please refer to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR, and Section 4.1.3 of Technical Report S-9a, Supplemental Human Health Risk Assessment Technical Report, for additional details and results of the evaluation.

AS00003-3

Comment:

The health risk assessment should be based on methodology and assumptions used by California's Office of Environmental Health Hazard Assessment.

Response:

The human health risk assessment estimated potential health risks using standard methods developed by the U.S. EPA and the California Environmental Protection Agency (CalEPA). Toxicity criteria developed by CalEPA's Office of Environmental Health Hazard Assessment were used when available and more conservative than U.S. EPA toxicity criteria. Please refer to Response to Comment AF00001-30 for a more detailed description of how the U.S.EPA and CalEPA methodology were incorporated.

AS00003-4

Comment:

The results should show the magnitude and location of health risks from the proposed plan on people in the surrounding area - including residences and schools.

Response:

The Supplement to the Draft EIS/EIR provided an evaluation of health risks associated with LAX operations for communities to help identify risks by jurisdiction. As required by CEQA, the analysis of health impacts associated with the expansion of LAX was carried out geographically to the point where health impacts are considered negligible, or below those represented by thresholds of significance. Thresholds of significance are quantitative or qualitative measures used to determine whether an environmental effect of a project (e.g., potential risks) would be considered significant. Wherever possible, validation of the choice of thresholds was provided by federal, state, and local guidelines, particularly the Guidelines for California Environmental Quality Act (State CEQA Guidelines) and related guidance and the Draft L.A. CEQA Thresholds Guide, published by the City of Los Angeles Environmental Affairs Department. For environmental disciplines mandated solely by NEPA, thresholds of significance were not included, as they are not required by NEPA. In lieu of federal thresholds, federal standards were used that are relevant to the analysis.

Most of the toxic air pollutant emissions are generated at or near ground level. Therefore, maximum offsite impacts are expected to occur at the fence line. Emissions from LAX would be carried primarily to the east by prevailing winds. As TAPs move downwind, they would be diluted, photodegraded, and/or deposited so that air concentrations would eventually be reduced to negligible amounts. The health risk assessment assessed risks and hazards for locations throughout a large geographic area, extending into communities adjacent to, and north, east, and south of LAX. A Cartesian grid system was used for receptor grid spacing and varied in density as distance from the theme building increased. In addition to the receptor grid, specific receptor locations of regulatory and community concern were identified. These sensitive receptors included schools, hospitals, nursing homes, and day-care facilities. Pollutant concentrations were predicted at all sensitive receptor locations within a radius of 3 kilometers from the LAX theme building. Dispersion and air modeling results were used to identify specific locations representing the most impacted resident, school and worker locations for quantitative risk assessment. Additionally discrete receptors were placed at the deposition monitoring station and project air quality monitoring station locations. Model outputs included maximum one-hour concentrations for evaluation of short-term impacts from airport operations and annual average concentrations for evaluation of chronic health impacts from toxic air pollutants on and near the airport. Cumulative risks for maximally exposed adult and child residents, school children, and in-airport workers were estimated using maximum estimated chemical concentrations in air.

Methodologies used to define the study area are discussed in Technical Report 14a (subsection 4.2.3, Definition of the Study Area in the Human Health Risk Assessment) of the Draft EIS/EIR. Areas of potential impact around LAX were identified using the results of the selection of TAPs of concern, screening level air dispersion modeling, and measured urban background concentrations. Pollutant concentrations produced from airport sources were predicted at sufficient receptor locations to capture all risks above 10 in one million and hazard indices greater than 5 and to identify the maximum ambient air quality impacts from airport sources on site as well as beyond the fence line. The health risk assessment presented incremental risk and hazard estimates geographically to include areas that would experience risk and hazards above and below those represented by thresholds of significance. This approach was taken to avoid complete dependence on single number comparisons. Estimates of risk and hazard focused on specific communities were developed from modeled risks and hazards from air dispersion modeling results. Risks and hazard estimates for communities were discussed in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. Figures presenting the geographical extent of incremental cancer risks and health hazards by community under post mitigation

3. Comments and Responses

conditions in 2015 for Alternatives A, B, C and D were presented in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. Figures presenting risk and hazards for communities include: Figure S4.24.1-13, Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative A; Figure S4.24.1-16, Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative B; Figure S4.24.1-17, Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative C; and Figure S4.24.1-18, Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative D. Additional figures presenting the geographical extent of incremental cancer risks and health hazards for horizon years 2005, 2013 and 2015 under pre-mitigation conditions and for interim years under post-mitigation years are available in Attachment B of Technical Report S-9a, Supplemental Human Health Risk Assessment Technical Report, of the Supplement to the Draft EIS/EIR.

AS00003-5

Comment:

There is a lot of information included in the document. It would be helpful from a community information standpoint to summarize the results in a single place in a simplified format.

Response:

Please refer to the Executive Summary of the Supplement to the Draft EIS/EIR for a summary of the revised Human Health Risk Assessment. The Executive Summary of the Supplement to the Draft EIS/EIR provided a summary of the alternatives and the revised human health risk assessment, as well as other impact evaluations. The Supplement to the Draft EIS/EIR was prepared to integrate a new alternative, Alternative D, into the existing environmental review process and to incorporate supplemental information and analyses for the LAX Master Plan. Such information and analyses were based upon the availability of new or updated information since publication of the Draft EIS/EIR in January 2001. In response to public comment, additional analyses were presented in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR and were summarized in the Executive Summary of the Supplement to the Draft EIS/EIR. Section 4.24.1, Overview, of the Draft EIS/EIR provided an overview of risk assessment methodologies used in both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AS00003-6

Comment:

Emissions Analyses

During our review, we have also noted a number of areas where the emissions assessment in the DEIS/DEIR should be improved or clarified. The proposed air quality mitigation program relies on four measures to provide 98 percent of the anticipated ozone precursor emission reductions in 2015-reduced aircraft engine taxi, clean aircraft incentives and landing fees, conversion to 100 percent electric ground support equipment, and remote airport terminals. Because the assumptions that drive the benefit calculations are critical, it is essential that they be clearly defined. ARB staff would like to work with LAWA staff to strengthen, where necessary, the technical air quality analysis of the DEIS/DEIR.

Response:

The air quality analysis in the Supplement to the Draft EIS/EIR provided revised data relative to feasible mitigation measures and their control efficiencies in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E.

AS00005**Tippets, William****State of California****9/21/2001****AS00005-1****Comment:**

The proposed project consists of three alternative expansion scenarios for LAX as well as a "no project" alternative. Under Alternative A, a new runway would be added to the north airfield complex, and two existing runways would be lengthened; all runways would be further separated from one another. This alternative differs from the other build options because it would not develop the Manchester Square property acquired as part of the LAX noise mitigation program. This alternative would fully meet the projected demand for aviation services at LAX by accommodating 97.9 million passengers and 4.2 million tons of cargo in 2015. As with each of the three build alternatives (A, B and C), a new passenger terminal complex would be constructed at the west end of the airport on Pershing Drive connected to the I-105 and I-405 freeways by a ring road encircling the airport. An LAX Expressway would be built along side the I-405 and would provide direct freeway access to the airport via a connection to the ring road. New midfield concourses would be connected to the west terminal and the existing central terminal by an Automated People Mover. New air cargo facilities would be built on newly acquired land east of the airport. The LAX Northside project would be reconfigured into a smaller, 2.65 million square-foot mixed use development and would be renamed the Westchester Southside project. The Continental City site would be used for air cargo facilities.

Under Alternative B, a new runway would be added to the south airfield complex, and two existing runways would be lengthened; all runways would be further separated from one another. This alternative would fully meet the projected demand for aviation services at LAX by accommodating 97.9 million passengers and 4.2 million tons of cargo in 2015. As with each of the three build alternatives (A, B and C), a new passenger terminal complex would be constructed at the west end of the airport on Pershing Drive connected to the I-105 and I-405 freeways by a ring road encircling the airport. An LAX Expressway would be built along side the I-405 and would provide direct freeway access to the airport via the MTA railroad right-of-way adjacent to Florence Avenue, and a connection to the ring road. New midfield concourses would be connected to the west terminal and the existing central terminal by an Automated People Mover. New air cargo facilities would be built on newly acquired land east of the airport. Again, the LAX Northside project would be reconfigured into a smaller, 2.65 million square-foot mixed use development and would be renamed the Westchester Southside project. The Continental City site would be used for air cargo facilities.

Under Alternative C, the number of runways would stay the same at four. Two existing runways would be moved, one runway widened, three runways lengthened and all runways further separated from one another to improve operational efficiency. This alternative would not fully meet the projected demand for aviation services at LAX. It would fully accommodate the cargo demand of 4.2 million tons in 2015. However, it would accommodate only 89.6 million passengers (a shortfall of 8.3 million passengers) in 2015. As with the other build alternatives, a new passenger terminal complex would be constructed at the west end of the airport on Pershing Drive connected to the I-105 and I-405 freeways by a ring road encircling the airport. An LAX Expressway would be built along side the I-405 and would provide direct freeway access to the airport via a connection to the ring road. New midfield concourses would be connected to the west terminal and the existing central terminal by an Automated People Mover. New air cargo facilities would be built on newly acquired land east of the airport. The LAX Northside project would be reconfigured into a smaller, 2.65-million-square-foot mixed use development and would be renamed the Westchester Southside project. The Continental City site would be used for air cargo facilities. LAWA staff has chosen this option as its preferred alternative. (The FAA has not yet identified its preferred alternative and, in accordance with its regulations, the FAA will identify a preferred alternative in the Final EIS/EIR.)

Response:

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

3. Comments and Responses

AS00005-2

Comment:

According to the DEIS/EIR, the proposed project will impact non-native grasslands, disturbed areas, valley needlegrass grasslands, southern foredune, southern dune scrub, and vernal ponds. Federally threatened and endangered species that will or have potential to be impacted by the project include the endangered El Segundo blue butterfly (*Euphilotes battoides allyni*) and Riverside fairy shrimp (*Streptocephalus woottoni*). Sensitive species, including several California Species of Special Concern (CSC) that would potentially be impacted by the proposed project include the loggerhead shrike (*Lanius ludovicianus* - CSC), burrowing owl (*Athene cunicularia* - CSC), western spadefoot toad (*Scaphiopus hammondi* - CSC), silvery legless lizard (*Anniella pulchra* - CSC), San Diego horned lizard (*Phrynosoma coronatum blainvilliei* - CSC), San Diego black tailed jackrabbit (*Lepus californicus bennettii* - CSC), Trask's snail (*Helminthoglypta traskii*), Henne's eucosman moth (*Eucosa hennei*), Ford's sand dune moth (*psammobotys fordii*), and Globose dune beetle (*Coelus globosus*). Sensitive plant species include Lewis' evening primrose (*Camissonia lewisii*), duneflower or sand food (*Pholisma arenarium*), and California spineflower (*Mucronea californica*).

Response:

Comment noted.

AS00005-3

Comment:

The Department offers the following comments concerning this project:

Habitat Evaluation Procedures Methodology

The DEIS/EIR relies on the Habitat Evaluation Procedures (HEP) methodology to define biological impacts and develop biological mitigation measures. For the reasons described below, the Department does not concur with the manner by which the HEP was applied; and, therefore we do not believe that the mitigation measures are acceptable.

The HEP methodology was first developed in the 1970's by the USFWS for the evaluation of impacts to individual species and their habitats. The HEP methodology is designed to quantify the habitat quality of given areas for a particular species. The HEP technique can be a useful tool for impact analysis for a target species by providing a consistent method of assessing the adverse or beneficial effects of a project and its alternatives. Using the habitat requirements of the target species as a basis for analysis, the importance of the study area's environmental variables to the target species are analyzed and used to generate a habitat suitability index (HSI), referred to as Habitat Value in the DEIS/EIR. A Habitat Value may range from 0.0-1.0, depending on the value to the target species. Multiplying the HSI or Habitat Value by the acreage of a study area yields habitat units (HU), a measure of a site's acreage and value for a particular species. For example, if a HEP analysis is conducted for two separate target species (Species "A" and Species "B") within an area supporting optimal habitat for Species A but only marginal habitat for Species B, the HSI values and HU values would be much higher for Species A than Species B. The HEP analysis presented in the DEIS/EIR does not follow this accepted methodology, and is flawed in the following fundamental ways:

1. The DEIS/EIR's HEP is developed based on idealized vernal pool/native grassland landscape characteristics that are not demonstrated as important features for any particular species of interest. The two reference sites chosen as idealized habitats for the analysis of the LAX project are the Santa Rosa Plateau and the Carrizo Plain Natural Area, both inland areas that support some similar types of habitat (grassland, forb, and vernal pool) but their similarity to the historical coastal habitats of the study area is questionable. In fact, they are very dissimilar to the existing condition of the study area, and are not at all analogous to southern foredune and southern dune scrub. Rather than focusing on how high quality habitats associated with the reference sites might help define the specific habitat requirements of the target species found at LAX, the DEIS/EIR develops a generalized HEP that largely ignores the requirements of the target species. For instance, the analysis quantifies such factors as vernal pool flora, native grasses over 10%, and contiguous native habitat over 40 acres, which have very different

relevance to species as diverse as the loggerhead shrike, Riverside fairy shrimp, black-tailed jackrabbit, or Lewis' evening primrose.

2. The HEP analysis arbitrarily assigns values to habitat components without any justification. For example, the category "under regulatory conservation" which measures the strength of environmental land-use laws for a given habitat type and fails to evaluate the quality of the habitat itself, is given twice the importance (0.10) as real habitat components such as "summer dessication" which is critical to the survival of Riverside fairy shrimp. On the other hand, "summer dessication" would not necessarily be an equally important element in consideration of the habitat requirements for the loggerhead shrike, burrowing owl, silvery legless lizard, etc.

3. The DEIS/EIR inappropriately assigns Habitat Values to all of the study area's different vegetation communities based on one vegetation community/landscape (the idealized reference sites). The artificially constructed habitat value measurements for vernal pools/native grasslands are applied to completely unrelated habitats using the same inappropriate categories. Southern foredune, for example, is downgraded because it does not contain "areas with periods of inundation of equal to or greater than 30 days", a habitat value that does not apply to the sandy substrates of southern foredune habitats. The southern foredune habitat on the El Segundo dunes, widely acknowledged as some of the highest quality and most diverse examples of its type in southern California, only rates a 0.45 value in the analysis because of this misapplication of specific habitat components to unrelated and structurally very different habitats. As a result, the entire project site is given artificially low Habitat Values because many areas do not exhibit "mound-depression microrelief," "native soils with slope less than 10%," "sensitive/listed vernal pool-associated species (reproducing)," etc. that are comparable to a vernal pool landscape. Many of the habitat components listed in Table 4.10-1 are insignificant in the context of assessing the importance of the site's vegetation resources.

4. The HEP used in the DEIS/EIR inappropriately "banks" habitat units of urbanized landscape areas that are subsequently used to downgrade the impacts of the proposed project on unrelated habitats. For example, the EIS/EIR (Page 4-646) considers future ornamental landscaping within the facility (arbitrarily assigned a value of 2.68 habitat units for 53.6 acres of landscaping) to offset the loss of non-native grasslands and disturbed areas supporting sensitive species.

5. The DEIS/EIR proposes that the restoration of disturbed dune scrub/foredune (Habitat Value of 0.35 according to DEIS/EIR) to southern foredune (Habitat Value of 0.45 according to DEIS/EIR) would result in a mitigation credit value of 0.8 per acre, a higher value than southern foredune or any other existing habitat within the study area. Using the DEIS/EIR's methodology, a change in Habitat Value from 0.35 to 0.45 is a difference of 0.1, not 0.8. Using the DEIS/EIR's methodology and Table 4.10-1, the restored southern foredune community would "ideally" resemble grassland/vernal pool habitats of Santa Rosa Plateau and Carrizo Plain, an undesirable result.

6. The mitigation ratio of 1:1 (as measured in "Habitat Units" in the DEIS/EIR) results in inadequate compensation for the loss of habitats occupied by sensitive species including the loggerhead shrike, San Diego black-tailed jackrabbit, and western spadefoot toad. In the following discussion we will examine the example of the non-native grassland and disturbed/bare ground communities under 2015 Alternative "A". The entire study area contains approximately 704.9 acres of non-native grassland (designated as non-native grassland/ruderal in the DEIS/EIR). Approximately 363.4 acres would be impacted under Alternative A. Using the DEIS/EIR's HEP analysis, this 363.4 acres is equivalent to 54.47 Habitat Units. The DEIS/EIR then combines the impacts for disturbed/bare ground (94.8 acres or 9.48 Habitat Units) with the grassland habitat units ($54.47 + 9.48 = 63.95$ Habitat Units). An arbitrarily assigned credit for future landscaped areas is then subtracted from the total impacts to yield the total Habitat Units of impact ($63.95 \text{ Habitat Units} - 2.68 \text{ Habitat Units}$ (or 53.6 acres of landscaping) = 61.27 Habitat Units). The proposed mitigation plan consists of three components: (1) enhancement of 16.9 acres of non-native grassland to needlegrass grassland; (2) restoration of 18.06 acres of existing roadways within the El Segundo blue butterfly preserve to southern foredune; and (3) enhancement of 74.6 acres of disturbed dune scrub/foredune to southern foredune. Of this total, only 16.9 acres would provide comparable mitigation (enhancement of non-native grassland to native grassland) for losses of 363.4 acres of grassland and 94.8 acres of disturbed habitat supporting sensitive species.

7. Most of the habitats present on LAX are artificially assigned low values, which then are used as the basis for developing mitigation measures. After creating these artificial habitat units, the DEIS/EIR then proposes that units are fully exchangeable, such that impacts to one habitat type, for instance grasslands, could be mitigated through enhancement of different habitat types supporting different

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species, such as southern foredune. By implying this arbitrary "exchange system" of mitigation, the DEIS/EIR has failed to establish a credible basis for the nexus and proportionality of the mitigation process.

8. In summary, we believe that the modified HEP method used for this analysis is flawed and misapplied, and is inappropriate for use in defining biological impacts and developing acceptable mitigation measures. The following discussion of impacts to habitats and sensitive species omits any references to habitat values as defined or used in the DEIS/EIR.

Response:

Please see Topical Response TR-BC-1 regarding the modified HEP methodology and Response to Comment AF00003-6.

AS00005-4

Comment:

Federally-Listed Species

9. We understand that the USFWS currently in formal consultation with the Federal Aviation Administration regarding proposed impacts to occupied habitat of the Riverside fairy shrimp.

Restoration of vernal pools sufficient to support Riverside fairy shrimp is experimental and often unsuccessful. Therefore, mitigation ratios typically vary from 3:1 to 5:1 for impacts to vernal pools depending on the quality of the pools to be disturbed. The "ephemerally wetted areas" on LAX are not high quality vernal pools, however, they do support two species of fairy shrimp and the western spadefoot toad, which require vernal pools for reproduction. Therefore, we recommend that the mitigation for impacts to the pools at LAX be 3:1, at the low end of the typical mitigation range. The surface area of the pools to be impacted on LAX is 1.3 acres, therefore the surface area of the mitigation ponds should be 3.9 acres.

Successful creation of functional vernal pool habitat must include provisions for the creation and management of surrounding upland habitats. These upland habitats serve both as buffers and watersheds for created vernal pools. The ratio of upland watershed to pool surface area on natural and successfully created pools is a least 10:1 and often 15:1. Therefore the amount of land minimally required to support the created pools will be 39 acres. We have recommended splitting this acreage between two or more sites, to increase the chances of successfully restoring the specific conditions which the fairy shrimp and western spadefoot toad require to breed.

Please review the Vernal Pool Construction Monitoring Protocol and Habitat Replacement Evaluation produced by the USFWS located at: <http://pacific.fws.gov/es/vpfinal.html>

Response:

Embedded cysts of the Riverside fairy shrimp shall be relocated to a suitable alternate location at a mitigation ration of 3:1, as determined through coordination with USFWS. As a result of Section 7 consultation among LAWA, FAA, and USFWS, the soils containing cysts of the Riverside fairy shrimp will be relocated to property owned by the FAA and designated a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS in conformance with the Draft Biological Opinion issued by the USFWS. The Draft Biological Opinion is included as Appendix F-E of this Final EIS/EIR.

Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for Riverside fairy shrimp mitigation. Mitigation for potential impacts to the western spadefoot toad shall be coordinated with the relocation of cysts of the Riverside fairy shrimp.

AS00005-5

Comment:

10. Potential impacts to the El Segundo Blue butterfly include 320 square feet of occupied habitat under Alternative A. Considering the rarity of the species and its habitat, direct, permanent impacts to

southern foredune and dune scrub communities containing the butterfly should be mitigated at a 5:1 ratio. This would result in the creation of 0.05 acres of suitable habitat. We recommend that this restoration occur in currently unoccupied portions of the dune preserve, such as subsites 45 or 50, or in the 104 acres north of the existing preserve. Impacts to the high density butterfly population in subsite 9 from the proposed ring road and World Way West realignment have not been sufficiently investigated, as described below in the light emissions discussion. We recommend further disclosure of the engineering plans being considered for the World Way West interchange area, in order to fully analyze the potential impacts associated with this portion of the proposed project.

Response:

Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly. Mitigation for impacts to habitat occupied by the El Segundo blue butterfly shall be at a ratio of at least 1:1 in conformance with the Draft Biological Opinion issued pursuant to Section 7 consultation among FAA, LAWA, and the USFWS.. This restoration would occur at least three years prior to the impact to account for the temporal loss of habitat. Restoration would occur in unoccupied areas of subsite 23 within the Habitat Restoration Area. Subsite 23 has been determined adequate ecologically to support plantings and relocation of coast buckwheat and butterfly pupae.

Figures 33 through 36 of Appendix J1, Biological Assessment Technical Report, depict a close-up view of the World Way West loop and the Habitat Restoration Area. There would be no direct impacts to the Habitat Restoration Area or the El Segundo blue butterfly. Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsection 4.11.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR discussed indirect impacts to the El Segundo blue butterfly. Section 6.0, Conclusions and Recommendations, in Appendix J1, Biological Assessment, provides a detailed description of the El Segundo Blue Butterfly Construction Avoidance Measure.

AS00005-6

Comment:

Other Impacts

11. The ring road which is proposed to replace Pershing Drive and circle the expanded airport presents a number of potential impacts to wildlife and habitats that have not been analyzed or mitigated. The DEIS/EIR states that a number of rare vertebrate species, such as the black-tailed jackrabbit, San Diego horned lizard, and silvery legless lizard occur, or are proposed to be reintroduced to the dunes. However, no analysis is presented as to the effects of increased speeds and traffic volume on rates or road kill for these species. These populations of sensitive species are already reduced due to the limited extent of habitat available, and therefore significant rises in mortality rates due to increased road kill may render these populations unsustainable. New technologies for deterring road crossings by small vertebrates are currently available (<http://www.fhwa.dot.gov/environment/wildlifecrossings/index.htm>). These technologies should be incorporated into the designs of the ring road, so as to prevent increases in road kill of sensitive species.

Response:

Areas adjacent to Pershing Drive and the proposed ring road are currently fenced and will remain fenced regardless of Master Plan improvements. This is a matter of airport security. The fence along the eastern perimeter of Pershing Drive encompasses the airfield and the fence along the western perimeter of Pershing Drive encompasses the Los Angeles/El Segundo Dunes. According to website, <http://www.fhwa.dot.gov/environment/wildlifecrossing/index.htm>, strong, properly anchored fencing can provide effective protection against mortality due to road kills. The fence encompassing the airfield has a cement anchor 2 feet in height around the bottom of the fence. The fence encompassing the Los Angeles/El Segundo Dunes is anchored in the ground below grade with intermittent cement anchors above ground. There is also a sidewalk 8 feet in width between the fence and Pershing Drive.

The fence encompassing San Diego black-tailed jackrabbit habitat will provide a physical barrier to the movement of this species across the ring road proposed under Alternatives A, B, and C. Alternative D does not include the ring road.

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The San Diego horned lizard is not likely to cross or utilize the proposed ring road because (1) they have been found exclusively on the Los Angeles/El Segundo Dunes; (2) their food source, primarily native seed harvesting ants (*Pogonomyrmex* sp.), is found in abundance on the Los Angeles/El Segundo Dunes; and (3) their habitat requirements, such as sites for courtship and display, egg-laying, and hibernation are apparently found within the normal area of foraging and basking. Pronounced seasonal movement or migration has not been reported. Thus, it is unlikely that this species would cross the 8-foot sidewalk to utilize the proposed ring road in order to carry-out a biological function necessary for its persistence on the Los Angeles/El Segundo Dunes.

The silvery legless lizard is not likely to cross or utilize the proposed ring road because (1) it is a burrowing species that prefers cooler temperatures and is rarely encountered above ground or near the soil surface; and (2) it prefers the sandy soils and native coastal shrub communities found on the Los Angeles/El Segundo Dunes, and was not determined to occur on the airfield or elsewhere within Master Plan boundaries.

AS00005-7

Comment:

12. Light emissions are known to disrupt the circadian rhythms of birds, butterflies, small mammals, and other species. This is especially true of nocturnal species, such as the numerous rare, endemic moth species restricted to the dunes. Light emissions along Pershing Drive are currently very low, with only a few street lights present adjacent to the preserve. However, as noted in the DEIS/EIR, several streetlights at the westerly end of World Way West light a wide area of the dunes preserve. The foot-candles emitted by these lights were not measured or analyzed in the DEIS/EIR. The number of additional streetlights proposed for the ring road and the additional infrastructure on the airport are also not disclosed, but the DEIS/EIR estimates that the light reaching the dunes preserve will increase to 0.60 foot-candles. How this figure was reached is not described. We recommend that the Final DEIS/EIR include a more detailed analysis of the biological effects of night lighting. Mitigation measures to offset potentially significant impacts should also be proposed.

Response:

The comment regarding a more detailed analysis of the biological effects of nightlighting has been noted. Analysis of potential impacts to sensitive species of flora and fauna from light emissions and noise was presented in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The analysis was based on the findings of field investigations and was substantiated with the findings of published literature. The analysis of potential noise impacts was based on the findings documented in Section 4.1, Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR; and Appendix S-C, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR. Literature reviewed included a literature synthesis compiled by the U.S. Air Force and the U.S. Fish and Wildlife Service and additional literature from the U.S. Fish and Wildlife Service and the Department of Transportation. The analysis of potential indirect impacts from lighting conditions was based on the findings documented in Section 4.18, Light Emissions, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The foot-candles reaching the Habitat Restoration Area from the World Way West lights was described on page 4-823 of Section 4.18, Light Emissions, of the Draft EIS/EIR and range from 0.004 to 0.26 foot-candles. The maximum change in light is calculated at 0.34 for each of the alternatives, as shown in Table 4.18-1, Estimated 2015 Lighting Change (foot-candles, fc) of the Draft EIS/EIR. The methodology for assessing the change in light from the build alternatives is described in Section 2.0, General Approach and Methodology, and Section 6.0, Environmental Consequences, of Technical Report 9, Light Emissions Technical Report of the Draft EIS/EIR.

AS00005-8

Comment:

13. The effects of increased noise levels on sensitive species and habitats are not adequately analyzed in the DEIS/EIR. Research has shown that chronic noise levels can be disruptive to avian species, amphibians, and rodents.

Response:

Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Supplement to the Draft EIS/EIR discussed the impacts of noise on sensitive and state- and federally listed fauna. As noted in the Federal Aviation Administration's Aviation Noise Effects, "the effects of aviation noise on animals... have revealed that the effects are highly species dependent and that the degree of the effect may vary widely." Literature was reviewed to obtain thresholds of noise specific to the sensitive fauna occurring within the Master Plan boundaries. Please also see Response to Comment AS00005-7.

AS00005-9

Comment:

14. The DEIS/EIR may fail to disclose and analyze proposed impacts to the northern 104 acres of the dunes. An approved EIR, circa 1983, was certified by the City of Los Angeles for the LAX Northside Project. The development of this area is considered part of the "no project alternative", but project changes since 1983 are not discussed in detail. The LAX Northside project has been renamed and reconfigured as the Westchester South project. However, the DEIS/EIR appears to present potential new impacts for project components not previously analyzed. Several figures in the DEIS/EIR, Biological Assessment Technical Report depict a golf course, resort hotel, light industrial, and commercial/mixed use in the northern area of the dunes. We recommend that any reasonably foreseeable direct and/or indirect physical changes associated with the project should be included as part of the project and analyzed for potentially significant environmental effects and appropriate mitigation measures.

Response:

Biological impacts due to the LAX Northside Development Project are disclosed in the Final EIR for that project. The LAX Master Plan Draft EIS/EIR disclosed all impacts due to the Westchester Southside project for all pertinent alternatives (A, B, and C). However, some of the figures depicting and describing Westchester Southside in Appendix J1, Biological Assessment Technical Report, contain incorrect information. No golf courses or resort hotels are proposed in the Los Angeles/El Segundo Dunes; that area shall remain as open space. In response, Figures 8, 11, and 14 of Appendix J1, Biological Assessment, have been revised. Please see Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR.

AS00005-10

Comment:

Mitigation

15. Because of the regional significance of declining species and habitats found within the Master Plan boundaries, we recommend that all biological mitigation areas associated with the project, both within and outside of the current preserve area, are protected and managed in perpetuity. Department staff are available to work with LAWA in the design and implementation of maintenance and monitoring plans to meet long-term biological goals.

Response:

Mitigation measures and management of mitigation areas are discussed in subsection 4.10.8 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AS00005-11

Comment:

16. Long-term management of the dunes is essential if the area is to provide mitigation opportunities for project impacts. Currently, portions of the dune preserve are in a state of degradation due to a general lack of management. In the last several years the dunes have been allowed to deteriorate through invasion by exotic plant species, and contain a highly altered vertebrate community through the abundance of red fox. We recommend the creation of a non-wasting endowment to support

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implementation of an approved management plan. Management of the dunes should be accomplished through an independent management organization with extensive expertise in managing sensitive habitats and endangered species.

Response:

As described in Section 4.10, Biotic Communities, of the Draft EIS/EIR, significant portions of the Los Angeles/El Segundo Dunes will be restored and managed as mitigation for project impacts. Implementation of the mitigation measures that were described in Section 4.10.8 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR will reduce potential impacts on native plants and plant communities to a less than significant level. CDFG's opinion regarding the creation of an endowment is noted.

AS00005-12

Comment:

17. The DEIS/EIR contains language in virtually all of the biological mitigation measures limiting monitoring and maintenance to "not more than five years." The accepted mitigation monitoring and maintenance period pursuant to CEQA is typically a period of not less than five years. In some cases five years or less is sufficient to meet performance standards; in other cases it is not. By limiting the maintenance and monitoring period to less than five years regardless of the success of the mitigation site, the DEIS/EIR implies that if performance criteria are not met within five years, no further maintenance or monitoring need be performed. If a mitigation site fails to meet acceptable performance standards, the significant impacts of the project would not be reduced below a level of significance. For these reasons, we recommend that all mitigation areas meet acceptable performance criteria, before LAWA is relieved of mitigation responsibility. On the other hand, it is often appropriate to cease maintenance and monitoring responsibilities if a mitigation site has clearly met acceptable performance standards prior to the end of five years.

Response:

All of the biological mitigation measures present clear performance criteria. Performance criteria are delineated to extend over a 5 year period, which is a reasonable time period for the assessment of mitigation achievement. The statement, "not more than 5 years" refers to this delineation of performance criteria. If these criteria should be achieved in less than 5 years, mitigation responsibilities would be completed. If performance criteria are not met within 5 years, monitoring would continue until performance criteria are met.

AS00005-13

Comment:

18. The Department is concerned with the loss of grasslands in southern California, including both native and non-native grasslands. Grasslands and other open areas on the site provide foraging habitat for raptors, and support sensitive species including burrowing owl, loggerhead shrike, western spadefoot toad, and San Diego black-tailed jackrabbit. The mitigation proposed in the DEIS/EIR is unacceptable. The Department recommends that proposed impacts to annual grassland be mitigated in-kind at a ratio of 0.5:1 to compensate for the loss of raptor foraging habitat and sensitive species habitat. Because LAX is one of the last expanses of grassland in the area, nearby mitigation sites with sufficient acreage may not exist. If sufficient acreage is not available on the site or nearby, an off-site grassland preserve should be considered. Primary consideration should be given to areas supporting or capable of supporting sensitive species impacted by the project. The establishment of an off-site grassland preserve would not necessarily mitigate for losses of habitat on a local level, but would at least provide compensatory habitat within the region.

Response:

Non-native grasslands east of Pershing Drive that would be impacted as a result of Master Plan improvements exist as highly fragmented, disturbed patches dominated by annual grasses with low (<10 percent) to no cover of native grasses. These grasslands are located within the Airport Operations Area (AOA) and are therefore subject to routine operations and maintenance activities, such as discing and mowing, pursuant to Title 14, CFR Part 139. Title 14, CFR Part 139 mandates that the AOA be

maintained in such a condition so as to minimize or eliminate hazards to public safety resulting from wildlife utilization of this area. As a consequence, these activities reduce the quality and quantity of foraging habitat and habitat for sensitive species. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed mitigation for impacts to non-native grassland/ruderal habitat on the AOA, as well as for impacts to sensitive species in Section 4.10, Biotic Communities (subsection 4.10.8). Mitigation shall take place in the adjacent Los Angeles/El Segundo Dunes, a protected area where grasslands will be managed to support sensitive wildlife species and where the presence of wildlife does not pose a significant hazard to incoming or departing aircraft. Impacts to native grasslands, as a result of installation of navigational aids and associated service roads in the Los Angeles/El Segundo Dunes, are minimal and shall be mitigated at a 1:1 ratio. LAWA shall mitigate the impact to non-native grasslands east of Pershing Drive at a 1:1 ratio as was addressed in mitigation measures MM-BC-10 through MM-BC-13 in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR.

AS00005-14

Comment:

19. The success criteria outlined in the mitigation measure for impacts to Lewis' evening primrose (MM-BC-2) are not acceptable. The acreage currently occupied by the species is 2.5 acres according to the DEIS/EIR. The estimate of 300 individuals present likely only represents an estimate of flowering individuals present at a given time. This species, like most other annual plants, is likely very dynamic in both the spatial distribution and numbers of observable (flowering) individuals present from year to year. Due to various dormancy mechanisms, annuals of xeric habitats rarely exhaust the entire seedbank in any given year. Observations of flowering individuals of annual plant species do not necessarily provide a census of the entire population (i.e., the seedbank). To better quantify the loss and appropriate mitigation measures, the acreage of occupied habitat must be taken into account along with the estimated number of flowering plants observed. We recommend that MM-BC-2 is revised to establish an area of no less than 2.5 acres of currently unoccupied but otherwise suitable habitat to disperse seed. The success criteria should not only include the "establishment" (germination?) of 300 seeds in the first year after dispersal, but should also include true success criteria, including measures of seed set, recruitment, and spatial distribution over the mitigation area for the entire five-year monitoring/maintenance period.

Response:

Comment noted. Mitigation measure MM-BC-2 in the Supplement to the Draft EIS/EIR has been modified as suggested (page 4-471).

AS00005-15

Comment:

20. We recommend that the planting of mature trees associated with MM-BC-3, as well as all landscaping associated with future improvements, avoid establishing non-native trees in areas where the presence of the trees could impact native dune or grassland communities. Impacts associated with non-native trees include the invasive tendencies of some plant materials, alterations of native arthropod communities due to irrigation and other changes, and creation of habitat for aggressive or non-native bird species. The Department recommends the use of locally native plants to the greatest extent feasible in the landscape areas. The applicant should not plant, seed or otherwise introduce invasive exotic plant species to the landscaped areas adjacent to or near mitigation or open space areas. Exotic plant species not to be used include those species listed on Lists A & B of the California Exotic Pest Plant Council's list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999." This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, and Spanish broom. A copy of the complete list can be obtained by contacting the California Exotic Pest Plant Council at 32912 Calle del Tesoro, San Juan Capistrano, CA 92675-4427, or by accessing their web site at <http://www.caleppc.org>.

Response:

The planting of mature trees associated with mitigation measure MM-BC-3 of the Supplement to the Draft EIS/EIR, as well as all landscaping associated with future improvements, shall avoid establishing non-native trees where they could impact native dune or grassland communities.

3. Comments and Responses

Locally native plants shall be used to the greatest extent feasible in the landscape areas and invasive exotic plant species shall not be introduced to the landscaped areas adjacent to or near mitigation or open space areas. Landscaping with locally native plant species would not require installation of permanent irrigation, as only a temporary irrigation system would be utilized. The temporary irrigation system would provide water to native plantings such as to supplement seasonal moisture.

Exotic plant species that shall be avoided in the planting of mature trees associated with MM-BC-3, and all future landscaping include those on Lists A&B of the California Exotic Pest Plant Council list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999."

As indicated on page 4-619 of the Draft EIS/EIR, "LAWA owns and manages the 307-acre Los Angeles/El Segundo Dunes and actively maintains the approximately 203 acres of the 307-acre site. Known as the El Segundo Blue Butterfly Habitat Restoration Area, the 203-acre site is home to the federally endangered El Segundo blue butterfly. LAWA's habitat conservation and restoration efforts have received national attention. The Habitat Restoration Area is the largest remaining representation of coastal dune community within Los Angeles."

A component of LAWA's management efforts includes the removal of non-native pest plant species. Over the past decade, these management efforts have contributed to a general upward trend in numbers of El Segundo blue butterflies (Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Supplement to the Draft EIS/EIR).

These precautions will avoid impacts due to the invasive tendencies of some plant materials, alterations to native arthropod communities, and creation of habitat for aggressive or non-native bird species.

AS00005-16

Comment:

21. We recommend that the spadefoot toad mitigation (MM-BC-4, in part) be coordinated with the relocation of vernal pool resources and Riverside fairy shrimp previously mentioned. All buffer areas and the watersheds of vernal pools (i.e., mitigation areas) should be managed in perpetuity for both Riverside fairy shrimp and spadefoot toad.

Response:

Relocation efforts for the western spadefoot toad and the cysts of Riverside fairy shrimp will be coordinated concurrently and in consultation with California Department of Fish and Game (CDFG) and U.S. Fish and Wildlife Service (USFWS). According to mitigation measures MM-BC-4, MM-BC-9, and MM-ET-1 of the Supplement to the Draft EIS/EIR, LAWA or its designee, in consultation with CDFG and USFWS will identify adequate relocation sites for the western spadefoot toad and Riverside fairy shrimp. As a result of Section 7 consultation among LAWA, FAA, and USFWS, the USFWS has issued a Draft Biological Opinion, included as Appendix F-E of this Final EIS/EIR. The Draft Biological Opinion acknowledges the feasibility of relocation of soils containing cysts from three areas that would be unavoidably impacted as a result of Alternative D to property owned by the FAA and designated as a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS. FAA and LAWA would undertake the relocation with specifications provided by the Draft Biological Opinion, including requirements for maintenance, monitoring, and public education. LAWA, in consultation with CDFG and the USFWS, will develop and implement a management and monitoring program to monitor the success of western spadefoot toad tadpoles for a period of no more than five years. If performance criteria are not met within 5 years, monitoring would continue until performance criteria are met.

AS00005-17

Comment:

22. The DEIS/EIR proposes to transport black-tailed jackrabbits to the dune preserve area (MM-BC-4, in part), and monitor their status for three years. Currently, jackrabbits inhabit a significant portion of the airfield west of the southern runway. Though the acreage occupied is not disclosed in the DEIS/EIR, it is likely greater than 100 acres. Within the habitat restoration area only 41 acres of grassland and dune

scrub habitats are present. These two habitats are the primary habitats suitable for jackrabbits on the dunes. No analysis is presented to suggest that 41 acres of habitat is sufficient to establish a self sustaining population of jackrabbits. A much larger extent of these two habitats (92 acres) is present on the dunes to the north of the habitat restoration area. We recommend incorporating the northern dunes into the dune preserve and establishing a jackrabbit population on the combined acreage. As translocation efforts are experimental and prone to failure, we also recommend the selection of a second site to establish a new population. Potential sites may include those finally selected as suitable for Riverside fairy shrimp habitat creation. A red fox control program will be essential to maintaining jackrabbits on the dunes or potentially in off-site mitigation areas.

Response:

The acreage occupied by the black-tailed jackrabbits is indicated in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR as 58.16 acres of disturbed/bare ground and 60.59 acres of non-native grassland, for a total of 118.75 acres.

San Diego black-tailed jackrabbit was sighted in only one area within the Master Plan boundaries, a portion of the airfield west of the southern runway, approximately 119 acres in size. This portion of the airfield is surrounded by developed areas that could not support or be easily traversed by the species; it is unlikely that that area of occupied habitat was underestimated. Only one black-tailed jackrabbit was observed during all surveys at LAX. Given this single sighting of one black-tailed jackrabbit, the population of this species at LAX is probably quite small.

As was stated in mitigation measures MM-BC-4 and MM-BC-9 in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR, LAWA or its designee shall relocate the black-tailed jackrabbit to the Habitat Restoration Area. However, the portion of the Los Angeles/El Segundo Dunes north of the current Habitat Restoration Area, consisting mostly of Disturbed Dune Scrub/Foredune and Non-native Grassland, is contiguous with the Habitat Restoration Area and would be available to the black-tailed jackrabbit. The combined acreage of 307 acres (104 acres plus 203 acres), which does not currently support this species, would provide sufficient habitat and forage for the relocated black-tailed jackrabbit population. Home ranges for black-tailed jackrabbit in California average only 45 acres, and jackrabbits are generalist herbivores, eating almost any vegetation up to about 20 inches above the ground. (California's Wildlife, Volume III: Mammals and <http://www.dfg.ca.gov/whdab/html/lifehistmammal.html>.) The 104-acre portion of the Los Angeles/El Segundo Dunes north of the current Habitat Restoration Area, would therefore support two black-tailed jackrabbit individuals; and the 203-acre Habitat Restoration Area would therefore support four black-tailed jackrabbit individuals.

The comment regarding a red fox control program has been noted. As described in mitigation measures MM-BC-4 and MM-BC-9, LAWA or its designee shall implement a monitoring plan to monitor the success of the relocated black-tailed jackrabbit(s).

AS00005-18

Comment:

23. The DEIS/EIR states that currently three pairs of loggerhead shrikes inhabit the dunes west of Pershing Drive. From the distribution of observation points mapped on figure 4.10-5, it appears one to two other pairs use the western airfield east of Pershing Drive for nesting. Therefore, the proposed project will result in a loss of habitat, and potentially the loss of two out of five pairs of shrikes on the property. Shrikes maintain large territories, and though the enhancement of the dunes preserve may increase the foraging value for the resident pairs, there is no evidence to show that an enhanced dune area will support two more pairs over what it supports currently. It is doubtful that the mitigation as proposed would reduce the impact below a level of significance. We recommend that the acquisition or restoration of occupied grassland habitat as previously mentioned as an effective mitigation measure.

Response:

The approximately 307-acre Los Angeles/El Segundo Dunes, including the 104-acre northern portion undergoing habitat restoration as described in mitigation measures MM-BC-4 through MM-BC-9 of the Supplement to the Draft EIS/EIR, would provide sufficient habitat for five pairs of Loggerhead shrike. Loggerhead shrikes aggressively defend an average territory size of approximately 20 acres. According to the California Wildlife Habitat Relationship System, the loggerhead shrike home range and territory average 18.7 acres with a range from 11- 40 acres. During the non-breeding season, solitary

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individuals are known to defend their territory. The 307-acre Los Angeles/EI Segundo Dunes provides ample suitable habitat for five pairs of loggerhead shrikes. In addition, mitigation measure MM-BC-3 describes the replacement of 300 mature trees at a ratio of 2:1 in other areas within the Master Plan boundaries. Loggerhead shrikes occupy open areas with sparse shrubs and trees providing suitable perches, bare ground and a low herbaceous layer. Implementation of MM-BC-3 would provide a necessary structural element for loggerhead shrike foraging and breeding habitat in other areas within the Master Plan boundaries. Therefore, it is unlikely that the acquisition and restoration of additional habitat for impacts to loggerhead shrike shall be required. Consultation with CDFG was undertaken to confirm the adequacy of the Los Angeles/EI Segundo Dunes loggerhead shrike habitat.

AS00005-19

Comment:

24. As previously mentioned, the proposed mitigation measures for loss of habitat for the three build alternatives (MM-BC-5, MM-BC-6, and MM-BC-7) should be revised. The Department recommends that grassland mitigation should be provided at a ratio of at least 0.5 to 1 for losses of grassland habitats. The DEIS/EIR's mitigation measures propose container stock planting densities for dominant species comprising valley needlegrass grassland, provided in plants/habitat unit. Converting these densities to plants per acre, and on-center spacing (assuming an even distribution of the container stock), the proposed spacings include: nodding needlegrass (5.18 feet on-center), white everlasting (31.7 feet on-center), doveweed (31.7 feet on-center), California croton (29.9 feet on-center), and dune primrose (23.97 feet on-center). These proposed spacings would result in an extremely low amount of cover, not at all resembling a natural grassland or grassland/forb community. Furthermore the species diversity as suggested in the DEIS/EIR would result in a target community lacking the diversity of a natural community. We recommend an increased container stock density as well as the inclusion of many more species. Both container stock and seed should be considered for this effort.

Response:

Please see Topical Response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP), which includes mitigation measures resulting from the HEP. Currently, the grassland mitigation ratio for Habitat Units is 1:1. Valley needlegrass grassland restoration and enhancement will be undertaken to the greatest extent feasible within the Los Angeles/EI Segundo Dunes. As stated in the comment, CDFG recommends a 0.5:1 mitigation ratio for impacts to grassland communities. However, grasslands under current conditions exist as highly fragmented, disturbed patches dominated by annual grasses with low (<10 percent) to no cover of native grasses. These areas have been characterized as non-native grassland/ruderal habitat. Impacts to non-native grassland/ruderal habitat as a result of Master Plan improvements would be mitigated by restoring a native Valley Needlegrass grassland community on the Los Angeles/EI Segundo Dunes. Measures described in mitigation measures MM-BC-5 through MM-BC-8 (subsection 4.10.8 of Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR) include habitat improvements to an area of the Los Angeles/EI Segundo Dunes that was historically Valley Needlegrass grassland, but is now dominated by non-native species such as slender wild oats (*Avena barbata*) and red-stemmed filaree (*Erodium cicutarium*). Only two native species were present during vegetation surveys in 1998, Lewis' evening primrose (*Camissonia lewissii*) and deerweed (*Lotus scoparius*). The planting densities described in mitigation measures MM-BC-5 through MM-BC-8 were derived from criteria adopted by CDFG that defines significant native grassland as having at least 10 percent native cover. The planting densities included in MM-BC-5 through MM-BC-8 achieve an initial 10 percent native cover. Thus, the restoration area can be considered a native grassland community. Over the following 5 years, intense weed abatement, maintenance, and monitoring (as described in MM-BC-5) shall be conducted to ensure growth and dispersal of natives across the restoration site. At the end of five years, cover of species must be 45 percent. If monitoring discerns a potential failure to meet that goal, remedial plantings shall be undertaken.

LAWA fully anticipates that with proper management, the restoration site would resemble an established natural grassland community. Species were selected for planting based on their presence within the Master Plan boundaries, including the Los Angeles/EI Segundo Dunes (locally adapted ecotypes). These species would serve as the primary seed resource for the planting stock. Additional species may be planted after successful establishment of the initial planting stock. However, consideration will be given to the geographic location of the seed source and its proximity to the Los Angeles/EI Segundo Dunes.

Both methods of direct seeding and planting grass plugs were considered for this restoration effort. It was determined that maintenance associated with the direct seeding method would be more intensive than maintenance associated with the plug method of planting. Grasses planted using the plug method tend to establish more quickly than grasses planted by direct seeding, providing more immediate cover. This immediate cover in turn provides the added benefit of weed suppression. The plug method also allows for the utilization of other weed control methods that would not be applicable in the direct seeding method. Lastly, because native grass cover is presently low on site, and concentrated along the toe of the backdune slope on subsite 3, the process of seed banking for nodding needlegrass will likely be needed and must be considered also in the seeding efforts.

AS00005-20

Comment:

Most importantly, the proposed success criteria of "attainment of at least a 10 percent cover of native cover" is not acceptable. The Department and many local agencies have adopted a threshold of ten percent cover by native grass species as a determining factor in the classification and mapping of a given area as a native grassland type. An upland site dominated by herbaceous species with only ten percent cover of grasses may represent a native grassland/forb community, or more commonly may represent an extremely degraded native grassland community with a high percentage of non-native, disturbance-adapted species. The Department does not accept ten percent total native cover as an acceptable performance criteria for natural communities that achieve up to 75%-100% cover during the spring season. Therefore, the Department recommends: (1) examination of high quality needlegrass/forb habitat within the Master Plan boundaries for use as a reference site; and (2) consideration of published data documenting historical plant species and communities of the area.¹ The success criteria for this mitigation measure should be the attainment of replacement habitat comparable to the existing and pre-disturbance condition of the reference site, rather than a goal of ten percent native cover.

25. The revegetation of needlegrass grassland is extremely difficult and has been subject to a high failure rate due primarily to competition by non-native plant species. Revegetation of native grassland is largely in the experimental phase, with many land managers and others currently exploring ways to increase the success of native grassland restoration. Site selection, cryptobiotic crusts, soil types, fire, soil and vegetation salvage, associated species, weed competition, and other factors interact to influence the success or failure of native grassland restoration. While the site may have historically supported more forbs than grasses, similar revegetation methods and constraints would apply. Based on past experience, the Department recommends an extended site preparation and installation period for revegetation of this plant community. In areas supporting non-native species, we recommend at least two to three years of weed control prior to the installation of native grass species, in addition to the five-year maintenance/monitoring period. In fact, some research has shown that five years may be only marginally sufficient for grassland revegetation sites to achieve significant native growth (see <http://www.hastingsreserve.org/GrassRestore/GrasRest2.html>). We recommend that the project use salvaged materials from the project site, including soils, cryptobiotic crusts, native grasses, and geophytes, if these are available.

26. Needlegrass grassland is designated as a Rare Natural Community (S.1.1) that has suffered a decline of well over 99 percent in southern California. Because of the rarity of this community, the Department recommends a higher mitigation ratio (2:1 to 3:1) for impacts to needlegrass grassland (discussed in MM-BC-8, MM-BC-9, and MM-BC-10). Likewise, previous comments regarding specific revegetation methodology also apply to MM-BC-8.

27. The DEIS/EIR suggests that "Any combination of habitat replacement completed by LAWA or its designee drawn from the above-listed opportunities that equals at least 61.27 habitat units shall be considered sufficient replacement for the loss of habitat resulting from implementation of Alternative A." As previously mentioned, the Department do not support this concept for this or any of the "build" alternatives.

¹ Mattoni, R., and T. Longcore. 1997. The Los Angeles Coastal Prairie, a Vanished Community. *Crossosoma* 26(2): 71-102

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Response:

In response to the Department's two recommendations: (1) LAWA shall examine the highest quality needlegrass/forb habitat within the Master Plan boundaries or select more suitable, high quality habitat outside Master Plan boundaries for use as a reference site for mitigation and (2) species to be planted as part of Valley Needlegrass Grassland restoration efforts include native perennials as described in the Long-term Habitat Management Plan for the Los Angeles Airport/El Segundo Dunes. The plan considers peer-reviewed articles describing historical plant species and communities of the area, including those by Rudolf H.T. Mattoni, Ph.D, who also contributed to it. The reference site, in combination with the Long-Term Habitat Management Plan, shall be used to determine the success criteria for grassland restoration.

Site preparation shall include complete removal of all non-native species prior to seed set using methods such as mowing, raking, hand-pulling, and cut and daub with herbicide. These techniques should be sufficient to adequately remove weeds prior to planting. The five-year monitoring program shall include, in addition to collection of qualitative and quantitative data, weed removal as necessary. Weed removal prior to planting, in conjunction with continual weed removal for five years after planting, should provide suitable growth conditions for nodding needlegrass and other plants.

As was stated in subsection 4.10.8.2 of the Draft EIS/EIR, "propagation and planting of nodding needlegrass shall be accomplished by propagation from seed collected on-site during spring/early summer." In addition, salvaged materials from the project site, such as soils and native grasses, shall be used if feasible.

Please see Response to Comment AS00005-13 regarding the mitigation ratio for impacts to Valley Needlegrass Grassland.

AS00005-21

Comment:

We appreciate the opportunity to comment on the DEIS/EIR for the Los Angeles International Airport Proposed Master Plan Improvements project. The Department has determined that the project as currently proposed would have significant, unmitigated impacts on sensitive biological resources. Specifically, the actions will substantially reduce the habitat of sensitive wildlife species, reduce the numbers of endangered, threatened or rare species, and result in impacts that are cumulatively significant in light of past habitat losses and the small amount of remaining habitat to support sensitive species in western Los Angeles County. We request that the FAA and the City of Los Angeles not take final certification action until the Department has had the opportunity to meet with the applicant to address the concerns identified in this letter.

Response:

LAWA undertook coordination with the California Department of Fish and Game (CDFG) in May 2002 and conducted a field visit on June 20, 2002 to the LAX airfield in which CDFG viewed all open areas within the airfield that included areas designated as non-native grassland/ruderal and disturbed/bare ground. LAWA communicated with CDFG again on December 17, 2003 and in 2004 to resolve outstanding issues. As a result of these meetings, changes to the mitigation measures have been incorporated into this Final EIS/EIR. The mitigation measures described in the Final EIS/EIR mitigate for all impacts to biological resources and endangered and threatened species to levels below CEQA thresholds of significance.

AS00006**Henry, Teresa****State of California****9/24/2001****AS00006-1****Comment:**

Thank you for including the California Coastal Commission in the environmental review process for the above-mentioned document. The following comments represent the opinions of the staff only and do not represent the comments of the Commission itself.

The California Coastal Commission has direct permitting responsibility and regulatory authority over all federally permitted or funded projects occurring within or affecting the California coastal zone. The Commission's authority, called "federal consistency review," comes from the coastal zone Management Act enacted by Congress in 1972 and periodically re-authorized since then. All federal activities affecting coastal zone resources have been subject to the Commission's regulatory jurisdiction since the National Oceanic and Atmospheric Administration of the U.S. Department of Commerce approved California's Coastal Management Program (CCMP). Activities authorized, funded, or carried out by federal agencies that affect coastal zone resources must be reviewed by the Commission for consistency with the federally approved California Coastal Management Program (CCMP), including the California Coastal Act.

Any development within the coastal zone requires a Coastal Development Permit (CDP) unless the developer of the project is a federal agency, in which case a federal consistency review, as described above, may be required. In reference to LAX, the inland boundary of the coastal zone is the inland extent of the dedicated right-of-way of Pershing Drive. Coastal Commission approval would be required for the proposed relocation of FAA's navigational aids within the Los Angeles/El Segundo Dunes located in the coastal zone. Any potential impacts to sensitive biotic communities, sensitive flora and fauna species, and wetlands within the coastal zone would be analyzed and mitigation would be required for those impacts within the coastal zone. It is possible that certain improvements proposed in sensitive areas that could be constructed elsewhere would be required to be relocated to less sensitive areas. Any development within the coastal zone including some not anticipated in this letter would require a CDP. Street Improvements located within the coastal zone, including many of the proposed improvements to Main Street, California Street, Pershing Drive, Imperial Highway and other streets, would require a CDP. Any changes to bike paths or footpaths within the coastal zone would require a CDP. Any changes of land use, drainage systems, or fuel pumps, as well as relocation of residences or businesses, within the coastal zone would require a CDP. Construction setup, staging or storage areas within the coastal zone would require a CDP. These items are examples and not a comprehensive list of all possible impacts that may require a CDP. Any additional development or change in intensity of use within the coastal zone will require a CDP.

Response:

LAWA acknowledges the California Coastal Commission's direct permitting responsibility and regulatory authority over all projects occurring within or affecting the California coastal zone. As appropriate, LAWLA will apply to the California Coastal Commission (CCC) for a Coastal Development Permit for any development or change in intensity of use within the coastal zone.

AS00006-2**Comment:**

Project Description. In our early meetings with the airport staff, the Coastal Commission staff understood that the development envisioned in the master plan was entirely located outside of the coastal zone-that no development was proposed seaward of Pershing drive. Some language in the EIR indicates that the Airport may be considering development of a golf course or vernal pools on the dunes, which are located in the Coastal Zone. Specifically, in the appendix that addresses natural resources, tables 8, 11 and 14, the map code for open space is also used for golf course. The map seems to show a 100-acre golf course on it the dunes in the coastal zone. On another illustration there seems to be a hotel resort. There are three depictions of a golf course on the dunes. For this reason the staff has also commented on issues involving the dunes.

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Response:

Development proposed for Alternatives A, B, C, and D would be entirely outside of the coastal zone, with the exception of changes to FAA-required navigational aids and associated service roads currently located within the Los Angeles/EI Segundo Dunes. No golf course, hotel resort, or vernal pools would be located on the dunes. All references in Figures 8, 11 and 14 in Appendix J1, Biological Assessment Technical Report, to a golf course or hotel resort development on the dunes have been revised as indicated in Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR.

AS00006-3

Comment:

In analyzing this MASTER PLAN EIS/EIR and the measures used to mitigate the various alternative's impacts, Coastal Commission staff will be concerned with:

1. Sensitive biological resources found in the Los Angeles/EI Segundo Dunes area, which are located within the coastal zone;
2. Effects on federally and state listed threatened and endangered species including those requiring an incidental take permit from the U.S. Fish and Wildlife Service;
3. Effects of water quality runoff on coastal waters or watercourses;
4. Effects to coastal access and recreation and traffic impacts;

This list is not comprehensive and in no way limits the Commission's jurisdiction over matters not listed.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts to sensitive biological resources found in the Los Angeles/EI Segundo Dunes and effects on federally- and state -listed threatened and endangered species in Section 4.10, Biotic Communities, Section 4.11, Endangered and Threatened Species of Flora and Fauna, and Section 4.14, Coastal Zone Management and Coastal Barriers. The effects of water quality runoff on coastal waters or watercourses were discussed in Section 4.7, Hydrology and Water Quality, with supporting technical data and analyses provided in Technical Report 6, Hydrology and Water Quality Technical Report, and Technical Report S-5, Supplemental Hydrology and Water Quality Technical Report. Effects to coastal access and traffic impacts were addressed in Section 4.14, Coastal Zone Management and Coastal Barriers, and Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts to recreational areas within the coastal zone in Section 4.1, Noise, Section 4.2, Land Use, and Section 4.8, Department of Transportation Act, Section 4(f), with supporting technical data and analyses provided in Appendix D, Aircraft Noise Technical Report, Appendix S-C1, Supplemental Aircraft Noise Technical Report, Technical Report 1, Land Use Technical Report, Technical Report S-1, Supplemental Land Use Technical Report, Appendix H, Department of Transportation Act Section 4(f) Report, and Appendix S-F, Supplemental Department of Transportation Act Section 4(f) Report.

AS00006-4

Comment:

Sensitive Biological Resources.

There are vernal pools and some coastal prairie and some degraded Coastal Sage Scrub on the West End of the airport outside the coastal zone. We are concerned that when the Airport considers mitigation measures for impacts on these resources that there is an understanding that an improvement or mitigation located west of Pershing Drive will be located inside the coastal zone. The Commission will review any development inside the coastal zone for consistency with the view, habitat and public access and recreation policies of the Coastal Act.

The Coastal Act policies addressing environmentally sensitive habitat areas, such as are found on the dunes are very strict. The policies would not allow relocation of habitat from the dunes to another part of the dunes or consolidation of habitat areas. Similarly the policies would not allow development of a

different kind of habitat on the dunes, such as vernal pools if that habitat was not now found there. Such development would require a coastal development permit to be issued by both the City of Los Angeles, and by the Commission. The policies that the Commission staff would use in preparing its analysis includes the following:

Section 30240

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The Commission's review of any development proposed in the dunes would require protecting the long-term viability of the dune habitat and the endangered species that depend on the dunes before approving any proposal. A hotel or golf course on the dunes would not be a use that is dependent on the resource. Therefore construction of a hotel or a golf course on the dunes would raise serious issues of conformity with Section 30240 of the Coastal Act.

Response:

Please see Response to Comment AS00006-2 regarding clarification of development within the coastal zone.

AS00006-5

Comment:

Water Quality. The Los Angeles World Airport now drains its storm water directly into the ocean, seaward of Dockweiler State Beach, a heavily used public beach. Los Angeles World Airports (LAWA) is committed to developing a detailed drainage plan (HWQ-1) upon the selection of a final build alternative. Most of the initial treatment of drainage proposed however, will occur outside the coastal zone. The Draft EIS/EIR states that with the implementation of HWQ-1, any hydrology and water quality associated impacts would be less than significant. It is, however, very difficult to assess the future success of such a plan without having the opportunity to examine it first. The Commission staff believes that the drainage plan should be incorporated into the Final EIS/EIR to allow for public review.

Response:

Please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and Response to Comment AR00003-63 regarding agency review of mitigation measures.

AS00006-6

Comment:

LAWA fails to propose specific potential management measures and practices to be implemented for each of the build alternatives. At a minimum, a conceptual design with minimum mitigation measures should be developed for each build alternative at this time. This is made feasible by the fact that the three build alternatives are really very similar in nature. Commission staff believes that the potential hydrology and water quality impacts associated with the build alternatives and the proposed mitigation measures should be an integral part of the build alternative selection process.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR function as a program EIS/EIR and not a project-specific EIS/EIR. Because Master Plan facilities have not been conceptually designed, it is premature to design drainage facilities at even a conceptual level. Accordingly, general potential hydrology and water quality impacts were disclosed sufficiently to allow decision-makers to understand the environmental consequences of the various alternatives. Likewise, the Draft EIS/EIR and Supplement to the Draft EIS/EIR discussed general mitigation measures that would be implemented for each build alternative. Upon selection of an alternative and development of a detailed drainage plan,

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specific management measures and practices for tracking the general mitigation measures proposed would be identified in greater specificity. Also please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and Response to Comment AR00003-63 regarding mitigation measures.

AS00006-7

Comment:

Besides the narrative stormwater BMP design standards customary in NPDES permits, the Commission staff believes that here exists a perfect opportunity for LAWA to take more meaningful and quantifiable measures to address the runoff issues and their associated impacts. The LA Regional Water Quality Control Board has recently taken steps to require numerical BMP design standards in its Standard Urban Storm Water Mitigation Plan (SUSMP). However, these standards only apply to a few categories of new and re-developments, of which airport is not one. Nevertheless, due to the scale of the proposed development and the significant impacts associated with the runoff as a result of the intensified uses, establishing specific design criteria such as the 85th percentile, 24-hour design storm standard is reasonable. Specifically, for design purposes, post-construction structural BMPs (or suites of BMPs) should be designed to treat, infiltrate or filter stormwater runoff from each storm event, up to and including the 85th percentile, 24-hour storm event for volume-based BMPs, and/or the 85th percentile, 1-hour storm event, with an appropriate safety factor, for flow-based BMPs. For LAX, this means treating runoff associated with up to and including 0.75 inch of rainfall in 24 hours or 0.2 inch per hour.

Response:

Once the preferred alternative is selected, a detailed drainage plan, that will include types and locations of treatment control BMPs, will be developed for that specific alternative. These controls, together with source control BMPs, will be selected to achieve compliance with NPDES regulations. The LAX Master Plan is being prepared for "program level" entitlements; subsequent environmental documents will address environmental issues at more specific detail as necessary and appropriate. Also please see page 4-5 of Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Draft EIS/EIR, and Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and performance standards.

AS00006-8

Comment:

While it is commendable that LAWA has aimed for "reducing impacts to water quality to the maximum extent practicable and achieving no net gain in pollutant loads discharged to receiving water bodies," there exist no practical and feasible guiding principles for designing management practices. Furthermore, the goal of "no net gain" is merely to hold steady the current level of pollutant contributions by LAX to the Santa Monica Bay and Dominguez Channel. It then begs the question of whether or not the current level is good enough for safeguarding the quality of the receiving waters. Judging from the information provided, LAX's current stormwater measures seem inadequate to satisfactorily treat the runoff generated onsite.

Response:

With the implementation of Master Plan Commitment HWQ-1 and Mitigation Measure MM-HWQ-1, the project alternatives would not increase pollutant loads to the receiving water bodies, and thus would not have a significant water quality impact. In the event that the LARWQCB determines that stricter water quality standards are necessary to protect the receiving waters to which LAX discharges, LAWA will implement any modifications necessary to achieve the new standards. Also, please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and compliance with regulations.

AS00006-9

Comment:

Since both of the receiving water bodies are on the CWA Section 303(d) list for impairment by several pollutants of concern of which LAX is a contributor (e.g., Cu, Pb, and Zn), it is conceivable that the

future Total Maximum Daily Loads (TMDLs) developed for these pollutants would require LAX to share in the necessary load reductions. It simply is sensible to anticipate those future needs by incorporating the necessary stormwater designs during the current phase of development when opportunities abound. It may be worth pointing out that LAWA already acknowledges "[d]ue to the relatively large area that would be redeveloped, substantial opportunities would exist to replace existing facilities with ones that incorporate water quality control BMPs into their design, construction and operations thereby reducing total LAX-related pollutant loads."

Response:

Please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AS00006-10

Comment:

It is not clear whether or not baseline information for the various pollutant loadings has been established. Pollutant loads used in the analysis were calculated by multiplying the pollutants' Event Mean Concentrations (EMCs) and average annual runoff. And, these EMCs were obtained from various sources not necessarily specific to the region (e.g., Federal Highway Administration) or most up-to-date. Pollutant loads could have been underestimated as a result. In addition, without locally relevant data for determining baseline levels, it will be impossible in the future to determine whether the goal of "no net gain" is being attained.

Response:

Please see Section 4.7, Hydrology and Water Quality (subsection 4.7.2, subsection 4.7.3, and page 4-413), of the Supplement to the Draft EIS/EIR regarding updated event mean concentration values and pollutant loads. Also, please see Topical Response TR-HWQ-1 regarding event mean concentration source data, Topical Response TR-HWQ-2 regarding performance standards, and Response to Comment AR00003-63 regarding mitigation monitoring.

AS00006-11

Comment:

Lastly, using LAWA's method where EMCs remain constant, the only variable in the formula for calculating pollutant loads before and after development would be land use (i.e., the change in impervious area coverage). This will most likely result in underestimates of pollutant loads because it ignores the potential increase in pollutant contributions due to the intensification of various activities at LAX. Stormwater BMPs designed using these projections may then fall short of intended treatment efficacy.

Response:

Please refer to Topical Response TR-HWQ-1 regarding land use intensification. Also, per Master Plan Commitment HWQ-1, LAWA will implement the types and number of BMPs necessary to prevent a net increase in pollutant loading from runoff from the selected alternative.

AS00006-12

Comment:

Only nine pollutants are considered in the DEIR. Several pollutants, including cadmium, mercury, nickel, silver, chromium, PAHs, and PCBs, scheduled for TMDL development for the Santa Monica Bay and Dominguez Channel have been prematurely eliminated from the study. The DEIR provides no valid reasons for their exclusion. The Commission staff strongly urges baseline information on the omitted pollutants be established and a rigorous monitoring program be implemented to determine the exact LAX contribution of these pollutants to the downstream water bodies.

Response:

Details concerning mitigation monitoring will be based on the drainage plan that is to be developed as required under Master Plan Commitment HWQ-1. Please see Response to Comment AR00003-63

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regarding the mitigation monitoring and reporting plan and Response to Comment AL00033-363 regarding BMPs and pollutant removal.

AS00006-13

Comment:

The planned parking capacity for each of the build alternatives would exceed demand for both 2005 and 2015 by about 6,800 stalls and 3,800 stalls, respectively. This is meant to reduce the number of double trips by people recirculating on the terminal service loop due to Central Terminal Area congestion or by not being able to find parking spaces. While this sounds like a good idea, the concern with these additional spaces are the potential increase in impervious areas. Are these additional stalls located in (existing) vertical structures or are they horizontal ground spaces built on formerly pervious areas? One of the most effective practices to reducing runoff and its associated pollutants is minimizing the creation of impervious areas in the first place. There needs to be a balanced analysis between traffic relief and water quality impacts. If these extra stalls are critical to ensuring traffic relief, active measures should be undertaken to minimize any negative runoff impacts associated with the increase in impervious areas. Examples of these measures include, but are not limited to, retention and/or detention basins, catch basin filters and underground sand filters.

Response:

The design of the parking facilities has not been finalized. Preliminary designs of all the build alternatives, however, show that most stalls will be located in vertical structures in order to minimize impervious area and the space required. The design of the parking facilities will comply with the SUSMP requirements. Also, please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AS00006-14

Comment:

Commission staff strongly encourages LAWA to, wherever appropriate, design water quality components into LAX's flood control measures. While it is important to ensure that drainage facilities can adequately convey stormwater runoff and prevent flooding, increasing the structure's capacity is often less effective than reducing peak flow rates. As mentioned in the DEIR, reducing peak flow rates could be achieved, for example, by reducing the directly connected impervious areas. Taking this one step further, peak flow rates could be reduced by minimizing overall impervious areas, period, or by creating pervious areas such as filtering strips and/or grassy swales to intercept flows.

Response:

LAWA intends to reduce storm water runoff volume and peak flows through a range of measures which could include decreasing the directly connected impervious area (DCIA), constructing storm water detention structures, redirecting storm water flows to increase the time of concentration, and other methods as stated in Section 4.7, Hydrology and Water Quality (subsection 4.7.5), of the Supplement to the Draft EIS/EIR. Also, please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AS00006-15

Comment:

While the pollutant loads associated with wet weather flows were estimated quantitatively, those associated with the dry weather flows were only addressed qualitatively. The reason given was that "[s]ince, the types of pollutants in dry weather flows are governed by the source of the flow and, therefore, are extremely variable and cannot be quantified, the analysis of dry weather flows is limited to the identification of factors that are likely to increase or decrease their occurrence." Were there no past sampling results or chemical use records to assist in the quantification? There needs to be a better effort in quantifying pollutant loading as a result of dry weather flows.

Response:

Under its NPDES Industrial Storm Water permit, LAX is required to perform quarterly visual observations of non-storm water discharges/dry weather flows. Analytical sampling of these flows only occurs if it is necessary to trace the origin of the discharge. Therefore, monitoring data characteristic of average dry weather flows associated with the airport are not available. Also, please see Section 4.7, Hydrology and Water Quality (subsection 4.7.5), regarding dry weather flow BMPs.

AS00006-16

Comment:

LAWA acknowledges that there will be an overall intensification of use at LAX under all three build alternatives. In addition, the DEIR states, "the Imperial retention basin would be removed and dry weather flows entering the storm drain system would have the potential to discharge untreated to the Santa Monica Bay or Dominguez Channel water bodies." The only mitigation measures proposed are compliance with existing regulations and airport procedures, particularly the LAX SWPPP, and incorporation of some unspecified source control, structural and treatment BMPs under HWQ-1. Unfortunately, these may not be adequate. The SWPPP developed pursuant to the Industrial Activities Storm Water General Permit (Industrial NPDES Permit) is often only required to be available onsite and ready for inspection by the appropriate authorities when requested, but not required as a part of the permit application process. In other words, the SWPPP is often not evaluated for adequacy. LAWA is strongly urged to propose clear measures to prevent and control dry weather runoff. This could be accomplished by incorporating the SWPPP into the final EIS/EIR to allow for public review. In light of their smaller quantities, diversion of dry weather runoffs for treatment (or treatment onsite) should be considered.

Response:

Because sufficient drainage information will not be available until an alternative is selected and an alternative-specific drainage plan is performed, it is not possible to modify the existing SWPPP at this time. Also, please see Response to Comment AR00002-3 regarding removal of the Imperial retention basin under Alternatives A, B, and C and Response to Comment SAL00015-304 regarding diversion of dry weather flows.

AS00006-17

Comment:

The DEIR fails to analyze a more comprehensive list of BMPs that could be implemented during the construction phase. It simply states that by following the procedures outlined in the SWPPP, prepared pursuant to the construction NPDES permit, and employing the eight BMPs listed in the DEIR, impacts to water quality associated with construction activities would be less than significant. For the same reason stated above for industrial NPDES permit, SWPPP developed according to the requirements of a construction permit is often not subject to agency/public review and cannot guarantee water quality protection. In addition, the eight BMPs listed in the DEIR fail to address, among others, the staging and times of year planned for land disturbance and the methods proposed for chemical use and storage. Such details should be incorporated into the final EIS/EIR.

Response:

Please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and compliance with regulations. The LAX Master Plan is being prepared for "program-level" entitlements. Subsequent environmental documents will address environmental issues at more specific detail as necessary and appropriate.

AS00006-18

Comment:

There is very little mention of BMP inspection, monitoring, and maintenance. Besides inappropriate and inadequate designs, BMPs often fail because they are not being properly maintained. A rigorous program needs to be in place to ensure that the BMPs continue to operate at their design capacities in

3. Comments and Responses

preventing and controlling polluted runoff. It is also imperative to identify BMP inadequacies in terms of type, size, location, and number. Structural BMPs should be Inspected prior to the start of the rainy season (no later than October 15th), after the first storm of the rainy season, and monthly thereafter until April 30th. Major observations to be made during inspections include:

- Locations of discharges of pollutants from the site;
- BMPs that are in need of maintenance;
- BMPs that are not performing, failing to operate, or inadequate; and
- Locations where additional BMPs are needed.

While it is important to have structural and/or treatment stormwater BMPs, the Coastal Commission staff strongly encourages the implementation of nonstructural BMPs for source control as well. These include, among others, personnel training for good housekeeping measures.

Response:

LAWA's existing SWPPP will be amended to include details pertaining to the operation and maintenance of all new or retrofitted structural BMPs, as required under SUSMP. This information will also be included in LAX construction SWPPPs. As stated in Section 4.7, Hydrology and Water Quality (subsection 4.7.5), of the Supplement to the Draft EIS/EIR, source control/non-structural BMPs will continue to be used to prevent stormwater contamination. Also, please see Topical Response TR-HWQ-2 regarding compliance with regulations.

AS00006-19

Comment:

Impacts on Beach Access. The proposed master plan improvement may impact major beach access routes-Highways 1, 42, 105, and 405, as well as Pershing Drive, West Imperial Highway, Westchester Parkway, Vista Del Mar, Main Street, and Culver Boulevard. As we have discussed, directly blocking access along Imperial Highway to the beach would raise major issues of consistency with Sections 30210 and 30211 of the Coastal Act. Increased congestion on any of these east-west corridors could impact beach access particularly in the summer months. The information that you provided does not show the extent of traffic impacts on these routes during peak beach use times. In analyzing projects for the Commission, the staff will need to know the project's impacts on beach access routes. We note that certain key intersections will function at level F after mitigation. Staff will need to know whether these routes will flow at high levels of congestion-at or above level F- on peak beach use times, including holidays and summer weekends.

Response:

The analysis of the a.m. and p.m. commuter peak hours was for an average day in August, which is the peak summer month. Therefore, the results that were shown in Section 4.3.2, Off-Airport Surface Transportation of the Draft EIS/EIR, should accurately reflect the conditions of peak beach access. The project alternatives would be designed to maintain full access to Dockweiler Beach State Park at all times, from both residential streets west of Pershing Drive and Imperial Highway as well on Vista del Mar. Alternatives A, B, and C would provide non-stop access from both Westchester Parkway and Imperial Highway to Vista del Mar. As a result, the analysis showed that these access routes would operate with good levels of service under these alternatives, even during the peak hours. Alternative D would not change the existing access routes to Dockweiler Beach State Park.

AS00006-20

Comment:

Traffic Impacts. One of the mitigation measures proposes funding for a Los Angeles County plan to "extend the Marina Freeway (Route 90)". There is no indication or proof that Caltrans or the County would be willing or able to use these funds. There is also no indication of alternate mitigation if these funds are not allocated to that proposed project. The portion of the Marina Freeway that would be extended is located within the coastal zone. There is an unnamed drainage in the median strip of the existing Marina Freeway (Route 90) that supports freshwater wetland plants. The standard of review of any development within the coastal zone is whether or not it is consistent with the Coastal Act. The status of a project as a required mitigation measure for development outside the coastal zone does not

change this standard of review or assure approval. Therefore, before any of the mitigation measures in the coastal zone such as this road are constructed Caltrans, the City of Los Angeles, or the County of Los Angeles must obtain a coastal development permit. It may not be possible to obtain a coastal development permit if the road or other improvement requires wetland fill or has other impacts on coastal resources. Provisions for alternative mitigation consistent with the Coastal Act should be provided.

Response:

Please see Topical Response TR-ST-2, Section 2.3.4, for a discussion of the assumptions regarding the Marina Freeway (Route 90). See also Topical Response TR-ET-2 regarding evaluation of wetlands as considered in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AS00006-21

Comment:

Transit Alternatives. The 1984 Marina del Rey Ballona LUP provides for light rail along Lincoln Boulevard connecting to the airport, and/or a 'people mover' along Lincoln Boulevard connecting to Santa Monica. Two 1987 revisions to that plan by both Los Angeles County (the Marina del Rey LUP) and the City of Los Angeles (the Playa Vista LUP) provide for light rail along Lincoln Boulevard connecting to the airport, and or a "people mover" along Lincoln Boulevard connecting to Santa Monica "if found feasible by local, regional, or state agencies responsible for their development." The 1987 Playa Vista LCP in addition requires that the part of any system operating in the City shall be linked to those portions located in County areas to assure an integrated system.

It may be more likely now than it was in 1987 that a transit alternative is feasible and might significantly reduce trips. Since 1987, there have been two successful light rail lines constructed in Los Angeles County. The Airport is now proposing to extend one of these lines, the "Green Line", across Lincoln Boulevard into the Airport. Although it is possible that an improvement that has high initial costs may still not be feasible, the Commission staff will most likely want a careful analysis of transit alternatives. We note that one of the difficulties of extending a light rail line or "people mover" along Lincoln has been lack of sufficient right-of-way. The mitigation measures for this project already include proposals to acquire right-of-way in several areas, including along some of the Lincoln Corridor. The presently proposed traffic mitigation measures would use former rail right-of-way located within Culver Boulevard for road improvements.

Response:

The extension of the Metro Green Line in Alternatives A, B and C would be from the existing station at Aviation Boulevard/Imperial Highway to the proposed west terminal near Imperial Highway and Pershing Drive. In Alternative D, Green Line passengers would connect to the Central Terminal Area by a moving pedestrian walkway elevated over Imperial Highway to an airport-operated Automated People Mover.

Any other new light rail services are beyond the scope of the LAX Master Plan project. Please see Topical Response TR-ST-5, and in particular Subtopical Responses TR-ST-5.2 and TR-ST-5.4 regarding light rail connections to the airport.

AS00006-22

Comment:

Wetland Issues that may be raised by some road improvements. Section 30233 allows fill of wetlands for incidental public service purposes. In the Bolsa Chica decision, the courts found that it was not allowable to fill wetlands except as provided for in section 30233. In fact, the court said that "incidental public services are limited to temporary disruptions and do not usually include permanent roadway expansions" at all. *Bolsa Chica Land Trust v. Superior Ct.* (1999) 71 Cal. App. 4th 493,517. However, it did allow for roadway expansions when "no other alternative exists and the expansion is necessary to maintain existing traffic capacity." *Id.* This decision will put severe limitations of on roadway expansions that require wetland fill. If any of the road expansions proposed as mitigation for traffic generated by airport expansion are located in the coastal zone and require wetland fill, it may not be possible for the Commission to approve the widened roadway because of the limitations of Section 30233.

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Many parts of the road improvement involve no wetland fill. In other areas, such as along Lincoln Boulevard in Area B and the extension of Admiralty to Culver Boulevard in Area A, there may be wetland fill issues. The Commission will need to know precisely what the impacts of the proposed widening will be on wetland areas. Additional surveys concerning the extent of the wetlands will need to be completed in advance of the Commission's consideration of the proposed road improvements.

Response:

It is acknowledged that any improvements occurring in the coastal zone would be subject to review and approval by the CCC, and that any impacts to wetlands or other environmentally sensitive habitat areas (ESHAs) would be subject to the requirements of the California Coastal Act.

Notwithstanding that the extension of Admiralty to Culver Boulevard is no longer proposed and that the traffic analysis completed for the LAX Master Plan EIS/EIR does not assume or rely upon that extension or the widening of Lincoln Boulevard, the impacts of those improvements would be addressed in the environmental clearance documents required for those projects, at a detailed level of analysis when/as the specifics of the improvements are known. Detailed surveys, such as suggested in the comment, would be conducted in conjunction with the preparation and processing of the subject environmental clearance documents, based on the specifics of the proposed improvements. Similarly, the CCC's review and permitting authority for those improvements would be exercised as those specific improvements are advanced through the regulatory process.

AS00006-23

Comment:

Mitigation Measures.

The proposed traffic mitigation measures concentrate on adding lanes to major streets, and some intersections such as Lincoln at Washington. According to the report, these measures will alleviate, but not entirely mitigate increased traffic. Mass transit mitigation includes "smart" signals along north/south bus routes, but does not include enhancements to east/west bus routes, which are the public transportation routes for beach visitors who now arrive on mass transit. Proposed mitigation measures that involve development within the coastal zone would be reviewed for consistency with the coastal act policies. Concerns would include impacts on beach visitor access, on wetland or habitat areas, or on community character.

Under the Coastal Act mitigation measures must be considered to reduce or avoid impacts. The Commission staff will rely on Coastal Act Sections 30253 and 30254 to analyze alternatives, and to consider the effects of the intensity of development. Under the Coastal Act, where traffic corridors are constrained by natural habitats or wetlands, or when public access would be adversely impacted the Commission staff will consider recommending that the size of the road be reduced.

Response:

Comment noted.

AS00006-24

Comment:

Consistency with Certified LUP's/LCP's. The standard of review of all development within the coastal zone is the policies of the Coastal Act. However, in communities where there is a certified local coastal program, that LCP will be the standard of review for development. The City of Manhattan Beach and Marina del Rey all have certified Local Coastal Programs. Any road improvements within these areas would require a coastal development permit issued by the local government having jurisdiction over the area. In areas such as Venice, Redondo Beach, Hermosa Beach, Playa Vista the standard of review would be consistency with the Land Use Plan. Where there is a certified Land Use Plan, the Commission staff will look consider the policies of the Land Use Plan, but the standard of review will remain the Coastal Act policies. This is relevant in the case of the Airport because it applies to mitigation measure such as road widening projects that may be located in those communities.

Response:

LAWA acknowledges that Coastal Development Permits will be required consistent with applicable certified land use plans and local coastal programs for improvements in communities surrounding the airport. The regulatory provisions concerning the coastal zone were discussed on page 4-753 in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR. Included in this discussion was a description of the California Coastal Commission's (CCC) authority over the project and the need to obtain a Coastal Development Permit when modifying land use or water use in a coastal zone. For the purposes of this EIS/EIR a consistency finding from the CCC is necessary before a decision can be made to implement the proposed action. As appropriate, LAWA will apply to the CCC for a Coastal Development Permit for any development or change in intensity of use within the coastal zone.

AS00007 Emerson, Pam State of California 5/11/2001

AS00007-1**Comment:**

On Thursday, April 25 I went to a show and tell and airport tour at LAX regarding their planned expansion, a controversial project directly adjacent to the coastal zone. They are keeping development outside the coastal zone and they have made changes in their circulation plan so that impacts direct coastal access routes (Imperial etc) will be avoided. Their EIR comment period is still running. We may want to comment on the following issues:

Response:

Please see Responses to Comments AS00007-2 through AS00007-8 below.

AS00007-2**Comment:**

1) Traffic. They claim no impacts south of Rosecrans (at the north end of Manhattan Beach), but admit to impacts on route 1 i.e. Lincoln Boulevard, the major coastal access route north of the airport. They are contributing to a number of intersection improvements. On the 16th I will be seeing LA DOT for other reasons and they have offered to go over the Airport's mitigation measures with me. Combined with Playa Vista it is a big impact. We have agreed not to raise a consistency issue on traffic but we may want to consider a comment once Karen and I have analyzed the traffic issues and mitigation measures.

Response:

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. The traffic analyses completed for the Draft EIS/EIR and for the Supplement to the Draft EIS/EIR included development at Playa Vista. In fact, the subject analyses included the former Phase II development proposal for Playa Vista, which was substantially reduced in November 2002. As such, the subject analyses are very conservative. It should be noted that Alternative D, which is now the LAWA staff's preferred alternative, does not include the ring road, consequently, no ring road improvements near the coastal zone would occur under Alternative D.

AS00007-3**Comment:**

2) Water quality. Four people from the RWQCB and one from City of LA environmental department were in attendance. It was pretty obvious from the tour that there are all kinds of opportunities for fuel spills and ground water and ocean runoff problems. There are two major floodwater collection basins that will need to be retrofitted with filters.

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Response:

Fuel spills and releases of other materials associated with airport operations are and will continue to be addressed through use of source control Best Management Practices (BMPs) that are identified in the facility's Storm Water Pollution Prevention Plan (SWPPP). The drainage plan performed for the selected alternative will address the need for new/retrofitted detention basins. Also, please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AS00007-4

Comment:

3) Habitat. There are vernal pools and some coastal prairie and some degraded CSS on the West End of the airport outside the coastal zone. The biologist say that FAA rules will make it very hard to restore the pools, because FAA forbids standing water for more than three hours to avoid attracting birds. Apparently the butterflies on the dunes are doing fine. I left to talk to LA City about another matter while the project biologists were beginning to explain their problems to Chuck Raysbrook, regional director at Fish and Game.

Response:

In June 2000, the FAA sent a letter to LAWA indicating that creation or restoration of vernal pools immediately west of the north runway complex, within the Los Angeles/El Segundo Dunes, to accommodate soils containing cysts of the Riverside fairy shrimp from the LAX airfield would be unacceptable due to aviation safety considerations.¹ The FAA's statutory mission is to ensure the safe and efficient use of navigable airspace, therefore the creation of vernal pools in the Los Angeles/El Segundo Dunes would be inconsistent with the provisions of 14 CFR Part 139, Section 139.337(f), Wildlife Hazard Management. Pursuant to the Federal Code of Regulations, Title 14, Part 139, Section 139.337: Wildlife Hazard Management, routine operations and maintenance activities, including the elimination of standing water, shall be undertaken to minimize or eliminate hazards to public safety resulting from wildlife utilization of the Airport Operations Area (AOA). As a result of Section 7 consultation among LAWA, FAA, and USFWS, the soils containing cysts of the Riverside fairy shrimp will be relocated to property owned by the FAA and designated a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS, in conformance with the Draft Biological Opinion issued by the USFWS. The Draft Biological Opinion is included as Appendix F-E of this Final EIS/EIR.

1. U. S. Department of Transportation, Federal Aviation Administration, 30 June 2000 (Letter to Los Angeles World Airports (James Ritchie) from the Federal Aviation Administration (Mr. David Kessler). Subject: Los Angeles International Airport Potential Mitigation Measures for Riverside Fairy Shrimp Cysts.

AS00007-5

Comment:

4) Degree of control: the Airport staff argues that they have no control over landings, which is what is driving the growth. They claim landings will occur whenever the airlines and or the FAA wish. They expect 89 million passengers by 2015.

Response:

Airport operators and the Federal Aviation Administration (FAA) do not have the authority to limit future activity at airports. Airlines choose to provide additional flights. The Master Plan analyzed the capacity offered by each alternative and the future delays that would result at LAX in determining the level of activity that will likely occur at LAX by 2015. The activity levels for each alternative were developed by considering the airlines' likely reaction to increasing congestion. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D, was added to the range of alternatives currently being considered for the LAX Master Plan. Alternative D, developed pursuant to the direction of Mayor Hahn, is designed to serve a level of future (2015) airport capacity comparable to that of the No Action/No Project Alternative, and is consistent with the policy framework of the SCAG 2001 RTP to accommodate

future regional aviation demand at airports other than LAX. Alternative D would make the airport safer and more secure, convenient, and efficient, and would have the fewest negative impacts to local communities and the region. Analysis of Alternative D is contained in the Draft LAX Master Plan Addendum and in the Supplement to the Draft EIS/EIR. The No Action/No Project Alternative examined the capacity of all of the airport components and defined the maximum level of activity (approximately 78.7 MAP) that could be accommodated at LAX without improvements. See Chapter V, Concept Development, Section 3.3.2 of the Draft LAX Master Plan and Chapter 3, Alternative D Constrained Activity, Section 3.1 of the Draft LAX Master Plan Addendum for more information on the activity and constraints associated with each alternative. Also please see Topical Response TR-GEN-3 regarding actual versus projected activity levels.

AS00007-6

Comment:

5) The big controversial issue is sound impacts, which is not our issue. Additional houses will be acquired in Westchester, and additional sound impacts will occur in Inglewood. The FAA rules say that if your house or apartment building is substandard structurally, they will not pay for soundproofing. I am sure we will hear additional controversy concerning the environmental justice of that rule.

Response:

A description of residential acquisition proposed under the Master Plan alternatives was presented in Section 4.2, Land Use (subsection 4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Note that under LAWA Staff's new preferred alternative, Alternative D, no residential acquisition is proposed. The commentor is correct in stating that additional sound impacts would occur in Inglewood under the Master Plan alternatives, as was presented throughout subsection 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. As described in Technical Report S-1, Supplemental Land Use Technical Report, a memorandum of understanding (MOU) was agreed to between City of Los Angeles and City of Inglewood to mitigate impacts associated with current and future operations at LAX. Currently under this MOU, LAWA has suspended its requirement for an aviation easement in exchange for sound insulation. In addition, under revised Mitigation Measure MM-LU-1, presented in subsection 4.2.8 of the Supplement to the Draft EIS/EIR, LAWA would reduce or eliminate, to the extent feasible, structural and building code compliance constraints to mitigation of sub-standard housing.

AS00007-7

Comment:

There is already controversy regarding noise impacts on Inglewood, El Segundo and Westchester.

Response:

Please see Response to Comment AL00006-2 regarding areas exposed to high noise levels under 1996 baseline and Year 2000 conditions and current measures underway to address existing high aircraft noise levels. See also Topical Responses TR-LU-2 regarding noise levels in Westchester, TR-LU-3 regarding residential sound insulation under the Aircraft Noise Mitigation Program (ANMP), TR-LU-4 regarding outdoor noise levels, and TR-LU-1 regarding quality of life.

AS00007-8

Comment:

In response to the noise issue the preferred alternative is lengthening a runway on the north side and extending the Sepulveda tunnel but the preferred alternative does not include a new runaway.

Response:

Comment noted.

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AS00008 Roberts, Terry State of California 11/13/2001

AS00008-1

Comment:

The State Clearinghouse submitted the above named Joint Document to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 9, 2001, and the comments from the responding agency(ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response:

Responses to the referenced agency submittals are provided in the responses to comment letters AS00001, AS00002, AS00003, AR00002, and AR00005. It should be noted that each of the agency letters to the OPR was also received separately by FAA and/or LAWA.

AR00001 Smith, Jeffrey Southern California Association of Governments 7/23/2001

AR00001-1

Comment:

The Los Angeles International Airport Proposed Master Plan Improvements meets SCAG's criteria for classification of a plan that is regionally significant. SCAG staff's comments are on the Draft EIS/EIR in terms of SCAG's aviation and transportation related policies from the 2001 Regional Transportation Plan.

A brief summary of SCAG staff comments includes the following: the Project exceeds the adopted 2001 Regional Transportation Plan (RTP) aviation strategy of 78 MAP; the Draft EIS/EIR does not suggest consideration or the potential incorporation of high-speed rail for the proposed Project; and there is no indication on funding to implement the proposed improvements.

In addition, SCAG staff outlines a number of recommendations, which would bring the proposed project into compliance with the RTP. These recommendations are listed on the following pages and should be strongly considered.

Response:

Please see Responses to Comments AR00001-2 through AR00001-17. Alternative D, the Enhanced Safety and Security Plan alternative evaluated in the Supplement to the Draft EIS/EIR, is consistent with the 2001 RTP. Please see Section 2.8, Funding, of the Draft EIS/EIR on page 2-19 for information on

project funding. Also please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AR00001-2

Comment:

SUMMARY OF SCAG STAFF COMMENTS

- The proposed Project considers the expansion of the Los Angeles International Airport. The proposed Project is designed to accommodate a range of 79 MAP to 98 MAP. The preferred alternative (Alternative C) would accommodate 89 MAP. The Project exceeds the adopted 2001 Regional Transportation Plan (RTP) aviation strategy of 78 MAP.

Response:

In response to the direction of Mayor Hahn, LAWA developed a new alternative for consideration as part of the LAX Master Plan. Alternative D, The Enhanced Safety and Security Plan alternative, is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. To ensure that the LAX Master Plan Alternative D has been fully analyzed to the level of the previous Master Plan alternatives, LAWA prepared a supplement to the January 2001 Draft EIS/EIR. Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP. Also please refer to Topical Response TR-MP-2 regarding LAWA's efforts to ensure compatibility between the LAX Master Plan and the SCAG RTP.

AR00001-3

Comment:

- The Draft EIS/EIR, on page 2-1, states that regional demand is expected to increase over the next fifteen years, with considerable demand expected at LAX. The project sponsor has reviewed the potential contributions of the existing and planned commercial service airports in the region to meet the increased demand and has concluded that the capacity of LAX needs to be increased to an appropriate level to meet this demand. The Draft EIS/EIR also recommends a number of mitigation measures that address environmental and ground access impacts. Despite the mitigation measures, most impacts would remain significant and unavoidable. In addition, the proposed expansion of the airport is not consistent with the adopted RTP aviation strategy.

Response:

As indicated above, LAWA developed a new alternative, Alternative D, for consideration as part of the LAX Master Plan. The Supplement to the Draft EIS/EIR analyzed the environmental impacts and mitigation measures associated with Alternative D. Also, please refer to Topical Response TR-MP-2 regarding LAWA's efforts to ensure compatibility between the LAX Master Plan and the SCAG RTP.

AR00001-4

Comment:

- The proposed expansion of LAX is anticipated to handle potential passenger and cargo increases. The projected increases exceed the adopted RTP aviation strategy.

Response:

Please see Response to Comment AR00001-2 above.

AR00001-5

Comment:

- Through the RTP, SCAG is proposing an Intra-Regional High Speed Maglev System, which will connect major regional activity centers and transportation facilities. The System, as envisioned, would provide a connection to the proposed Project. The Draft EIS/EIR includes a section on rail technology,

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however, the discussion does not suggest consideration or the potential incorporation of high-speed rail for the proposed Project.

Response:

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AR00001-6

Comment:

The Draft EIS/EIR includes a section on funding. The total program cost of the proposed Project is \$12 billion dollars. The Draft EIS/EIR on page 2-19, suggests that funding for the proposed Project could come from a combination of private, state, local and federal funding. The Draft EIS/EIR describes a few funding programs, but there is no indication on funding to implement the proposed improvements.

Response:

As was discussed in Section 2.8 of the Draft EIS/EIR, the proposed funding includes a combination of FAA Airport Improvement Fund grants, passenger facility charges, general airport revenue bonds, airline fees, and other state/federal grants. No taxpayer dollars would be used to pay for any of the proposed improvements.

AR00001-7

Comment:

CONCLUSION AND RECOMMENDATION:

1. Based on the review of the LAX Master Plan Draft EIS/EIR, the proposed Project is not consistent with the 2001 Regional Transportation Plan. The proposed Project should be consistent with the 2001 RTP and aviation strategy that was adopted by the Regional Council to replace the 1998 RTP. Project consistency is essential for implementation of transportation, projects, programs and policies.

Response:

Comment noted. Please see Response to Comment AR00001-2 above.

AR00001-8

Comment:

2. In order for the LAX Master Plan to be consistent with the 2001 RTP, staff strongly recommends the following:

Response:

Please see Responses to Comments below.

AR00001-9

Comment:

- Rescope the LAX Master Plan alternatives to conform to the RTP aviation strategy of 78 MAP or less.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided

in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AR00001-10

Comment:

- Consider a decentralized/regional approach to comply with RTP aviation strategy.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AR00001-11

Comment:

- Use an Intra-Regional High Speed Maglev System as a way to redistribute regional demand.

Response:

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AR00001-12

Comment:

- Redistribute cargo and passengers to regional airports such as March Global Port, San Bernardino, Southern California Logistics, Palmdale, Ontario, El Toro and John Wayne.

Response:

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AR00001-13

Comment:

- Use mitigation measures stressed in the RTP EIR, and other options such as remote terminals.

Response:

Comment noted. The 2001 RTP EIR acknowledges that individual airports would undertake airport specific studies for proposed improvements and those studies would identify impacts and appropriate mitigation measures. The EIS/EIR completed for the LAX Master Plan does just that. Overall, the project features, Master Plan commitments, and mitigation measures that were presented in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for the LAX Master Plan are generally consistent with, and responsive to, the relevant mitigation measures of the 2001 RTP EIR. These include measures as related to relocation of homes and business (i.e., provisions for relocation and real estate acquisition); consistency with regional plans (i.e., Alternative D's responsiveness to policy framework of the 2001 RTP); mitigation of air quality impacts from construction and operations; mitigation of noise impacts;

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implementation of design guidelines and landscaping to reduce visual/aesthetic impacts; implementation of Best Management Practices (BMPs) to reduce construction-related erosion and sedimentation, as well as long-term operations-related water quality impacts; mitigation of impacts to biological resources; implementation of cultural resource investigation, evaluation, and recovery measures in the event significant archaeological resources are discovered during project implementation; completion of site/project-specific geotechnical evaluations in conjunction with the detailed design, engineering, and construction of individual improvement projects; implementation of energy conservation measures; and appropriate coordination with public services and utilities agencies. Remote terminals are not included in any of the build alternatives.

AR00001-14

Comment:

- Participate in the Southern California Regional Airport Authority (SCRAA). Los Angeles World Airports must work with SCRAA to review projects, which are consistent with the RTP and support safety.

Response:

Comment noted. Please see Topical Response TR-RC-1 for information on the role of the Southern California Regional Airport Authority (SCRAA) and the Southern California Association of Governments in the development of the LAX Master Plan. The decline in air travel demand due to the economic recession, the events of September 11, 2001, the war in Iraq, and SARS has largely driven the SCRAA back to inactivity. Riverside County voted in July 2002 to withdraw from SCRAA.

Alternative D provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX.

AR00001-15

Comment:

- Coordinate the Master Plan transportation strategies and funding with surrounding communities, LACMTA and the Regional Transportation Plan and Regional Transportation Improvement Program Process.

Response:

Comment noted.

AR00001-16

Comment:

- Please note SCAG's continued objection to the Arbor Vitae Interchange.

Response:

Comment noted. FHWA has withdrawn its support for a half interchange at Arbor Vitae and the proposed half interchange is not part of the LAX Master Plan. FHWA policy is to only consider proposed full interchanges, not partial ones. The analyses in the Draft EIS/EIR and Supplement to the Draft EIS/EIR assumed that no portion of the Arbor Vitae interchange would be built in any pre-2015 scenarios. The Year 2005 analysis in the Draft EIS/EIR, Supplement to the Draft EIS/EIR, and in Technical Reports 3b and S-2b, therefore showed project impacts without the Arbor Vitae interchange for the Year 2005. The Arbor Vitae half-interchange is not proposed as a mitigation measure for the LAX Master Plan, nor is it an element of the Master Plan itself. The half-interchange is on the list of background transportation improvements to be implemented in the future. As shown in Table 2.3 of Technical Report 3b, all Year 2015 scenarios analyzed in the Draft EIS/EIR (all baseline alternatives and all project alternatives) include the assumption that one-half of the Arbor Vitae Interchange at I-405 would be built by the Year 2015. This assumption is consistent with the requirements of NEPA and

CEQA. The half-interchange project was funded in the Regional Transportation Improvement Program (RTIP) and included in the Regional Transportation Plan (RTP) at the time the EIS/EIR project began, and is in both adopted documents. The Southern California Association of Governments (SCAG) removed the Arbor Vitae half-interchange from the RTP and RTIP on April 12, 2001 but then amended the RTP and RTIP on March 9, 2002 to incorporate the half-interchange. The Draft EIS/EIR and Supplement to the Draft EIS/EIR analyses indicated that only a small number of airport trips would use this half-interchange. In the project scenarios, vehicles on I-405 to/from the north wishing to connect to Arbor Vitae Street and the LAX Ring Road would not be able to use the Arbor Vitae ramps (they do not connect to/from the north). Vehicles connecting between I-405 north and Arbor Vitae west/Ring Road would have a separate expressway facility that makes the connection. Vehicles wishing to connect between LAX and I-405 south generally would not use the Arbor Vitae ramps but instead would have several more convenient opportunities further south, including ramps at Century Boulevard, Sepulveda Boulevard, Imperial Highway, and I-105. Also, please see Topical Response TR-ST-2 regarding the Arbor Vitae interchange.

AR00001-17

Comment:

3. All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

Response:

Comment noted. In accordance with Section 21081.6 of the California Environmental Quality Act (CEQA) and Section 1505.2(c) of the National Environmental Policy Act (NEPA), mitigation monitoring and reporting requirements will be included as part of project approvals.

AR00002

Dickerson, Dennis

**California Regional Water
Quality Control Board**

9/17/2001

AR00002-1

Comment:

The Los Angeles Regional Water Quality Control Board (Regional Board) is charged with protecting surface and groundwater quality in the coastal watersheds of Los Angeles and Ventura Counties, including the Santa Monica Bay Watershed where the proposed LAX expansion project is located. The Regional Board has reviewed the above-referenced Environmental Impact Statement/Environmental Impact Report (EIS/EIR) and is pleased to provide the following comments.

Response:

Comment noted. Please see Responses to Comments below.

AR00002-2

Comment:

Section 4.7 Hydrology and Water Quality

The proposed project entails the expansion of the existing LAX airport to include 275 additional acres of land mainly for road construction and the extension of the Green Line. The project alternatives involve some construction within the existing area to lengthen existing runways and/or create new ones, and/or construct an additional terminal. Surface water from the existing site and the proposed expansion will be discharged directly to the Santa Monica Bay or the Dominguez Channel - both of which have been listed on U.S. EPA's 1998 303(d) list as being impaired. Some of the pollutants identified as being associated with the run-off -copper, lead, zinc, and ammonia (which is a component of Total Kjeldahl Nitrogen) - are impairing pollutants in these waterbodies. In addition phosphorus and oil and grease, while not listed, are pollutants of concern in the Santa Monica Bay Watershed. Discharge of pollutants already known as stressors from urban areas should, at a minimum, be minimized to the Maximum Extent Practical.

3. Comments and Responses

Response:

The combination of source control and treatment controls that are either currently implemented or proposed have the potential to address a wide range of pollutants, and are not targeted only at those pollutants for which there is sufficient information to conduct quantitative modeling analysis. Also, please refer to Topical Response TR-HWQ-1 regarding selection of model constituents and storm water toxicity.

AR00002-3

Comment:

Treatment of Dry weather flows

According to the EIS/EIR the current practice is for run-off from the Imperial Sub-Basin, which drains the maintenance, fuelling, and washing areas, to be collected in a water quality detention basin and conveyed to Hyperion Treatment plant (HTP). In Alternatives A, B and C, as described in the draft EIS/EIR, this retention basin will be removed and is not expected to be replaced. This creates the potential for the direct discharge of polluted run-off from this area to the storm drains.

As per NPDES Permit CAS614001, NPDES Permit CAS000001 [State of California, General Industrial Activities Storm Water Discharge Permit (State Industrial permit)] of which the City of Los Angeles is a Permittee (WDID No. 419S004995), non-storm water discharges including the washing of outdoor maintenance; aircraft and vehicle washing and servicing; and washing of paved areas is prohibited. These activities may occur only if the discharge is to the sanitary sewer and not the storm drain system. Therefore, dry weather run-off from these activities should be collected and treated. An Industrial Wastewater Pre-treatment permit for discharge to HTP, or an NPDES permit for industrial wastewater discharge may be required.

Response:

As was stated in Section 4.7, Hydrology and Water Quality (subsection 4.7.5), of the Supplement to the Draft EIS/EIR, the frequency of source control BMPs would be increased in response to increases in frequency of certain airport activities. The Imperial retention basin would be removed under Alternatives A, B, and C but would be replaced by other structural BMP controls of equivalent capacity. In the event that these structural BMPs are not designed to discharge to the Hyperion Treatment Plant, they would be designed so that any wastes that they receive can be collected, characterized, and disposed of off-site at the appropriate facility. The Imperial retention basin would remain under Alternative D. As was described in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the Master Plan Commitment HWQ-1 performance standard of no net increase in pollutant loading to receiving waters through implementation of structural and non-structural BMPs will result in no significant impacts as a result of the selected alternative. Master Plan Commitment HWQ-1 has been modified in the Supplement to the Draft EIS/EIR (subsection 4.7.5), to include management of dry weather discharges. Also added to Master Plan Commitment HWQ-1 is a class of dry weather BMPs (hydrodynamic devices) that will be considered during development of the detailed drainage plan for the selected alternative.

AR00002-4

Comment:

The EIS/EIR does not address the potential increases in zinc and copper deposits, associated with automotive tires and brakes, as a result of increased traffic. These deposits will increase the pollutant loading of dry weather and storm water runoff. It is not clear whether these factors were included when estimating the projected increases of pollutants in the run-off from the site.

Response:

Pollutant loads for zinc and copper were calculated in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for baseline conditions, the No Action/No Project Alternative, and the four build alternatives. As shown on page 4-413 in Section 4.7, Hydrology and Water Quality (subsection 4.7.6), of the Supplement to the Draft EIS/EIR, total copper concentrations for the four build alternatives are

somewhat greater than those estimated under the No Action/No Project Alternative. Specifically, total copper concentrations in storm water runoff from the No Action/No Project Alternative are estimated to be 407 lb/yr compared to between 430 lb/yr for Alternative D to 436 lb/yr for Alternative A. Total zinc concentrations in runoff from Alternatives A, B, and C (2,428 lb/yr, 2,361 lb/yr, and 2,418 lb/yr, respectively) are estimated to be less than the No Action/No Project Alternative (2,545 lb/yr), while runoff from Alternative D is estimated to be greater than the No Action/No Project Alternative at an estimated concentration of 2,568 lb/yr. By implementing Master Plan Commitment HWQ-1, the impact associated with the increased pollutant loads would be reduced to a level that is less than significant. Also, please refer to Topical Response TR-HWQ-1 regarding land use intensification.

AR00002-5

Comment:

Stormwater Run-off

The proposed project will result in increased impervious area; leading to higher peak rates of run-off from the site to the stormdrains. The increased flow rate may cause scouring downstream in unimproved channels, if such channels are present. The SUSMP program requires the use of storm water best management practices (BMPs) for new development and re-development, to minimize, eliminate, or otherwise prevent storm water pollution. To comply with SUSMP, post-development peak storm water runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak storm water discharge rate will result in increased potential for down stream erosion. The EIR should include details of hydrology and pollutant loadings, and identify measures to control the effects of increased peak rate of run-off.

Response:

Please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AR00002-6

Comment:

The EIS/EIR states the project proponents intent to develop an adequate Storm Water Pollution Prevention Plan (SWPPP) for construction once an alternative has been selected. In addition to the erosion and sediment controls that need to be on site, the new monitoring requirements recently included in the State Construction Permit will need to be implemented. The Regional Board intends to review this SWPPP for adequacy.

Response:

LAX is currently permitted under both the City of Los Angeles Municipal NPDES permit and under its own Industrial NPDES permit. LAWA will implement the monitoring requirements included in the State Construction Permit, and any other requirements specified by the existing permits. The facility's existing SWPPP will be amended to reflect changes in infrastructure, modified pollution prevention practices, and changes to the required monitoring programs. All other requirements, such as inspections and annual reporting, will continue to be met. Also, please see Topical Response TR-HWQ-2 regarding compliance with regulations.

AR00002-7

Comment:

Atmospheric Deposition

The Regional Board is concerned about the potential impact of the projected increases in air pollution on the water quality in the area. Air pollutants can be deposited into water bodies either directly from the air onto the surface of the water, or through indirect deposition, where the pollutants settle on the land and are then carried into a water body by runoff or through natural processes such as the movement of groundwater through the soil. Studies have shown that aerial deposition may be a significant contributor of pollution to Santa Monica Bay; however this issue is not discussed in the reports. While the effects of indirect deposition may be mitigated by the collection and treatment of run-off, the impacts of direct

3. Comments and Responses

deposition should be taken into account. The Regional Board requests an estimate of the projected loading of these air pollutants, on the affected waterbodies via direct aerial deposition.

Response:

In preparation of the Supplement to the Draft EIS/EIR, studies were reviewed regarding airports as sources of atmospheric deposition. Please see Topical Response TR-AQ-1.

Additional studies were reviewed regarding the potential water quality impacts to Santa Monica Bay as a result of direct deposition of air pollutants.^{1,2} The research conducted indicates that the annual rate of aerial transport and deposition of trace metals to Santa Monica Bay is significant relative to other means of input of metals to the Bay and that chronic daily dry deposition constitutes the majority of the Bay's annual total metals load. Airport contributions to dry deposition within the watershed or to the Bay were not identified.

Research papers related to aerial deposition in the Great Lakes area were also reviewed.^{3,4} These articles describe the monitoring program within the Great Lakes region whose purpose is to identify sources of aerial deposition. This research, which is being conducted as a joint effort among the USEPA Great Lakes National Program Office, Environment Canada and the Ontario Ministry of the Environment, has generated monitoring data from each of the Great Lakes since 1990. There is no mention in this study of research that is currently being conducted or that has been conducted that attempts to quantify airport contributions.

Review of the articles cited indicates that studies performed related to sources of atmospheric deposition point largely to fallout of particulates from urban pollution, many of the specific sources being indistinguishable. Contributions from airport sources have not been identified as primary sources to dry deposition. In addition, a precise methodology for quantifying the contribution from airports has not been developed to date. Because LAX's contribution to impacts from aerial deposition cannot be quantified or even qualified, potential water quality impacts from the Master Plan alternatives are too speculative for evaluation (State CEQA Guidelines Section 15145).

This approach related to potential impacts from aerial deposition on receiving waters is consistent with State CEQA Guidelines in that LAWA has both researched the literature and conducted studies itself that sought to definitively identify the LAX contribution to dry deposition and found that the airport contributions are either not present or they are indistinguishable from other urban sources. Further studies/analysis prior to approval of the EIS/EIR would constitute an unreasonable obligation. (State CEQA Guidelines Sections 15151 and 15204(a). See also *Society for California Archaeology v. County of Butte* (3d. Dist. 1977) 65 Cal.App.3d 832,838 [135 Cal.Rptr.679]).

1 Southern California Coastal Water Research Project, "Measuring and modeling of atmospheric deposition on Santa Monica Bay and the Santa Monica Bay Watershed," prepared by Stolzenbach, Keith R, et al., 2001,

2 LAWA, "Dry Deposition Monitoring at Los Angeles International Airport, prepared by Planning Consultants Research," 1998,

3 Delta Institute, "Atmospheric Deposition of Toxins in the Great Lakes: Integrating Science and Policy," 2002,

4 Buehler, C. and R. Hites, "The Great Lakes' Integrated Atmospheric Deposition Network, Environmental Science and Technology," September 1, 2002.

AR00002-8

Comment:

Impact on Groundwater

The assumption is made that the impact of the project on the groundwater recharge rate is insignificant since "the Groundwater beneath LAX is not used for municipal or agricultural purposes". The groundwater in the area is designated as a potential municipal source (MUN) and as such is expected to be maintained in sufficient quantity and of sufficient quality to be able to achieve this beneficial use.

In the event where neither quality nor quantity will allow for this beneficial use of the water, it is the Regional Board's responsibility to take steps to ensure that no further degradation or losses occur while trying to restore it. The Regional Board requests that the threat of groundwater contamination be reviewed in the context of MUN considerations and the presence or absence of saltwater intrusion.

Response:

Beneficial uses associated with the portion of the West Coast Basin that underlies the Hydrology and Water Quality Study Area (HWQSA) must be protected, even if those uses do not currently exist. In its assessment of potential impacts to the basin through a decrease in surface water recharge, LAWA found that the decrease in recharge associated with all of the alternatives considered represents less than one percent of the safe yield of the West Coast Basin. Such a minimal change in recharge would have a similarly minimal to nonexistent change in ground water levels beneath the airport property. Additionally, it should be noted that the injection system designed and operated by Los Angeles County near the project area to prevent seawater intrusion extends from just south of LAX to Palos Verdes. Injection wells were not installed in the vicinity of LAX or to the north of LAX because the potential for seawater intrusion was considered by Los Angeles County to be minimal due to the narrow extent of the aquifer in these areas. Therefore, the possibility of inducing a seawater intrusion that could affect water quality is also minimal to nonexistent. For these reasons, LAWA stated in Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR that impacts to the West Coast Basin due to a decrease in surface water recharge are less than significant.

AR00002-9

Comment:

Section 4.11.8.1 MM-ET-1 Riverside Fairy Shrimp Habitat Restoration

The Regional Board understands that the proposed impacts to 1.3 acres of vernal pool habitat containing the embedded cysts of the Riverside Fairy shrimp are recommended to be mitigated at a "ratio of not more than 1:1." Please note, the Board generally requires a minimum 3:1 mitigation-to-impact area replacement ratio for wetland impacts that cannot reasonably be avoided. A lower ratio may be considered appropriate if a mitigation site is offered as fully functional, in-kind, and having equal to or greater value prior to commencement of project impacts. The Board will consider any temporal impacts to aquatic resources and any "estimated" data used to calculate habitat values of uninstalled and incomplete mitigation areas prior to issuance of a Water Quality Certification, pursuant to Section 401 of the Clean Water Act.

The document proposes that replacement habitat "shall have a habitat value of not less than 0.75" (essentially five times that of the existing habitat value estimated at 0.15) and states that a "program to monitor the progress of habitat creation" shall be developed "prior to relocation of the embedded cysts." Although both of these proposals are encouraged, the document fails to identify the exact location of the proposed mitigation site and omits detailed discussion regarding how the mitigation site would be created, monitored, and maintained in perpetuity. These items must be addressed and should include specific success criteria and remedial action upon failure to meet success criteria. Furthermore, of the eight potential mitigation sites identified in the document, the Board does not concur with utilizing any of the six Orange County sites because each of these sites are located outside of the Los Angeles Regional Board's jurisdiction.

Response:

Comment noted. Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation. As a result of consultation among LAWA, FAA, and USFWS, the soils containing cysts of the Riverside fairy shrimp will be relocated to property owned by the FAA and designated a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS in conformance with the Draft Biological Opinion issued by the USFWS. The Draft Biological Opinion is included as Appendix F-E of this Final EIS/EIR.

3. Comments and Responses

AR00002-10

Comment:

Section 4.12 Wetlands

The proposed project will require a Clean Water Act Section 401 Water Quality Certification from the Regional Board prior to obtaining permit approval from the U.S. Army Corps of Engineers (please contact Anthony Klecha at 213/576-6785 for additional information). In addition, the project may be subject to the Board's authority under the Porter-Cologne Water Quality Control Act if it will result in any discharges of waste that could affect the quality of the waters of the state, defined as any surface water or groundwater, including saline waters, within the boundaries of the state (Section 13050(e)). For example, Argo Ditch, as referenced in Section 4.12.2 of the document, is a water of the state and as such, is subject to the Board's authority and therefore should be subject to evaluation or consideration under the Master Plan.

Response:

Regulatory provisions concerning water quality are described in Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR and Technical Report 6, Hydrology and Water Quality Technical Report of the Draft EIS/EIR. The major regulatory provisions considered include the Water Quality Control Plan (Porter-Cologne Water Quality Control Act), National Pollutant Discharge Elimination Systems (NPDES) Program, and Total Maximum Daily Load Program. Since publication of the Draft EIS/EIR, changes have occurred in several regulatory programs pertaining to water quality previously described in the Draft EIS/EIR. These changes are considered in Section 4.7, Hydrology and Water Quality, of the Supplement to the Draft EIS/EIR, and Technical Report S-5, Supplemental Hydrology and Water Quality Technical Report of the Supplement to the Draft EIS/EIR. With respect to Argo Ditch, this drainage is a man-made flood control structure. The U.S. Army Corp of Engineers (USACOE) authorized emergency operations and maintenance activities to permanently remove isolated wetland and riparian vegetation from Argo Ditch pursuant to a Nationwide Permit No. 31. Upon completion of the emergency maintenance activities, the USACOE determined that Argo Ditch would no longer be subject to its jurisdiction pursuant to Section 404 of the Clean Water Act. As described in subsection 4.7.3 of the Draft EIS/EIR, LAWA and its tenants are permitted under the industrial NPDES program. In compliance therewith, LAWA has prepared a SWPPP to address storm water discharges associated with industrial activities at LAX. All applicable permits would be obtained for waste discharges that could affect the quality of waters of the state.

AR00002-11

Comment:

Section 4.23 Hazardous Materials

The Regional Board would like to ensure that this project does not interfere with the on-going groundwater remediation efforts at LAX; and has the following recommendations:

(i) In the event that an existing soil and/or groundwater remediation system must be removed in part, or completely, the appropriate regulatory agency should be notified and prior written approval must be obtained.

(ii) Previously unidentified soil and/or groundwater contamination discovered during construction activities must be reported to the appropriate regulatory agency.

The Regional Board expects to be given an opportunity to comment on the program or document developed to coordinate efforts associated with the handling of contaminated materials encountered during construction as reference in the Master Plan hazardous materials commitment, HM-2.

Response:

LAWA agrees to the stated requirements of the Regional Board within their commitment of continued implementation of existing remediation efforts at LAX. As was stated within Section 4.23, Hazardous Materials (subsection 4.23.5), of the Supplement to the Draft EIS/EIR, LAWA will obtain approval to initiate construction from the agency with jurisdiction, if it is determined that construction would preclude reinstatement of the remediation effort. In addition, the appropriate regulatory agency will be notified of the discovery of previously unknown contaminated soil or groundwater and take immediate and effective measures to ensure the health and safety of the public and workers and to protect the environment.

AR00003**Jacobs, Sandra****South Bay Cities Council of
Governments****9/20/2001****AR00003-1****Comment:**

The South Bay Cities Council of Governments has reviewed the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) with the assistance of a consultant team of technical experts. Our analysis has led us to recommend that Los Angeles World Airports deem the document inadequate for certification because it fails to comply with the requirements of both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

The technical comments attached identify extensive omissions and deficiencies with the Draft EIS/EIR. In addition, we are concerned that the document omits an alternative of a fully regional solution which more effectively utilizes other commercially viable airports in Southern California to address the anticipated growth in regional air passenger and air cargo demand.

Response:

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. While each of the proposed build alternatives currently being considered are part of a regional plan for the future, Alternative D is responsive to the types of concerns expressed by a number of commentor's that a certain type of regional plan be included as a proposed LAX Master Plan alternative.

AR00003-2**Comment:**

The following constitutes the comments of the South Bay Cities Council of Governments ("SBCCOG"), pursuant to the requirements of the California Environmental Quality Act, Public Resources Code § 21000, et seq., ("CEQA") and the National Environmental Policy Act, 42 U.S.C. § 4321, et seq., ("NEPA"), concerning the Draft Environmental Impact Statement/Environmental Impact Report ("Draft EIS/EIR") for the Los Angeles International Airport ("Airport") Proposed Master Plan Improvements ("Project"), prepared jointly by the Federal Aviation Administration ("FAA") and the City of Los Angeles ("Los Angeles").¹

The issues raised by these comments fall into seven general categories, although they are not limited only to those categories:

(I) the baseline used in the Draft EIS/EIR, against which the various environmental impacts of the Project are compared, is not properly designated;

(II) the discussion of the Project's surface traffic impacts is misleading;

(III) the noise impacts of the Project are inadequately addressed,

(IV) the potential air quality impacts of the Project are not fully disclosed;

(V) the Draft EIS/EIR does not explore all reasonable alternatives, and, thus, paves the way for its ultimate conclusion that expansion of the Airport's airside and groundside facilities are the sole way to meet future demand;

(VI) the Draft EIS/EIR fails to adequately specify mitigation measures or methods to enforce them; and

(VII) the recently articulated project goal of increasing safety obscures the Project's clear capacity-enhancing purpose. As a result of these defects, the Draft EIS/EIR cannot meet the high standards of disclosure that are the gravamen of both CEQA and NEPA.

3. Comments and Responses

1 The FAA and Los Angeles shall, for the remainder of this letter, be referred to collectively as "Project Proponents".

Response:

Please see Responses to Comments AR00003-9 through AR00003-66 below.

AR00003-3

Comment:

I. THE DRAFT EIS/EIR DOES NOT PROPERLY DESIGNATE THE BASELINE FOR ANALYSIS.2

The specification of a baseline for comparison with Project impacts is a critical component of analysis under CEQA, because without an accurate specification of the baseline, "analysis of impacts, mitigation measures and project alternatives becomes impossible." County of Amador v. El Dorado County Water Agency, 76 Cal.App.4th 931, 953 (1999). A central concept of CEQA is that "a baseline figure must represent an environmental condition existing on the property prior to the project." Save Our Peninsula Committee. et al. v. Monterey County Board of Supervisors, et al., 87 Cal.App.4th 99, 124 (2001). The regulations implementing CEQA, 14 Cal. Code Regs. § 15000, et seq., ("CEQA Guidelines") are specific as to the definition of "prior to the project":

"An environmental impact report must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or, if no Notice of Preparation is published, at the time the environmental analysis is commenced . . . This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." CEQA Guidelines § 15125(a).

While the courts have taken the position that the "date for establishing a baseline cannot be a rigid one", Save Our Peninsula Committee, supra, 87 Cal.App.4th at 125, they have also held unequivocally that "an EIR must focus on impacts to the existing environment, not hypothetical situations", County of Amador, supra 76 Cal.App.4th at 955. The baseline for analysis in the Draft EIS/EIR does not meet these tests.

2 Later sections II, III and IV more fully discuss the pitfalls arising from the use of the three separate and distinct baseline assumptions used in that analysis; Environmental Baseline, Adjusted Environmental Baseline, No-Project/No-Action.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues.

AR00003-4

Comment:

A. The Draft EIS/EIR's Base Year Does Not Reflect the Physical Conditions on the Project at the Time of the Publication of its Notice of Preparation.

The Airport Master Plan, November, 2000, Technical Analysis ("Master Plan") is the basis of the analysis contained in the Draft EIS/EIR (Master Plan, Preface, page i). The analyses contained in Master Plan, Chapter II, Existing Conditions Working Paper, 4/19/96, use data from the base year 1994 (see, e.g., § 2.3.1, page II-2.1, re: Annual Weather Conditions; Figure II-2.17, page II-2.53, re: Design Day Hourly Distribution of Operations and Tables following). The Notice of Preparation, however, was published in July, 1997 (Draft EIS/EIR, page ES-2), almost three years after the conditions reflected in the original Master Plan data and analysis. Courts have consistently taken the position that a baseline should not "be set a number of years earlier than the commencement of the current project". Save Our Peninsula Committee, supra, 87 Cal.App.4th at 127.

Moreover, the Master Plan and Draft EIS/EIR contain multiple inconsistent base years such that it is impossible for the public to ascertain which base year is used for a given purpose. On the one hand, the Draft EIS/EIR (page ES-2) states that the environmental analysis normally describes existing conditions

as of the July, 1997 date on which the Notice of Preparation was published (even though none of the data in the Master Plan upon which the Draft EIS/EIR is based reflects a 1997 origin). On the other hand, the Draft EIS/EIR states that, where a full year's worth of data is needed, data from 1996 is used (see, e.g., Draft EIS/EIR Technical Report on Surface Traffic), and sometimes earlier years [unspecified], and sometimes even data from the later years 1999 and 2000 (even though these latter are more than two years after the publication of the Notice of Preparation). Additionally, the Master Plan is unclear as to whether 1994 or 1995 data is used. Finally, different base years are used for different components of the analysis, e.g., 1996 for surface traffic and noise, 2000 for water resources.

Response:

Although the Master Plan reports some information pertaining to 1994 and other years, the airside performance baseline was updated to reflect 1996 activity (see Appendix 5F, 1996 Baseline Airside Simulation Assumptions and Results, of the Draft LAX Master Plan). The baseline year for operational data used throughout the Draft EIS/EIR and Supplement to the Draft EIS/EIR is 1996. Please also see Topical Response TR-GEN-1 regarding baseline issues, including the reporting of information later than the baseline year.

AR00003-5

Comment:

Such selective shifting of baselines has substantive consequences. For example, the use of a 1994 (or even 1996) baseline in analysis of aircraft noise impacts artificially elevates the baseline for analysis by incorporating noise from the larger numbers of Stage 2 aircraft in the fleet in 1994/96. These aircraft were totally phased out of the United States fleet by the year 2000.

Response:

The 1996 environmental baseline for the Draft EIS/EIR includes many of the noisier Stage 2 aircraft that were phased out in the year 2000. Please see Topical Response TR-N-1, in particular Subtopical Response TR-N-1.3, regarding a comparison of the 1996 baseline and Year 2000 conditions relative to the noise analysis, Topical Response TR-N-3, in particular Subtopical Response TR-N-3.3, regarding noise related to the phase out of Stage 2 aircraft, and Topical Response TR-GEN-1 regarding general baseline issues. The Supplement to the Draft EIS/EIR analyzed and compared Year 2000 conditions to baseline conditions in Section 4.1, Noise, and Section 4.2, Land Use.

AR00003-6

Comment:

Further, the use of a 1994 (or 1996) baseline year in the air quality analysis potentially overstates the baseline level of criteria pollutants in the L.A. region which has since come into attainment for all criteria pollutants except Ozone and Particulate Matter.³ In short, the nonspecificity of both the Master Plan and Draft EIS/EIR with respect to the base year for analysis renders the results of their analyses questionable.

³ The Draft EIS/EIR also states that its use of earlier years results in a more "conservative" analysis, because there were fewer passengers and operations in earlier years, and, thus, less noise and fewer emissions to compare against those generated by the Project. This claim is inaccurate at least with respect to noise and air quality analyses as set forth below. In any event, it does not account for the opposite effect of using later years 1999/2000 as the baseline, which would, by the logic used in the Draft EIS/EIR, artificially elevate the baseline and, consequently minimize the environmental impacts of the Project. As neither the Master Plan nor Draft EIS/EIR are specific as to the distribution of various baseline years throughout the analysis, it is impossible to ascertain the degree of distortion that may have occurred through the use of these alternate baselines.

Response:

As with other analyses that relied upon operational data, the air quality analysis used a baseline year of 1996. For the emissions analysis, the Draft EIS/EIR compared future emissions with Master Plan implementation to LAX-related emissions in 1996. As indicated in Tables S4.6-6, LAX Environmental Baseline (1996) Emissions Inventory for On-Airport Sources, and S4.6-7, LAX Year 2000 Emissions

3. Comments and Responses

Inventory for On-Airport Sources, of the Supplement to the Draft EIS/EIR (Section 4.6, Air Quality), emissions of all criteria pollutants at LAX in 2000 were higher than they were in 1996. As a result, comparison of future project-related emissions to 1996 emissions generates a greater level of emissions attributable to the project than would occur if a 2000 baseline were used. By attributing a higher level of emissions to the Master Plan, the Draft EIS/EIR and Supplement to the Draft EIS/EIR present a conservative analysis.

The fact that the South Coast Air Basin demonstrated attainment of the NO₂ standard in 1998 and the CO standard in 2002 is not relevant to the discussion of baseline. In accordance with federal and state requirements, the Draft EIS/EIR and Supplement to the Draft EIS/EIR compare future project-plus-background concentrations to the National and the California Ambient Air Quality Standards (NAAQS and CAAQS, respectively).

Please see Response to Comment AL00022-96, Subtopical Response TR-N-1.3 regarding baseline issues pertaining to the noise analysis, and Topical Response TR-GEN-1 regarding baseline issues in general.

AR00003-7

Comment:

B. The Master Plan and Draft EIS/EIR Baseline Analyses Are Based On Incomplete and/or Inaccurate Data.

The Master Plan defines the capacity of the Airport's existing airside facilities as "the number of aircraft operations, arrivals and departures, that the Airport can accommodate with a reasonable amount of aircraft delay." (Master Plan, § 2, page II-2.1) The correct determination of existing airside capacity is critical to identification of the Airport's potential to accommodate future air traffic demand and plan future airport's development. (Master Plan, Chapter 2, page II-2.1) Various independent variables are used in the modeling of existing airport capacity, including, but not limited to: (1) runway operating configurations; (2) noise abatement procedures; (3) airspace operating assumptions; and (4) airfield operating assumptions. (Master Plan, § 2.3, page II-2.21) Delay is also apparently a contributing variable. The relationships within the model are such that, if the definition of a given variable, or the value assigned to it, are questionable, the capacity determination resulting from the model is prejudiced.

Here, even if, for argument's sake, the Draft EIS/EIR had specifically and accurately designated a base year, critical data used in the Master Plan baseline demand/capacity/delay analysis is incomplete or in some cases inaccurate.

Response:

As described in the Draft LAX Master Plan (Chapter II, Section 2.1), an Airside Working Group (AWG) was formed to review the assumptions, approach, and results of the airside analysis, including the assessment of airside capacity, throughout the study. The AWG's comments are reflected in the Master Plan. The AWG included participation from LAWA, FAA, and the LAX carriers. The simulation model was calibrated twice (1994 baseline and 1996 baseline) to ensure that the simulations reflect actual operations at LAX by using actual performance data from the LAX carriers to compare actual versus simulated hourly operations and airfield travel times. Please see Section 2.4 of the Master Plan for a more detailed discussion on simulation model calibration.

Please see Topical Response TR-GEN-1 regarding the environmental baseline.

AR00003-8

Comment:

As a threshold matter, the Master Plan demand/capacity/delay analysis is predicated on Aircraft Communications, Addressing and Reporting System ("ACARS"), and Official Airline Guide ("OAG") data sources. These two data sources exaggerate, or, inaccurately characterize, true (airport capacity related) delay. The Master Plan defines delay as "the difference between the actual time it takes an aircraft to perform an arrival or departure and the normal time it would take to perform the same operation with no interference from other aircraft." (Master Plan, § 2.1, page II-2.2) ACARS data is

generated by the airlines, and is based on activities such as push back, parking at the gate, or opening or closing cabin doors. ACARS data includes information about on-time performance, based on the arrival and departure times developed by each airline for each segment of flight. Since the data is airline-generated, airline definitions of delay are automatically built into the report.⁴

Further, the OAG is published for the express purpose of identifying the arrival and departure times of various airlines. When the airlines set up their schedules, they factor in the average delay for each leg of flight between city pairs. Thus, the OAG also builds delay into the departure and arrival times based on each airline's historical data and operating experience for each flight segment.

In summary, ACARS data is not original source data but is the product of third party intervention. It is manipulated by various airline functionaries before a final report is released. Similarly, OAG data is manipulated to include delay not after, but before the fact. Therefore, because both sources of data already include a delay factor, their use in the Master Plan's modeling, as set forth below, is likely to cause a double counting of delay.⁵

Instead of ACARS or OAG data, the Master Plan should have relied on radar data. Radar data is a memorialization of the movement of arriving aircraft from a specified distance outside the terminal control area until touchdown and, conversely, for departing aircraft, from the aircraft's lift-off from the runway to the same distance outside the airport's control area. Every operation is tracked in real time without the intervention of third party interpretation, manipulation, or extraneous factors, unrelated to the operational capacity of airport infrastructure.

4 When an aircraft pushes back from the gate or closes the cabin door, the aircraft could be late for a variety of reasons. Many delays are due to factors that are airline-controllable such as late boarding of passengers, customer service delays, maintenance delays, late arriving equipment, catering, fueling, baggage and the unavailability of crew members, to name but a few. Other types of delay would be attributable to airport, runway or taxiway design, airport acceptance rates, airport construction, noise abatement regulations, air traffic control restrictions and weather. These items are also introduced and incorporated into the ACARS report as a delay factor.

5 In addition, the Master Plan analysis relies on numerous sources other than ACARS or OAG data including personal observations, a small sampling of users and an unique determination of aircraft speeds and routes, none of which is suitable, let alone optimal, for developing baseline analyses or formulating assumptions. (See, e.g., Master Plan, § 2.1.3, pages II-2.5 - II-2.6)

Response:

ACARS data was used to calibrate the simulation model to reflect the existing condition. There are many fields of data included in ACARS, and the simulation analysis was calibrated against taxi-in and taxi-out times which were generated from wheels touch-down time to gate door opening time and from gate door closing time to wheels lift-off time. These specific data fields report times at LAX. Data for a select amount flights with taxi times well outside the range of the taxi times associated with other similar aircraft was thrown out, so as not to corrupt the overall hourly taxi times. ACARS data was the best data available at the time of the baseline calibration. Radar data was not an acceptable source of data for calibrating the baseline because it does not capture ground movements (arrival or departure time at the gate) used for determining taxi-in and taxi-out times.

Delay is built into each leg of the flight in the OAG model. SIMMOD simulates the movement of arriving and departing aircraft from their entry/exit into the Los Angeles Terminal Air Traffic Airspace through approach and landing phase, or taxi and takeoff, to their exit from the terminal air traffic airspace. Therefore, the design day schedule only considers the arrival time or departure time at LAX in the OAG schedule and not the full leg of the flight where delay would be included. Airport capacity was, therefore, based on conservative assumptions in the respect that any delay that the airlines have adjusted their scheduled arrival and departure times to account for in the OAG, is not considered in the delay measurement of the model.

As discussed in the Draft LAX Master Plan (Chapter II, Section 2.1), an Airside Working Group (AWG) was formed to review the assumptions, approach and results of the airside analysis, including the assessment of airside capacity throughout the study. The AWG's comments are reflected in the Master Plan. The AWG included participation from LAWA, FAA, and the LAX carriers. The simulation model was calibrated twice (1994 baseline and 1996 baseline) to ensure that the simulations reflect actual

3. Comments and Responses

operations at LAX by using actual performance data from the LAX carriers to compare actual versus simulated hourly operations and airfield travel times. Please see Chapter II, Section 2.4, of the Draft LAX Master Plan for a more detailed discussion on simulation model calibration.

AR00003-9

Comment:

The effects of this confounding of substantive with non-substantive delay factors are reflected in the Master Plan's modeling of demand/capacity/delay. The FAA's Simulation Model ("SIMMOD"), Version 2.1, was apparently used in the Master Plan's demand/capacity/delay analysis. SIMMOD simulates the movement of arriving and departing aircraft from their entry/exit into the Los Angeles Terminal Air Traffic Airspace through approach and landing phase, or taxi and takeoff, to their exit from the terminal air traffic airspace. Proper calibration of SIMMOD is essential since the resulting statistics depend upon the data used to develop the baseline assumptions and operating instructions for the model. In this case, ACARS and OAG data were used to calibrate SIMMOD. Because of the potential double counting inherent in these data sources, and the consequent exaggeration of delay in the model, the principal conclusion that is drawn from SIMMOD is that the only way to remedy delay is to build additional airport infrastructure. The most obvious flaw of such an analysis is that it eliminates, at the outset, opportunities to gain efficiency through improvements in operating practices and minor modifications to the air traffic system. Thus, what seems like a relatively minor data collection/designation problem pervades the demand/capacity/delay modeling upon which the Draft EIS/EIR's environmental analysis is based, and subtly biases the results.

C. The Draft EIS/EIR is Based on Implausible Modeling Assumptions.

The accuracy of SIMMOD's results depends on an accurate "description" of the "airport's operating environment". (Master Plan, §. 2.1, page II-2.2) Both the Master Plan and Draft EIS/EIR acknowledge that the "description" is made up not merely of data purporting to represent actual current conditions, but also assumptions arising from that data (see, e.g., Master Plan, § 2, page II-2.1). Therefore, to the extent data and assumptions are incorrect or incomplete, so too will be the results of the model. In addition to the data problems specified above, SIMMOD, as used in the Master Plan, incorporates implausible, or biased, assumptions which, in turn, call into question the integrity of its output.

Response:

Please see Response to Comment AR00003-8 regarding the use of ACARS and OAG data in the airside simulation analysis. The Master Plan assumes that controllers would do what is necessary to safely maximize the capacity of the runways within the constraints of the airspace. The ability of controllers to achieve optimum use of the runways in a high volume situation inherently assumes technology or procedural changes would be in place. For further discussion of the airside improvements and modifications to the air traffic system that are incorporated into the Master Plan please see Response to Comment AL00036-30.

AR00003-10

Comment:

1. Assumptions Concerning Aircraft Delay Are Unexplained and Unsupported.

The Master Plan's (and Draft EIS/EIR's) definition and description of the delays at the existing (pre-Project) Airport are based on consultants' opinions and not on factual information. First, while the Master Plan acknowledges that "a standard definition of acceptable delay is not used in the industry" (Master Plan, § 2.1.3, page II-2.5), it then concludes that "delay levels of six to ten minutes indicate the need for additional facilities"; that "as average aircraft delay increases above six minutes, passengers tend to perceive service reliability problems"; "as delay approaches ten minutes per operation, further increases in demand are limited", and, "flight cancellations were assumed when delays exceed 20 minutes per average annual aircraft operation." (Master Plan, § 2.1.3, pages II-2.5 - II-2.6) These assumptions are apparently based on information derived from prior studies by the Master Plan consultants at airports other than Los Angeles, in years as early as 1988. In other words, the delay standards relied upon in the Master Plan are based on outdated data concerning potentially irrelevant

subject airports. All of these have unique characteristics that may have influenced creation or perception of delay, and none of them are discussed in the Master Plan or Draft EIS/EIR.

Further, these unsupported assumptions do not reflect an understanding of the diverse ways in which delay is determined by the airlines, Air Traffic Control and the Department of Transportation. First, a typical airline will develop performance criteria for each phase of flight based on company goals and performance percentages, including arrival and departure delay. Airlines use "zero variance" as a standard for "on time" performance (i.e., zero difference between arrival and/or departure times and published schedules). The percentage goal for each activity will be based on the level of performance the airline hopes to, or, in some cases, must attain in order to remain competitive. Some airlines track on time performance plus five minutes and most will track on time performance plus 14 minutes.

FAA Air Traffic Control, on the other hand, computes delay based on actual delay time en route. An arriving aircraft is considered delayed only if the aircraft is held en route to the destination for 15 minutes or more at any given moment during the flight. It is possible that these aircraft could be held at more than one interval during a flight. However, if each holding period does not exceed the 15 minute threshold, no delay is recorded, even though the total delay might well be in excess of 15 minutes. Further, inbound delay is kept separate from outbound delay. A departing aircraft is not counted as delayed until: (1) the average taxi time for the airport; (2) the time from the gate to the runway; and (3) 15 minutes have cumulatively elapsed. Air Traffic Control delays do not consider airline schedules or internally generated delays in their reporting system. The majority of Air Traffic Control delays are as a result of weather and not system capacity. Finally, the Department of Transportation grades airline performance on the time of arrival at the destination airport within 14 minutes of the scheduled arrival time. The Master Plan utilizes none of those benchmarks. Thus, the Master Plan fails to adequately explain the basis for its demand/capacity/delay analysis.

Response:

Chapter II, Section 2.1.3, Aircraft Delay Standards, of the Draft LAX Master Plan describes the existing conditions in 1994. The delay level defined within this section was based on the industry trends prior to the 1990s. During the great increase in aviation activity in the late 1990s up until September 11th, 2001, airlines and passengers exhibited a trend tolerating higher delays at capacity constrained airports. Therefore, the acceptable level of delay was increased to 10-15 minutes in the Master Plan. Please see Chapter V, Section 3.3.2 of the Draft LAX Master Plan. In the airside simulation analysis, flights were cancelled as needed in order to process all arrivals prior to midnight. Please see Appendix J, Section 3.3.3, Aircraft Delay and Taxi Time, of the Draft LAX Master Plan.

Delay is used in diverse ways by the airlines, Air Traffic Control, and the Department of Transportation for various purposes. For the planning purposes of an airport, delay measurement is used to project the time frame and level of activity which may require facilities and improvement needs. For the simulation modeling, delay is measured as the difference between scheduled departure time and actual departure time and, thus, is more likely to result from airport system inefficiencies rather than be related to weather or equipment as other definitions of delay measure. Therefore, the measurement of delay in the Draft EIS/EIR is more likely to reflect the need for facilities and improvements at the airport itself.

AR00003-11

Comment:

2. The Master Plan's Assumptions Concerning Turboprop Operations are Manifestly Inaccurate.

Referring to its analysis of existing noise abatement procedures as they pertain to the creation or maintenance of demand/capacity/delay, the Master Plan states that "based on actual information obtained by the Los Angeles Noise Management Bureau, turboprop departures were permitted to turn slightly earlier than jet departures at the Airport VOR, which is located between runways 7L and 7R, west of Pershing Drive" (Master Plan, § 2.3.3, page II-2.31). In addition, Figures II-2.11 and II-2.12 indicate that, when the Airport is operating on a west flow, turboprop aircraft turn at the VOR.

These representations are inaccurate and lead to incorrect assumptions about flight paths. In fact, if such a turn were permitted, it would occur prior to the shoreline, contrary to current noise abatement procedures. Turning the turboprops early allows faster aircraft to depart behind the turboprops at a more accelerated rate than is currently allowed, thus allowing more aircraft to depart in a given interval.

3. Comments and Responses

The results of this inaccurate assumption are that: (1) the baseline departure capacity is artificially elevated to a level higher than would be realized had actual air traffic data been used and the noise abatement procedures modeled as they are actually used; and (2) turboprops, as depicted in the Master Plan and Draft EIS/EIR, are directed over noise sensitive areas not previously overflown, and, as a result, elevate the baseline noise levels, thereby concomitantly reducing the apparent noise impacts of the Project.

Response:

According to the information provided by the Los Angeles Noise Management Bureau, the application of noise abatement procedures is somewhat different from the published noise abatement procedures. The Los Angeles Airport Traffic Control Tower instructs both turboprop and turbojet aircraft to turn to the assigned heading at the shoreline. Turboprop aircraft can more easily define the shoreline and turn more quickly than turbojet aircraft, which have a higher angle of attack and greater speed. Thus, the turn for turboprop aircraft is more closely related to the actual shoreline crossing. Actual operating conditions were modeled in order to accurately capture existing capacity and environmental impacts. An Airside Working Group that included representatives from the FAA, the airlines, and the airport, reviewed this and all other simulation assumptions and results, as well as the need to properly simulate actual operating conditions, in order to accurately capture actual environmental impacts. With the slight deviation from the existing noise abatement procedures, in reality, the departure capacity would be slightly higher. The environmental impacts associated with the deviation were captured in the analysis. The same turboprop departure procedures were assumed for all alternative analyses. If the existing noise abatement procedures were strictly followed in the future, the noise impacts would be smaller since the aircraft would not fly over noise sensitive areas

AR00003-12

Comment:

3. The Master Plan's Flight Schedule Assumptions Are Outdated.

The Master Plan reports the results of a SIMMOD analysis conducted in 1994, using 1994 data and 1994 assumptions. In addition to this obsolete data, the ACARS data upon which the SIMMOD analysis is based includes less than 51% of commercial operations and more than 46% of the total operations in the design day flight schedule. As: (1) operational configurations long predate the commencement of the environmental process; (2) current schedules were not used (although available), the assumptions concerning a typical day's traffic are substantially unsupported, and (3) not all of the aircraft operators were considered, the assumptions concerning a typical day's traffic are substantially unsupported.

Response:

Please see Response to Comment AR00003-8 regarding the use of ACARS data and the Draft LAX Master Plan (Chapter II, Section 2.3.7.1) for the flight schedule development methodology used to produce a peak month average day (design day) level of activity. It is appropriate to use a peak month average day, not a typical day. The aircraft activity developed for each Master Plan alternative includes all aircraft operator categories: air carrier, commuter, cargo, general aviation, and military. Each operator may not be included in the design day aircraft activity due to the differences in service frequency. This results from the design day aircraft activity representing an average day during the peak operation month.

Please see Chapter V, Appendix F, Table V-F.7 and Table V-F.9 regarding simulation performance results.

Please see the Draft Master Plan Addendum Appendix A, Existing Baseline Comparison Issues 1996-2000, and Appendix B, 2000 Base Airside Simulation Assumptions and Results regarding updated simulation performance results.

AR00003-13

Comment:

4. The Master Plan's Fleet Mix Assumptions are Inaccurate.

The Master Plan relies on a fleet mix distribution derived from "August 11, 1994 OAG, NMB Do Daily Operations Records and LADOA 1994 Monthly Air Traffic Volumes" (Master Plan, Table II-2.16, page II-2.58). This 1994 fleet mix distribution is outdated and, thus, inadequate for use in SIMMOD. Specifically, it includes a large number of Stage 2 aircraft which are no longer in operation at the Airport. Not only are Stage 2 aircraft noisier, but they have different emissions characteristics from the newer high bypass ratio, Stage 3 aircraft. If a more recent base year had been selected, the proportion of Stage 2 aircraft would have been smaller, and the noise baseline lower, and, thus, more accurate.

Response:

The baseline year of the Master Plan was updated to 1996 in 1997. Appendix F of the Master Plan describes the assumptions and results of the 1996 baseline SIMMOD analysis. The Supplement to the Draft EIS/EIR reflects a baseline year of 2000 for the SIMMOD analysis. There is a declining proportion of use of Stage 2 aircraft in the fleet mix. The Supplement to the Draft EIS/EIR provides detailed aircraft noise analyses for the Year 2000 for referential purposes and allows the reader to draw comparisons between the environmental baseline year (1996) noise and the noise levels for a period of time following the discontinuation of the use of older, louder Stage 2 aircraft after December 31, 1999. For further information on this topic, please see Subtopical Response TR-N-1.3.

AR00003-14

Comment:

5. The Master Plan's Assumptions Concerning Aircraft Speed Are Inaccurate.

The Master Plan's assumptions concerning aircraft speeds were apparently inflated to fit the underlying assumption of unconstrained aircraft flows. The Master Plan model calls for all aircraft to operate at the same constant air speed before proceeding to the Airport and landing. The model further assumes that all aircraft exit the runway at the same point and within the same amount of time in order to reach the modeled flow rate. In actual conditions, the speeds of the aircraft vary, with high airspeed greatly reduced as the aircraft approaches the airport. Nor would all aircraft exit the runway at the same location. In short, this assumption of high constant speed will have an as yet unascertained impact on the model's results but would tend to overstate capacity of the existing facility, and, thus, the baseline for comparison with the Project's improvements.

Response:

All airside simulation assumptions were reviewed with the FAA, Tower and TRACON personnel. Airspeed assumptions for the Master Plan alternatives are based on information from the Southern California TRACON and ARTS data. Assumptions included speeds by arrivals and departures at various altitudes, stage of flight, and by aircraft category. Actual runway exit utilization distributions were obtained from the LAX Airport Capacity Enhancement Plan for west flow and used as the initial runway exit use assumptions for the simulations. The runway exit distributions allow aircraft to be modeled exiting at various taxiways along the runway as occurs at the current LAX airport. The airspace speed and runway occupancy time of an aircraft are separate input variables.

AR00003-15

Comment:

D. The Master Plan's Model Omits Critical Variables.

Another crucial issue revolves around variables the Master Plan fails to include in its model. Specifically these include: (1) the capacity of the airspace beyond the Airport Terminal Control Area ("TRACON"); and (2) gate capacity for future scenarios.

1. The Master Plan Should Have Considered Airspace Capacity Beyond The Airport's Terminal Area Airspace.

According to the Master Plan, airspace considerations were limited to entry (and exit) from the Airport's TRACON airspace. (Master Plan, § 2.1.1, page II-2.3) The failure to consider airspace capacity beyond that point is a material omission from the analysis. This is because the majority of aircraft delays are absorbed in the en route environment before an aircraft arrives in TRACON airspace. By modeling only

3. Comments and Responses

the terminal area, the results of the model are skewed for both arriving and departing aircraft. For departing aircraft, if the model does not consider the inherent constraints of the en route air traffic system, including differences in aircraft performance and the impacts of other air traffic transiting the area for other airports, the departure flow pictured in the model will remain unconstrained and aircraft can take off at a constant, predetermined rate. When reaching the boundary, the aircraft are dropped from the scenario, and the model does not further consider constraints of the en route system which naturally impact the TRACON airspace. Unfortunately, this unconstrained flow scenario is not normally possible in today's complex air traffic control system.

Similar problems exist in modeling arrivals without consideration of airspace outside the TRACON. Inbound aircraft are assumed, in the Master Plan model, to be at the entry point of terminal airspace when required by the model. Aircraft proceed inbound at a set speed, reduce speed at a predetermined point, land and proceed unimpeded to their gate. This is not a reasonable representation of a typical aircraft arrival. In fact, there is almost no likelihood that aircraft can be delivered to the terminal inbound fix at a rate consistent with the model's assumptions.

Instead, the Master Plan's arrival model appears to have been developed to insure that an arriving aircraft would be at the inbound fix at the specific time required in order to maximize the arrival rate for the airport. Although Air Traffic Control consistently tries to keep the aircraft sequenced as closely as possible "in-trail", it is not possible to consistently space aircraft a set distance apart for extended periods of time. The availability of aircraft to fit into the sequence, aircraft speeds, the mix of large and small aircraft, a lack of demand, aircraft deviations due to weather, intrail restrictions though an en route sector or intrail restrictions required for an airport approach control facility and other variables cause the in trail spacing of arrival aircraft to be inconsistent. As a result of these and many other factors, there is unused capacity in each of these arrival sequences. In summary, the Master Plan's failure to adequately consider constraining factors outside the TRACON airspace calls into question the validity of the model's result.

Response:

The LAX operating environment for the focus of this study does not include all of the operating elements in the Los Angeles basin airspace, or area outside the TRACON, but is focused on the LAX airspace. Existing interactions between LAX and other facilities in the Los Angeles basin airspace are taken into account in the form of in-trail restrictions used to coordinate air traffic in the basin. Please see Chapter II, Section 3 of the Draft Lax Master Plan for a list of the objectives of the input data used in the simulation models to evaluate the existing airside. Please see Response to Comment AR00003-14 regarding the assumptions used in the simulation analysis.

AR00003-16

Comment:

2. The Master Plan Should Have Modeled Gate Capacity.

The Master Plan did not include in its modeling aircraft gate operations for future activity levels, allegedly because of the inability of the existing gate facilities to accommodate the higher activity levels.⁶ (Master Plan, § 2.5.3, page II-2.104) The Master Plan disclaims the importance of this omission ["The inability to model gate operations in detail does not impact the results of the airside capacity analysis since at higher activity levels the runway system tends to be the primary constraint . . ." Master Plan, § 2.5.3, page II-2.110]. The Master Plan is in error.

If an aircraft cannot get to the gate unimpeded, the resulting delay must be factored into the analysis. In the Master Plan, taxi patterns are consistent and aircraft are dropped from the model when they reach the gate area. The model does not capture any delays in the gate area or any delays that might occur in reaching the gate due to congestion on the ramp. The same is true for departing aircraft. If a departing aircraft cannot leave the gate due to inbound traffic or other traffic in the gate area, the departure demand at the airport may not be as regular as is assumed in the Master Plan's model.

The importance of this omission is that it precludes development of a clear picture of the delay reduction, and consequent capacity enhancing, attributes of the Project. Without estimation of the potential groundside/terminal structure constraints on operations (capacity), the actual delay reducing, and capacity enhancing, benefits of the Project as a whole cannot be accurately ascertained.

6 Performance measures contained in the Master Plan, § 2.5.1, include "outbound ground delay" which, in turn, appear to include gate related variables such as "gate push-back delay". This performance measure was apparently used in the modeling of existing gate operations but not future ones. (Master Plan, § 2.5.1, page II-2.97)

Response:

The three future activity levels discussed in Chapter II, Section 2.5.3 of the Draft LAX Master Plan were developed to assess the existing airside capacity. Assuming the runway system would be the primary capacity constraint of the unconstrained future activity levels, the focus of these preliminary simulations was placed on the delay associated with the runways (such as long airborne and departure queues awaiting clearance) to estimate runway capacity.

For a complete assessment of the airside facilities, delay and capacity constraints associated with the gate facilities are key factors in determining the overall performance of an alternative. The gate related variables were components in the performance assessment of the baseline as well as all build alternatives. The performance measures listed in Chapter II, Section 2.5.1 as being used in evaluating the existing baseline was also used for each build alternative. Each of the final iteration alternatives' simulations capture the delay associated with the gate area, such as congestion and push-back delay, and includes this in the total ground delay. For the gate layout of each alternative (gates are defined by airline and aircraft size) and the gate assignments of each flight in each alternative's design day schedule, please see Chapter V, Appendix H, Section 3.1 of the Draft LAX Master Plan. Please see Chapter V, Section 3.3.3, Table V-3.36 of the Draft LAX Master Plan for a summary of the airside performance results of the Master Plan alternatives.

AR00003-17

Comment:

3. The Master Plan Should Have Considered Currently Implemented Air Traffic Procedures.

While the Master Plan acknowledges the existence of the current Dual Civet Arrival procedure, it fails to analyze its delay reducing, or consequent capacity enhancing efficiencies. The procedure is mentioned, then drops off the "radar" screen. The Dual Civet Arrivals, however, have so greatly reduced arrival delay at the Airport that no national delay program for the airport has been established since the procedure's implementation. Ignoring the impacts of Dual Civet Arrivals results in an exaggeration of existing delay and a consequent exaggeration of the Project's delay reducing, and capacity enhancing benefits.

Response:

The Dual Civet Arrival procedure is, in fact, incorporated into the Master Plan alternatives. The Master Plan alternatives include multiple airspace route changes to provide additional capacity between the outer fixes and the final approaches to maximize runway capacity. Each of the Master Plan alternatives incorporates the addition of a second Civet outer fix to its arrival routes. Other modifications include two arrival tracks, separated vertically, over Santa Monica on the north side and over Seal Beach on the South Side. For further discussion of the airspace operating assumptions for the Master Plan please see Chapter V, Appendix J, Section 2.2 of the Draft LAX Master Plan and Appendix E, Section 1.4.2 of the Draft LAX Master Plan Addendum.

AR00003-18

Comment:

E. Demand, as Defined in the Master Plan, is an Identity with Capacity.

Inaccurate data and assumptions are not alone in influencing the outcome of a modeling effort. Inadequate specification of a variable may also lead to an unrepresentative result. In this case, the independent variable, demand, as defined, is not independent but is virtually synonymous with, or surrogate for, the dependent variable, capacity. Thus, the demand variable has an interactive relationship with the dependent variable which influences the model's outcome in significant ways.

3. Comments and Responses

For example, the Master Plan defines aircraft demand as "a 24-hour flight schedule representative of design day activity." (Master Plan, § 2.1.2, page II-2.3) The "24-hour flight schedule" definition is almost identical to the definition of "capacity", "the number of aircraft operations, arrivals and departures, that the Airport can accommodate with a reasonable amount of aircraft delay." (Master Plan, § 2, page II-2.1) The two variables, therefore, vary together, i.e., as "capacity" increases, "demand" will also increase, rendering demand useless as a predictor of capacity. The precise degree in which the interaction of the independent and dependent variables in the model affect the analysis cannot be ascertained at this point without re-running SIMMOD. Suffice it to say that a new surrogate for demand, derived, for example, from airline market surveys, or annual enplanements, is necessary to insure the integrity of the model's results.

Response:

Relative to the Master Plan Alternatives, demand is a 24-hour flight schedule representative of design day activity in an unconstrained environment. In other words, if there are no limitations to airside and landside development, this is the projected level of activity that would be served at LAX. The aviation demand for LAX is comprised of three components: annual air passengers, annual air cargo tonnage, and annual aircraft operations. The methodology and historical data, including annual enplanement records or any market surveys used in developing the unconstrained demand levels are discussed in detail beginning in Chapter III, Forecasts of Aviation Demand, of the Draft LAX Master Plan.

One of the objectives of the final iteration Master Plan Alternatives was to accommodate as much of the aviation demand as the market delivers within development constraints such as land acquisition. The capacity of each alternative was determined based on the level of activity or percentage of the total demand that could be accommodated at an acceptable level of delay under the alternative's constrained facilities. None of the Master Plan alternatives were able to meet the unconstrained demand within the constraints of the limited airside and landside facilities. Under these conditions, it is assumed that the airlines will modify their air service to maximize their opportunities in the constrained airfield conditions. Please see Chapter V, Section 3.3.2 of the Draft LAX Master Plan for further discussion on the inability of the Master Plan alternatives to meet the unconstrained demand, the projected reaction of the airlines, and the resulting activity levels of the alternatives.

AR00003-19

Comment:

II. THE DRAFT EIS/EIR DOES NOT FULLY ANALYZE THE PROJECT'S OFF-AIRPORT SURFACE TRAFFIC IMPACTS.

While the Draft EIS/EIR's off airport surface traffic analysis adequately depicts some aspects of the Project's surface traffic generation potential, it is notably deficient in the following ways: (1) the analysis gives little consideration to surface traffic impacts on South Bay Communities other than those directly proximate to the airport;

Response:

Please see Subtopical Response TR-ST-2.1 for a discussion of the study area and facilities analyzed.

AR00003-20

Comment:

(2) the use of the Adjusted Environmental Baseline for comparison with the Project's surface traffic impacts creates a misleading picture of the magnitude of those impacts;

Response:

Please see Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios.

AR00003-21**Comment:**

(3) the Draft EIS/EIR improperly equates the direct and cumulative impacts of surface traffic;

Response:

The traffic analysis followed the guidelines for the City of Los Angeles. According to those guidelines, the traffic analysis that was conducted is cumulative by nature. That is, when analyzing the traffic on a road system in a future year, the modelers accounted for (in the Adjusted Environmental Baseline) all of the traffic expected on the road system in that year, including new traffic generated from new developments that should be constructed in the future (i.e. related projects) and from ambient background traffic growth. The direct traffic generated by the proposed project is then accounted for in the project scenarios, in addition to the existing traffic that the facility, in this case, LAX, generates. This method ensures that the project sponsors are responsible for mitigating their project's impacts while accounting for cumulative traffic effects. However, it does not require the sponsor to mitigate other projects' impacts, which is prohibited by California state law. As a result, the traffic analysis accounts for both direct and cumulative impacts. Please also see Response to Comment AL00018-19.

AR00003-22**Comment:**

(4) the Draft EIS/EIR provides inadequate information regarding the Northside/Westchester Southside Project;

Response:

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

AR00003-23**Comment:**

(5) the Draft EIS/EIR transportation planning horizon is improperly attenuated; and

Response:

History has shown that aviation is a constantly-changing industry. Both airlines and airports change continuously from year to year and decade to decade. For example, as late as the early 1980s, many Los Angeles decision-makers anticipated a major civil-use spaceport and airport built in Palmdale before the year 2000. Such industry variability often renders activity forecasts beyond 20 years as suspect. Therefore, when the LAX Master Plan project began in 1995, it was determined that a 20 year forecast would be most appropriate, and a horizon year of 2015 was established for the project.

AR00003-24**Comment:**

(6) the Draft EIS/EIR lacks a mitigation monitoring program detailing implementation of mitigation measures for the impacts of surface traffic.

Response:

Neither NEPA nor CEQA require that a mitigation monitoring program be included as part of an EIS or EIR. CEQA does require that a mitigation monitoring or reporting program be adopted in conjunction with project approval findings following certification of an EIR. Under NEPA, mitigation monitoring is determined in conjunction with the approval of the Record of Decision. Both of these requirements will be followed for this project. Please also see Response to Comment AR00003-63.

3. Comments and Responses

AR00003-25

Comment:

A. The Draft EIS/EIR Lacks Adequate Consideration of Surface Traffic Impacts on South Bay Communities.

The Draft EIS/EIR analyzed 61 intersections, with an additional 15 intersections selected for focused analysis. Only nine of the 76 intersections were south of the I-105 (Century) freeway. The apparent explanation for the focus on the north side of the airport is presented in the Draft EIS/EIR, pages 4-284 - 4-289:

"South of LAX, there is a higher percentage of LAX traffic on I-405 and a lower percentage on the arterials, indicating that airport traffic is in fact staying on the freeway system as desired. However, this is not the result of I-405 operating well, but is more a result of the layout of the roadway network south of LAX. There are no alternative arterial routes that closely parallel I-405 south. In fact, south of LAX, all major arterial routes change to a north/south orientation, while I-405 south of Rosecrans Avenue continues in a northwest/southeast direction."

This explanation does not account, however, for at least three conditions acknowledged in the Draft EIS/EIR which exist south of the Airport: (1) airport traffic south of the airport represents a significant component of traffic on local streets; (2) interviews at freeway intersections south of the airport indicate a large percentage of airport trips; and (3) the Draft EIS/EIR claims a benefit from redistribution of traffic south of the airport off the freeway and onto local streets.

1. Airport Traffic Represents a Significant Component of Traffic on Local Streets South of the Airport.

The Draft EIS/EIR notes that 8% of the afternoon peak on Sepulveda Boulevard south of El Segundo Boulevard is airport related, but concludes "... even if all the Airport bound traffic were removed, there would be little noticeable difference on most roads outside of the immediate vicinity of the airport, particularly during the morning and evening rush hours." (Draft EIS/EIR, page 4-289) The 8% reported in the Draft EIS/EIR is, however, more important to traffic flow than it appears. For example, the intersection of Sepulveda and El Segundo Boulevards has a reported 1996 Volume to Capacity (V/C) of .869 and a projected 2005 V/C ratio of 1.062 (Draft EIS/EIR, Table 4.3.2-23, page 4-334). Eight percent of the 1996 traffic represents an airport contribution at this intersection of .069. The benchmark of "significant impact" is defined in the Draft EIS/EIR as a change in V/C ratio of .01 for an intersection operating at Level of Service ("LOS") F (Draft EIS/EIR, page 4-291). Therefore, at the intersection of Sepulveda and El Segundo Boulevards, a contribution of .069 to the V/C ratio can hardly be considered as representing "... little noticeable difference ..."

2. Freeway Ramp Data Shows Traffic Exiting the I-405 South of the Airport.

Master Plan, Chapter II, Section 7.3, reports the results of a survey conducted at area intersections during the A.M. and P.M. peak hours. The results of that survey call into question the assumption that traffic is not diverted off the I-405 onto local streets south of the Airport, where it demonstrates that more than 30% of the trips at northbound I-405 ramps at El Segundo were Airport related.

3. The Draft EIS/EIR Is Internally Contradictory with Respect to Use of Off-Freeway Traffic Routes South of the Airport.

The Draft EIS/EIR states, in pertinent part: "Further, although it would be ideal for airport access to be provided directly via freeways, the dispersion of Airport traffic onto many arterial and freeway routes does have a side benefit in that its impact is minimized on any given route" (Draft EIS/EIR, page 4-289). This statement directly contradicts the Draft EIS/EIR's initial assumption that the roadway system is designed such that freeway traffic is not diverted to the local street system south of the airport. If, in fact, airport traffic is diverted from the freeway, as claimed for traffic to and from the north, would not a similar set of traffic solutions be applicable to the south as well?

In addition, Master Plan, Table II-7.12 also sets forth data that calls into question the assumption of the limited diversion of freeway traffic onto local streets south of the airport. Table II-7.12 illustrates that, by

absolute volume, only 3 of 30 "key roadway segments" carry more Airport related morning peak hour traffic than does Sepulveda Boulevard north of Rosecrans Avenue, and in the afternoon only four key segments carry more peak hour traffic than that intersection.

In short, the failure to consider traffic impacts south of Rosecrans Avenue appears arbitrary. At a minimum, the Draft EIS/EIR and its technical appendices need to provide a much clearer statement of why the intersections evaluated were selected, and why no consideration was given to areas south of Rosecrans Avenue.

Response:

The statement that "there would be little noticeable difference on most roads outside the immediate vicinity of the airport" is an accurate quote from the Draft EIS/EIR. It should be noted, however, that this sentence does not claim that there will be little noticeable difference on all South Bay roads, but that there will be little noticeable difference on most South Bay roads. The example given in the comment (intersection of Sepulveda and El Segundo Boulevards) is located closer to LAX than most South Bay roads, and is one of the most heavily impacted intersections in the South Bay. It is therefore not a typical example of "most" South Bay roads. This intersection is also analyzed in detail in the document. Significant project impacts are identified at this location, and mitigation measures are recommended. The analysis of the Sepulveda/El Segundo intersection certainly does not imply that all intersections in the South Bay will be impacted by a similar amount, nor does it change the more general assessment of "most" South Bay roads and intersections intended by the quoted reference.

Please see Chapter II, Section 7.3, of the Draft LAX Master Plan, and Attachment B to Technical Report 3b of the Draft LAX Master Plan, regarding the diversion of South Bay trips from I-405 to arterial streets. The figure showing existing airport trips in this attachment shows relatively large volumes of airport trips on I-405 (in comparison to other roadways) both north of Howard Hughes Parkway and south of El Segundo Boulevard. However the volumes on I-405 between Howard Hughes Parkway and Century Boulevard drop significantly, while traffic volumes on Sepulveda Boulevard and La Tijera Boulevard grow by comparable amounts. The high volumes of airport trips on I-405 in the South Bay do not drop as much between El Segundo Boulevard and Century Boulevard, and the arterial streets of Sepulveda and Airport Boulevards do not show as significant an increase in volumes. Also, there are large volumes of traffic using the northbound off-ramp and southbound on-ramp at Century Boulevard, while the ramps connecting to the north have very little traffic. It is therefore concluded that more airport trips divert from I-405 to arterial streets north of LAX than in the South Bay.

The sentence referenced in item 3 of the comment (from page 4-289 in the Draft EIS/EIR) is not referring to the diversion of airport traffic off of I-405. It is referring to the fact that not all airport trips use the freeways. Many of the trips use arterial streets for the entire trip because they would need to go out of their way to get to a freeway. There are many arterial streets that can be used to access LAX. As a result, airport trips that do not use freeways are spread out over many arterial streets. Therefore the sentence referenced does not contradict the statements regarding trip diversion.

Table II-7.12 in the Draft LAX Master Plan gives model-generated estimates of airport trips in 1995 on Tier II roadway links. This table was updated to reflect the year 1996. The updated 1996 estimates, found in Table II-7.13 of Technical Report 3b of the Draft LAX Master Plan, are not substantially different from the earlier 1995 estimates. The figure in Attachment B referenced above, however, clearly shows that the traffic on El Segundo Boulevard north of Rosecrans is not the result of traffic being diverted from I-405.

For a discussion of the study area definition and identification of facilities analyzed, please see Subtopical Response TR-ST-2.1.

AR00003-26

Comment:

B. The Use of the Adjusted Environmental Baseline for Comparison With the Project's Surface Traffic Impacts is Misleading.

Three scenarios were used as baselines against which to evaluate the surface traffic effects of the proposed Master Plan improvements: (1) Environmental Baseline; (2) Adjusted Environmental Baseline;

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and (3) the No-Project/No-Action alternative. The Environmental Baseline is the existing condition pre-project. It includes existing roadways and land uses, and the current airport configuration. The year used in this baseline changed during the development of the Master Plan. At the initiation of the Master Plan process, the baseline year used was 1994. Information is reported in different Master Plan sections for 1994 and 1995. For the third iteration of the Master Plan, the baseline became 1996. The technical reports for the Draft EIS/EIR used 1996.

The Adjusted Environmental Baseline uses the current airport configuration but assumes that future off airport roadways and land uses already in the pipeline will be completed (see Section B. 1 below). As with the Environmental Baseline, the definition of Adjusted Environmental Baseline changed with the development of the Master Plan. The existing condition section of the Master Plan (Chapter IV, Section 7) used horizon years of 2000 to 2015. The "constrained" alternatives section (Chapter V, Section 3) used the years 2005 and 2015. Finally, the No-Action/No-Project Alternative is the converse of the Adjusted Environmental Baseline and assumes that off-airport development will remain constant, but currently approved airport projects will be completed.

There are at least two issues of importance raised by reliance on the Adjusted Environmental Baseline: (1) accuracy of the Adjusted Environmental Baseline and its resulting projections; and (2) applicability of the Adjusted Environmental Baseline to the environmental impact analysis.

1. The Uncertain Definition of the Adjusted Environmental Baseline Makes the Results of its Comparison With Project Impacts Questionable.

The initial question about the Adjusted Environmental Baseline is the accuracy of the definition of "Existing Condition/Environmental Baseline" on which it is purportedly based. There are significant differences between the 1995 data concerning the "Existing Condition/Environmental Baseline" contained in the proposed Master Plan and the 1996 data contained in the Draft EIS/EIR. A comparison of Master Plan, Table II-7.2 and Draft EIS/EIR, Table 4.3.2-24, for the a.m. peak hour, shows changes in the "Existing Conditions/Environmental Baseline" between 1995 and 1996. As illustrated in the following Table, some intersections got significantly better and some significantly worse. In all but one case, the difference in V/C ratios between 1995 and 1996 exceeds thresholds used for determining significance in the Draft EIS/EIR.

Intersection	Master Plan Table II 7.2 1995 V/C*	EIS/EIR Table 4.3.2-24 1996 V/C	V/C Difference
Aviation/EI Segundo	0.981(E)	0.835(D)	-.146
Aviation/Rosecrans	0.915(E)	1.121(F)	.206
Highland/Rosecrans	0.714(C)	1.069(F)	.335
Sepulveda/EI Segundo	0.840(D)	0.869(D)	.029
Sepulveda/Mariposa	0.776(C)	0.730(C)	-.046
Sepulveda/Rosecrans	1.238(F)	1.220(F)	-.018
Vista Del Mar/Grand	0.755(C)	0.749(C)	-.006
Vista Del Mar/Imperial	0.821(D)	0.465(A)	-.356

* In Master Plan Table II 7.2 the first column heading is apparently mislabeled

Moreover, the "adjustments" to the "Existing Conditions/Environmental Baseline" involved adding additional roadways and additional traffic to the system based on anticipated projects. The definitions of these "adjustments" is not consistent within the Draft EIS/EIR, or between it and the Master Plan. For example, the Draft EIS/EIR states that: "A list of approved development projects were developed . . . (Draft EIS/EIR, page 4-279)" [Emphasis added.] The traffic technical report on which the Draft EIS/EIR is based states: "A list of planned development projects was developed . . ." (Technical Report, § 3b, page 2-3)" [Emphasis added.] Master Plan, Table IV-8.3; Master Plan, Chapter V, Appendix L; and Technical Report, 3b, Table 2-3, present projected regional roadway improvements. Master Plan, Chapter V, Section 2.6 indicates that the future roadway network used in the analysis includes those projects " . . . currently funded and approved or which have a high probability for completion by 2015 . . ." Clearly, the distinction between "approved" and "planned" projects is critical to a functional definition of Adjusted Environmental Baseline. The baseline will be set much higher (and the consequent relationship of the Adjusted Environmental Baseline with the Project's impacts much lower) if all planned projects are included in addition to all approved projects.

Finally, Chapter IV of the Master Plan (Table VI-8.1, page IV-8.5) provides a "preliminary list of related projects" that differs from the list presented in Table 2.2 of the Draft EIS/EIR Traffic Technical Report, 3b. While differences are to be expected between the 1996 version of the Master Plan and the Updated 2000 version of the Traffic Technical Report, one difference may be more crucial than others - the projected size and resulting traffic impact of the Playa Vista Project. For example, according to the Master Plan, Table IV-8.1, the Playa Vista Project will contain 13,156 single-family units and 8,262 multi-family units. Master Plan, Chapter V, Appendix L, and the Draft EIS/EIR Traffic Technical Report specifies 13,085 multi-family units and no single-family units for the same Project. There is no explanation for the change, nor any reference to the source of either number. The difference is crucial because the traffic analysis assumed three people for each single-family home, and only two for each multi-family residence. The change therefore results in a significant diminution in traffic if the latter multi-family numbers are correct. Considering the potential of over 13,000 housing units for traffic generation, a complete explanation is needed to render the Draft EIS/EIR surface traffic analysis.

2. The Applicability of the Adjusted Environmental Baseline to the Draft EIS/EIR Traffic Analysis is Questionable.

As set forth above, the off airport surface traffic analysis in the Draft EIS/EIR uses the Adjusted Environmental Baseline as "the basis of comparison under CEQA for future mitigation for the three build alternatives" (Draft EIS/EIR, page 4-276). The Adjusted Environmental Baseline reflects projected conditions in the years 2005 and 2015 with off airport land use activities completed and regional circulation improvements in place, but without any increased use of the airport. This approach minimizes the potential direct impact from the adoption of the proposed Master Plan because: (1) the future traffic volumes without the Project increase thereby reducing the proportional effect of the added airport traffic from the Project and (2) additional circulation system improvements provide additional capacity. While it is reasonable to assess particular impacts at the time at which they might occur, relying on this approach requires assurances that the projected circulation improvements will actually be in place. No such assurances are provided in the Draft EIS/EIR.

The Off Airport Technical Report lists circulation system improvements that were included in the modeling process. This listing provides an indication of when certain improvements are anticipated. Without these improvements, the circulation system for the Adjusted Environmental Baseline would, apparently, be the same as for the 1996 condition, and many more intersections and roadway segments would be subject to significant adverse impacts as a result of the proposed Master Plan.

Response:

Please see Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios.

AR00003-27

Comment:

It is important, therefore, that the Draft EIS/EIR traffic analysis include projected phasing of the anticipated improvements relative to the additional traffic resulting from airport use. This should include a discussion of the phasing of airport improvements as they pertain to traffic generation with respect to the circulation improvements used in the Adjusted Environmental Baseline. Limitations should be placed on airport traffic generation if anticipated circulation improvements off-airport do not occur. Once the Adjusted Environmental Baseline is accepted as accurate and the conditions to achieve it are assured, the next issue concerns the significance of surface traffic impacts and the mitigation measures needed to reduce those impacts.

Response:

Please see Topical Response TR-ST-3 regarding construction traffic and Topical Response TR-ST-2 regarding the Adjusted Environmental Baseline. A mitigation phasing plan is included in Table S4.3.2-13 in Section 4.3, Surface Transportation, of the Supplement to the Draft EIS/EIR.

3. Comments and Responses

AR00003-28

Comment:

C. The Direct and Cumulative Impacts of Surface Traffic Are Improperly Equated.

The surface traffic analysis uses traffic volumes from airport and non-airport projects. (See, e.g., Master Plan § 2.6.2, page V-2.279). Therefore, it is at least partially a cumulative impact analysis.⁷ Because the surface traffic analysis is based on cumulative traffic volumes, the significance of the direct impacts and the cumulative impacts are equated. However, the use of the Adjusted Environmental Baseline makes this equation between direct and indirect effects inappropriate. While comparing the Project to the adjusted future conditions may be appropriate for assessing direct impacts, the cumulative impact is the impact of all traffic relative to the existing condition, not expected future conditions as contained in the Adjusted Environmental Baseline.

The result of this improper equation of direct and indirect effects is material. The following Table (derived from Draft EIS/EIR, Table 4.3.2-24) for the a.m. peak hour illustrates the problem. The reported change in congestion between the existing conditions and Alternative C, the preferred project alternative, is often significant, while the comparison of Alternative C with the Adjusted Environmental Baseline (which incorporates future conditions) is not.

Intersection ⁸	Existing V/C(LOS)	Adjusted Baseline V/C(LOS)	Alternative C (w/mit) V/C(LOS)	Difference (w) Existing	Difference (w) Adjusted
Aviation/El Segundo	0.835(D)	1.097(F)	0.865(F)*		
Aviation/Rosecrans	1.121(F)	1.164(F)	1.171(F)	+0.50	+0.007
Highland/Rosecrans	1.069(F)	1.211(F)	0.947(E)	-.122	-.264
Sepulveda/El Segundo	0.869(D)	1.190(F)	1.161(F)	+.292	-.029
Sepulveda/Mariposa	0.730(C)	0.772(C)	0.803(D)	+.073	+.031
Sepulveda/Rosecrans	1.220(F)	1.275(F)	1.243(F)	+.023	-.032
Vista Del Mar/Grand	0.749(C)	0.918(E)	0.729(C)	-.02	-.189
Vista Del Mar/Imperial	0.465(A)	1.098(F)	0.903(E)	+.438	-.195

* Apparent error in Table 4.3.2-24 of the EIS/EIR (page 4-340)

Using this concept of the Adjusted Environmental Baseline, the result is that the cumulative impacts of the Project are often significant and not mitigated even when the Project's direct effects have been.⁹

⁷ "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable probable future projects." (CEQA Guidelines, § 15355(b))

⁸ Change in V/C Rates of .01 defines significant impact for intersections at LOS F (Draft EIS/EIR, p. 4-291).

⁹ Note that if the comparison had been between Alternative C and the No-Project/ No-Action Alternative, the difference would have been even greater, as the No-Project/ No-Action Alternative provides for on-airport, potentially capacity-enhancing, improvements, but not off-airport surface traffic impact mitigation.

Response:

Please see Response to Comment AR00003-21 regarding cumulative impacts.

AR00003-29

Comment:

D. The Draft EIS/EIR Inadequately Documents the Northside/Westchester Southside Project.

The Draft EIS/EIR's impact analysis for off airport surface traffic is dependent upon the assumption that there will be a substantial reduction in the number of trips generated from the Northside Project. By "reconstituting" the Northside Project into the Westchester Southside Project, the Draft EIS/EIR projects that there will be a significant decrease in collateral trips with the adoption of the proposed Master Plan.

The source of the collateral trip reduction is the change in the land use for the Northside Project and Continental City Project. Attachment A of Technical Report 3b provides the basis for the reduction in collateral trips.

	AM PEAK			PM PEAK		
	Adjusted Baseline	No Project	Alternative C	Adjusted Baseline	No Project	Alternative C
Northside	0	7,217	3,922	0	7,131	4,423
Continental City	0	5,323	0	0	5,348	0
Manchester Square	0	0	212	0	0	233
Total	0	12,540	4,134	0	12,479	4,656

The issue here is the same as that concerning the Adjusted Environmental Baseline, i.e., the actions needed to insure that the reduction is achieved. The principal question is what specific discretionary actions are required to modify the allowable land uses in the Northside Project and in Continental City property, and how will compliance be assured?

The land use component of the Draft EIS/EIR and Condition LU-1 in Chapter V, Environmental Action Plan, presents a "Master Plan commitment" that:

"To the maximum extent feasible, all [Q] conditions . . . from the City of Los Angeles Ordinance No. 159,526 that address the Northside project area will be incorporated by LAWA into the Zoning Code Amendment and LAX Master Plan Implementing Ordinance for the Westchester Southside Project. Accepting that certain conditions may be updated, revised, or determined infeasible as a result of changes to the LAX Northside project, the final [Q] conditions for the Westchester Southside Project will ensure that the level of environmental protection afforded by the full set of LAX Northside projects [Q] conditions is maintained." (Draft EIS/EIR, Chapter V, page 5-2).

Since this traffic reduction is critical to the projected Master Plan trip generation, the detail associated with this property needs to be firmly established. It is unacceptable to assume that certain conditions may be "updated, revised or determined infeasible" if they are necessary to bring about the decrease in collateral trips upon which the Master Plan projections are based. While there are some discussions of the Northside/Westchester Southside Project in the Draft EIS/EIR's purpose and need chapter and Master Plan, Appendix Q, these are brief, general presentations lacking in specificity as to the actions needed to commit the City to limit these uses.

The importance of this lack of specificity in the definition of Project actions, as they relate to the Northside/Westchester Southside Project, is that there is no commitment by Los Angeles to insure that the traffic reduction represented by the changes in allowable land use will occur. The surface traffic capacity for the Project claimed through the reduction of traffic generation from the Westchester Southside Project is significant. Without a more adequate demonstration of the Master Plan's ability to achieve that reduction, and a concrete commitment to meeting those goals, the Draft EIS/EIR will remain inadequate.

Response:

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

AR00003-30

Comment:

E. The Transportation Planning Horizon Used in the Draft EIS/EIR is Improperly Shortened So As To Minimize the Full Build Out Surface Traffic Impacts of the Project.

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The Draft EIS/EIR modeled future conditions for the years 2005 and 2015. The current regional transportation plan, however, uses 2025 as the horizon year. The use of a later year between 2015 and 2025 for analysis is proper in light of the fact that the Project is anticipated to take 16 years to complete.¹⁰ If the Project commences as early as 2002, it will not be completed until 2018, three years after the 2015 horizon has expired. With the year 2013 being the second greatest peak construction year (Draft EIS/EIR, page 4-270), the proposed Master Plan improvements will not be complete by the time the present horizon year of 2015 is reached. The import of the choice of 2015 as horizon year, before the Project is completed, is that the full build-out ("worst case") impacts of the Project will remain unanalyzed.

¹⁰ The Draft EIS/EIR, Purpose and Need Section (Chapter 2, pages 2-12 through 2-13) indicates that the Project will be implemented in two phases. The first phase will last six years and the following phase 10 more years.

Response:

Please see Response to Comment AR00003-23 regarding the horizon year used in the analysis.

AR00003-31

Comment:

Further, while the impacts resulting from the adoption of the proposed Master Plan are generally evaluated against the Adjusted Environmental Baseline, much of the Draft EIS/EIR's discussion of surface traffic is compared to the No-Project/No-Action alternative (i.e., the alternative that assumes growth in operations and passenger demand at the Airport, along with completion of improvements already planned, but no off airport traffic or other development improvements). The comparison of the Project with two separate baselines in the years 2015 presents a misleading picture. While the reconstitution of the Northside Project may provide a reduction in the traffic generated in 2015, the existing airport improvements clearly permit growth beyond that currently possible.

Response:

Please see Subtopical Response TR-ST-2.2 regarding the adjusted environmental baseline.

AR00003-32

Comment:

Therefore, the further into the future conditions are projected, the greater the effect of the proposed Master Plan improvements on traffic.

Response:

This comment is similar to comment AR00003-23. Please see Response to Comment AR00003-23.

AR00003-33

Comment:

F. The Impacts of Construction Traffic Are Largely Ignored.

While the Project's construction will stretch over a period of 14 years, the impacts of the numerous construction vehicles that will be in use during that period remain unexplored. First, the Draft EIS/EIR acknowledges a volume of construction vehicles which includes 2.8 trucks per minute, 10 hours per day, 6 days per week, or 1.2 trips per minute, 20 hours per day in a 7 day work schedule (Draft EIS/EIR, page 4-319). While the Draft EIS/EIR purports to address mitigation by recommending that trucks trips be divided among four locations on the construction site, that purported mitigation does not consider the trucks' impacts on surrounding arteries even a short distance from the construction site.

Response:

Sections 4.3.1.6.2 and 4.3.2.6.2 of the Supplement to the Draft EIS/EIR and Section 7 of Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface

Transportation Technical Report, address the concern raised in this comment. Please also see Topical Response TR-ST-3 regarding construction traffic. While delays will inevitably occur from time to time during construction, a plan would be in place to mitigate the impacts as much as possible.

AR00003-34

Comment:

Moreover, the Project will admittedly coincide with the construction of Playa Vista, located approximately 2 miles north of the airport (Draft EIS/EIR, page 4-320). The Draft EIS/EIR contains little or no analysis of the cumulative impacts of the construction of these two projects on surface traffic on surrounding arteries and the San Diego Freeway.

Response:

Sections 4.3.1.6.2 and 4.3.2.6.2 of the Supplement to the Draft EIS/EIR and Section 7 of Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface Transportation Technical Report, and Topical Response TR-ST-3 address the concern raised in this comment, namely specific haul route impacts, and the cumulative impacts of the Master Plan and Playa Vista projects.

AR00003-35

Comment:

Moreover, the mitigation offered is slight. The Draft EIS/EIR offers to expand the ". . . Traffic Coordination Office . . ." to minimize the impacts of construction traffic (Draft EIS/EIR, page 4-320). This purported mitigation measure, even when combined with other assurances including that "construction traffic . . . can be managed . . ." (Draft EIS/EIR, page 4-320), and "traffic patterns around the airport for the general public would be largely maintained . . ." (Id.), does little, if anything, to assure that the manifest impacts of construction will be mitigated. The Draft EIS/EIR admits as much where it states "however, even with these commitments in place, the Project would still cause sufficient construction-related traffic to cause notable disruption of normal traffic flows near the airport." (Id.) Since construction is planned to last more than 14 years, the Draft EIS/EIR is basically stating that for that entire period, traffic is expected to be disrupted, and the Project's purported mitigation will be insufficient to restore stability.

Response:

The Supplement to the Draft EIS/EIR provides additional detail on construction-related traffic impacts of all alternatives, including specific haul route impacts, and the cumulative impacts of the Master Plan and Playa Vista projects. That analysis incorporates construction truck traffic into the interim year traffic modeling analysis, so that the impact of all airport-related traffic, both normal operational traffic and construction traffic, is fully analyzed and mitigated for the three peak hours (8:00 to 9:00 a.m.; 11:00 a.m. to 12:00 noon; and 5:00 to 6:00 p.m.). That analysis shows that the total traffic could be mitigated during the peak hours, except for at six intersections. Please see Topical Response TR-ST-3 regarding construction traffic.

AR00003-36

Comment:

Finally, the Draft EIS/EIR pays little or no attention to the traffic impact of vehicles used by construction workers. It states that construction employees will work in three shifts, and that the second shift will arrive before the first shift ends (Draft EIS/EIR, page 4-319). Using simple math, it appears that at some points during the day, parking would have to be provided for more than 8,000 workers when these two shifts overlap. While remote parking areas are suggested for construction employees, they are as far away as Palmdale, Van Nuys and Ontario (Id.). The likelihood of construction workers using such remote parking is slim to none. Therefore, the mitigation measure is largely useless. However, even if remote parking were utilized to any extent, the Draft EIS/EIR fails to discuss the traffic impacts of the shuttles which would bring the construction workers from these remote locations to the airport. In short, even though construction is expected to last for 14 years, the Draft EIS/EIR contains little, if any,

3. Comments and Responses

analysis of the impacts of construction worker traffic which will take place on the entire street/freeway system 6 or 7 days a week during that period.

Response:

The Supplement to the Draft EIS/EIR provides additional detail on construction-related traffic impacts of all alternatives, including specific haul route impacts, and the cumulative impacts of the Master Plan and Playa Vista projects. That analysis incorporates construction truck traffic into the interim year traffic modeling analysis, so that the impact of all airport-related traffic, both normal operational traffic and construction traffic, is fully analyzed and mitigated for the three peak hours (8:00 to 9:00 a.m.; 11:00 a.m. to 12:00 noon; and 5:00 to 6:00 p.m.). That analysis shows that the total traffic could be mitigated during the peak hours, except for at six intersections. Please see Topical Response TR-ST-3 regarding construction traffic.

AR00003-37

Comment:

In summary, while "the general construction concept is to have many of the transportation improvements completed within the first five years after construction begins . . ." (Draft EIS/EIR, page 4-318), the LAX Expressway and northeastern portion of the ring road from the San Diego Freeway to Sepulveda Boulevard would not be available to traffic until well after the first five years (Draft EIS/EIR, Table 4.3.2-18, page 4-318). Therefore, there would be no new routes available for mitigating the above impacts during the heaviest construction period.¹¹ As a consequence of the above omissions, the Draft EIS/EIR's analysis of construction traffic impacts is materially deficient.

¹¹ The Draft EIS/EIR states that Phase 1 of the Project would be 5-6 years long and end in 2005. As the Draft EIS/EIR cannot be approved before late 2001, at the earliest, and Phase 1 of the construction could not then begin before 2002, Phase 1 could not end until at least 2007 or 2008. Similarly, Phase 2 which is estimated to extend 10 years past the completion of Phase 1, would end in 2017 not 2015, as assumed in the Draft EIS/EIR. This is important because the impacts of construction, and associated traffic, will now be extending well past the period anticipated in the Draft EIS/EIR.

Response:

Sections 4.3.1.6.2 and 4.3.2.6.2 of the Supplement to the Draft EIS/EIR and Section 7 of Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface Transportation Technical Report, address the concern raised in this comment. Please also see Topical Response TR-ST-3 regarding phasing.

AR00003-38

Comment:

G. The Draft EIS/EIR Lacks a Mitigation Monitoring Program.

The Draft EIS/EIR, Chapter V is entitled "Environmental Action Plan". It is not specific as to whether this constitutes a Mitigation Monitoring Program required by CEQA (CEQA Guidelines § 15091(d)). If it does represent a Draft Mitigation Monitoring Program, it is inadequate. The Section lacks a clear statement of the party responsible for implementing the mitigation, the mechanism for enforcement of the mitigation and the timing of implementation. Moreover, it lacks detailed explanation of the way in which the diminution of traffic from the Northside Project, as well as other surface traffic mitigation measures will be achieved.

Response:

Chapter 5, Environmental Action Plan, of the Draft EIS/EIR was not intended to constitute a Mitigation Monitoring Program as required by CEQA. Neither NEPA nor CEQA require that a mitigation monitoring program be included as part of an EIS or EIR. CEQA does require that a mitigation monitoring or reporting program be adopted in conjunction with project approval findings following certification of an EIR. Under NEPA, mitigation monitoring is determined in conjunction with the approval of the Record of Decision. Both of these requirements will be followed for this project. Please also see Response to Comment AR00003-63.

AR00003-39

Comment:

III. THE DRAFT EIS/EIR NOISE ANALYSIS UNDERSTATES THE PROJECT'S AIRCRAFT NOISE IMPACTS.

The Draft EIS/EIR minimizes the Project's noise impacts by artificially inflating the Environmental Baseline and by failing to disclose the Project's overflight noise impacts.¹²

A. The Draft EIS/EIR Does Not Designate the Proper Baseline for Its Noise Analysis.

As noted earlier, a threshold issue in environmental analysis is the establishment of a "baseline". The function of a "baseline" is to provide a benchmark of existing conditions against which the environmental impacts of a project may be measured. If the baseline is incorrectly designated at too high a level, the impacts of the Project will be improperly minimized. In this case, the Draft EIS/EIR utilizes three separate and distinct baselines for analyzing the impacts of the Project: (1) the Environmental Baseline (1996), i.e., the purported conditions in existence before implementation of the Project; (2) "No-Project" baseline for 2005 (and 2015) which includes "natural" growth on the airport resulting from implementation of already approved airport projects continued in the current Master Plan that purportedly would have occurred even if the Project is not implemented; and (3) Adjusted Environmental Baseline predicated on projected conditions in the years 2005 and 2015 with off-airport land use activities completed and regional circulation improvements in place, but without any improvement to airport facilities.

The Draft EIS/EIR chooses 1996 (i.e., the Environmental Baseline) as the base year for evaluation of aircraft noise impacts, and states that in 2015, the Project's horizon year, Alternative C "would reduce the total number of people exposed to aircraft noise above 65 CNEL compared to current conditions as represented by the Environmental Baseline year." (Draft EIS/EIR, page 4-11) By using 1996 as the benchmark, the Draft EIS/EIR's noise analysis artificially minimizes the apparent growth in noise impacts associated with the Project. This is because, in 1996, many noisy Stage 2 aircraft remained in the fleet (which were then phased out in late 1999). When the Notice of Preparation was published in July 1997, the Project proponents knew with certainty at that time that some of the noisiest aircraft in its fleet would not operate after December 31, 1999, and that the removal of these aircraft from the fleet serving the Airport would reduce the size of the airport's noise exposure contours. The Draft EIS/EIR concedes that the "reduction in noise exposure is the result of a federally mandated phase out of older, noisier Stage 2 jets," and not the implementation of the Project. Despite that fact, the Draft EIS/EIR consciously skews the analysis by using 1996 as the Base Year for its noise analysis.

The Draft EIS/EIR disregards the fleet mix changes brought about by the Stage 2 phase out. The Draft EIS/EIR's "Average Annual Day Operations and Fleet Mix - Environmental Baseline" (Draft EIS/EIR, Appendix D, page 11) includes a total of 139 noisy Stage 2 aircraft in the daily operations mix. In other words, nearly 7% of the aircraft included in the calculation of the baseline noise contour analysis are high noise producing aircraft the inclusion of which will increase the size of the baseline noise contours and, thereby minimize the apparent impacts of the Project.

Courts have displayed flexibility in dealing with cases involving complex long term environmental review. They have agreed that, for lengthy environmental review such as that at issue here, the analysis of such impacts as surface traffic (and aircraft operations) which normally fluctuate over time are properly assessed against a later baseline than the time of the publication of the Notice of Preparation. (Save our Peninsula Committee, *supra*, 87 Cal.App.4th at 125-126) Therefore, Project proponents are not tied to the 1996 baseline, the last full year of data before the year of Notice of Preparation Publication, but should, more properly, have used a year no earlier than 1999, the last full year of data available before publication of the Draft EIS/EIR. Moreover, that data should have been updated with available data from the year 2000. Absent such an update, the Draft EIS/EIR noise analysis is incomplete and, thus, inadequate.

¹² Project proponents apparently did not use the most recent Integrated Noise Model (INM) Version 6.0 to calculate aircraft noise as the Draft EIS/EIR discusses INM, Version 5.1a. Draft EIS/EIR, Appendix D, page 6.

3. Comments and Responses

Response:

The environmental baseline year used for the noise analysis in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR is 1996. The No Action/No Project conditions are not used as the environmental baseline. The environmental baseline includes Stage 2 aircraft since it is based on the Fourth Quarter 1996 Quarterly Noise Report provided by LAWA, and these aircraft were still operating in 1996. However, for all of the project alternatives, future conditions reflect the phase-out of Stage 2 aircraft. The Supplement to the Draft EIS/EIR provided a discussion of Year 2000 conditions, including an analysis of project-related noise impacts compared to Year 2000, for the No Action/No Project Alternative and four build alternatives in Section 4.1, Noise, Section 4.2, Land Use, Appendix S-C1 and Technical Report S-1. Please also see Topical Response TR-GEN-1 regarding baseline issues.

The noise modeling approach is described in Appendix D, Section 2.1.5, of the Draft EIS/EIR. In addition, please see Topical Response TR-N-1, in particular Subtopical Responses TR-N-1.3 and TR-N-1.5, and Response to Comment AL00033-87 for more information on the noise modeling approach. It should be noted that Integrated Noise Model (INM), Version 6.0 was only used to generate the aircraft contours presented in Appendix D, Section 1.3, of the Draft EIS/EIR. INM Version 5.1a was only used as a reference to describe that it allows for an unlimited amount of flight tracks during modeling.

AR00003-40

Comment:

B. The Draft EIS/EIR Fails to Disclose the Project's Overflight Noise Impacts.

Under FAA Rules, changes in operations above an altitude of 3,000 feet Above Ground Level (AGL) are categorically excluded from environmental review under NEPA. FAA Order 1050.1D, Appendix 3, paragraph 3.a.13. However, FAA Order 1050.1D, paragraph 32 also mandates that "extraordinary circumstances" such as actions which are likely to have a significant impact on noise levels over noise sensitive areas, or a significant impact on coastal zones, "shall be the subject of an environmental assessment." (Id., paragraph 32)

Here, the noise analysis in the Draft EIS/EIR narrowly focuses on cumulative aircraft noise impacts created by aircraft approaching the Airport from the east, and from start-of-takeoff roll. However, it completely disregards the impact of single event overflight noise on the South Bay communities: (1) by failing to depict and analyze the noise impacts from additional new routes over areas not previously over-flown; (2) by failing to acknowledge a potential increase in lateral separation of aircraft which could lead to an increase in overflight noise; (3) by failing to report or study the noise impacts of increased operations over coastal zones; and (4) by using an outdated modeling system to justify the decision not to study the noise impacts to South Bay communities.

1. The Draft EIS/EIR Depicts Additional New Routes Over Noise-Sensitive Areas Within the South Bay Communities but Fails to Analyze the Noise Effects of These New Routes.

CEQ Guidelines § 1502.15 14 state that "[t]he environmental impact statement shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration." [emphasis added] The Draft EIS/EIR's failure to comply with this mandate is two-fold. First, the Preferred Alternative includes new routes over areas not previously impacted. Second, the Draft EIS/EIR does not analyze the noise impact created by these new routes over noise sensitive areas, thereby failing to describe the environment of the areas to be affected or created.

Master Plan Maps (pages II-2.36 - II-2.37, Figures II-2.11 and II-2.12) illustrate that when the Airport is operating on a west flow, M-class or turbo-prop aircraft turn at the VOR. This is contrary to stated airport policy and noise abatement procedures which require aircraft to proceed past the shoreline before starting a turn. In fact, twelve of the departure tracks for turbo-props used to establish the baseline integrated noise monitor data are routed over residential areas not previously overflown. (Draft EIS/EIR, Appendix D, page 7, Exhibit 2). The use of these incorrect flight tracks and early turns potentially affects the noise contour on both sides of the airport.

Moreover, if the turbo-prop aircraft turn early, the designated routes will cause them to fly over noise sensitive areas such as parts of El Segundo, thus requiring further review under the "extraordinary

circumstances" exception of FAA Order 10501.1D, paragraph 32. In short, the development of these new routes could potentially violate Airport noise abatement policy and could create unacknowledged impacts which must be analyzed.

13 The Draft EIS/EIR improperly relies on draft FAA Order 1050.1E and the City of Los Angeles' Draft L.A. CEQA Thresholds Guide (May 14, 1998) as authority for several of its assertions.

14 The Draft EIS/EIR is also a federal document subject to the requirements of the National Environmental Policy Act, 42 U.S.C. § 4321, et seq., and its implementing regulations, 40 C.F.R. § 1500, et seq. ("CEQ Guidelines").

Response:

There will not be new air traffic routes developed over the South Bay communities as a result of the Master Plan project. For each Master Plan alternative, the air traffic routes now used will continue to be used by aircraft operating at LAX. For more information, please see Subtopical Response TR-N-3.1 flight routes relative to areas of the South Bay, Subtopical Response TR-N-7.1 regarding enforcement of noise rules, and Subtopical Response TR-N-3.2 regarding early turns over areas north and south of LAX. As described in Subtopical Response TR-N-3.1, the new procedures implemented to reroute traffic south of LAX during departure are independent of the Master Plan and have nothing to do with the implementation of any of the proposed alternatives. These new procedures were described in Appendix D, Section 7, of the Draft EIS/EIR for informational purposes. They were included in the modeling of future noise conditions, but they were not included within the environmental baseline condition of 1996 because they had not been implemented at that time.

The statement that the airport noise abatement procedures, "require aircraft to proceed past the shoreline before starting a turn" is partially correct. As described in Topical Response TR-N-7, the procedures clearly state that pilots of all aircraft departing toward the west shall maintain runway heading until past the shoreline before commencing any turns, unless specifically instructed otherwise by ATC. The safety of operation is the principal concern of air traffic control, and when practicable, noise abatement measures are implemented. When they are not practicable, deviations are made from the stated procedures. Where new runways are proposed (Alternatives A and B), or runways are to be relocated (each build alternative), the flight tracks leading from the runway to the ocean are each intended for aircraft to fly to the coast line prior to turns from their initial headings. This concept is built into the noise modeling of each alternative as a mitigation action of the Draft EIS/EIR.

Beyond the initial climbs from the runways during departure, the aircraft flight corridors from each runway over the ocean will be the same as are now used and will be mutually dependent on the maintenance of separation between aircraft of different types. Separation may be attained by providing 15 degree divergence turns once the aircraft has passed the coastline, while the successive aircraft may be maintained on runway heading until adequate separation is obtained. As the commentor has noted, turboprop and smaller aircraft are usually the ones selected by the controllers for divergence turns to get out of the path of larger and faster jet aircraft. The implementation of mitigation actions (MM-N-4, Update the Aircraft Noise Abatement Program Elements as Applicable to Adapt to the Future Airfield Configuration) to retain all aircraft to the west on runway heading until reaching the coastline would eliminate divergence turns.

The commentor states that 12 flight tracks indicated on Exhibit 2 in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR used by turboprop aircraft are new and incorrectly located over residential communities. However, the Exhibit 2 presents the flight tracks used to model the environmental baseline conditions present in 1996, and are thereby representative of the flight tracks at the airport for several years prior to the preparation of the noise contours. The flight tracks are correctly located to depict the baseline conditions.

The commentor is concerned that new flight tracks for turboprop aircraft will be developed to fly over noise-sensitive parts of El Segundo and that such new overflights would violate airport noise abatement policy and require further analysis. The stated mitigation action for each development alternative is to have all aircraft fly to the coastline prior to turns on course. Compliance with this mitigation rule has two components. First, controllers would no longer have the flexibility to turn the slower aircraft out of the way of faster aircraft before reaching the coastline in order to increase the departure capacity of the runway. Second, pilot compliance with the procedure would have to be improved. As more and more aircraft are properly equipped with better navigation systems in future years, a greater level of

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compliance with this goal will be attained. It is the intention of the airport that precise departure procedures, based on instrumentation, will be developed to allow all properly equipped aircraft to follow the coast departure procedure in all conditions.

The comment states that the document is deficient, "by failing to acknowledge a potential increase in the lateral separation of aircraft which could lead to an increase in overflight noise." The additional lateral separation provided by the relocation of runways is addressed through the computation of noise levels through the immediate airport environs for all alternatives. Representative flight tracks related to the relocated flight tracks were developed and assigned traffic in accordance with standard planning practices for the noise analyses, conducted using the Integrated Noise Model.

The comment states that the document is deficient, "by failing to report or study the noise impacts of increased operations over coastal zones." The noise analyses provides information on the anticipated noise effects over all areas in the vicinity of the airport within the 65 CNEL contour (the area of significant impact). Impacts on biotic communities within the coastal zones were addressed in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix J, Appendix S-H and Technical Report 7.

Finally, the comment states that the document is deficient, "by using an outdated modeling system to justify the decision not to study the noise impacts to South Bay communities." Under the guidance provided under NEPA and CEQA guidelines, there are no significant impacts to the South Bay communities because the flight tracks associated with the proposed alternatives will not change from those in use at the time of the publication of the Draft EIS/EIR. See the discussion of flight routes relative to areas of the South Bay provided in Subtopical Response TR-N-3.1. The model used to assess the necessity for further assessment of imposed impacts over the area was current at the time of the assessments and is irrelevant to the question of whether there are project related impacts because the flight tracks are unchanged by the project alternatives. In response to the comment included in Footnote 10, FAA Order 1050.1D and its Change Order 4 are the guiding regulatory documents for the preparation of the federal analyses of the noise evaluations of the Draft EIS/EIR. The comment provided in Footnote 11 is acknowledged, NEPA requirements have been and will continued to be followed.

AR00003-41

Comment:

2. Greater Lateral Dispersion of Aircraft Will Potentially Occur to Accommodate the Increase in Operations at the Airport Which May Lead to Premature Easterly Turns Over the South Bay Communities and Consequent Increases in Overflight Noise.

Even if no new routes were contemplated, the Draft EIS/EIR states that over 90% of the operations at the Airport are in a west flow with climb out over the ocean. The aircraft then turn either south-east or north-east towards their easterly destination. The Draft EIS/EIR anticipates that the Project will lead to an increase in operations. The Draft EIS/EIR does not, however, discuss the way in which these increased operations will be integrated into the existing Airport air traffic flows. If it did, it would also have to reveal the potential for increased overflights of South Bay communities.

To accommodate this increase in air traffic, more airspace will probably be required to maintain adequate separation between aircraft during climb out. Air traffic controllers separate aircraft in two ways, laterally and vertically. Generally speaking, since heavy departing aircraft are resistant to an increase in vertical separations for reasons of both cost and performance, aircraft are dispersed laterally. As lateral separation between departing aircraft must be maintained, a greater number of offshore aircraft may come closer and over the shoreline, which may also lead to premature easterly turns from the initial southerly headings of departing flights. These premature turns will potentially lead to an increase in overflight noise over South Bay Communities, noise sensitive areas not previously included in standard departure tracks. At a minimum, the Draft EIS/EIR should contain a supplementary single-event noise analysis for communities south of the airport.

Response:

New air traffic routes will not be developed over the South Bay communities as a result of the Master Plan projects. Regardless of the alternative, the air traffic routes now used throughout the region and in areas beyond the initial departure and final approach courses will continue to be used by aircraft operating at LAX. As described by Subtopical Response TR-N-3.1, the new procedures implemented to reroute traffic south of LAX during departure are independent of the Master Plan and have nothing to do with the implementation of any of the proposed development actions. These changes were reported in Appendix D, Aircraft Noise Technical Report, Section 7 of the Draft EIS/EIR for informational purposes. They were included in the modeling of future noise conditions, but not within the environmental baseline condition of 1996 because they had not been implemented at that time.

The dispersion of individual aircraft departure tracks around the flight paths will become less variable in the future as the industry-wide movement toward the development of GPS/FMS flight procedures becomes more refined. Use of GPS procedures will result in more consistent flight paths than have been the case historically, because pilots (or FMS) will use specific geographic coordinates to navigate their way to and from the airport. Further, the dispersion of flight tracks in the dominant departure direction lends no refinement to the definition of impacts, because there are no incompatible properties directly west of the runways. Dispersion lateral to the defined departure courses will be corrected by greater navigational controls on aircraft locations.

Noise impacts to communities in the South Bay are below the level of significance. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C and Technical Report S-1. Please see Topical Response TR-N-2 regarding single event noise and CNEL differences, in particular Subtopical Response TR-N-2.2.

AR00003-42**Comment:**

3. The FAA Fails to Study the Project's Noise Impacts over Coastal Zones.

FAA Order 1050.1D, paragraph 32, Extraordinary Circumstances, mandates that a normally categorically excluded proposed Federal action which "is likely to have a significant impact on natural, ecological, cultural, or scenic resources of national, state, or local significance, including... coastal zones," (FAA Order 1050.1D, paragraph 32) shall be the subject of, at a minimum, an environmental assessment. Included in South Bay communities are the coastal zones south of the airport. As California's coastal zones are of national, state, and local significance, they fall within the mandate contained in FAA Order 1050.1D. Nevertheless, the Draft EIS/EIR fails to acknowledge, let alone analyze, impacts on South Bay coastal zones.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts to parks, beaches, and ecological resources in the coastal zone and considered sensitive land uses, in Section 4.1, Noise, Section 4.2, Land Use, and Section 4.8, Department of Transportation Act, Section 4(f), with supporting technical data and analyses provided in Appendix D, Appendix H, and Technical Report 1, of the Draft EIS/EIR, and Appendix SC-1, Appendix S-F, and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

In addition, impacts to sensitive species within the coastal zone, including the El Segundo blue butterfly, were addressed in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix J and Technical Report 7 of the Draft EIS/EIR and Appendix S-H of the Supplement to the Draft EIS/EIR.

Section 4.8, Department of Transportation Act, Section 4(f), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided a discussion of anticipated impacts to public parks and recreation areas for the Master Plan alternatives. Dockweiler Beach State Park, Vista del Mar Park, and the South Bay Bicycle Trail are located within the coastal zone. As indicated on page 12 of Appendix S-F, Supplemental Department of Transportation Act Section 4(f) Report, of the Supplement to the Draft EIS/EIR, Vista del Mar Park and portions of Dockweiler Beach State Park and the South Bay Bicycle Trail are exposed to

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65 dB CNEL or greater noise levels under existing baseline conditions. Despite the high noise levels, these recreational facilities are frequently used. Potential noise increases at Vista del Mar Park, Dockweiler Beach State Park, and the South Bay Bicycle Trail under each of the Master Plan build alternatives were addressed in Section 4.8, Department of Transportation Act, Section 4(f), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix H and Technical Report 1 of the Draft EIS/EIR, and Appendix S-F and Technical Report S-1 of the Supplement to the Draft EIS/EIR. As discussed in Section 4.8 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, since these recreational areas have been and are currently exposed to high noise levels from both aircraft and vehicular traffic, the anticipated increases in noise would not interfere with the normal use of the parks/bicycle trail. No other park or recreation areas in the coastal zone, including the beach area near Marina del Rey, would experience a substantial noise increase that would potentially interfere with its normal use.

AR00003-43

Comment:

4. The Draft EIS/EIR Ignores FAA Order 1050.1D. Paragraph 32 and Uses a Modeling System Which Lacks Any Legal or Scientific Basis in Order to Justify the Draft EIS/EIR's Failure to Examine the Noise Impacts to Communities in the South Bay.

The Draft EIS/EIR noise analysis assumes that noise in the South Bay communities which lies outside the parameters established for the noise analysis, does not exist. The noise analysis is, therefore, incomplete. First, as discussed above, the turbo-prop routes and the potential for increased lateral separation of aircraft will have a material impact on noise levels of noise sensitive areas including coastal zones. Therefore, FAA Order 1050.1D, paragraph 32 calls for at least an assessment of changes in operations above 3,000 feet AGL. Nevertheless, the Draft EIS/EIR, in two paragraphs, completely dismisses this requirement and categorically states that "no further noise review" above 3,000 feet is necessary since the noise associated with jet aircraft weighing more than 75,000 pounds will not change more than five decibels CNEL. (Draft EIS/EIR, Appendix D, page 65)

Second, the rationale for this determination is unexplained and unjustified under either legal or scientific standards. The five decibel CNEL standard is not acknowledged in the procedures and policies of NEPA, FAA Order 1050. 1D, or FAA Order 5050.4A. The Draft EIS/EIR's methodology is further flawed by the use of a patently erroneous measure. The FAA's benchmark for the measurement of overflight is "Above Ground Level" (AGL).¹⁵ The measure employed in the Draft EIS/EIR is "Above the Airport." (Draft EIS/EIR, Appendix D, page 65). The potential for mischief with the latter measure is clear. If the Project proponents analyze noise at altitudes greater than "3,000 feet above an airport's elevation," then communities in the South Bay and elsewhere which are located well above the airport's elevation would be at a severe disadvantage. For instance, Palos Verdes is at approximately 1,480 feet elevation,¹⁶ while the Airport is located at 126 feet.¹⁷ Due to the difference in elevation between Palos Verdes and the Airport, an aircraft may be 3,001 feet "above the airport", and its noise not subject to environmental review, while it is only 1,521 feet above Palos Verdes. Thus, while the noise impact may not meet the "above the airport" criterion, the noise over Palos Verdes would be significantly greater but remain unaccounted for in the model.

Third, the Draft EIS/EIR claims to have relied upon the Air Traffic Noise Screening Model (ATNS), Version 2.0, to:

"assess the effects of noise level changes associated with air traffic procedure changes at altitudes greater than 3,000 feet above an airport's elevation. This methodology requires that changes in aircraft noise be evaluated if the noise associated with jet aircraft weighing more than 75,000 pounds changes by more than five decibels of DNL (CNEL in California) over residential areas and the aircraft is in flight at an altitude between 3,000 and 18,000 feet above the airport." (Draft EIS/EIR, Appendix D, page 65) [Emphasis added.]

It did not. In fact, it appears that the outdated and obsolete checklist from FAA Notice 7210.360 was utilized instead. ATNS is a computerized version of the former FAA Notice 7210.360, and supercedes the checklist method. It requires actual data input, performs the calculations, and prepares written documentation on the findings. The Draft EIS/EIR contains only a checklist. After checking off five

boxes from the "departure" N 7210.360 checklist, (Draft EIS/EIR, Volume D, pages 79-86) the Project proponents determined that:

"since the flight tracks of the new and relocated runways will be located within close proximity to the present flight tracks of the existing runways, and the aircraft activity on these tracks will not result in an increase of 5 decibels of DNL (CNEL) over any residential area when the aircraft are above 3,000 feet, the checklist indicates that no further noise review under this requirement is necessary." Draft EIS/EIR, Volume D, pg. 65. (*Italics added for emphasis.*)

The checklist itself is proof that the drafters never used the actual ATNS aircraft noise screening modeling system, but, instead, chose to work with its former outdated and obsolete checklist version. The Draft EIS/EIR misleads the public into believing that an actual, scientific analysis was conducted to determine whether noise decibels would increase above 3,000 feet.

In short, the Draft EIS/EIR does a disservice to the South Bay communities by ignoring the potential noise impacts that the new flight tracks and lateral separation of aircraft will cause to the area. Not only should the Project proponents conduct a full environmental review of the noise impacts to the area under FAA 1050.1D, paragraph 32, but a more accurate, and scientifically appropriate methodology should be used to make the determination of the significance of noise impacts over South Bay communities.

15 See, in general, FAA Order 1050.1D which uses the benchmark "ABOVE GROUND LEVEL" as a starting point for altitude measurements.

16 <http://pointvicenteinterpretivecenter.com/rpv/recreationparks/content/rpvfactsheet2000.htm> (accessed June 22, 2001).

17 <http://www.airnav.com/airport/LAX> (accessed June 22, 2001).

Response:

The noise analysis was conducted in complete compliance with appropriate FAA and scientific principles including FAA Order 1050.1D and Order 5050.4A. Please see Response to Comment AR00003-40 regarding air traffic routes over South Bay communities. As indicated in that response, there will not be new air traffic routes developed over the South Bay communities as a result of the Master Plan. For more information, please see Subtopical Response TR-N-3.1 regarding new overflight routes over the South Bay.

The analysis for noise screening of track changes above 3,000 feet altitude was done in accordance with FAA guidelines. Although NEPA does not include a 5 dB threshold of significance, the Draft EIS/EIR and Supplement to the Draft EIS/EIR were also prepared under CEQA requirements where increases of 5 CNEL in areas exposed to less than 60 CNEL are to be considered. Please see Appendix D, Aircraft Noise Technical Report, Section 4, of the Draft EIS/EIR for additional information. The Air Traffic Noise Screening Model (ATNS) referred to by the commentor is a computerized version of the checklist that was formerly used. There are no new requirements or decision criteria included in the newer version of the ATNS. Therefore, there is no material difference in the analysis performed using the checklist versus the computerized model. Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.3, and Topical Response TR-N-3 regarding aircraft flight procedures.

AR00003-44

Comment:

IV. THE DRAFT EIS/EIR AIR QUALITY ANALYSIS IS INADEQUATE.

The Draft EIS/EIR's air quality analysis exhibits serious deficiencies, not the least of which is the total absence of a formal air quality conformity analysis required under federal law where, as here, the Project's air quality impacts are not claimed to be insignificant (see 42 U.S.C. § 7506 18). The absence of a conformity analysis necessarily renders the following comments preliminary, and SBCCOG reserves the right to comment further upon issuance of the conformity analysis.

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18 "No department, agency, or instrumentality of the federal government shall engage in, support in any way or provide financial assistance for, license, permit or approve any activity which does not conform to an implementation plan . . ." (42 U.S.C. § 7506(c)(1))

Response:

Please see Response to Comment AF00001-4 regarding the general conformity determination.

AR00003-45

Comment:

A. The Baseline for the Draft EIS/EIR Air Quality Analysis is Not Appropriately Estimated.

The Draft EIS/EIR assumes that annual aircraft operations will be essentially identical regardless of whether the Preferred Alternative is implemented (Draft EIS/EIR, page ES-9). Under the No-Action/No-Project Alternative, total operations are expected to be 98 percent of operations under the preferred expanded capacity scenario (Alternative C). Furthermore, air passenger operations activity will actually be higher under the No-Action/No-Project Alternative. At the same time, the Preferred Alternative moves about 15 percent more passengers through higher aircraft load factors.

Basic economic theory, however, dictates that under free market conditions, demand will reach equilibrium for a given level of supply at a certain market cost (including time costs associated with delays, congestion, etc.). If the supply curve (for air transportation) is then shifted, as would occur under an increased capacity situation such as that proposed,¹⁹ the supply/demand equilibrium for the same level of market cost will shift to a point of higher demand. This shift is often referred to as induced demand, and analyses which do not consider this effect (or which assume demand levels counter to market behavior as appears to be the case with the Draft EIS/EIR) are not accurate in general, or specifically with respect to future air quality conditions under any of the various alternatives.

Viewed from a practical rather than theoretical perspective, the Draft EIS/EIR presumes that the Airport will support over 391,000 aircraft landing and takeoff (LTO) cycles in 2015 by doing nothing other than carrying through with those projects already adopted. Although operations without the Project would be constrained by greater delays as well as excessive times to reach the airport, the Draft EIS/EIR does not account for the discouraging effects of these delays, and assumes that under the Preferred Alternative, specifically designed to relieve these problems of congestion and delay, the total number of annual LTOs will increase by less than 2 percent (to 398,000) over the No-Action/No-Project Alternative. There are only two possible explanations for this relationship: (1) either usage under the No-Action/No-Project baseline is overstated; or (2) usage under the Preferred Alternative is understated.

¹⁹ The Preferred Alternative lengthens and reconfigures runways, adds a new West Terminal, and improves traffic flow.

Response:

Based on twenty-five years of historical data at LAX, the Master Plan projects that demand at the airport will continue to increase through 2015. The LAX Master Plan looked at various options to meet the forecast demand in the 1st and 2nd iterations. Extensive feedback from local residents, business owners and oversight agencies following the 2nd iteration analysis resulted in a reevaluation of goals and objectives. The LAX Master Plan would in the future place a higher priority on environmental and community objectives over economic and air service objectives. The Master Plan alternatives are thus, constrained alternatives because none of the them have sufficient capacity to meet the forecast demand in 2015 without changes in the activity profiles. The Master Plan alternatives were designed to maximize the amount of traffic that could be served in the limited space available.

Alternative C is a four runway alternative limited in the number of operations, like the baseline and No Action/No Project Alternative, by its runway capacity. The alternative's maximized facilities would not be able to accommodate the forecast demand, let alone induced demand. The demand projected in the forecast that is left unmet, will most likely look outside the region for service. Alternative C is able to accommodate a higher passenger activity level than the No Action/No Project Alternative not because it maintains higher load factors, but because Alternative C's airfield would be able to accommodate larger aircraft and thus, more seats. Alternative C would modify existing taxiways, gates and runways to

accommodate an increase in the size of the fleet mix. Unable to increase in operations, Alternative C assumes that airlines would adjust their air service to include larger fleet mix to meet more of the forecast passenger demand. The alternative would also be able to accommodate the unconstrained forecast level of cargo which is a benefit that the No Action/No Project Alternative does not possess. For further discussion of the constrained activity levels associated with the No Action/No Project Alternative and Alternative C, please see Chapter V, Section 3.3.2 of the Draft LAX Master Plan.

AR00003-46

Comment:

Correspondingly, either emissions for the No-Action/No-Project baseline are overstated or emissions for the Preferred Alternative are understated. The result is an artificial (and erroneous) minimization of the difference in emissions between baseline conditions and those of the Project.

Response:

Please see Response to Comment AR00003-45 above regarding the activity levels of the No Action/No Project and Alternative C. It should be noted that, subsequent to the publication of the Draft EIS/EIR, LAWA developed a new alternative, Alternative D, which has replaced Alternative C as the staff-preferred alternative. Emissions were calculated using these activity levels and the methodologies detailed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. As noted in Section 4.6.2, General Approach and Methodology, of the Supplement to the Draft EIS/EIR, all alternatives, including the No Action/No Project Alternative and the LAWA staff-preferred alternative, were calculated using the same methodologies.

It should be noted that No Action/No Project Alternative is not the same as the 1996 environmental baseline. All alternatives, including the No Action/No Project Alternative, are compared against the environmental baseline for purposes of determining significance under CEQA, as discussed in Section 4.6.3, Affected Environment/Environmental Baseline, and Section 4.6.4, Thresholds of Significance, of the Supplement to the Draft EIS/EIR. The No Action/No Project Alternative and Alternatives A, B, C, and D, are all compared against the environmental baseline separately for purposes of the significance determination.

AR00003-47

Comment:

This same issue affects stationary source emissions. Increased airport capacity can be expected to attract associated industrial and commercial activity into the area. This attraction would not occur without the increased capacity and, therefore, must be accounted for if a true assessment of airport emission impacts is to be determined. Note that this commercial development is distinct from currently planned commercial development, in that it occurs due to airport capacity expansion, but outside the formal planning process of the airport. One must recognize that the estimates of reduced emissions under the action alternatives (either the preferred or alternative scenarios relative to a No-Action/No-Project scenario) are due almost entirely to "flow" improvements in the form of reduced taxiway congestion and improved traffic movement both on and offsite. If these congestion reductions are eliminated or reduced through increased air travel or associated demand that is not properly accounted for in the Draft EIS/EIR, the predicted emissions impacts will not be accurate.

Response:

The regional planning organization (SCAG) prepares and updates the RTP to reflect the latest information, forecasts, and assumptions pertaining to demographics, commercial development, and land-use throughout the Los Angeles area - including the area around LAX. Importantly, this information is used by the air quality management agency (SCAQMD) in their Air Quality Management Plan. In this way, the air quality impacts associated with airport-induced activity and growth are properly accounted for on a regional basis. It is also worth noting that the planned operational capacity for LAX associated with Alternative D is essentially the same as that forecasted for the No Action/No Project Alternative. Therefore, any growth in commercial activities associated with the airport will be the same with or without the proposed Master Plan improvements. Moreover, the LAX Master Plan includes numerous off-site improvements to the area-wide transportation system network that will help to accommodate the anticipated growth. Finally, Section 4.6.10, Secondary Air Emissions - Electricity Production, of the

3. Comments and Responses

Supplement to the Draft EIS/EIR provided estimates of airport-related emissions generated by power plants, which are classified as stationary sources. See also Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for additional information on growth induced impact.

AR00003-48

Comment:

B. Future Background Pollutant Concentrations Are Not Appropriately Estimated.

Background pollutant concentrations are required to accurately estimate the impact of the proposed Airport expansion on National Ambient Air Quality Standards/California Ambient Air Quality Standards ("NAAQS/CAAQS") compliance. These concentrations must account for the combined impacts of the universe of emission sources not explicitly accounted for in the airport analysis. In effect, the background concentrations determine the emissions baseline upon which Airport emissions are placed. If this base is underestimated, the overall affect of airport expansion on NAAQS/CAAQS compliance could be similarly understated. Alternatively, if the base is too high, the Draft EIS/EIR analysis could be conservative. While the Draft EIS/EIR presumes the latter (Draft EIS/EIR, Technical Appendix G, page 46), it contains no data to support such a conclusion and some reason to believe that the converse may be true.

Current short term (sub-annual) background concentrations for the Draft EIS/EIR are based on measurements taken at an onsite monitoring station located just east of the southern runway configuration. Current annual concentrations are based on data collected at a South Coast Air Quality Management District ("SCAQMD") monitoring facility (Hawthorne) located near, but southeast of the Airport (Draft EIS/EIR, Technical Report 4, Attachment A, page 3). On the premise that measurements from these sites inherently include emissions from the Airport, the Draft EIS/EIR concludes that such emissions represent conservative background concentration baselines for air quality analysis (since Airport emissions will be added on top of a background that already includes Airport emissions).

However, the prevailing wind direction for the Airport area is southwest to northeast (Draft EIS/EIR, Technical Report 4, Attachment A, page 3). Therefore, there is probably little influence from the Airport on the offsite concentrations used as background, as well as only moderate influence on the onsite-based background concentrations. The bulk of airport activity, including all terminal and motor vehicle operations occur under the influence of a prevailing wind plume that crosses Airport property to the north of the onsite monitoring station. While certain aircraft takeoff and queuing emissions are undoubtedly accounted for in the onsite baseline concentrations, these represent only a small fraction of overall airport emissions. Comparative data for concentrations from both monitoring stations could demonstrate the validity of the claim of conservatism, (i.e., do the observed concentrations for identical monitoring periods show a higher background at the onsite station?), but the Draft EIS/EIR apparently contains no data for the offsite monitoring station (other than the specific background concentrations used in the Draft EIS/EIR and associated documents, which are not comparable to the data for the onsite monitoring station).

More importantly, the emissions inventory rollback techniques used to forecast future background concentrations (Draft EIS/EIR, Technical Appendix G, pages 45-46) are of questionable validity for the Airport area. Background concentrations as well as future emission reduction influences around the Airport are constrained by geography. Since the prevailing wind flows from the southwest to the northeast, the Pacific Ocean represents a physical constraint that may significantly influence emission reduction impacts on background concentrations. In effect, the implemented rollback procedure to estimate future background concentrations reduces current background concentrations in proportion to expected regional emission inventory reductions over the same time period. Therefore, this procedure inherently assumes that inventory reductions are homogeneous throughout the region in terms of their influence on background concentrations. This is perhaps a viable assumption in instances where one part of a region has similar source characteristics with another, but the Airport region is clearly constrained to those source characteristics along the Pacific coastline to the immediate south of the Airport. It is the expected reductions from these sources in particular that should be used to adjust Airport background concentrations.

Generally background concentrations for 2005 are reduced 30 to 40 percent while concentrations for 2015 are reduced 50 to 60 percent from the current measured data (Draft EIS/EIR, Technical Report 4, Attachment A, page 4). Clearly this assumes significant emission reductions will affect coastal monitoring sites and provides substantial headroom for emissions increases within the confines of the NAAQS/CAAQS. These reductions probably represent the most significant influence on forecast pollutant concentrations in 2005 and 2015. It is critical that the propriety of the assumed background concentrations at least be supported by comparative analysis of current Airport and offsite monitoring data as well as analysis of emissions source classifications for the area immediately to the south of the Airport with the remainder of the air basin. This comparison will either provide the proper support for the currently implemented approach or suggest a more appropriate alternative.

Response:

Please see Response to Comment AF00001-28 regarding future background concentrations.

AR00003-49

Comment:

C. Reverse Thrust Emissions from Aircraft Are Not Included in the Draft EIS/EIR Air Quality Analysis.

The Draft EIS/EIR makes an affirmative determination not to address emissions from aircraft reverse thrust operations, ostensibly on the basis of inadequate emission factors and short usage times (Draft EIS/EIR, Technical Appendix G, page 4). Both of these claims are misleading. First, reverse thrust is essentially a high thrust operating mode and emission factors for such modes (i.e., climbout and takeoff) are readily available. Common practice is to use takeoff emission factors. Second, it is true that the time in mode for reverse thrust operations is short, however high thrust modes produce very high unit time NO_x. For example, at a commonly utilized reverse thrust mode time of 15 seconds, increased NO_x emissions would be equivalent to the NO_x produced by increasing overall takeoff time by 35 percent (0.7 minutes plus 0.25 minutes versus 0.7 minutes). Since takeoff accounts for about 35 percent of total aircraft NO_x (Draft EIS/EIR, Technical Report 4, Attachment C), the overall aircraft NO_x inventory could increase by nearly 13 percent simply due to the inclusion of reverse thrust-related emissions alone. Without some affirmative determination that such operations will be prohibited under the action alternatives, reverse thrust emissions should be included in the Draft EIS/EIR air quality analysis.

Response:

Please see Response to Comment AF00001-21 regarding the use of reverse thrust in air quality emissions estimates.

AR00003-50

Comment:

D. The Applicability of the Construction Equipment NO_x Standard is Overstated.

The Draft EIS/EIR states that only construction vehicles meeting a 2.5 grams per brake horsepower-hour (g/bhp-hr) NO_x standard will be used for airport construction projects by 2005 (Draft EIS/EIR, Technical Appendix G, page 3). Furthermore, this requirement will be phased in between 2001 and 2005, beginning at 20 percent of vehicles and increasing at a rate of 20 percent per year. This "requirement" raises several concerns as it is applied to the construction equipment emissions analysis in the Draft EIS/EIR.

First, the 3.0 g/bhp-hr NMHC+NO_x standard (that is the basis for the 2.5 g/bhp-hr NO_x assumption) for construction vehicles does not take effect until 2005 for 300-750 horsepower (hp) engines, 2006 and 2007 for 100-300 hp engines, or not at all for engines of other hp. Mandating this equipment for Airport work at an accelerated schedule beginning in 2001 may or may not be successful, but clearly requires some statement of commitment by the regulated parties. Voluntary, so-called "Blue Sky Series," engines can be certified by manufacturers before 2005 but there is no requirement to do so (and little incentive since these engines cannot be used in the emissions averaging programs associated with non-Blue Sky engines, averaging programs which are currently relied on by all heavy duty engine manufacturers for emissions standards compliance). In reality, construction firms will only be able to

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provide equipment that is available on the market and it is dubious that the number of engines meeting the suggested standard in the required years will be significant.

Second, the mandatory "clean engine" standards that do begin in 2001 require NO_x at levels around 4.0 g/bhp-hr (an exact value is not possible since the standard is again expressed as NMHC+NO_x, in this case 4.8 g/bhp-hr). However, these standards also only apply to 300-750 hp equipment. While a number of construction equipment engines fall into this category, many others range from as low as 25 hp up through 300 hp. For these lower hp categories, standards do not begin until 2003 or 2004 and get progressively less stringent as engine size decreases (to 5.6 g/bhp-hr for engines below 100 hp).

Third, even if this low emissions requirement could be enforced (i.e., allow use of only new Blue Sky Series engines at the Airport), an assumption of 100 percent in-use compliance is overly optimistic. While it is not possible to say with certainty what fraction of equipment may operate at emissions levels above certification standards, experience has demonstrated that engines employing sophisticated engine management strategies and aftertreatment controls (as is expected for engines meeting these stringent standards) are subject to both malperformances and malmaintenance effects. For first generation engines, such problems are usually exacerbated. What can be stated with certainty is that construction emissions impacts will be larger than the level acknowledged in the Draft EIS/EIR.

Response:

The analysis completed for Alternative D, as summarized in Section 4.6, Appendix S-E, and Technical Report S-4 of the Supplement to the Draft EIS/EIR, utilized the CARB off-road model. All emission factors were obtained from CARB's document entitled, "Emission Inventory of Offroad, Large Compression Ignited Engines Using the New Offroad Emissions Model." A mix of off-road engines is assumed to be included in the CARB model. Further, many of the requirements will be in effect during the construction phase of this project (2005-2015).

Worst-case construction emission estimates were calculated by assuming that all construction equipment on-site would be idling for approximately 8.5 hours per day. As phases of construction activities could potentially overlap, emission estimates of all equipment from all phases of activities are assumed to be used simultaneously. Therefore, the construction equipment NO_x emissions are conservatively estimated for Alternative D.

AR00003-51

Comment:

E. General Emission Factors for Offroad Equipment are Understated.

In general, it appears that the emission factors employed for offroad engines, even in the absence of the 2.5 g/bhp-hr issue noted above, are significantly underestimated. This underestimation affects not just construction equipment, but both baseline and ongoing aircraft Ground Support Equipment ("GSE") operations, and results from the fact that outdated emission factor sources were utilized. The net effect is that airport emission and air quality impacts are underestimated.

Offroad engine emissions knowledge is currently in a state of rapid development and estimation techniques need to maintain currency with the latest methods. In California, this would imply use of the California Air Resources Board's ("CARB") OFFROAD emission factor model, while nationally a similar model termed NONROAD has been developed by the U.S. Environmental Protection Agency ("EPA"). While development continues on both, they clearly represent the most up-to-date compendiums of current offroad engine emissions estimation techniques. For example, these models employ the most recent emission factor test data, emissions deterioration test data, and equipment size and activity factors. References cited in the Draft EIS/EIR (Draft EIS/EIR, Technical Report 4, Attachment A), such as the EPA's AP-42 and Procedures for Emissions Inventory Preparation documents as well as the SCAQMD's CEQA Handbook, employ less developed and, in many cases, seriously outdated data.

An example of the magnitude of the emissions underestimation can be derived by comparing emission factors across the alternative methods. The Draft EIS/EIR relies on the use of the FAA's Emissions Dispersion and Modeling System ("EDMS") to generate GSE emission estimates. However, EDMS includes significantly outdated GSE emissions data.²⁰ A quick comparison indicates that CARB OFFROAD model and EPA NONROAD model GSE (average) emission rates (for the same equipment

activity distribution assumed in the EIS/EIR) are, for diesel equipment, from 7 to 13 times greater for VOC, 5 to 10 times greater for PM, 5 to 9 times greater for CO, 4 to 5 times greater for NO_x, and 4 to 5 times greater for SO₂. For gasoline GSE, the models produce average emission rates 10 to 20 times greater for VOC, 1 to 6 times greater for PM, 15 to 16 times greater for CO, 6 to 9 times greater for NO_x, and 2 to 4 times greater for SO₂. The impact of using outdated emission rates is clearly significant and should be reevaluated if realistic air quality impacts are to be derived.

F. Ground Support Equipment Populations Are Not Appropriately Specified.

As stated above, the Draft EIS/EIR uses the FAA's EDMS model to estimate GSE emissions (Draft EIS/EIR, Technical Report 4, Attachment A). Inherent within this approach is an assumption that EDMS properly estimates GSE populations. Since the current GSE population at the Airport is known, it would be appropriate to determine whether EDMS assumptions are consistent with the Airport's actual population and use-hour statistics. This would provide support for the validity of EDMS equipment estimation algorithms and allow for a more appropriate assessment of the accuracy of the GSE emissions estimates and air quality impacts of the Draft EIS/EIR.

20 This situation may be improved in the latest version of EMDS, which was released subsequent to the completion of the Draft EIS/EIR.

Response:

Since publication of the Draft EIS/EIR, an updated EDMS (EDMS 4.11) was released. Please see Appendix S-E of the Supplement to the Draft EIS/EIR regarding updates incorporated into this most recently available version of EDMS, including the updated GSE emission factors from the EPA's NONROAD model, which is an acceptable method for estimating emissions from GSE.

The commentor suggests the use of the "population" method (rather than the currently used "LTO" method) in EDMS 4.11 to calculate GSE emissions. Both methods are equally acceptable under FAA Air Quality analysis guidelines. The "population" method bases GSE usage on equipment surveys while the "LTO" method bases the amount of GSE usage to be proportional to the actual number of aircraft landing-takeoff operation cycles. It is believed that the "LTO" method produces a more conservative estimate of GSE emissions, especially in future years, since GSE purchases by airlines would likely lag with the growth of aircraft operations.

AR00003-52

Comment:

G. Emissions Benefits of Conversion of GSE to Electric, Hybrid, and Alternative Fuels are Overstated.

The Draft EIS/EIR contemplates a widespread GSE replacement program under all three of the action alternatives, while retaining primarily fossil fuel powered GSE for the No-Action/No-Project Alternative (Draft EIS/EIR, Technical Report 4, Attachment L). While this could be construed as a mitigation measure and, in fact, is listed as the single most effective mitigation measure on the list of potential mitigation measures included in the Draft EIS/EIR (pages 4-514 through 4-519), it is arbitrary to apply the measure only to the action alternatives, as there are no specific constraints to such substitution today or under the No-Action/No-Project Alternative. Electric GSE is cost effective from a market standpoint today. Therefore, whatever incentive or mandate will be offered under the action alternatives to move toward electrification could just as readily apply today. Required infrastructure modifications are relatively modest, with no dependency on the expansions associated with any of the action alternatives. But by far the most troubling issue is that the replacement program already appears to be accounted for in the "unmitigated" emission estimates for all three action scenarios. If this is the case, no additional emission reductions will be achieved through GSE electrification as is claimed in the proposed list of mitigation measures.

Response:

Conversion of GSE to alternative fuels is part of an ongoing program at LAX. The Master Plan provides an opportunity to accelerate the conversion. However, the unmitigated scenarios do not assume full conversion to electric motors by 2015. Only with a mitigation plan in place is the assumption that full conversion of GSE to zero emission equipment made. Also note that, as indicated in the Supplement to the Draft EIS/EIR Appendix S-E Section 2.3.1, CARB signed a memorandum of understanding in 2002

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with most of the commercial airlines serving LAX to reduce emissions from GSE; emissions reductions from the MOU are accounted for in all future alternatives, including the No Action/No Project Alternative.

The conversion of GSE was applied to the build alternatives as well as to the No Action/No Project Alternative. As discussed in Section 2.1.3.1 of Appendix G of the Draft EIS/EIR, the market penetration of alternative-fueled and electric-powered GSE was developed from surveys of existing conditions. The environmental baseline included the assumption that 25 to 30 percent of GSE had already been converted from conventional fuels (gasoline or diesel). It was assumed that conversions would continue, even under the No Action/No Project Alternative; however, the conversion rate would be much slower than under any of the build alternatives. Note that CEQA requires that feasible mitigation measures be implemented to avoid or lessen a project's significant impacts. If there were no action taken, there would be no project and, hence, no mitigation necessary.

The Supplement to the Draft EIS/EIR provides an enhanced discussion of air quality mitigation measures in Section 4.6.8, Mitigation Measures, with supporting technical data and analyses in Section 2.3 of Appendix S-E.

AR00003-53

Comment:

H. Incorrect Aircraft PM Emission Factors Are Used in the Draft EIS/EIR Air Quality Analysis.

Two issues exist with respect to the aircraft PM analysis that result in an underestimation of the Project's potential air quality impacts. First, it appears that the Draft EIS/EIR is based on the incorrect emission factors from the supporting analysis undertaken to develop those factors (Draft EIS/EIR, Technical Report 4, Attachment H). Second, it appears that the approach used to develop PM emission factors for aircraft²¹ produces estimates that are not consistent with previous PM emission testing results.²²

Analysis of PM emission factor estimation reveals that the basic estimation approach used in the Draft EIS/EIR yields an emission factor that only considers the basic non-volatile portion of particulate. An adjustment factor (that varies with fuel sulfur content) exists and should be used to correct the estimate to total PM (Draft EIS/EIR, Technical Report 4, Attachment H). This factor is calculated to be about 2.6 for low sulfur (about 70 ppmW) jet fuel and 14.7 for high sulfur (about 675 ppmW) jet fuel.²³ Since existing EPA data demonstrates that U.S. jet fuel averages about 600 ppmW sulfur, the appropriate adjustment factor for the Draft EIS/EIR would be about 13.2. However, from figures presented in the Draft EIS/EIR, it appears that the unadjusted emission factors were used for all emissions analysis. If so, PM emission impacts are significantly underestimated and should be reassessed after applying an adjustment to increase the PM emission rate by a factor of 13.

In addition there is a potential deficiency in the approach employed to estimate PM emission factor data. The underlying need for a statistical estimation technique such as that employed cannot be disputed as the available aircraft PM emissions testing database is both small and dated. However, the Draft EIS/EIR (Technical Report 4, Attachment H) statement that the age of that data renders it valueless are questionable. Engine technology has advanced relative to the engines represented in the test database, but the fundamental physical and chemical combustion characteristics that give rise to PM formation have not. The additional claim that the existing aircraft emission factors are not of value since they reflect total PM as opposed to PM-10 is also without merit. Virtually 100 percent of combustion-related PM is PM-10, so any error resulting from the substitution of total PM for PM-10 will be insignificant. In fact, the PM emission factor estimation approach employed in the Draft EIS/EIR requires just such an assumption of equivalency between total PM and PM-10 (as stated in Technical Report 4, Attachment H).

If relationships between aircraft PM and another routinely measured pollutant can be developed for one or more of the standard aircraft operating modes, then measured values for this "independent" pollutant can be used to estimate PM emission rates in that mode (or modes). Such a statistical approach can take advantage of the limited existing PM emissions database, while at the same time recognizing the substantial progress that has been made in aircraft engine performance. It is, however, critical that such relationships consider possible operating mode-specific differences in any identified PM relationship, as engine and combustion efficiency vary substantially across modes. For example, one would expect PM

emission rates to be inherently low in high efficiency (high NOx) modes of operation since the same high temperature, high pressure conditions that give rise to high NOx also favor more complete fuel combustion. Conversely, PM would be expected to be high in low efficiency combustion modes. In short, it should not be expected that the significance of any inter-species relationship(s) is/are invariant across the full range of operating modes.

A very strong statistical relationship between measured PM and the inverse of measured NOx is observed in three of the four standard aircraft operating modes (approach, takeoff, and climbout), with coefficient t-statistics all significant at 99-plus percent confidence. A strong coefficient can also be observed for the taxi mode, but it explains virtually none of the observed variation in PM and NOx (whereas variance explanatory significance exceeds 99 percent confidence for the other three modes). The magnitude of the relationship coefficients varies from 28.4 in takeoff mode to 45.0 in climbout mode, and is 33.0 in approach mode. While all three modes exhibit significant relationships, takeoff mode serves as the best basis for an overall relationship, as it statistically produces the smallest root mean square error based on regression data (an error 35 to 40 percent lower than those of climbout and approach modes). Using this takeoff mode PM-to-NOx relation as a means to estimate aircraft takeoff PM emission rates for each of the engines with NOx measurements in the overall ICAO emissions database, PM emission rates for the other three operating modes (climbout, approach, and taxi) can be developed based on observed statistical relationships between mode-specific PM and takeoff PM (i.e., PM-to-PM regressions across modes). Linear coefficients for all three modes (1.42 for climbout, 1.53 for approach, and 3.10 for taxi, all in pounds per thousand pounds fuel burned space) are significant at 99-plus percent confidence, with adjusted correlation coefficients for climbout and approach at 0.78 and 0.83 respectively. Taxi mode correlation is poor, but the PM-to-PM relation does account for observed variance at greater than 99 percent confidence.

Using existing ICAO emissions measurement statistics, this alternative approach produces PM emission rates that are 4 to 37 times higher than those used in the Draft EIS/EIR. The smallest differentials are observed at the highest thrust modes. The differentials grow with reducing thrust possibly because the Draft EIS/EIR approach does not take operating efficiency differentials between modes into consideration. Nevertheless, for a typical LTO cycle (as per Draft EIS/EIR times-in-mode), the aggregate aircraft PM emission factor will be underpredicted by a factor of 17 using the Draft EIS/EIR approach. The effect on PM air quality analyses is obvious.²⁴

21 The International Civil Aviation Organization ("ICAO") emissions certification process for aircraft does not include PM, so alternative emission factor estimation approaches are required.

22 Adjustments not employed in the Draft EIS/EIR may compensate for most of this deficiency.

23 This calculation is based on data presented in the Draft EIS/EIR (Technical Report 4, Attachment H).

24 Interestingly, if the appropriate carbon-to-total PM emission factor correction of 13.2 is implemented as suggested in the support material for the Draft EIS/EIR (Technical Report 4, Attachment H), the bulk of the emission factor differentials between the two estimation approaches virtually disappear (i.e., a correction factor of 13 versus an underestimation factor of 17 for an aggregate LTO). Nevertheless, significant differences would still exist on a mode specific basis.

Response:

Aircraft engine emission factors for particulate matter (PM) are discussed in Attachment H, Aircraft Engine Particulate Matter Emissions Data Technical Memorandum, of Technical Report 4 of the Draft EIS/EIR. In Section 1.2, Purpose of Analysis, it is revealed that presently there is an overall deficiency of PM emission factors for commercial aircraft engines that are based on empirical (or measured) data. However, as part of this assessment, an extensive review and analysis of the available literature by researchers at the University of Missouri determined that PM emission factors could be estimated based on available aircraft engine fuel flow rates, smoke numbers and counts of particle emissions. For the purposes of this analysis, a variety of data sources were used to compute the aircraft PM emission factors based on the completeness, applicability and suitability of the information. This includes data from the International Civil Aviation Organization (ICAO), the National Air & Space Administration (NASA), the California Federal Implementation Plan (FIP) and others. In this way, the aircraft engine PM emission factors are backed up by the best research and technical information currently available. Notwithstanding the above, the estimated PM emission factors derived from this analysis are inherently limited by the incomplete database of measured particulate matter from aircraft engines and the use of

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assumptions required to overcome this deficiency. Unfortunately, this uncertainty is unavoidable until more reliable measurements of aircraft particulate exhaust emissions are made and the data published. For this reason, the sources and potential magnitude of this uncertainty are also discussed in the body of this work. In the meantime, these data represent the most realistic, thorough and up-to-date PM emission factors for commercial aircraft engines currently available. Because these emission factors are based on an aggregate from all aircraft operational modes (take-off, landing, climbout, etc.) and a predominately older aircraft fleet (B727, B737, DC10, etc.), they are considered to be conservatively high values relative to those expected from the fleet at LAX. As a result, it is not expected that the results from the analysis has significantly under predicted the potential impact of PM emissions from aircraft.

AR00003-54

Comment:

I. Aircraft SO₂ Emissions are Underpredicted.

The Draft EIS/EIR relies on version 3.2 of the EDMS model to predict aircraft SO₂ emissions (Draft EIS/EIR, Technical Appendix G, page 4). This model underestimates aircraft SO₂ emissions by a factor of two due to reliance on an incorrect AP-42 emission factor (the emission factor was developed without accounting for the factor of two ratio between SO₂ mass and fuel sulfur mass). To the extent that the Draft EIS/EIR already demonstrates potential ambient SO₂ concerns, those concerns will be exacerbated by this underprediction.

Response:

EDMS 3.2 is the version that was available at the time the Draft EIS/EIR was complete. The Supplement to the Draft EIS/EIR addressed updates to the methodologies detailed in the Draft EIS/EIR, including the use of the most recent version of EDMS (EDMS 4.11), in Section 4.6 Air Quality, with supporting technical data in Appendix S-E and Technical Report S-4. EDMS 4.11 does include changes to the SO₂ emission factors. A detailed discussion of changes and upgrades included in EDMS 4.11 can be found in Section 2.1.3 of Appendix S-E.

AR00003-55

Comment:

J. The Assumption of Gate-Based Power and Air for All Aircraft is Questionable.

The Draft EIS/EIR assumes that 100 percent of air carrier gate power and conditioned air needs will be satisfied by gate-based electrically powered systems as opposed to fossil fuel powered auxiliary power units (APU) or GSE (Draft EIS/EIR, Technical Appendix G, page 10). Experience has shown that even under conditions where gate-based equipment is available, not all airlines or aircraft will utilize it consistently. This seems to be especially true for quick-turnaround airlines such as Southwest. Although the assumption of 100 percent availability and usage affects the no action and action scenarios equally, it is important from an ambient air quality perspective to account for the full range of expected emissions. Without some definitive airport policy that gate-based systems (both power and air) be used and that any on-board APU be shut down until needed for main engine startup, the Draft EIS/EIR would present a more realistic assessment of aircraft emissions if it adjusted the percentage of gate-based system usage to match currently observed use rates at the Airport.

K. APU Emission Factors for SO₂ and PM Not Considered.

APU emission factors for both SO₂ and PM are assumed to be zero. This results from deficiencies in the EDMS model and should be corrected to properly estimate aircraft-related air quality impacts. SO₂ emissions are a function of fuel sulfur content, so that emission rates can be readily calculated and applied. APU PM emission rates can be developed using the same methodology applied to main aircraft engines. The potential impacts of this deficiency would be magnified were the Draft EIS/EIR to properly attribute some fraction of gate power and air support to APU.

Response:

In both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, auxiliary power units (APU) emissions were presented combined with ground support equipment (GSE) emissions. In the Final EIS/EIR, Tables x, y, and z present APU emissions separately from those of other source types. For the criteria pollutants, APU emissions are generally less than five percent by mass of GSE emissions. Thus, APU emissions represent a relatively small contribution to total on-airport emissions.

As noted in the Supplement to the Draft EIS/EIR Appendix S-E Section 2.3.1, it is LAWA's goal to have all of its aircraft gates at LAX equipped with 400-Hz power and preconditioned air in the near future. This feature will allow aircraft pilots to minimize the use of their aircrafts' APUs while parked at the gate. FAA, EPA, and LAWA will engage interested parties in an evaluation of all feasible measures for reducing APU emissions at the gates; such measures may include incentive programs and aircraft guidelines restricting APU use at gates when turnaround time exceeds certain limits. This effort is not part of the air quality mitigation measures recommended for the LAX Master Plan but is rather a measure which LAWA voluntarily enters into, for the reason noted below.

The Clean Air Act Section 233 (42 USC 7573) declares that all states and their political subdivisions are preempted from adopting or attempting to enforce "any standard respecting emissions of any pollutant from any aircraft or engine thereof" that is different from an applicable EPA standard. Therefore, it is beyond the jurisdiction of either LAWA or FAA to utilize a "command-and-control" approach to limit APU emissions.

Since publication of the Draft EIS/EIR, an updated EDMS (EDMS 4.11) was released, including revised SO₂ emission factors. Please see Appendix S-E of the Supplement to the Draft EIS/EIR regarding updates incorporated into this most recently available version of EDMS. However, PM₁₀ emission factors for APUs are still unavailable in EDMS. Aircraft engine PM₁₀ emission factors were developed for use in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR based on fuel flow and smoke number found in the ICAO database. These data are also unavailable for APUs. Therefore any calculation of PM₁₀ from APUs would be a gross speculation at best, and not representative of acceptable scientific or engineering methods or ethics.

AR00003-56

Comment:

L. Aircraft Taxi Times are Not Included in the Draft EIS/EIR or Supporting Data.

Aircraft taxi-idle times are not included in the Draft EIS/EIR, its technical appendices or supporting documentation.²⁵ It can be deduced from the included emissions estimates for aircraft taxiing that those emissions decrease substantially under the action scenarios, but the actual times should be included to allow the public an opportunity to better evaluate their propriety. In addition, the ability of SIMMOD to accurately estimate aircraft taxi times must be demonstrated by comparing SIMMOD predictions for current conditions at the Airport to observed taxi times at the Airport. The issue of aircraft taxi times is critical. The bulk of Aircraft VOC and CO emissions are generated during taxiing. In addition, although NO_x emission rates are low during taxiing, the amount of time spent in taxi mode results in a significant taxi contribution to overall NO_x emissions. Most critically, it is expected that virtually all of the aircraft emissions differential between the project baseline and the project alternatives is due to assumed reductions in aircraft idle time. Clearly, it is important that taxi times be accurately modeled. However, sufficient information is not included in the Draft EIS/EIR to determine that accurate modeling was performed.

²⁵ The Draft EIS/EIR contains references to the development of the taxi/idle times using SIMMOD, but no actual indications of what those times were.

Response:

Table S7 of Appendix S-E to the Supplement to the Draft EIS/EIR presents the data and source of the taxi/idle times used in EDMS 4.11 to calculate the emissions. Please see Response to Comment AF00001-22 regarding the taxi/idle times used in previous EDMS versions (EDMS3.2).

As part of the simulation process, the SIMMOD model was calibrated to ensure that the simulations reflect actual operations at LAX (known as the baseline simulation). The baseline was calibrated by

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comparing actual versus simulated hourly operations and airfield travel times. Aircraft Communications Addressing and Reporting System (ACARS) data was used to obtain actual aircraft counts at the runway and to compute actual taxi-in and taxi-out time to compare against simulation results. For further discussion on the calibration analysis and its results, please see Chapter II, Section 2.4 of the Draft LAX Master Plan.

AR00003-57

Comment:

M. The Project's Conformity Cannot Be Determined from Data and Analysis Contained in the Draft EIS/EIR.

Even without consideration of the various issues noted above, the Draft EIS/EIR presents several air quality concerns relative to the NAAQS/CAAQS under the Preferred Alternative. Although a series of mitigation measures are discussed and preliminary emission reduction estimates presented, these estimates are not documented and therefore, the calculation methodologies cannot be evaluated. The Draft EIS/EIR defers formal review of potential mitigation measures until a Final EIS/EIR is developed (Draft EIS/EIR, page 4-459). Similarly, the Draft EIS/EIR acknowledges the applicability of federal conformity requirements, but defers both the conformity analysis and a proposed conformity determination to the Final EIS/EIR (Draft EIS/EIR, page 4-460). Unfortunately, such an approach makes it impossible to comment constructively on either potential emission mitigation measures or the conformity process, since these processes will be released for comment only after the underlying decision-making has been finalized.

Response:

The Supplement to the Draft EIS/EIR presented an enhanced discussion and evaluation of air quality mitigation measures in subsection 4.6.8 and in Appendix S-E, Section 2.3. Also, please see Response to Comment AF00001-4 regarding the general conformity determination.

AR00003-58

Comment:

V. THE DRAFT EIS/EIR'S ALTERNATIVES FAIL TO SATISFY THE "PURPOSE AND NEED" FOR THE PROJECT.

The mandate to evaluate and compare alternatives is the "heart" of an EIS (CEQ Guidelines, § 1502.14). FAA Order 1050.1D, paragraph 63, implementing NEPA, mandates that an EIS "shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." The FAA Order further requires that the EIS Alternatives analysis include a rigorous exploration and objective evaluation of all reasonable alternatives. Courts have concluded that to be reasonable, the suggested alternatives must meet the goals of the proposed action.²⁶

The Draft EIS/EIR's alternatives analysis fails to meet the stated goals of the Project. The Draft EIS/EIR states that the general "[p]urpose and objectives of the Master Plan are to provide... sufficient airport capacity for passengers and freight in the Los Angeles region to sustain and advance the economic growth and vitality of the Los Angeles region." (Draft EIS/EIR, volume 1, pg. 2-1) More specifically, the Draft EIS/EIR outlines three objectives which the Project needs to satisfy: (1) "to respond to the local and regional demand for air transportation during the period 2000 to 2015, taking into consideration the amount, type, location, and timing of such demand"; (2) "to ensure that new investments in airport capacity are efficient and cost-effective, maximizing the return on existing infrastructure capital"; and (3) "to sustain and advance the international trade component of the regional economy and the international commercial gateway role of Los Angeles."²⁷

²⁶ See, generally, *City of Carmel-By-The-Sea v. United States DOT*, 123 F.3d 1142 (1997); *National Wildlife Federation v. Federal Energy Regulatory Commission*, 912 F.2d 1471 (1990).

²⁷ *Id.*

Response:

The Draft EIS/EIR presents the purpose and need, and project objectives, in Chapter 2, Purpose and Need for the Proposed Action, describes the basis and nature of a reasonable range of alternatives for the proposed action in Chapter 3, Alternatives, and provides a comprehensive comparative analysis of those alternatives in Chapter 4, Affected Environment, Consequences, and Mitigation Measures. Neither NEPA or CEQA require that all alternatives meet the purpose and need/project objectives to the full extent and the same degree. Section 15126.6(a) of the CEQA Guidelines requires an EIR to include a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects. Section 15126.6(b) of the CEQA Guidelines goes on to state that an EIR focus on alternatives to the project which are capable of avoiding or reducing significant impacts, even if these alternatives would impede to some degree the attainment of the project objectives. The Draft EIS/EIR provide the public and decision-makers with a range of alternatives that provide relatively greater or lesser environmental impacts, depending on the particular alternative and specific environmental discipline, recognizing that the comparative differences in impacts can be weighed against the degree to which each alternative meets the purpose and need/project objectives. Additionally, the Supplement to the Draft EIS/EIR expanded the range of alternatives being considered through the introduction of Alternative D, which avoids or substantially reduces many of the significant environmental impacts associated with the other alternatives, while also responding to the purpose and need/project objectives to a degree different than the other alternatives. Both the process and the documentation provided for the LAX Master Plan EIS/EIR relative to purpose and need/project objectives and alternatives are consistent with the requirements of NEPA and CEQA. Please also see Topical Response TR-ALT-1 for additional discussion regarding the range of alternatives evaluated for the proposed project.

AR00003-59

Comment:

It is not clear, however, that the proposed runway improvements that form an integral part of Alternative C, the Preferred Alternative, constitute a superior, or even an efficient way to accomplish the Project's stated purposes. For example, all three of the Project's objectives could potentially be, at least partially, achieved through airspace/air traffic modifications, both within the terminal airspace and in the en route system. This alternative is neither acknowledged nor explored in the Draft EIS/EIR. Nevertheless, this conclusion is supported by the fact that the Dual Civet arrival configuration has reduced arrival delay for operations from the east significantly since 1998 and has resulted in an average time-savings of 4.4 minutes per Civet turbojet arrival aircraft. In fact, since the Dual Civet arrival procedures were implemented, there have been no national delay programs set up for the Airport, since delay has not been an issue. However, the Draft EIS/EIR does neither addresses nor incorporates the capacity or delay reduction efficiencies gained through this procedure in any of its modeling.²⁸

²⁸ Where the Master Plan does address air traffic procedures, it is in error. The Master Plan states that the Departure Sequencing Program (DSP), a program that provides the capability to sequence departures from Los Angeles basin airports, would enhance capacity at the Airport. (Master Plan, § 2.6.1.3, page II-2.137) However, the DSP program has been cancelled by the FAA due to a lack of benefit. Essentially, the Southern California TRACON consolidation effort occurred many years ago and the references to it in the Master Plan and the Draft EIS/EIR are outdated. Many innovations and changes in airspace and procedures at the TRACON over the past few years have occurred, and none are referenced or adequately considered in the Draft EIS/EIR. Basically, the Draft EIS/EIR does not address the changes in airspace design or the new routes that have been developed as a result of airspace enhancements in Southern California.

Response:

The Master Plan's consideration of benefits that can be achieved through airspace/air traffic, as well as technology, improvements are discussed in Response to Comment AL00036-30.

The Dual Civet arrival procedure is reflected in all of the Master Plan Alternatives, including the No Action/No Project Alternative. The high delay levels experienced at the Civet arrival fix due to high demand of flights from the eastern United States was identified early on in the Master Planning process. As a result, all development alternatives included the assumption that the Civet fix capacity constraint would be alleviated through airspace improvements within the planning horizon. As the commentor states, the Dual Civet arrival procedure has been implemented at LAX. The Master Plan's 1996

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baseline conditions do not reflect the Dual Civet arrival procedure, as this procedure was implemented subsequent to the development of the Master Plan baseline. The purpose of the baseline is to reflect the Airport's operating environment as it exists at that time (year 1996 in this case).

The Departure Sequencing Program (DSP) has been abandoned by the FAA. DSP was a prototype system that was evaluated and found to have little application in the Los Angeles basin. It was work intensive for the controller and did not provide the best operational solutions.

Airspace and air traffic procedures are rarely static. The commentor is correct in that there have been multiple improvements made in the Los Angeles basin that have provided some level of operational improvement. Response to Comment AL00036-30 discusses the ways in which the Master Plan incorporates assumptions regarding improvements in airspace/air traffic as well as procedures.

Following the publication of the Draft EIS/EIR, LAWA developed a new alternative that, consistent with public comments calling for a regional approach alternative, is designed to accommodate passenger and cargo activity at LAX that would approximate those of the No Action/No Project Alternative, has fewer environmental impacts, and improves airport safety and security. Alternative D, the LAWA staff-preferred alternative, also includes the Dual Civet arrival procedure. Alternative D was addressed in the Supplement to the Draft EIS/EIR and the Draft LAX Master Plan Addendum.

AR00003-60

Comment:

Moreover, a closer examination of the Master Plan and the Draft EIS/EIR reveals that the Draft EIS/EIR may have ignored relatively inexpensive improvements in air traffic procedures in favor of very expensive, physical changes to the airfield. This is apparently because the Project's true purpose does not include the first two claimed in the Draft EIS/EIR, i.e., the broad ones of providing "sufficient airport capacity for passengers and freight in the Los Angeles region" (Draft EIS/EIR, Volume 1, page 2-1), in an "efficient and cost effective" way (Draft EIS/EIR, page 2-1). Instead, the Project's principal purpose is the narrow and singular one of accommodating "New Large Aircraft" ("NLA") that, with their long haul capabilities, would potentially serve the Airport in order to "sustain and advance the international trade component of the regional economy." (Draft EIS/EIR, page 2-1)²⁹

This conclusion is substantiated by the fact that the current aircraft fleet does not require 12,000 feet of runway to take off. Even today's heavy aircraft such as the B-747-400 and the B-777-400 only need 8,000 - 10,000 feet of runway for take-off and landing (under the weather conditions prevailing at the Airport). The Airport's existing runways are 8,295-feet, 10,285-feet, 12,091-feet, and 11,096-feet in length. Thus, even the shortest runway at the Airport can accommodate the heaviest and largest aircraft in the fleet under prevailing circumstances today.

The result of the Draft EIS/EIR's failure to acknowledge the Project's primary purpose, i.e., to increase the proportion of super long-haul aircraft in the fleet, is a concomitant failure to analyze the full range and magnitude of environmental impacts that may arise from the desired change in fleet mix. While it is, as yet, early in the NLA development process, some technical facts about the aircraft are already known, sufficient to make at least some educated projections concerning its impact. For instance, ascertaining the projected climb rate will enable an estimate of whether the NLA can meet current airport noise abatement operational requirements; or whether those will have to be altered; or whether the NLA will, ultimately, overfly noise sensitive communities at lower (or higher) altitudes, resulting in higher (or lower) noise levels over those communities. Similarly, preliminary data concerning engine type and emissions characteristics would enable at least a preliminary analysis of the air quality impact of the NLA, as well as the GSE needed to support it, if different from those categories already in use. Finally, the Draft EIS/EIR should have included the capacity/delay impacts from the increased use of NLA. As the Draft EIS/EIR fails to model ground operations in detail, the delay impacts that may result are not considered in developing an accurate analysis of arrival and departure flows and the congestion which may ensue even after Project implementation.

²⁹ The Draft EIS/EIR comes close to admitting as much: "Development of NLA aircraft is driven by increasing demand and constrained international gateway airports around the world, including LAX . . . Development of the NLA will allow these airports to continue to meet the growing demand for travel

between primary trading partners. As one of the three major (and busiest) gateway airports in the nation, LAX would be one of the first airports to be served by NLA." (Draft EIS/EIR, page 2-11)

Response:

Comment Noted.

It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to the No Action/No Project Alternative, and will make the airport safer and more secure, convenient and efficient. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. Please see Topical Response TR-SAF-1 regarding Alternative D and safety.

Each of the Master Plan alternatives (developed prior to Alternative D) responds to the forecast demand by increasing the capacity levels of the airport to accommodate a greater percentage of the demand. Alternative C cannot serve all of the projected demand because its facilities are constrained as a result of greater emphasis being placed on the effects of expansion on the environment and surrounding communities than on economic and air service objectives. Instead, it maximizes the amount of activity it can serve in the limited space available. Through evaluation in the multi-iterative process of the Master Plan, those improvements and modifications proposed to increase airport capacity in each of the Master Plan alternatives are both efficient and cost effective. These changes would ensure that the network of surrounding LAX facilities dependent on air transportation could maximize the return on their invested capital.

The Master Plan alternatives assume the airlines would make air service modifications to maximize their opportunities even under constrained airfield conditions. Air service modifications would include an overall increase in the average size of the aircraft using the airport. By increasing the average aircraft size more passengers could be served without an increase in operations. The increase would include the addition of a small number of NLA aircraft to the larger fleet mix. Runways, taxiways, and gates would be modified to accommodate the larger fleet mix, not just NLA aircraft.

The Draft EIS/EIR assumed that the Boeing 747 aircraft is representative of the NLA for ground movements. Currently there are four runways at LAX, two parallel runways on the south complex and two parallel runways on the north complex. The two inboard runways (6R/24L and 7L/25R) in each complex are used primarily for departures. The outboard runways (6L/24R and 7R/25L) are used primarily for arrivals. (Please see Figure II-2.8 in Chapter II, Existing Conditions, of the Draft LAX Master Plan for a graphical depiction of how the runways are used.) Landing length requirements are typically shorter than departure length requirements, thus the primary departure runways are longer than the primary arrival runways at LAX. The runway length deficiency to which the commentor refers is for departing aircraft; therefore, this response focuses on the two primary departure runways - 6R/24L and 7L/25R. Runway 7L/25R (the main departure runway on the south complex) is the longest runway at the airport at 12,091 feet long. The main departure runway on the north complex (Runway 6R/24L) is 10,285 feet long.

A runway length analysis was prepared as part of the Draft LAX Master Plan (see Chapter IV, Facility Requirements, Section 3.2.2). The determining factors for takeoff runway length requirements are aircraft weight and other physical characteristics; pressure altitude; temperature; and prevailing surface winds. The runway length analysis was prepared for hot day conditions, which are defined as 86 degrees Fahrenheit. This analysis concluded that Runway 6R/24L has insufficient length to accommodate fully loaded takeoffs under hot day conditions by the Boeing 737-300, 747-200/300, 747-400, and the MD-11:

Aircraft Type	Takeoff Runway Length Requirement (feet)
B-737-300	10,600
B-747-200/300	11,500
B-747-400	11,100
MD-11	10,950

The Airbus A380 (the only NLA currently in development) is scheduled to enter commercial service in 2006. Airbus has publicly stated that, at MTOW, the A380 will require about 10,000 feet for departure

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operations. However, airport engineering data regarding hot day performance remains unavailable at this time. It is expected that the A380 would have slightly improved runway performance compared to the Boeing 747-400. Only the southern Runway 7L/25R can accommodate departures by the aircraft in the above matrix at maximum takeoff weight in hot day conditions.

Takeoff runway length requirements can be even greater than those discussed above. For example, if temperatures were higher than 86 degrees Fahrenheit, runway length requirements would increase. In addition, departing aircraft are affected by surface winds. The runway length requirements described above assume no winds. LAX operates predominantly in a westerly configuration, as the prevailing winds are from the west or southwest. The Los Angeles Airport Traffic Control Tower often will retain the airport in a west configuration even when there is a slight east tailwind. This is done to gain an operational advantage because the west configuration is more efficient and it keeps the majority of departing aircraft over the ocean. Aircraft taking off with a slight east tailwind would require a runway length slightly longer than what would be needed without an east tailwind. In addition, the runway length analysis prepared for the Master Plan does not take into consideration the individual requirements of the airlines. Specific airline operating procedures are often more restrictive.

The lack of sufficient runway departure length on the north airfield complex means that northbound departures that require greater than 10,300 feet must takeoff from the south complex and cross over to the north complex in the air. It is generally preferred for northbound departures to depart from the north complex and southbound departures to depart from the south complex. Departures are conducted in this manner in order to avoid coordinated crossings in the air, which reduces the departure capacity of the airfield and can increase delays. However, fully loaded aircraft often request to depart from Runway 7L/25R, regardless of their destination, because of wind, temperature, or a combination of the two.

The number of days pilots are unable to use the northern complex for departure with certain aircraft was not calculated. Air Traffic Control Tower personnel have estimated that this restriction occurs approximately 20 days per year.

Though detailed engineering data remains unavailable at this time it can be assumed that the Airbus A380 would have performance on par with, if not better than the Boeing 747-400 due to the fact that that A380 has been designed and engineered in a more modern time. Though it cannot be said for sure, it would be reasonable to expect that the Airbus A380 would be quieter and have better runway and climb performance than other large aircraft currently in commercial service in spite of its massive size. This can be demonstrated by the Boeing 777's performance relative to that of the Boeing 727. Though the 777 has more than twice the number of seats, it has better runway performance and is quieter. It is likely that the addition of the Airbus A380 to the fleet would provide an overall environmental benefit relative to maintaining older, louder, less fuel-efficient aircraft. Further, the Airbus A380, or NLA is expected to make up 1.18% of the total 2015 Design Day fleet mix or 27 of 2,279 total operations.

Extension of Runway 6R/24L to 12,000 feet as depicted in the build alternatives A, B, and C would permit departures by the largest aircraft from either the north or south airfield complex. Alternative D would provide 11,700 feet of runway pavement plus a 300 foot clearway off of the west end. Application of Declared Distances would provide for a Take-Off Distance Allowed of 12,000 feet. The additional length would reduce airfield congestion and eliminate excessive coordinated crossings in the air, thus reducing departure delays.

AR00003-61

Comment:

In summary, because the alternatives analysis is the "heart" of the NEPA process; because the Draft EIS/EIR fails to consider, or analyze, the impacts of eminently reasonable alternatives such as airspace changes to meet the Project's stated purposes; because Alternative C does not alone meet the Project's stated purposes; and because the most significant result of implementing Alternative C, the increased capacity to accommodate NLAs, remains unanalyzed from an environmental perspective, the Draft EIS/EIR's alternatives analysis is seriously flawed.

Response:

Comment noted. Please see Responses to Comments AL00036-30 regarding airspace issues, AL00016-53 regarding the relationship between the purpose and need/objectives of the project and the alternatives evaluated in the EIS/EIR, and PC00686-2 regarding NLAs.

AR00003-62

Comment:

VI. THE DRAFT EIS/EIR DOES NOT ADEQUATELY SPECIFY MITIGATION MEASURES OR METHODS TO ENFORCE THEM.

CEQA requires that agencies identify the environmental impacts of a project, and implement mitigation measures to lessen the adverse environmental impacts. (CEQA Guidelines § 15002 (a)(3)). However, the Draft EIS/EIR fails to comply with CEQA by (1) failing to provide a complete list of mitigation measures, and (2) failing to specify, at a minimum, a Draft Mitigation Monitoring Program to inform the public of how the project proponents intend to ensure the implementation of mitigation measures.

Response:

Please see Response to Comment AR00003-63 below.

AR00003-63

Comment:

A. The Draft EIS/EIR Delays Disclosure of the Full List of Mitigation Measures Until the Final EIS/EIR.

CEQA Guidelines § 15126.4(a)(1)(B) mandates that the "[f]ormulation of mitigation measures should not be deferred until some further time." While the Draft EIS/EIR acknowledges the existence of significant unmitigable impacts, it also states that, "A final package of design features, Master Plan Commitments, and Mitigation Measures will be developed ... The resulting Environmental Action Plan will be published in the Final EIS/EIR." (Draft EIS/EIR, Executive Summary, pg. ES-30) By deferring to the Final EIS/EIR to reveal the mitigation measures, the public's opportunity comment will have been attenuated. The SBCCOG, therefore, reserves the right to comment on items, including the Draft Conformity and Mitigation Monitoring Program that should have been included, but were omitted from the Draft EIS/EIR.

Response:

The Master Plan and Draft EIS/EIR and Supplement to the Draft EIS/EIR are being completed at a program-level of consideration. Thus, the evaluation of impacts and mitigation of those impacts are provided at this time at a general program-level. As individual projects of the Master Plan are advanced for implementation and future environmental evaluation occurs, additional details of mitigation can be provided, as appropriate. This is not deferral of mitigation, but rather is the identification of the overall mitigation approach which can be further refined, if and as appropriate, at a project-level of planning.

Both the Draft EIS/EIR and Supplement to the Draft EIS/EIR present a broad range of mitigation measures that could be approved and implemented to reduce or avoid environmental impacts associated with the Draft LAX Master Plan as was described in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In some circumstances, the Draft EIS/EIR and Supplement to the Draft EIS/EIR listed a range of possible mitigation measures for an identified impact. Such an approach is especially appropriate at the program-level of evaluation, where further studies may be necessary after the plan has been approved. Where a range of possible mitigation measures is provided, performance standards have been proposed to mitigate significant impacts. The public, agencies, and decision-makers have the ability to review and comment on these mitigation measures and such comments on the proposed mitigation measures will be considered during the decision-making process for finalization as part of the final decision on the project. This approach of disclosing recommended mitigation measures for review and comment is consistent with the intent and requirements of NEPA and CEQA. In addition, the proposed Environmental Action Plan included as part of this Final EIS/EIR, which contains project features, Master Plan commitments, and mitigation measures to reduce or avoid environmental effects, reflects consideration of comments on the Environmental Action Plan components identified in both the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

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Regarding a mitigation monitoring or reporting program, pursuant to Section 21081.6(a) of CEQA, the public (lead) agency shall adopt a monitoring or reporting program for mitigation measures when making the necessary findings in conjunction with project approval. The mitigation monitoring and reporting program will specify the timing of and monitoring responsibility for implementation of adopted mitigation measures. The mitigation monitoring and reporting program is a means to ensure compliance with mitigation measures during project implementation. Pursuant to Section 1505.2(c) of NEPA, the Record of Decision (ROD) must include a monitoring and enforcement program for each mitigation measure. Neither NEPA nor CEQA require or encourage the inclusion of the mitigation monitoring or reporting program as part of a Draft EIS/EIR.

Please see Response to Comment AF00001-14 regarding a discussion of the general conformity determination analysis consistent with the requirements of the Clean Air Act.

AR00003-64

Comment:

B. The Draft EIS/EIR Fails to Provide a Draft Mitigation Monitoring Program.

California Public Resources Code §21081.6 requires that a public agency "adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation." (Cal. Pub. Resources Code § 21081.6 (a)(1)). If an EIR "identifies one or more significant environmental effects of the project," CEQA Guidelines § 15091(a) requires an agency to "make one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding." With these findings, the CEQA Guidelines mandate that "the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures." (CEQA § 15091(d))

The Draft EIS/EIR violates CEQA Guidelines § 1509(d) and California Public Resources Code § 21081.6 in that it fails to set forth a program that monitors or reports on each mitigation measure. Although the Draft EIS/EIR cites some mitigation measures to combat the environmental impacts of the Project, it makes no mention of the "permit conditions, agreements, or other measures" (CEQA Guidelines § 15091(d)) which would ensure compliance with mitigation measures. In other words, it does not specify the steps necessary to ensure compliance, the responsible party to ensure compliance, or the resulting consequences should compliance not occur.

Response:

Please see Response to Comment AR00003-63 above.

AR00003-65

Comment:

VII. THE UNRELATED ISSUE OF "SAFETY" SHOULD NOT BE USED AS A SMOKESCREEN TO PUSH THE CAPACITY-DRIVEN DRAFT EIS/EIR FORWARD.

In recent public statements, the FAA and LAWA have introduced the notion that because of its high number of runway incursions, the Airport is unsafe, and that the Project's "improvements" are critical to remedying the adverse safety conditions.

Contrary to the FAA's contention, however, runway incursions are largely a function of pilot or air traffic controller error, not airport layout and design.³⁰

In fact, the Airport can eliminate runway incursions only if it builds runways with no entrances and no exits. However, simple solutions such as enhanced marking and lighting for runways, increased awareness and training for pilots and controllers, improvements in communications and procedures, and resolving management issues at the FAA³¹ are all basic and available measures that should be implemented at the Airport. In addition, affordable incursion-reducing technologies currently available to

the Airport such as the Airport Movement Area Safety System (presently in use at the San Francisco International Airport), which uses radar to alert controllers to potential collisions, would minimize the problem as well.³² In fact, even the FAA has even pressed the need for instituting technological improvements at airports to combat the runway incursion issue.³³

While recent incidents have made runway incursions a "hot button" in the eyes of the public, Congress, and aviation organizations, this recently surfaced "safety" issue cannot serve as justification for a project which otherwise fails to meet environmental standards.

30 A pilot might enter a runway without proper authorization or clearance; a pilot is unfamiliar with an airport, does not hear an instruction, or fails to acknowledge an instruction to hold short of an active runway; a pilot, when approaching an active runway, crosses the hold line for that runway; a controller may clear an aircraft onto an active runway without ensuring that there are no other aircraft operating on that runway; the controller may fail to coordinate an aircraft crossing a runway with the controller who has the responsibility for approving all operations on that runway; a controller may clear an aircraft to cross a runway and the pilot may take an excessive amount of time crossing and may interfere with another aircraft; and the controller may fail to exercise the proper oversight of the operation and allow two aircraft to occupy an active runway resulting in a runway incursion.

31 Transportation Department Inspector General Kenneth M. Mead recently told a House subcommittee that the "FAA's director of runway safety has little authority over FAA employees who work on runway safety projects. Result: Almost every FAA runway safety project runs years late at more than double the anticipated cost, often failing to meet original expectations." The Washington Post Company, "Runway Alert", page A22, July 7, 2001.

32 "It's the first surface detection equipment that really gives an alert to the controller and allows the controller to prevent a collision." CNN, "Close Calls on Runways Alarm Aviation Experts", June 27, 2001.

33 The Director of the FAA's Runway Safety Office, Mr. Bill Davis, expressed that "he needs additional authority to coordinate and speed up technological improvements." The Washington Post Company, "Runway Alert", page A22, July 7, 2001.

Response:

The content of this comment is essentially the same as AR00003-65; please see Response to Comment AR00003-65.

AR00003-66

Comment:

VII. CONCLUSIONS.

Based on the above analyses, the SBCCOG concludes that the Draft EIS/EIR does not serve its most fundamental purpose as an "environmental alarm bell" to "alert the public and responsible officials to environmental changes before they have reached ecological points of no return." (See, e.g., *County of Inyo v. Yorty*, 32 Cal.App.3d 795, 810 (1993).) Among other things, the varying baselines, selectively applied to areas of potential impact so as to artificially diminish the apparent impacts of the Project; the virtual absence of any analysis of impacts south of the Airport; and the lack of consideration of imminently reasonable alternatives, including air traffic alternatives, to the expenditure of billions of dollars in what are ultimately only marginally effective airfield improvements, require substantial analytic revisions to the Draft EIS/EIR. The SBCCOG further concludes that, after those revisions are made, "significant new information" will emerge which will require that the Draft EIS/EIR be recirculated (*Center Sensible Planning, Inc. v. Board of Supervisors*, 122 Cal.App.3d 813, 822 (1981), so that the public, in general, and the SBCCOG and its members in particular, are not denied their statutorily mandated opportunity to test, assess and evaluate the new data and conclusions contained in the revised Draft EIS/EIR, and to make informed judgments as to their validity.

Response:

Please see Responses to Comments AR00003-3 through AR00003-65 for responses to the specific concerns cited in the letter.

3. Comments and Responses

AR00004

**Wallerstein, D.Env.,
Barry**

**South Coast Air Quality
Management District**

9/21/2001

AR00004-1

Comment:

Draft Environmental Impact Statement / Environmental Impact Report (DEIS/DEIR) for the Los Angeles International Airport Proposed Master Plan Improvements

1 . Construction Off-road Mobile Source Emission factors: In the Technical Report 4, Appendix G - "Air Quality Impact Analysis," there is a brief methodology section describing how construction emissions were calculated for the proposed project alternatives. In the third full paragraph on page 3 of Appendix G it is stated, "Hourly emission rates were calculated for all vehicle types using project specific information where available or guidance default values for the variables in the emission factor calculations." Although construction schedules and activity levels for construction equipment are described in Attachment E to Appendix G, the construction equipment emission factors in Attachment F to Appendix G (Table A9-8-B from the AQMD's Handbook) are given in pounds per horsepower-hour. The final EIR/S should describe the methodology and show the equation(s) for converting pounds per horsepower-hour to pounds per hour of operation for the equipment listed in Attachment E to Appendix G. Further, a table similar to Table A9-5-A in the AQMD's Handbook should be created and included in the Final EIR/S, in Attachment E for example.

Response:

The description of methodology for converting "pounds per horsepower-hour" to "pounds per hour" was inadvertently omitted from the Draft EIS/EIR. The equation for converting "pounds per horsepower-hour" to "pounds per hour" of operation is as follows:

Hourly Emissions [lb/hr] = (Emission Factor [lb/hp-hr]) x (Equipment Rating [hp]) x (Load Factor [unitless])

Where:

Emission Factor = emission factor from CARB's OFFROAD model.

Equipment Rating = engine horsepower rating of the construction equipment (equipment types specified by project construction experts based on level of effort required, and are estimates based on past experience).

Load factor = fraction from Table A9-8-D (Typical Load Factors for Mobile [Off-Road] Equipment) in SCAQMD's CEQA Handbook. The load factor varies depending on the type of equipment.

AR00004-2

Comment:

2. Construction Worker AVR Assumption: On page 3 of Technical Report 4, Appendix G - "Air Quality Impact Analysis," one of the assumptions used to calculate construction worker commute trip emissions is an AVR of 2.0. In the Final EIR/S please provide support for using an AVR of 2.0, otherwise a more conservative AVR of 1.0 should be used.

Response:

This assumption was revised in the Supplement to the Draft EIS/EIR. The AVR assumed for construction workers is 1.0.

AR00004-3**Comment:**

3. Breakdown of Construction Emissions by Emissions Source/Activity: Related to item #1, the CEQA/NEPA lead agencies provide substantial detail for estimating construction emissions. However, it is difficult to recreate construction emission estimates in Technical Report 4, Appendix G, Attachment G because these emission estimate tables simply provide total emissions without a breakdown of emissions by emissions source i.e., piece of equipment or construction task. An intermediate table providing peak daily emissions (year 2004) by emissions source for LAWA's staff-preferred Alternative C would have been helpful in evaluating the construction air quality impacts analysis. Such an intermediate table should be included in the Final EIR/S.

Response:

Peak daily, quarterly, and annual construction emissions were outlined in Table S4.6-11 of Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR. Emissions were given for 2004, 2005 and 2015. Construction assumptions used to calculate emissions were included in Attachment D to Technical Report S-4, Supplemental Air Quality Technical Report.

AR00004-4**Comment:**

4. Table 4.6-10 - Unmitigated Construction Emissions: A comparison of the daily and quarterly emissions data in Table 4.6-10 shows these data to be consistent with the comparable data in Technical Report 4, Appendix G, Attachment E. Comparable annual emissions data do not appear to be included in Attachment E. A spot check of the annual emissions data performed by multiplying the quarterly emissions by four shows that the annual emissions data appear to underestimate annual construction emissions for each of the alternatives. Please explain this apparent discrepancy or correct the data in this table in the Final EIR/S.

Response:

The annual construction emission inventories presented in Table 4.6-10 of Section 4.6, Air Quality, in the Draft EIS/EIR, were developed by summing the individual quarterly emissions presented in Attachment E of Technical Report 4, of the Draft EIS/EIR. Table 4.6-10 only presented the peak quarterly emissions for a given year, while Attachment E of Technical Report 4 provided quarterly emissions for each quarter. Multiplying the peak quarterly emissions by four (4) would substantially over estimate the annual emissions for each year. It should be noted that peak daily, quarterly, and annual construction emissions were outlined in Table S4.6-11 of Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

AR00004-5**Comment:**

5. Traffic Analysis: Please follow up and respond to CARB's concerns that the traffic analysis was used to calculate off-airport vehicle miles traveled (VMT) and emissions.

Response:

Comment noted. The letter received from CARB commenting on the Draft EIS/EIR did not discuss the traffic analysis.

AR00004-6**Comment:**

6. Aircraft Particulate Matter: A further discussion needs to be included as to why the health risk assessment (HRA) excluded aircraft particulate matter emission or include in the HRA.

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Response:

As indicated in Attachment B (subsection 7.3.1) in Technical Report 14a of the Draft EIS/EIR, exposure to particulate matter in jet exhaust was not possible due to lack of information. However, the assessment of risks associated with particulate matter is unlikely to be significantly underestimated as a result. The great majority of PM emissions due to airport activity is due to GSE and diesel truck traffic. Jet engines burn more cleanly because of the difference in combustion processes and because engine manufacturers have designed engines to avoid significant PM to avoid wear and pitting of turbine blades.

The Draft EIS/EIR addressed potential health risks associated with exposure to diesel particulates for the No Action/No Project Alternative as well as for the Alternatives A, B, and C. Potential health risks associated with exposure to diesel particulates are discussed in detail in Technical Report 14a of the Draft EIS/EIR. Subsection 6.3.2.1, Residents (Adults and Young Children), of Technical Report 14a of the Draft EIS/EIR indicates that estimated cancer risks for adults and children are mostly due to predicted exposure to diesel particulates and 1,3-butadiene. The Supplement to the Draft EIS/EIR (Section 4.24.1, Human Health Risk Assessment) provided additional information on human health risks associated with the No Action/No Project Alternative as well as the build alternatives. The analysis included a comparison to Year 2000 conditions and an evaluation of health risks using a 70-year exposure duration. Diesel particulates remain a major contributor to total cancer risks for the No Action/No Project Alternative as well as for the build alternatives.

Diesel particulate risks did not include particulate matter from aircraft. This exclusion is justified based on differences in diesel fuel and jet fuel as well as differences in combustion processes. Diesel fuel is a complex mixture of thousands of individual compounds, most with carbon numbers between 10 and 22. Most of these compounds are members of the paraffinic, naphthenic, or aromatic class of hydrocarbons. Generally speaking, more than half of the molecules in diesel fuels contain at least 15 carbon atoms (Chevron, 2000). Jet fuel differs significantly from diesel fuel both physically and chemically, being significantly lighter with shorter carbon chains, smaller molecules (generally), and more uniform composition. Commercial jet fuel is similar to kerosene in composition and contains an array of carbon chain-lengths from 4 to 16 carbons long (ATSDR, 1997).

Diesel engines and jet engines also differ in their combustion mechanisms and fuel combustion efficiencies. Most diesel engines are based on the compression/ignition principle. In a typical four-stroke compression/ignition four-stroke cycle, air is drawn into the cylinder in the intake stroke and then compressed, creating space for finely atomized diesel fuel to be sprayed into the hot air, initiating auto-ignition of the mixture. During the subsequent power stroke, the expanding hot mixture forces the piston down. The final exhaust stroke purges the burnt gases. The diesel cycle relies upon warm vapor for combustion of fuel injected in pulses into cylinders. As a result, the combustion process is often incomplete or inefficient, creating a large amount of partially oxidized carbon-containing particulate matter in the exhaust. Hazardous components of diesel exhaust include, but are not limited to: benzene, arsenic, nickel, benzo(a)pyrene, 1,3-butadiene, formaldehyde, a variety of hydrocarbons, carbon monoxide, sulfur oxides, nitrogen oxides, and particulate matter (PM). Concentrations of PM and other hazardous components in diesel exhaust vary significantly depending on factors such as engine type and condition, fuel grade, and combustion efficiency.

Toxicological research indicates that the component of diesel exhaust responsible for most toxicological effects is PM (USEPA, 2003). Diesel PM typically consists of a solid core, composed mainly of elemental carbon, with a coating of various organic and inorganic compounds. More than 75 percent of diesel exhaust particles have diameters smaller than 1 micrometer (μm), with typical particles sized between 0.1 and 0.25 μm (CalEPA, 1997). For reference, particles 10 μm and smaller are generally respirable, meaning that they deposit into the deepest and often most sensitive areas of the lung (the alveoli). Particles that deposit in the deep lung are not removed in mucus that protects much of the respiratory tree and may reside in the lung for long periods of time.

According to USEPA's Integrated Risk Information System (IRIS), the systemic (non-cancer) toxicity of diesel emissions is due to the insoluble carbon core of diesel particles. Long-term effects seen with whole diesel are not found or are much less evident in laboratory animals exposed to similar dilutions of diesel exhaust filtered to remove most of the PM. As a result, USEPA's reference concentration (RfC) for diesel exhaust is based entirely upon PM. In addition, the California Air Resources Board (CARB) has identified diesel exhaust PM as a "toxic air contaminant" under the state's air toxics program, based on the information available on cancer and non-cancer health effects. California limited its findings to diesel PM, as opposed to diesel exhaust.

Jet engines operate through use of turbines continuously injected with carefully controlled amounts of fuel. Basically, in a jet turbine engine, turbine blades draw air in at tremendous speeds, causing higher pressure on the inside of the turbine. The engine is so hot (up to 3,500 degrees Fahrenheit) that the fuel ignites in a constant flame. The thrust provides the huge force necessary to propel commercial airliners. The high temperatures and continuous fuel injection act to combust fuel more completely and efficiently than diesel engines. Burning of jet fuel in engines using modern turbine technology creates much less particulate matter than is created during diesel fuel combustion. The combination of different fuel compositions and combustion technologies result in exhausts which differ chemically and physically, and, as a result, toxicologically from diesel exhaust.

Relatively little is currently known about the actual amount of PM present in jet exhaust or especially about the toxicity of jet exhaust. The following is an excerpt from USEPA's 1999 document, Evaluation of Air Pollutant Emissions from Subsonic Commercial Jet Aircraft: "PM emissions result from the incomplete combustion of fuel. High power operation, such as takeoff and climb-out, produce the highest PM emission rates due to the high fuel consumption under those conditions. PM emission test data for aircraft engines are sparse, and engine-specific PM emission factors are available for only a few engine models." As a result, PM emission factors are not reported in the document. Estimates of PM emissions for use in this report were made using a variety of sources. No data were available for many types of engines and estimates were based on fuel consumption for similar engines in many cases.

Because of (a) differing fuels, (b) very different combustion processes in jet engines and diesel engines, and (c) to a lesser extent uncertainties in PM emissions from jet engines, extrapolation of PM emissions from diesel exhaust to jet exhaust is not considered appropriate or scientifically justifiable for the LAX Human Health Risk Assessment. A January 2000 CARB Advisory Committee draft report on commercial airport activities states that, when assessing toxic impacts associated with particulate emissions from aircraft, it may not be appropriate to use the CalEPA Unit Risk Factor for diesel PM ($3.0 \times 10^{-4} \mu\text{g}/\text{m}^3$) (CalEPA, 1997). Although PM from jet exhaust is not quantified in the evaluation, various investigations (Spicer et al., 1994) have been performed which provide information about emission factors for other toxic air contaminants in jet exhaust. As a result, carcinogenic risks and hazard quotients are calculated in the HHRA for specific jet exhaust components with known emission factors (e.g., chlorinated dioxins, various PAHs, and 1,3-butadiene).

Agency for Toxic Substances and Disease Registry (ATSDR), "Toxicological Profile for Jet Fuel," CD-ROM, 1997.

CalEPA, "Non-cancer Chronic Reference Exposure Levels (RELs), Air Toxicology and Epidemiology Section, Draft for Public Review," 1997.

Chevron Company, Information about Diesel Fuel Chemistry, Available: <http://www.chevron.com/prodserv/bulletin/diesel> [June 2000].

Spicer et al, "Chemical Composition and Photochemical Reactivity of Exhaust from Aircraft Turbine Engines, Annals Geophysicae," May 25, 1994.

USEPA, "Evaluation of Air Pollutant Emissions from Subsonic Commercial Jet Aircraft," 1999.

USEPA, "Integrated Risk Information System (IRIS) Online Database," 2000.

AR00004-7

Comment:

7. Breakdown of Operation Emissions by Emissions Source/Activity: In the Technical Report 4, Appendix G - "Air Quality Impact Analysis," there is an extensive methodology section describing how operation emissions were calculated for the proposed project alternatives. Apparently, from the discussion, on-airport emissions were calculated primarily from the EDMS model, whereas off-airport emissions (primarily on-road mobile sources) were calculated using CARB methodologies and EMFAC2000 (version 1.99) emission factors. Similar to comment #3 above, a table showing emissions for operation emissions sources/activities identified in the methodology section of Technical Report 4,

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Appendix G - "Air Quality Impact Analysis," would be useful, especially to help evaluate the mitigation control efficiencies identified in Table 4.6-16 on pages 4-514 through 4-516 and Table 4.6-17 on pages 4-517 and 4-518 (see also comment #6).

Response:

Attachment V, of Technical Report 4, Air Quality Technical Report, provides a breakdown of emissions by source group for each alternative. The on-airport emissions for aircraft sources were calculated using EDMS 3.2, and the on-road, mobile sources were calculated using EMFAC2000. Stationary source emissions were estimated from tenant surveys which included a collection of SCAQMD permits for on-airport tenants. The on-airport emissions for aircraft sources were updated in the Supplement to the Draft EIS/EIR using EDMS 4.11 and on-road, mobile source emissions were updated in the Supplement to the Draft EIS/EIR using EMFAC2002. EDMS 4.11 and EMFAC2002 are the two most recent versions available for these ERA/FAA and CARB/SCAQMD required models.

AR00004-8

Comment:

8. Enforceable Mitigation Measures: Table 4.6-16 lists a number of mitigation measures with potentially quantifiable effects, including a range of potential emission reductions (in tons per year) for each mitigation measure. However, many of the mitigation measures rely on future approvals (FAA approvals for example) or rely on future cooperative agreements with other agencies (MTA and Caltrans), the airline tenants at LAX or other airports in the region. Since there is currently no guarantee that these approvals or cooperation with these other entities will ultimately occur, the AQMD believes taking credit for emission reductions that are currently unenforceable is inconsistent with CEQA Guidelines §§ 15126.4 (a)(1)(B) (mitigation measures should not be deferred to some future time) and 15126.4(a)(2) (mitigation measures should be enforceable through "legally-binding instruments." Therefore, Table 4.6-17 on pages 4-517 and 4-518 and Tables 4.6-19, 4.6-20 and 4.6-21 on pages 4-520, 4-521 and 4-522, respectively, should be modified to show only emission reductions that are currently enforceable. This comment also applies to the health risk assessment results in Table 4.24.1-4 on page 4-1022 of the Draft EIR/S. Alternatively, the lead agencies could show a range of emission reductions showing currently enforceable mitigation measures as the end of the range up to a high end of the range showing emission reductions if all approvals and cooperation with all other entities occur.

Response:

The preliminary list of mitigation measures included in the Draft EIS/EIR was modified in the Supplement to the Draft EIS/EIR published in July 2003. The recommended list of mitigation measures included in the Supplement to the Draft EIS/EIR does not include two measures (single engine taxi mitigation measure, landing fees mitigation measure) that require FAA approval. In accordance with Section 15126.4 of the CEQA Guidelines, "an EIR shall describe feasible measures that could minimize significant adverse impacts." As such, the list of recommended mitigation measures includes a variety of components intended to reduce air quality impacts. However, only a limited number of the recommended mitigation measures were quantified for the post-mitigation analysis included in the Supplement to the Draft EIS/EIR. Please see Table S4.6-18, Recommending Mitigation Measure Components, of the Supplement to the Draft EIS/EIR for a range of emission reductions for those measures that could be quantified. Those mitigation components included in the analysis include GSE electrification, LAX dedicated clean-fuel buses, and construction mitigation measures which are enforceable through contract requirements.

Moreover, with the exception of NO_x emissions under Alternative D implementation of the recommended mitigation measures would not reduce any potentially significant impacts to a less than significant level.

AR00004-9

Comment:

9. Table 4.6-19 - Emission Inventories: There appears to be errors in the data in Table 4.6-19. For example, the percent reduction (mitigated emissions) claimed for each of the alternatives appears to be incorrectly calculated based on the tons per year for each alternative relative to the baseline. In the case of SO₂ for the year 2005, there is actually a net increase in emissions for each of the alternatives

not a reduction. For the year 2015, the table shows a net increase in emissions for NO_x (for all alternatives), SO₂ (for all alternatives), and PM₁₀ (for Alternatives A and B). Please explain or correct these apparent discrepancies in the Final EIR/S.

Response:

The percentages listed in Table 4.6-19 of the Draft EIS/EIR were the percent reduction based on the unmitigated emissions as was presented in Table 4.6-8. Since the publication of the Draft EIS/EIR, Table 4.6-19 was revised due to use of revised methodologies. Please see Table S4.6-19 in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR for revised values.

AR00004-10

Comment:

10. Mitigation Measure Control efficiencies: With regard to the control efficiencies identified for the mitigation measures in Table 4.6-16, the Draft EIR/S does not appear to provide any supporting documentation regarding the methodology used to calculate the range of potential emission reductions, including assumptions, equations, emission factors, source of emission reduction control efficiencies, etc. The Final EIR/S should provide documentation to support the emission reductions shown in Table 4.6-16. This detailed information need not be included in the main text of the Final EIR/S, but could be incorporated into Technical Report 4, Appendix G - "Air Quality Impact Analysis," for example, or one of the technical attachments.

Response:

The Supplement to the Draft EIS/EIR contained revised data relative to feasible mitigation measures and their quantifiable emission reductions in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E.

AR00004-11

Comment:

11. Overlapping Phases: The Draft EIR/S presents construction and operation air quality data for each of the project alternatives as discreet non-overlapping phases. For example, Table 4.6-10 shows only construction emissions for the peak construction year, 2004, and the horizon years 2005 and 2015. Tables 4.6-9 and 4.6-19 show only unmitigated and mitigation on-airport operation emissions respectively, for the horizon years 2005 and 2015. However, once phase 1 becomes operational in 2005, phase 1 operation emissions will overlap with phase 2 construction emissions. It is recommended that the lead agencies provide additional information in the Final EIR/S, in a table for example, that shows phase 1 operation emissions, peak phase 2 construction emissions, and the sum of the two to determine if these overlapping emissions could exceed the emissions estimates in Tables 4.6-10, 4.6-9, or 4.6-19.

Response:

The Draft EIS/EIR addressed the air quality analysis, including selection of the peak year of emissions, in Section 4.6, Air Quality.

Under CEQA, emission thresholds for operational and construction sources are separate. In addition, for regional traffic analyses, emissions are compared against a regional adjusted baseline as was described in Section 4.6, Air Quality, of the Draft EIS/EIR. Because of this, the dividing of the emission inventories into the three categories is warranted. For the dispersion analysis, air concentrations for on-airport operational sources and construction related sources have been re-analyzed and combined for comparison against the National Ambient Air Quality Standards (AAQS) and California AAQS. Please refer to Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR regarding the methodologies used and the concentration results of the air dispersion modeling.

Construction emissions for every year of construction are presented in Attachment G of Technical Report 4 of the Draft EIS/EIR (for Alternatives A, B, C, and the No Action/No Project Alternative), and in Attachment D of Technical Report S-4 of the Supplement to the Draft EIS/EIR (for Attachment D).

3. Comments and Responses

AR00004-12

Comment:

12. Mitigation Measures: Table 4.6-16 and Technical Report 4, Appendix G, Attachment X identify potential mitigation measures currently under consideration as part of the proposed project. In the case of some mitigation measures, there is insufficient detail associated with the description of the mitigation measures to properly evaluate them or their control efficiency. For example, in Table 4.6-16 the following mitigation measure is listed for construction, "Use soil stabilization and/or watering to reduce fugitive dust emissions during construction." Associated with this mitigation measure is a fugitive dust control efficiency of 90 to 95 percent. To justify such a high control efficiency, the lead agency needs to specify the number of times per day the site will be watered, for example, and specifically what other types of soil stabilization will be employed to achieve such a high control efficiency. Other examples include mitigation measures in Attachment X such as those for stationary sources, which simply state "efficient buildings" or "energy conservation" without describing what is meant by these terms. A better description of the mitigation measures will assist the public in better evaluating their effectiveness.

Response:

LAWA is preparing a mitigation monitoring and reporting program, which contains many components, to ensure compliance with the mitigation plan. This program describes in detail how they would be carried out and their associated control efficiencies. LAWA intends to adopt and implement all feasible measures to reduce the project's adverse environmental impacts. The Supplement to the Draft EIS/EIR addressed air quality mitigation measures in subsection 4.6.8, Mitigation Measures, with supporting technical data and analyses provided in Appendix S-E. A range of potential emission reductions for NOx was given for on-airport impacts as well as construction-related impacts.

The actual amount of PM10 reduction assumed from implementation of all proposed fugitive dust control measures was 63 percent. This number is based on implementation of all proposed mitigation measures outlined in Table S4.6-18. These measures include, but are not limited to: watering the site three times daily, use of chemical soil stabilizers, paving of all access roads, and use of staging areas for equipment, etc.

Construction-related NOx was estimated to be reduced by approximately 32 percent upon implementation of proposed Alternative D mitigation measures.

AR00004-13

Comment:

13. Additional Construction Mitigation Measures: In addition to the construction mitigation measures identified in Table 4.6-16 and Attachment X, the lead agencies should consider incorporating the following mitigation measures:

- Configure construction parking to minimize traffic interference;
- Provide temporary traffic control during all phases of construction activities to improve traffic flow (e.g., flag person);
- Develop a construction traffic management plan that includes, but is not limited to: rerouting construction trucks off congested streets, consolidating truck deliveries, providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Prohibit truck idling in excess of ten minutes;
- Use electricity from power poles instead of temporary diesel or gasoline generators;
- Suspend all grading when wind speed exceeds 25 miles per hour;
- Traffic speeds on all unpaved roads should be reduced to 15 miles per hour or less;
- Cover all haul trucks hauling dirt, sand, soil, or other loose materials;
- Sweep streets with AQMD Rule 1186-certified street sweepers whenever visible dust accumulates on roadways; and
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the site each trip; etc.

Examples of other construction air quality mitigation measures can be found in Chapter 11 of the AQMD's Handbook.

Response:

All suggested mitigation measures contained in this comment included in subsection 4.6.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR.

AR00004-14

Comment:

14. Additional Operation Mitigation Measures: In addition to the operation mitigation measures identified in Table 4.6-16 and Attachment X, the lead agencies should consider incorporating the following mitigation measures:

- Use central water heating systems;
- Install solar panels on roofs to supply electricity for air conditioning, etc., to reduce energy consumption;
- Use light-colored roofing materials, which reflect sunlight and, therefore, heat away from buildings;
- Use double glass paned windows;
- Use energy efficient low-sodium parking lot lights; and
- Use fuel cells to produce heat and/or electricity; etc.

Examples of other operation air quality mitigation measures can be found in Chapter 11 of the AQMD's Handbook.

Response:

The Supplement to the Draft EIS/EIR provided an enhanced discussion of air quality mitigation measures in subsection 4.6.8, Mitigation Measures, with supporting technical data and analyses in Section 2.3 of Appendix S-E. The LAX Master Plan does not assess the details of building design at the EIS/EIR stage, but subsection 2.3.1 of Appendix S-E discussed LAWA's approach to energy conservation at LAX. Therefore, these six specific measures were not addressed in the Supplement to the Draft EIS/EIR as mitigation, but are part of LAWA's on-going voluntary approach to incorporate such measures wherever technologically and economically feasible.

The commentor is also referred to the Response to Comment AL00033-335.

AR00004-15

Comment:

15. CALMPRO Program: In Section 4.6.2.3 on pages 4-468 and 4-469 of the Draft EIR/S and on pages 24 and 25 of Technical Report 4, Appendix G - "Air Quality Impact Analysis," various models used to analyze air quality impacts are discussed, including U.S. EPA's CALMPRO model, ISCST and EDMS models. As stated on page 39 of Appendix G, by using CALMPRO, "The influence of calm periods is eliminated by zeroing hourly concentrations at all receptors if the corresponding hour of meteorological data is calm." With regard to using the ISCST model, to provide the most conservative analysis, the "NOCALM" model option should be used, which includes the influence of calm wind periods as part of the analysis. With regard to the EDMS model, to provide the most conservative analysis, CALMPRO should not be applied. Instead, the comparable EDMS results should be used, which includes the influence of calm periods.

Response:

Steady-state Gaussian plume models do not apply in conditions of calm winds. Inclusion of calm winds (<1m/s) in gaussian dispersion modeling may cause concentrations to become unrealistically large due to the mathematical division by numbers less than 1 in the gaussian dispersion equations. Federal modeling guidance (Chapter 9.3.4.2 of Appendix W to 40 CFR Part 51) dictates that hourly concentrations calculated using calm winds not be considered valid, and these hours are not included in the calculation of multiple-hour averages as described in said guidance.

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Modeling was performed according to a modeling protocol which was reviewed by SCAQMD, and review comments were incorporated. The inclusion of unrealistically high concentrations based on calm winds introduces an excessive level of conservatism. The U.S. EPA's CALMPRO routine was used in the Draft EIS/EIR modeling analyses to perform decalming, as well as to calculate block averages, rather than the running averages EDMS 3.2 calculates. The EPA's method of decalming included in the AERMOD dispersion model was used in the Alternative D modeling in the Supplement to the Draft EIS/EIR. However, the onsite meteorological data, as shown in Attachment S to Technical Report 4 of the Draft EIS/EIR, contains no hours of calm winds as defined. Therefore, the decalming methods produce no significant differences in the predicted concentrations.

AR00004-16

Comment:

16. Post Processing EDMS Model Runs: On page 39 of Technical Report 4, Appendix G - "Air Quality Impact Analysis," it is stated that the EDMS model calculates NO_x emissions, which must be converted into NO₂ emissions. Further, it is stated that to convert NO_x into annual NO₂ concentrations, the Tier 2 Ambient Ratio Method (ARM) was used, as recommended by U.S. EPA. It is also stated that the ARM conversion ratio (approximately 0.42) was also used to convert NO_x to NO₂ for short-term NO₂ concentrations. Although the ARM conversion ratio is appropriate for annual concentrations, it is not appropriate for short-term concentrations. Pursuant to AQMD-recommended modeling protocol and to provide a conservative analysis, 100 percent NO_x to NO₂ conversion should be assumed for short-term NO₂ concentrations.

Response:

Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR discussed use of the Ozone Limiting Method (OLM) to convert short-term NO_x to NO₂ concentrations. This method was applied with the approval of SCAQMD. In addition, Attachment Q in Technical Report S-4 of the Supplement to the Draft EIS/EIR, provides results of monitored data collected at the Hawthorne monitoring station for three years, as well as data collected at the LAX on-site monitoring station. This data indicates that the NO₂ to NO_x ratio drops rapidly below 100 percent as the total NO_x concentration exceeds 100 ppbv (parts per billion by volume), or 0.1 ppmv.

AR00004-17

Comment:

17. ISCST Model Application: In Attachments A and Z to Technical Report 4, Appendix G - "Air Quality Impact Analysis," the lead agency does not provide information on the model parameter options used in the ISCST model application. As noted previously, the "NOCALM" option should be used pursuant to AQMD's recommended modeling protocol.

Response:

The "DEFAULT" model option was used in ISCST3. This option selects EPA-regulatory default options for ISCST3 as defined in Appendix A.5 of Appendix W to 40 CFR Part 51. These options include the selection of stack tip downwash, final plume rise, buoyancy induced dispersion, vertical potential temperature gradient, treatment of calms, and appropriate wind profile exponents. Please see Response to Comment AR00004-15 regarding calm winds.

AR00004-18

Comment:

18. Human Health Risk Assessment - ISCST Model Application: As noted on page 4 of Attachment F to Technical Report 14a "Human Health Risk Assessment Technical Report," it is stated that the ISCST is the dispersion model used to estimate toxic air pollutant health risks. As noted previously, to provide a conservative analysis, the "NOCALM" model option should be selected.

Response:

The content of this comment is essentially the same as comment AR00004-15; please refer to Response to Comment AR00004-15.

AR00004-19**Comment:**

19. Human Health Risk Assessment Assumptions: On page 4-1004 of the methodology section in Chapter 4.24 - "Human Health and Safety (CEQA)" in the Draft EIR/S, it is stated that estimated cancer risks are based on a 30-year exposure to residents near the airport. Pursuant to AQMD risk assessment procedures guidance and to provide a more conservative analysis, a 70-year exposure assumption should be used to assess cancer risks from a proposed project.

Response:

Comment noted. Risk calculations for the horizon year 2015 were based on the assumption that adult residents were exposed to the maximum estimated chemical concentrations in air for the year 2015 for a subsequent exposure duration of 30 and 70 years. The longer exposure duration was used in the Supplement to the Draft EIS/EIR, Section 4.24.1, in response to comments by SCAQMD. School children and child residents were assumed to be exposed to the maximum chemical concentrations in air estimated for the year 2015 for an exposure duration of 6 years.

Horizon years evaluated in the Draft EIS/EIR were based upon project specifics. Timeframes evaluated in planning documents such as the Air Quality Management Plan (AQMP) and the Regional Transportation Plan (RTP) are based upon regulatory guidelines. Both the AQMP and RTP have a 20-year horizon. The 1997 Air Quality Management Plan provided projected emissions up to the year 2010. In addition, it provided a first look at air quality analysis for the year 2020; the year 2020 analysis was provided for informational purposes only and did not serve as part of the maintenance plan.

AR00005**Swamikannu,
D.Env., Xavier****California Regional Water
Quality Control Board****9/24/2001****AR00005-1****Comment:**

Section 4.7 Hydrology and Water Quality

For any construction activity 5 acres and above (1 acre beginning in March 2003), LAX shall obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit (State Construction Permit, NPDES No. CAS000002. The requirements for that permit generally are a Storm Water Pollution Prevention Plan (SWPPP) which includes specific pollution prevention practices to be implemented on site during construction; erosion and sediment controls that will be implemented on site; monitoring requirements; and post construction controls. These post-construction controls are intended to reduce pollutants in storm water discharges after all construction phases have been completed. These must be consistent with all local post-construction storm water management requirements, policies, and guidelines. LAX and the Federal Aviation Administration must consider site-specific and seasonal conditions when designing the control practices. Operation and maintenance of control practices after construction is completed shall be addressed, including short-term and long-term funding sources and the responsible party. In the Los Angeles Region, the Regional Board has required numerical BMP design standards in its Standard Urban Storm Water Mitigation Plans (SUSMPs). The SUSMP requirements apply to the LAX development or redevelopment (the addition, creation, or replacement) which involves 100,000 square feet of impervious surface or more. Post-construction treatment controls shall be designed to treat, infiltrate or filter storm water runoff from each storm event, up to and including the 85th percentile, 24-hour storm event for volume-based BMPs (Water Quality Volume - WQV), and/or the 85th percentile hourly rainfall intensity, with a safety factor of times 2, for flow-based BMPs (Water Quality Flow - WQF). For LAX, this means, WQV is 1.2 inches of rainfall over a 24 hr period and the WQF is 0.2 inches per hour.

3. Comments and Responses

Response:

LAWA will comply with all applicable requirements of the Los Angeles Regional Water Quality Control Board in preparing SWPPPs for construction and post construction projects covered by the LAX Master Plan. Following selection of the preferred alternative, LAWA will prepare detailed drawings of the various proposed land use developments, (i.e. terminals, air cargo facilities, LAX Northside/Westchester Southside project), and their associated support facilities such as parking lots, loading docks, etc. The drainage plan, to be completed as part of Master Plan Commitment HWQ-1 (subsection 4.7.5), will indicate the type and location of the BMPs to be installed at the airport. Selection of BMPs will be based upon their ability to remove pollutants associated with the activities being performed within their drainage area as well as upon logistical and maintenance issues. LAWA will draw upon the large body of information available to assist in BMP selection. The alternative chosen for implementation will comply with the SUSMP requirements, as was indicated in Master Plan Commitment HWQ-1.

AR00005-2

Comment:

The proposed project entails the expansion of the existing LAX airport to include 275 additional acres of land mainly for road construction and the extension of the Metropolitan Transit Authority Green Line. The project alternatives involve construction within existing areas to lengthen existing runways and/or create new ones, and/or construct an additional terminal and other auxiliary construction activities. Surface water from the existing site and the proposed expansion will be discharged directly to the Santa Monica Bay and to the Dominguez Channel. Both of these receiving water bodies are impaired by copper, lead, zinc, and ammonia. Phosphorus and oil and grease are pollutants of concern in the Santa Monica Bay Watershed. These are all pollutants that are currently found in surface runoff from LAX and whether or not a proposed alternative is completed at LAX, this Regional Board expects that the discharge of pollutants from LAX will be reduced from current levels to comply with water quality standards and/or the MEP standard, whichever is stricter.

Response:

Please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1, performance standards and compliance with regulations. In the event that the No Action/No Project Alternative is selected, LAWA will continue to meet BAT/BCT standards on storm water leaving LAX as required by the NPDES Industrial and Municipal storm water permits under which the facility is covered.

AR00005-3

Comment:

The City of Los Angeles is a permittee under National Pollutant Discharge Elimination System (NPDES) Permit No. CAS000001 [State of California General Industrial Activities Storm Water Discharge Permit (State Industrial Permit) WDID No. 419S004995]. The goal of this permit is to reduce the discharge of pollutants to receiving waters from industrial activities at the permitted site. This State Industrial Permit allows for storm water discharges from the permitted site on the condition that a site-specific Storm Water Pollution Prevention Plan (SWPPP) and pollution prevention practices are optimally implemented to reduce pollutants. A site-specific storm water monitoring program is also required and is intended to characterize runoff from the site and help direct efforts to reduce pollutants from runoff in the specific areas where the pollutants originate. The State Industrial Permit also requires that an annual report be submitted by July 1.

Response:

Please see Topical Response TR-HWQ-2 regarding compliance with regulations and Response to Comment AR00002-6 regarding compliance specifically with NPDES regulations.

AR00005-4

Comment:

The annual reports submitted by LAX include monitoring results from storm water sampling. As part of the monitoring program, a list of constituents likely to be found on site is required to be sampled in

storm water runoff. LAX has many activities which have pollutants associated with them. LAX has sampled for some parameters but the list of parameters is incomplete. This Regional Board would like characterization results from storm water discharges from LAX included in the next environmental document relating to master plan improvements including polycyclic aromatic hydrocarbons (PAHs), heavy metals, pesticides, deicing agents, and any other constituents likely to be found in storm water runoff from the numerous activities at LAX. These constituents may be monitored in conjunction with sampling under the State Industrial Permit. LAX shall also initiate storm water toxicity testing for both chronic (for chronic use the Tier I species for toxicity tests as specified in the California Ocean Plan of 1997, or its update) and acute (for acute use the State Water Resources Control Board protocols).

Response:

Conversations with the LARWQB since this comment was received indicate that the LARWQB will be modifying NPDES storm water monitoring requirements at LAX to include additional parameters at increased frequencies. The LARWQB is therefore no longer requesting this information at this time.

AR00005-5

Comment:

The review of analytical results for specific conductance, total suspended solids, total organic carbon, total recoverable petroleum hydrocarbons have exceeded federal benchmarks for storm water runoff and/or state water quality standards. Additional treatment controls appear necessary. This Regional Board expects that LAX and the FAA will address this Regional Board's water quality concerns in any future environmental documents related to LAX Master Plan Improvements.

Response:

LAWA will comply with local, state, and federal regulations pertaining to applicable water quality standards. Also, please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and compliance with regulations and Response to Comment AR00003-63 regarding mitigation measures.

**AR00006 No Author Identified, Coalition for a Truly Regional
Airport Plan**

AR00006-1

Comment:

RESOLUTION NO. 99-07

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ADELANTO, SAN BERNARDINO COUNTY, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, Airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

3. Comments and Responses

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, that: The communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

As was described in Chapters 1, 2, and 3 of the Draft EIS/EIR, and further explained in Chapter 3 of the Supplement to the Draft EIS/EIR, formulation of the build alternatives occurred within a regional context and each of the proposed alternatives represents a variation of how LAX will fit into a regional plan for the future. The planning process for the Master Plan includes a very careful and comprehensive evaluation of the region's air transportation system, the nature of demand for air transportation in the region including consideration of the status and role of each existing and planned major commercial airport in the region, and the various means for meeting the demand for transportation in the region. Each of the proposed build alternatives currently being considered for the Master Plan is a part of a regional plan for the future.

Subsequent to the publication of the Draft EIS/EIR, Alternative D, Enhanced Safety and Security Plan, was added to the range of alternatives being considered. Notwithstanding that all of the proposed alternatives are part of a regional plan, as pointed out above, Alternative D is responsive to the types of concerns expressed in the recitals of the resolution by the Coalition for a Truly Regional Airport Plan, leading to the conclusion of the resolution that a certain type of regional plan be adopted. The ways in which Alternative D is responsive to the concerns implied in the recitals are as follows:

- Alternative D does not propose expansion of capacity to 98 million annual passengers (MAP) and 4.2 million annual tons (MAT) of cargo activity, but rather is designed for a level of passenger and cargo activity comparable to that of the No Action/No Project Alternative (i.e., approximately 78.7 MAP and 3.1 MAT). Correspondingly, the number of flights and ground traffic is substantially lower for Alternative D than for the other build alternatives, as are also the associated impacts related to air pollutants and air toxics, noise, and traffic.
- Although the conclusion of the Draft EIS/EIR is that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities, including areas with predominantly low-income and minority populations, and the region.
- The cost for Alternative D is substantially less than the \$12 - \$15 billion of the other build alternatives.
- Alternative D is consistent with the policy framework of the SCAG 2001 Regional Transportation Plan (RTP) calling for no expansion of LAX, which is located in a highly urbanized area with substantial populations exposed to the effects of airport operations, but rather directing future growth in regional

aviation activity to other existing and planned major airports in the region where substantial growth in population and jobs is expected to occur over the next two decades.

In summary, each of the proposed alternatives are considered to be part of a regional airport plan; however, Alternative D would be most responsive to the type of regional plan implied within the resolution by the Coalition for a Truly Regional Airport Plan. It should be noted, however, that while all of the proposed build alternatives were formulated within a regional context and Alternative D is the most responsive to the type of regional airport plan desired by the coalition for a Truly Regional Airport Plan, it is not within the jurisdiction and responsibility of LAWA alone to complete such a plan. Through the current master plans being developed by LAWA for LAX, Ontario Airport, and Palmdale Airport, and through LAWA's continued willingness to work in cooperation with other agencies in developing such a plan, LAWA is working to address regional aviation needs.

AR00006-2

Comment:

RESOLUTION NO. R97-55

A RESOLUTION OF THE ALHAMBRA CITY COUNCIL OPPOSING EXPANSION OF THE LOS ANGELES INTERNATIONAL AIRPORT (LAX)

WHEREAS, the City of Los Angeles Department of Airports (DOA) seeks to add additional runways and flights to and from LAX to quadruple its passenger and cargo capacity rather than utilize other DOA properties, or other regional airports in a "fair share" balance within the five county region of Ventura, Los Angeles, San Bernardino, Riverside and Orange Counties; and,

WHEREAS, LAX's expansion plans will result in even higher levels of hazardous air pollution, noise pollution, and air traffic congestion which will have a severe impact on the health, safety, and quality of life of residents in the City of Alhambra; and,

WHEREAS, the City experiences low-flying aircraft an average of 30 percent of the days each year based on poor weather conditions at LAX, and these number of days will likely increase to at least half the days each year due to the higher air traffic volume and consequent more frequent use of the City's airway; and,

WHEREAS, LAX's expansion plans will result in a continuous flow of low flying commercial aircraft over the City of Alhambra, thereby destroying the quiet ambience of the bedroom community and making residential property less desirable; and,

WHEREAS, LAX expansion plans are vehemently opposed by other communities; such as, Inglewood, Hawthorne, El Segundo, Redondo Beach and Monterey Park who will also suffer from the impacts of increase air traffic into LAX; and,

WHEREAS, LAX's expansion plans will do more harm than good for the Los Angeles area commerce by devaluing property located along the flight paths and driving businesses and homeowners to leave; and,

WHEREAS, LAX's expansion plans are unrealistic attempt to accommodate all of the Los Angeles area's air transportation needs into one of the nation's smallest metropolitan airports; and,

NOW, THEREFORE, BE IT RESOLVED, by the Alhambra City Council as follows:

SECTION ONE: This Council hereby opposes the expansion of LAX and urges our State and Federal Legislators to enact legislation that requires environmental studies on the negative impacts of low flying aircraft on communities that lie within the flight paths of airports;

SECTION TWO: The City Clerk shall certify to the adoption of the Resolution and shall send copies of same to Federal and State Representatives, the Federal Aviation Agency, the Los Angeles Department of Airports, Los Angeles County Board of Supervisors, San Gabriel Valley Council of Governments and the Southern California Association of Governments.

3. Comments and Responses

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-3

Comment:

Resolution No. 99-09

A Resolution of the Town Council of the Town of Apple Valley encouraging the development of aviation facilities in areas experiencing growth in demand for such facilities.

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation through the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Materplan for Los Angeles International (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion given LAX's location in the built-out intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for saving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

Now, therefore, be it resolved that:

It is the policy of the Town Council of the Town of Apple Valley to encourage the development of aviation facilities in areas experiencing growth in demand, and

NOW, THEREFORE, BE IT FURTHER RESOLVED that:

The Town of Apple Valley urges the Southern California Association of Governments and its Aviation Task Force to prepare a long-range Regional Airport Plan for Southern California that includes one or more fully developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-4**Comment:**

RESOLUTION NO. 01-C11

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF AZUSA, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding the LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many others commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF AZUSA, CALIFORNIA, DOES RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

That the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

That the Assistant City Clerk shall certify to the passage and adoption of this resolution and enter it into the book of original resolutions.

Response:

Comment noted. Please see Response to Comment AR00006-1.

3. Comments and Responses

AR00006-5

Comment:

RESOLUTION NO. 1999-45

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BANNING, CALIFORNIA SUPPORTING SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) AND ITS AVIATION TASK FORCE IN THEIR PREPARATION OF A LONG-RANGE REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Long Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year, and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given the location of LAX in the built-out intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest in growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern, California; and

WHEREAS, the development of airports based on research in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW THEREFORE, BE IT RESOLVED, that SCAG affirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand; and

BE IT FURTHER RESOLVED, that the City Council of the City of Banning supports the Southern California Association of Government and its Aviation Task Force in their preparation of a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passengers and cargo operations among the region's commercial aviation facilities; with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-6

Comment:

RESOLUTION NO. 3795-1999

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BARSTOW CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, Expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, Airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX, which will be paid for by regional tax payers; and

WHEREAS, There are many other commercial airports in Southern California, some with significant histories as commercial airports and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in the air commerce in Southern California; and

WHEREAS, The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED that the City of Barstow calls upon the communities of Southern California (including the City of Los Angeles) and the Counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura, the State of California, and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-7

Comment:

RESOLUTION NO. 2000-09

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BELL, CALIFORNIA CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

3. Comments and Responses

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, that the City of Bell calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-8

Comment:

RESOLUTION NO. 99-59

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BELL GARDENS CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX

NOW, THEREFORE, BE IT RESOLVED, that the City of Bell Gardens calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-9

Comment:

RESOLUTION NO. 99-71

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BELLFLOWER CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, such an expansion will greatly increase the number of flights into LAX, double ground traffic going to and from LAX, and create enormous adverse noise and air pollution impacts upon surrounding communities and may cost 12 billion dollars; and

WHEREAS, Southern California has several airports that handle commercial and cargo traffic; and

WHEREAS, these airports are located in areas projected for the greatest growth in population and employment over the next twenty years while communities surrounding LAX are projected to grow the least; and

WHEREAS, developing airport capacity near high growth communities may be an environmentally superior, lower-cost and more equitable strategy than expanding LAX.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BELLFLOWER, AS FOLLOWS:

3. Comments and Responses

SECTION 1. The City Council of the City of Bellflower supports the call for a regional airport plan for Southern California.

SECTION 2. The Mayor, or presiding officer, is hereby authorized to affix his signature to the Resolution signifying its adoption by the City Council of the City of Bellflower, and the City Clerk, or her duly appointed deputy, is directed to attest thereto.

SECTION 3. The City Administrator, or duly appointed staff, is hereby directed to draft and send Letters of Support to the proponents of a regional airport plan, the City's State representatives and to any other appropriate and concerned parties, and the Mayor or presiding officer, is hereby authorized to affix his signature to the Letters of Support.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-10

Comment:

RESOLUTION NO. 99-642

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BLYTHE CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment, over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burden on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Blythe calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional Representatives to join together in developing the Regional Airport Plan for Southern California that

constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-11

Comment:

RESOLUTION NO. 10951

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BUENA PARK, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic to and from LAX; and

WHEREAS, communities in the vicinity of LAX and John Wayne Airport which already experience adverse environmental impacts from the operations of the airport can expect increased noise and air pollution, increased traffic congestion and air pollution from ground traffic; and

WHEREAS, there are many other existing and proposed commercial airports in Southern California, including the former Marine Corps Air Station, El Toro, expected to experience increased growth in population and employment over the next 20 years; and

WHEREAS, developing airport capacity near high growth communities may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environment burden on communities near LAX;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF BUENA PARK calls upon the communities of Southern California, including the City of Los Angeles, the counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; the Southern California Association of Governments, and our congressional representatives to join together in developing a truly Regional Airport Plan for Southern California, including the former Marine Corps Air Station, El Toro, in Southern California, to serve the expanding air commerce marketplace in an equitable and fair share allocation of the demand for air travel.

Response:

Comment noted. Please see Response to Comment AR00006-1. In addition, please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

AR00006-12

Comment:

RESOLUTION NO. 99-5

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CALIMESA, CALIFORNIA, IN SUPPORT OF A REGIONAL AIRPORT IN THE INLAND AREA

3. Comments and Responses

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED THAT: SCAG affirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand; and

BE IT FURTHER RESOLVED by the City Council of the City of Calimesa that the cities and counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, shall prepare a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-13

Comment:

RESOLUTION NO. 99-015

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CARSON, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, Airport officials estimate LAX improvements will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, There are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, The development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, the City Council of the City of Carson calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-14

Comment:

RESOLUTION NO. 99-34

A RESOLUTION OF THE CITY COUNCIL FOR THE CITY OF CATHEDRAL CITY, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Matter Plan for the Los Angeles International Airport (LAX) which anticipated expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

3. Comments and Responses

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and,

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burden on communities near LAX.

NOW, THEREFORE, the City Council of the City of Cathedral City, California, does hereby Resolve, Declare, Determine and Order as follows:

SECTION 1. That the City of Cathedral City join with other communities of Southern California in the development of a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

SECTION 2. That the City Clerk shall certify to the passage and adoption of this Resolution; shall enter the same in the book of original Resolutions of said City; and shall make a minute of passage and adoption thereof in the records of the proceedings of the City Council of said City, in the minutes of the meeting at which Resolution is passed and adopted.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-15

Comment:

RESOLUTION No. 99R-20

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CHINO HILLS SUPPORTING A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA;

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double the ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvements will costs as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW THEREFORE, the City Council of the City of Chino Hills does resolve that, the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-16

Comment:

RESOLUTION NO. R-28-99

RESOLUTION OF THE CITY OF COLTON SUPPORTING CERTAIN ACTIONS TAKEN BY SAN BERNARDINO ASSOCIATED GOVERNMENTS IN THE DEVELOPMENT OF A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

3. Comments and Responses

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF COLTON DOES HEREBY RESOLVE, DETERMINE AND ORDER AS FOLLOWS:

Section 1. The City Council hereby acknowledges receipt of the joint resolution adopted by San Bernardino Associated Governments (SANBAG) on March 3, 1999, entitled:

JOINT RESOLUTION FOR GENERAL ASSEMBLY.

The City hereby acknowledges and concurs with the findings set forth in the joint resolution of SANBAG.

Section 2. The City Council hereby designates the SANBAG to serve as the lead agency for the purpose of preparing a long-range Regional Airport Plan for Southern California as set forth in the joint resolution of SANBAG.

Section 3. The City Council hereby requests SCAG reaffirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand, and

Section 4. The City Council hereby support the efforts of the cities and counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, in the preparation of a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Section 5. This Resolution shall take effect upon the date of its adoption.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-17

Comment:

RESOLUTION NO. 99-19

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CORONA CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX;

NOW, THEREFORE, BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF CORONA DOES HEREBY call upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-18

Comment:

RESOLUTION NO. 01-20

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COSTA MESA, CALIFORNIA, SUPPORTING A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, airport facilities are an important part of the infrastructure of Southern California in terms of supporting continued economic growth, tourism, business, and resident access to State, National, and International destinations; and

WHEREAS, projected demand for airline travel is expected to exceed existing and planned airport facilities; and

WHEREAS, the demand for additional airport facilities is regional in nature involving all of Southern California; and

WHEREAS, there are many commercial airports in Southern California, some with significant histories as commercial airports, recently converted to commercial or joint military and commercial airports, and others available as the result of military base closure; and

WHEREAS, a regional approach to the provision of airport facilities will ensure that no one community is excessively subjected to the adverse environmental and social impacts associated with the operation of airport facilities; and

WHEREAS, the City of Costa Mesa is already adversely impacted by the operation of John Wayne Airport (JWA) at its current level of operation;

3. Comments and Responses

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

That the City of Costa Mesa hereby supports a regional approach to addressing projected demand for airline travel, including the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura.

Further, that the City of Costa Mesa hereby supports a careful evaluation of opportunities for the expansion of existing commercial, joint military and commercial use facilities, and military facilities available as the result of base closure, to meet projected demand, excluding JWA which already adversely impacts residents and businesses in the surrounding area, including the City of Costa Mesa.

Response:

Comment noted. Please see Response to Comment AR00006-1. In addition, please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

AR00006-19

Comment:

RESOLUTION NO. 00-6022

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COVINA CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, be it resolved that the City Council of the City of Covina calls upon the communities of Southern California, including the City of Los Angeles; the counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that

constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-20

Comment:

RESOLUTION NO. 00-13

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CUDAHY, CALIFORNIA, TO SUPPORT A JOINT PLAN TO DEVELOP A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA THAT CONSTRAINS LAX TO OPERATE WITHIN CURRENT CAPACITIES, AND ENCOURAGES THE DEVELOPMENT OF OTHER COMMERCIAL AIRPORTS IN SOUTHERN CALIFORNIA TO SERVE THE EXPANDING AIR COMMERCE MARKET PLACE.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, Airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environment burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, that City of Cudahy calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

3. Comments and Responses

AR00006-21

Comment:

RESOLUTION NO. 5393

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CYPRESS, CALIFORNIA, IN SUPPORT OF A TRULY REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per years; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic to and from LAX; and

WHEREAS, communities in the vicinity of LAX and John Wayne Airport (JWA) already experience adverse environmental impacts from the operations of the airport and can expect increased noise and air pollution, increased traffic congestion and air pollution from ground traffic; and

WHEREAS, there are many other existing and proposed commercial airports in Southern California, including the former Marine Corps Air Station, El Toro, expected to experience increased growth in population and employment over the next twenty years; and

WHEREAS, developing airport capacity near high growth communities may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environment burden on other communities;

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Cypress, supports the Orange County Regional Airport Authority's desire to join the communities and representatives of Southern California together, along with the State of California and the Southern California Association of Governments, in developing a truly Regional Airport Plan for Southern California, which includes the former Marine Corps Air Station, El Toro, to serve the expanding air commerce marketplace in an equitable and fair share allocation of the demand for air travel.

Response:

Comment noted. Please see Response to Comment AR00006-1. In addition, please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

AR00006-22

Comment:

RESOLUTION NO. 1999-06

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DESERT HOT SPRINGS, CALIFORNIA CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

Whereas, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

Whereas, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

Whereas, communities in the vicinity of LAX already experiences enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

Whereas, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

Whereas, there are many other commercial airports in Southern California: some with significant histories as commercial airports; and

Whereas, some facilities were recently converted to commercial or joint military and commercial airports; and

Whereas, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years while LAX is near the communities expected to experience the least amount of growth in the same period; and

Whereas, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environment superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

Whereas, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environment burden on communities near LAX.

Now, therefore, be it resolved that, the City Council of the City of Desert Hot Springs, California, supports the efforts by Riverside County Transportation Commission in the development of a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-23

Comment:

RESOLUTION NO 6366

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DOWNEY, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX), which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year, and, its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic especially from dramatic increases in the activity of diesel trucks around the airport; and,

3. Comments and Responses

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX, which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, be it resolved that the City of Downey calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-24

Comment:

RESOLUTION NO. 4091

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EL SEGUNDO, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposal will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF EL SEGUNDO, CALIFORNIA, DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The City of El Segundo, California, calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Section 2. The City Clerk shall certify to the passage and adoption of this Resolution; shall enter the same in the book of original Resolutions of said City, and shall make a minute of the passage and adoption thereof in the records of the proceedings of the City Council of said City, in the minutes of the meeting at which the same is passed and adopted.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-25

Comment:

RESOLUTION NO. 99-86

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF FONTANA ENCOURAGING THE DEVELOPMENT OF A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within Southern California is forecasted to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for the Los Angeles International airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

3. Comments and Responses

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in high-growth areas will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED the city Council of the City of Fontana encourages the cities and counties of Southern California to work with the Southern California Association of Governments and its Aviation Task Force in preparing a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airlines passengers and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impact associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-26

Comment:

RESOLUTION NO. 8235-99

RESOLUTION OF THE ORANGE COUNTY REGIONAL AIRPORT AUTHORITY SUPPORTING A REGIONAL APPROACH TO AIR TRANSPORTATION

WHEREAS, Southern California communities are now analyzing the most equitable and efficient means to serve the region's air passenger needs in the 21st century; and

WHEREAS, SCAG and other independent sources indicate that the region's air passenger and cargo demand will double over the next twenty years; and

WHEREAS, the capacity of existing public use airports are inadequate to serve projected demand over the next twenty years; and

WHEREAS, the Los Angeles Department of Airports initiated a revision of the LAX Master Plan to expand its service level from the current 60 million annual passengers to an expected 98 million annual passengers, and its cargo activity from 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, communities surrounding LAX are concerned about the potential increased environmental impacts, such as increases in noise, air pollution, and traffic congestion from the proposed expansion of LAX; and

WHEREAS, the Southern California Association of Governments (SCAG) has taken a policy position that each County within the Southern California region should be responsible for serving its own air passenger and cargo demand; and

WHEREAS, Orange County's population is expected to grow from 2.7 million to 3.5 million within the next decade. John Wayne Airport currently serves only half of its air passenger demand and 4% of its cargo needs, with the remainder served by LAX, Ontario Airport and other airports; and

WHEREAS; it is unreasonable and inequitable to rely on LAX to serve the vast majority of the region's air transportation needs; and

WHEREAS, developing airport capacity near high growth areas is an environmentally superior, low cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, El Toro MCAS has the capability, in conjunction with John Wayne Airport, to serve all of Orange County's air passenger and cargo needs well into the next century, with less noise and traffic impacts than LAX experiences at its current capacity; and

NOW, THEREFORE, THE ORANGE COUNTY REGIONAL AIRPORT AUTHORITY RESOLVES that the Southern California community join together to develop a Regional Airport Plan for Southern California that develops the capacity of other airports beside LAX, and specifically focuses on airports like El Toro that are located in and would directly serve high-growth communities, such as Orange County.

Response:

Comment noted. Please see Response to Comment AR00006-1. In addition, please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

AR00006-27

Comment:

RESOLUTION NO. 4485

RESOLUTION OF THE CITY COUNCIL, OF THE CITY OF GARDENA, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double the ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, DOES HEREBY RESOLVE, DECLARE, AND DETERMINE AS FOLLOWS;

SECTION 1. That the City of Gardena, California, does hereby call upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together to develop the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

3. Comments and Responses

SECTION 2. That the City Clerk shall certify to the passage and adoption of this resolution; shall cause the same to be entered among the original Resolutions of said City, and shall make a minute of the passage and adoption thereof in the records of the proceedings of the City Council for the meeting at which the same is passed and adopted.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-28

Comment:

RESOLUTION NO. 99-04

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GRAND TERRACE, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposal will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, THAT: the City Council of the City of Grand Terrace calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-29**Comment:**

RESOLUTION NO. 6509

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HAWTHORNE, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Dept. of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Hawthorne calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-30**Comment:**

RESOLUTION NO. 3399

3. Comments and Responses

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED THAT:

SCAG affirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand, and

NOW, THEREFORE, BE IT FURTHER RESOLVED THAT:

The Cities and Counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, shall prepare a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger-and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-31

Comment:

RESOLUTION NO. 99-5951

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HERMOSA BEACH, CALIFORNIA, TO ADOPT A RESOLUTION CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Dept. of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million

passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year and,

WHEREAS, Expanding its passenger and cargo activity as proposal will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

BE IT FURTHER RESOLVED that the City of Hermosa Beach calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-32

Comment:

RESOLUTION NO. 99-15

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HESPERIA, CALIFORNIA, SUPPORTING THE PREPARATION OF A LONG-RANGE REGIONAL AIRPORT PLAN

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

3. Comments and Responses

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as \$12 billion and

[UNREADABLE TEXT]

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-33

Comment:

RESOLUTION NO. 99-15

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HIGHLAND, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as \$12 billion, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED THAT SCAG affirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand.

BE IT FURTHER RESOLVED that the cities and counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, shall prepare a long-range Regional Airport Plan for Southern California that includes one or more fully developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-34**Comment:**

RESOLUTION NO. 99-74

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HUNTINGTON PARK CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increase congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF HUNTINGTON PARK DOES RESOLVE AS FOLLOWS:

SECTION 1. The City of Huntington Park calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

SECTION 2. The City Clerk shall certify to the adoption of this Resolution.

Response:

Comment noted. Please see Response to Comment AR00006-1.

3. Comments and Responses

AR00006-35

Comment:

RESOLUTION NO. 6215

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF INDIO, CALIFORNIA, SUPPORTING DEVELOPING A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA THAT CONSTRAINS THE LAX TO OPERATE WITHIN THE CAPACITY OF ITS EXISTING FACILITIES AND DEVELOPS THE CAPACITY OF THE MANY OTHER COMMERCIAL AIRPORTS IN SOUTHERN CALIFORNIA TO SERVE THE EXPANDING AIR COMMERCE MARKETPLACE.

WHEREAS, the Los Angeles Dept. of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposal will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Indio, California does hereby resolves as follows:

The communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains the LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-36**Comment:**

RESOLUTION NO. 99-27

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF INGLEWOOD, CALIFORNIA, REQUESTING THAT THE CITY COUNCIL OF THE CITY OF LOS ANGELES, CALIFORNIA, OPPOSE EXPANSION OF LOS ANGELES WORLD AIRPORTS UNLESS AND UNTIL THE NEGATIVE IMPACTS OF AIRCRAFT NOISE ON THE CITY OF INGLEWOOD ARE ADDRESSED AND ABATED.

WHEREAS, over ninety percent of aircraft arrivals at the Los Angeles World Airport (LAWA) travel over the City of Inglewood, California; and,

WHEREAS, Inglewood is disproportionately impacted by pollutants generated by air and surface street traffic, in relation to other cities; and,

WHEREAS, fifty percent of surface traffic going to LAWA goes through Inglewood causing traffic congestion, street deterioration and an increase in accidents; and,

WHEREAS, the extraordinary amount of traffic generated by LAWA through the City of Inglewood places an unfair burden on the public safety services of the City of Inglewood, thereby reducing the availability of police, fire and paramedic services for the citizens of Inglewood; and,

WHEREAS, aircraft noise contributes to deterioration of neighborhoods through higher transience rates and increased poverty; and,

WHEREAS, additional impacts to neighborhoods include increased crime associated with activities of poverty-stricken persons who can least afford to move into quieter areas; and,

WHEREAS, the Inglewood City Council is calling upon the Los Angeles City Council to direct the LAWA Board of Airport Commissioners to mitigate the negative impacts on the Inglewood community caused by the increasing number of passengers and flights generated by LAWA.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Inglewood, California, that the City Council requests that the City Council of the City of Los Angeles oppose any expansion of LAWA until and unless the following actions are taken to mitigate the negative impacts on the City of Inglewood generated by LAWA;

SECTION 1) The City Council of the City of Los Angeles shall support legislation that directs the United States Department of Transportation to lower the existing noise mitigation threshold from 65db CNEL to 55db CNEL; and,

SECTION 3) The City Council of the City of Los Angeles direct the LAWA Board of Airport Commissioners to accelerate sound-proof insulation and acquisition of affected properties with a goal of 100% mitigation within the next six years; and,

SECTION 4) The acceleration of sound-proof insulation shall also include the elimination of any stipulation or requirement that property owners in the City of Inglewood give up their rights to airspace by signing an avigation easement in order to obtain funding through LAWA; and,

SECTION 5) The City Council of the City of Los Angeles shall direct the LAWA Board of Airport Commissioners to provide a minimum of \$25 million annually to mitigate the negative impacts of increased air and surface traffic, aircraft noise, and the resultant increase in crime and strain on Inglewood's public safety services.

BE IT FURTHER RESOLVED that the City Council of the City of Inglewood, California, will support the efforts of the City Council of the City of Los Angeles, and the Los Angeles World Airport Board of Airport Commissioners for regional expansion once the above mitigation efforts are addressed and provided

3. Comments and Responses

that any expansion or growth will not result in any additional flights over the City of Inglewood and any additional runways at LAWA be located outside of the southern boundaries of the City of Inglewood.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-37

Comment:

RESOLUTION NO. CC-9810-98

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LAWNDAL, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as 12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF LAWNDAL, CALIFORNIA DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1: The City of Lawndale calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-38**Comment:**

RESOLUTION NO. 2065

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOMA LINDA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX), which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, in addition to greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX;

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Loma Linda calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-39**Comment:**

RESOLUTION NO. 98-57

3. Comments and Responses

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOMITA CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvement will cost as much as \$ 12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, that:

1) The City Council of the City of Lomita calls upon the Los Angeles Department of Airports to encourage efforts in the region to mitigate current traffic impacts from the airport as well as future impacts.

2) The City Council of the City of Lomita calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-40

Comment:

RESOLUTION NO. 1834

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOS ALAMITOS SUPPORTING A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience adverse environmental impacts from the operations of the airport can expect increased noise and air pollution, increased traffic congestion and air pollution from ground traffic; and

WHEREAS, there are many other existing and proposed commercial airports in Southern California, including the former Marine Corps Air Station, El Toro, expected to experience increased growth in population and employment over the next twenty years; and

WHEREAS, developing airport capacity near high growth communities may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS,, the development of theses regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environment burden on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Los Alamitos, that:

The City of Los Alamitos calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; the Southern California Association of Governments, and our congressional representatives to join together in developing a truly Regional Airport Plan for Southern California that develops the capacity of all other existing and proposed commercial airports, including the former Marine Corps Air Station, El Toro, in Southern California, to serve the expanding air commerce marketplace in an equitable and fair share allocation of the demand for air travel.

Response:

Comment noted. Please see Response to Comment AR00006-1. In addition, please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

AR00006-41

Comment:

RESOLUTION NO. 5431

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MANHATTAN BEACH, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR THE SOUTHERN CALIFORNIA AREA

WHEREAS, the County of Los Angeles Department of Airports has initiated a revision of the master plan for Los Angeles World Airport (LAX) which anticipates expanding its passenger activity from the current 60 million passengers per year to an expected 98 million passengers per year and an increase in cargo activity from the current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operation of the airport can expect increased noise and air pollution from overhead aircraft and greatly increased congestion and air pollution from ground traffic; and

3. Comments and Responses

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the cost of transportation improvements required to facilitate access to LAX which will have to be borne by the regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant experience as commercial airports others recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, cost effective and equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will encourage job creation and economic development throughout the region and reduce the public health and environmental burdens on the communities surrounding LAX.

NOW, THEREFORE. BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF MANHATTAN BEACH, CALIFORNIA DOES HEREBY DECLARE, FIND, DETERMINE AND ORDER AS FOLLOWS:

SECTION 1. The City of Manhattan Beach calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura; the State of California; and the congressional representatives of these areas to join together in developing a Regional Airport Plan for Southern California.

SECTION 2. The Regional Airport Plan for Southern California must develop the capacity of the other commercial airports in Southern California to serve the expanding air commerce marketplace.

SECTION 3. The Regional Airport Plan for Southern California should limit the growth of LAX to a level acceptable to the surrounding communities after significant mitigation measures which address the negative impacts on these communities have been certified and implemented.

SECTION 4. The City Clerk shall make this Resolution reasonably available for public inspection within thirty (30) days of the date this Resolution is adopted.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-42

Comment:

RESOLUTION NO. 99-2246

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MONTCLAIR CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year, and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX, which already experience enormous adverse environmental impacts from the operations of the airport, can expect greatly increased noise and air

pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next 20 years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Montclair calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-43

Comment:

RESOLUTION NO. 10375

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MONTEREY PARK, CALIFORNIA CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from the current 60 million passengers per year to an expected 98 million passengers per year and cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposal will greatly increase the number of flights and potentially double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experienced enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion dollars; not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

3. Comments and Responses

WHEREAS, there are many other commercial airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while Lax is near the communities expected to experience the least growth in the same period; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period: and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Monterey Park calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-44

Comment:

RESOLUTION NO. 99-12

A RESOLUTION OF THE CITY OF MORENO VALLEY SUPPORTING THE DEVELOPMENT AND IMPLEMENTATION OF A "REGIONAL AIRPORT PLAN" FOR SOUTHERN CALIFORNIA

WHEREAS, the City of Moreno Valley has entered into an agreement with the cities of Perris and Riverside and the County of Riverside to create the March Joint Powers Authority (JPA) to develop appropriate uses for March Air Base; and

WHEREAS, the JPA created the "March Inland Port" as a joint use commercial airport in cooperation with the United States Air Force; and

WHEREAS, the development of commercial cargo operations at the March Inland Port is a key strategy in the pursuit of Economic Development and the creation of new jobs by the JPA; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year, and

WHEREAS, expanding passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development opportunities at LAX may be an environmentally superior, lower cost and more equitable strategy for serving future growth in air commerce in Southern California; and

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-45

Comment:

RESOLUTION NO. 99-688

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MURRIETA CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX;

3. Comments and Responses

NOW THEREFORE BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF MURRIETA DOES HEREBY call upon the communities of Southern California including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-46

Comment:

RESOLUTION NO. 8-10-99-3

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF NEEDLES, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX, and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Needles calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-47**Comment:**

RESOLUTION NO. 99-71

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PALM DESERT, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX in nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED as follows:

The City of Palm Desert calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-48**Comment:**

RESOLUTION NO. 19545

3. Comments and Responses

OF THE CITY COUNCIL OF THE CITY OF PALM SPRINGS, CALIFORNIA, AUTHORIZING THE CITY OF PALM SPRINGS TO JOIN THE COACHELLA VALLEY ASSOCIATION OF GOVERNMENTS IN CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burden on communities near LAX,

NOW THEREFORE BE IT RESOLVED that the City of Palm Springs calls for the Coachella Valley Association of Governments to call upon the communities of Southern California including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional Representatives to join together in developing the Regional Airport Plan for Southern California that develops the capacity of the commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-49

Comment:

RESOLUTION R98-54

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PALOS VERDES ESTATES CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS: The Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS: Expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS: Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS: Airport officials estimate LAX improvement will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and,

WHEREAS: There are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS: Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS: Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS: The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX:

NOW, THEREFORE, BE IT RESOLVED, THAT: The City of Palos Verdes Estates calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-50

Comment:

RESOLUTION NUMBER 2697

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the March Joint powers Authority (JPA) created the "March Inland Port" as a joint use commercial airport in cooperation with the United States Air Force; and

WHEREAS, the development of commercial cargo operations at the march Inland Port is a key strategy in the pursuit of economic development and the creation of new jobs the March JPA; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

3. Comments and Responses

WHEREAS, expanding its passenger and cargo activity as proposal will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Perris as follows:

SECTION 1. The communities of Southern California, including the City of Los Angeles; the counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-51

Comment:

RESOLUTION NO. 99-35

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RANCHO MIRAGE CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to a expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and,

WHEREAS, there are many other commercial airports in southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burden on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED THAT, the City of Rancho Mirage calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional Representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-52

Comment:

RESOLUTION NO. 5664

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDLANDS CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

3. Comments and Responses

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. The City of Redlands calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-53

Comment:

RESOLUTION NO. 8043

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDONDO BEACH CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, be it resolved, that the City of Redondo Beach calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Be it resolved further, that the City Clerk shall certify the passage and adoption of this resolution, shall enter the same in the Book of Resolutions of said City, and shall cause the action of the City Council in adopting the same to be entered in the official minutes of said City Council.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-54

Comment:

RESOLUTION NO. 4541

A RESOLUTION OF THE CITY OF RIALTO, STATE OF CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, The Los Angeles Dept. of Airports has initiated a revision of the Master plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, Expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, Airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, There are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

3. Comments and Responses

WHEREAS, The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF RIALTO, that the City of Rialto calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-55

Comment:

RESOLUTION NO. 19443

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA, ENDORSING SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS JOINT RESOLUTION FOR GENERAL ASSEMBLY DRAFT DATED FEBRUARY 23,1999, AND FOR GENERAL ASSEMBLY SUPPORTING THE PREPARATION OF A LONG-RANGE REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 69 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system; and

WHEREAS, the Southern California Association of Governments has provided the City of Riverside with a draft Resolution dated February 23, 1999, supporting joint preparation of a long-range Regional

Airport Plan by the Cities and Counties of Southern California working through SCAG and its Aviation Task Force, and City of Riverside endorses such draft resolution.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Riverside, California, that:

Section 1: The City of Riverside encourages the development of aviation facilities in areas experiencing growth in demand.

Section 2: The City of Riverside endorses the Southern California Association of Governments draft resolution dated February 23, 1999, entitled Joint Resolution for General Assembly.

Section 3: The City of Riverside supports the Cities and Counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, in preparation of a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-56

Comment:

RESOLUTION NO. 19442

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA, ENDORSING THE MARCH JOINT POWERS AUTHORITY RESOLUTION NO. JPA-99-01 AND SUPPORTING THE DEVELOPMENT AND IMPLEMENTATION OF A "REGIONAL AIRPORT PLAN" FOR SOUTHERN CALIFORNIA.

WHEREAS, the March Joint Powers Authority (JPA) created the "March Inland Port" as a joint use commercial airport in cooperation with the United States Air Force; and

WHEREAS, the development of commercial cargo operations at the March Inland Port is a key strategy in the pursuit of economic development and the creation of new jobs by the March JPA; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by taxpayers in the region; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint use military and commercial airports; and

3. Comments and Responses

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be environmentally superior, demand less public investment, and offer a more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

WHEREAS the Joint Powers Commission of the March JPA adopted Resolution No. JPA-99-01 on January 20, 1999, encouraging the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura, the State of California and the Southern California Congressional delegation to join together in developing a new "Regional Airport Plan" for Southern California that constrains LAX to operate within the capacity of its existing facilities and develop the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace; and

WHEREAS, the City of Riverside City Council endorses Resolution No. JPA-99-01 and supports development of a Regional Airport Plan.

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Riverside, California, that:

Section 1: The City of Riverside endorses the March JPA Resolution No. JPA-99-01.

Section 2: The communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura, the State of California, and the Southern California Congressional delegation be encouraged to join together and the City of Riverside supports joining together in developing a new "Regional Airport Plan" for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-57

Comment:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ROSEMEAD SUPPORTING THE DEVELOPMENT OF A REGIONAL AIRPORT SYSTEM FOR SOUTHERN CALIFORNIA

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED THAT SCAG affirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand, and

NOW, THEREFORE, BE IT RESOLVED THAT the Cities and Counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, shall prepare a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-58

Comment:

RESOLUTION NO. 1999-41

RESOLUTION OF THE MAYOR AND COMMON COUNCIL OF THE CITY OF SAN BERNARDINO CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest appears to be a high-cost, high impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and

3. Comments and Responses

employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COMMON COUNCIL OF THE CITY OF SAN BERNARDINO AS FOLLOWS:

The Cities and Counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, shall prepare a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-59

Comment:

RESOLUTION NO. 99-22

JOINT RESOLUTION FOR GENERAL ASSEMBLY

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing Commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED that SCAG affirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand, and

NOW, THEREFORE, BE IT FURTHER RESOLVED that the Cities and Counties of Southern California, working through the Southern California Association of Governments and its Aviation Task Force, shall prepare a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-60

Comment:

RESOLUTION NUMBER 9327 (CCS)

(City Council Series)

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA MONICA CALLING FOR THE DEVELOPMENT OF A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the City of Los Angeles Department of Airports has initiated a revision to the Master Plan for Los Angeles International Airport (LAX) in order to expand the passenger and cargo capacity of LAX to accommodate an expected 98 million annual passengers and 4.2 million tons of annual cargo load by the year 2015; and

WHEREAS, communities in the vicinity of LAX already experience enormous adverse environmental impacts from operations of the airport; and

WHEREAS, the proposed expansion is expected to further impact these communities as a result of increased noise, air pollution and road and freeway congestion; and

WHEREAS, improvements to LAX to accommodate the expected growth in passenger and cargo activity, which could cost as much as twelve billion dollars, plus the costs of transportation improvements required to facilitate access to LAX, will be paid for by regional taxpayers; and

WHEREAS, there are many airports in Southern California, some with significant histories as commercial airports, some which have recently been converted to commercial airports and some military airports which are planned to be converted to commercial or joint-use airports; and

WHEREAS, several of these airports are located in areas of Southern California

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-61

Comment:

RESOLUTION NUMBER 4878

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SEAL BEACH CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

3. Comments and Responses

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Seal Beach calls upon the communities of Southern California, including the City of Los Angeles; the counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-62

Comment:

RESOLUTION NO. 6560

CITY OF SOUTH GATE LOS ANGELES COUNTY, CALIFORNIA

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SOUTH GATE SUPPORTING THE DEVELOPMENT OF A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 62 million passengers per year to and expected 90 million passengers per year and its cargo activity from its current 2.1 million tons per year to an expected 4.2 million tons per year, and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience adverse environmental impacts from the operations of the airport can expect increased noise and air pollution from overhead aircraft and increased congestion and air pollution from ground traffic around the airport; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years; and

WHEREAS, developing airport capacity near high growth communities may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SOUTH GATE DOES FIND, DETERMINE, RESOLVE AS FOLLOWS:

SECTION 1. The communities of Southern California, including the City of South Gate; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives join together in developing a Regional Airport Plan for Southern California that is balanced in developing the capacity of its existing facilities and to develop the capacity of the many other commercial airports in Southern California so as to serve the expanding air commerce marketplace.

SECTION 2. The City Clerk shall certify to the passage and adoption of this Resolution which shall take effect and be in force immediately.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-63

Comment:

RESOLUTION NO. 2001-20

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF STANTON, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX and John Wayne Airport which already experience enormous adverse environmental impact from the operations of the airport can expect greatly increased noise and ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports; and

3. Comments and Responses

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX; and

NOW, THEREFORE LET IT BE RESOLVED that the City Council of Stanton calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-64

Comment:

RESOLUTION NO. 99-21

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF TEMECULA SUPPORTING THE DEVELOPMENT OF A SUBREGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

NOW BE IT RESOLVED by the City Council of the City of Temecula as follows:

Section 1. The City Council of the City of Temecula does hereby find, determine and declare as follows:

A. Access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region. Aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 tons of cargo per year by 2020.

B. The Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million per year.

C. Airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system.

D. The proposed expansion given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's needs for added aviation capacity.

E. There are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth.

F. Developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California.

G. The development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

Section 2. The City Council of the City of Temecula does hereby resolve that the City of Temecula supports the Southern California Association of Governments in its efforts to develop a Subregional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-65

Comment:

RESOLUTION 99-129

RESOLUTION CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS: The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS: Expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS: Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS: Airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS: There are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS: Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS: Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS: The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED that the City of Torrance calls upon the communities of Southern California, including the City of Los Angeles; the counties of Los Angeles, Orange, San

3. Comments and Responses

Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-66

Comment:

RESOLUTION NO. 99-02

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF TWENTYNINE PALMS, CALIFORNIA, SUPPORTING SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS POLICY TO ENCOURAGE THE DEVELOPMENT OF AVIATION FACILITIES IN AREAS EXPERIENCING GROWTH IN DEMAND

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system

THEREFORE, be it resolved that The City of Twentynine Palms supports SCAG's policy to encourage development of aviation facilities in areas experiencing growth in demand.

BE IT FURTHER RESOLVED that the City Council supports the preparation of a long-range Regional Airport Plan for Southern California.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-67**Comment:**

RESOLUTION NO. 5021

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF UPLAND CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS: The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS: Expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS: Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS: Airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS: There are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joining military and commercial airports; and

WHEREAS: Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS: Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving further growth in air commerce in Southern California; and

WHEREAS: The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED:

SECTION 1: The City of Upland calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-68**Comment:**

RESOLUTION NO. 99-17

3. Comments and Responses

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VICTORVILLE URGING THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS AND ITS AVIATION TASK FORCE TO PREPARE A LONG RANGE REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion given LAX's location in the built-out intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF VICTORVILLE encourages the development of aviation facilities in areas experiencing growth in demand; and

NOW THEREFORE, BE IT FURTHER RESOLVED THAT THE CITY COUNCIL OF THE CITY OF VICTORVILLE urges the Southern California Association of Governments and its Aviation Task Force to prepare a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-69

Comment:

RESOLUTION 2001-2539

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VILLA PARK CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60

million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, there are other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial operations; and

WHEREAS, several of these airports are located in areas of Southern California that are expected to experience the greatest growth in population and employment over the next twenty years; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, and lower-cost strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Villa Park hereby calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura, the State of California, and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that develops the capacity of all airports in Southern California to serve the expanding demand for air commerce.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-70

Comment:

RESOLUTION NO. 99-2028

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD OPPOSING THE MASTER PLAN PROPOSED BY THE CITY OF LOS ANGELES DEPARTMENT OF AIRPORTS AND CALLING FOR THE DEVELOPMENT OF A LONG TERM REGIONAL STRATEGIC PLAN FOR OUR AIR TRAFFIC NEEDS.

THE CITY COUNCIL OF THE CITY OF WEST HOLLYWOOD HEREBY RESOLVES AS FOLLOWS:

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, Expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, Airport officials estimate LAX improvement will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and,

WHEREAS, There are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

3. Comments and Responses

WHEREAS, Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period. For example, the City of Los Angeles owns huge tracks of land in fast-developing Palmdale surrounding the Palmdale Airport-and the local community strongly supports airport development to generate jobs and economic opportunities; and,

WHEREAS, Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX:

NOW, THEREFORE, BE IT RESOLVED that the City of West Hollywood opposes the current master plan framework, and calls upon the City of Los Angeles Airports Commission and the Department of Airports to reject any master plan revision that does not address long-term, regional air traffic needs.

BE IT FURTHER RESOLVED that the City of West Hollywood joins the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California; and

BE IT FURTHER RESOLVED that the City of Los Angeles restrict LAX to operate within the capacity of its existing facilities and to facilitate the development of capacity of the many other commercial airports in Southern California, including Palmdale, to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-71

Comment:

RESLO

A RESOLUTION OF
CITY OF WHITTIER
EXPANSION OF
INTERNATIONAL AIRPORT (LAX)

WHEREAS, the City of Los Angeles Department of Airports seeks to add additional runways and flights to and from LAX to double its passenger and cargo capacity rather than utilize other Los Angeles Department of Airport properties, or other regional airports in a "fair share" balance within the five (5) county regions of Ventura, Los Angeles, Riverside and Orange Counties; and

WHEREAS, the expansion of LAX will result in even higher levels of hazardous air pollution, noise pollution, and air traffic congestion which will have a severe impact on the health, safety, and quality of life of residents in the City of Whittier; and

WHEREAS, the expansion of LAX will result in the continuous flow of low flying commercial aircraft over the City of Whittier thereby destroying the quiet ambiance of the community and making residential property less desirable; and

WHEREAS, the expansion of LAX has been opposed by the cities of Monterey Park, Inglewood, Hawthorne, El Segundo and Redondo Beach who will also be impacted from increased air traffic into LAX associated with its expansion; and

WHEREAS, LAX's expansion plans are an unrealistic attempt to accommodate all of the Los Angeles area's air transportation need into one of the nation's smallest metropolitan airports.

THE CITY COUNCIL OF THE CITY OF WHITTIER DOES RESOLVE AS FOLLOWS:

SECTION 1. The City of Whittier opposes the expansion of LAX.

SECTION 2. Urge State and Federal legislatures to enact legislation that requires environmental studies on the negative impacts of low flying aircraft on communities that lie within the flight paths of airports.

SECTION 3. Instruct staff to closely follow the efforts of other San Gabriel Valley cities and other affected communities to see what efforts they are pursuing to prevent airport expansion plans from further deteriorating our residents' quality of life.

SECTION 4. The City Clerk shall certify to the passage and adoption hereof.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-72

Comment:

RESOLUTION NO. 99-05

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF YUCAIPA, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX), which anticipates expanding its passenger activity from a current 60-million passengers per year to an expected 98-million passengers per year and, its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year, and

WHEREAS, expanding LAX's passenger and cargo activity, as proposed, will greatly increase the number of flights and nearly double ground traffic going to and from LAX, and

WHEREAS, communities in the vicinity of LAX, which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft and greatly increased congestion and air pollution from ground traffic, especially from dramatic increase in the activity of diesel trucks around the airport, and

WHEREAS, airport officials estimate the LAX improvements will cost as much as 12 billion, not including the costs of transportation improvements required to facilitate access to LAX, which will be paid for by regional tax payers, and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports, and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period, and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California, and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

3. Comments and Responses

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF YUCAIPA, CALIFORNIA, DOES HEREBY RESOLVE, DETERMINE AND ORDER AS FOLLOWS:

Section 1. That the City of Yucaipa hereby calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace,

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-73

Comment:

RESOLUTION NO. 99-4

RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF YUCCA VALLEY, CALIFORNIA, SUPPORTING SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS POLICY TO ENCOURAGE THE DEVELOPMENT OF AVIATION FACILITIES IN AREAS EXPERIENCING GROWTH IN DEMAND

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED that the Town Council of the Town of Yucca Valley supports SCAG's policy to encourage development of aviation facilities in areas experiencing growth in demand

BE IT FURTHER RESOLVED that the Town Council supports the preparation of a long-range Regional Airport Plan for Southern California.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-74

Comment:

A RESOLUTION OF THE SOUTH BAY CITIES COUNCIL OF GOVERNMENTS

SOURCE: LAX Standing Committee

WHEREAS, the regional need for commercial airport services is far greater than can be satisfied by a single location; and

WHEREAS, the City of Los Angeles Department of Airports is developing a Master Plan for LAX to guide the development and operation of the airport through the year 2015; and

WHEREAS, the proposed expansion includes nearly doubling the number of passengers serviced annually by the airport and increasing cargo operations by nearly 150 percent; and

WHEREAS, the impacts of LAX on the SCAG region are already substantial and multifaceted, including economic, safety, noise, crime, vehicular traffic, and air quality, to mention a few; and

WHEREAS, the impacts of noise, crime, vehicular traffic and air quality of the South Bay Region of SCAG are disproportionate to the benefits provided to those cities by LAX;

WHEREAS, there has been no study of the environmental impacts LAX has on the SCAG region since 1978; and

WHEREAS, the development scenarios presented by LAX offer no alternatives other than expanding the operations at LAX within its existing boundaries; and

WHEREAS, air services should be dispersed throughout the region to maximize benefits to all communities within the region and minimize impacts to any one or small group of communities; and

WHEREAS, there are several other airports in the SCAG region, including John Wayne, Long Beach, Burbank, Ontario, March Air Force Base, El Toro MCAS, as well as property owned by Los Angeles in Palmdale purchased for siting a new airport; and

WHEREAS, several of these commercial airports in the SCAG region are also seeking to expand their operations.

NOW, THEREFORE, BE IT RESOLVED, that the South Bay Cities Council of Governments demands that SCAG consider the determination of consistency of the LAX Environment Impact Report with the Regional Transportation Plan only after the City of Los Angeles has demonstrated that it has made every effort to coordinate the proposed expansion of LAX with all other commercial airport facilities or possible future commercial airport facilities in the region.

The Clerk shall certify to the passage and adoption of this Resolution; and shall make a minute of the passage and adoption thereof in the records of the proceedings of the South Bay Cities Council of Governments in the minutes of the meeting at which the same is passed and adopted.

Response:

Comment noted. Please see Response to Comment AR00006-1 and Topical Response TR-RC-4 regarding Orange County air transportation demand.

3. Comments and Responses

AR00006-75

Comment:

RESOLUTION No. 15/1998-99

RESOLUTION CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, Expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, School Districts and communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, There are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, THAT the Board of Education of the El Segundo Unified School District calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-76

Comment:

Inglewood Unified School District Board of Education LAX Resolution, Approved March 24, 1999

WHEREAS, the Los Angeles World Airports of the City of Los Angeles (LAWA) is developing a Master Plan for Los Angeles International Airport (LAX) to guide the development and operation of the airport through the year 2015; and

WHEREAS, the current operations of LAX far exceed projections that are contained within its only comprehensive environmental assessment that was published in 1975; and

WHEREAS, the other cities and localities have estimated that the current operations at LAX may produce as much as 524 tons of air pollution each day from air and surface vehicles, which equals a pound of pollution per person per day for approximately 1 million people within a five-mile radius of LAX; and

WHEREAS, the Master Plan as presently proposed by LAWA does not presently address adequately the interest and concerns of citizens of Inglewood and Ladera Heights, which concerns and interests must be adequately addressed; and

WHEREAS, the airport expansion as proposed will place unsafe, unfair, and unacceptable burdens on the students, parents, faculty, community and staff of the Inglewood Unified School District, as well as other school districts and communities in the region; and

WHEREAS, the students, parents, faculty, staff and community of the Inglewood Unified School District have had to endure, for many years, increased air and noise pollution that is disproportionate to other communities in the region, with disruptions to classrooms and other student activities; and

WHEREAS, the Lennox Unified School District, the City Councils of Inglewood, Hawthorne, and El Segundo have drafted public statements and resolutions opposing the proposed expansion of LAX;

NOW THEREFORE, BE IT RESOLVED, that the Board of Education of the Inglewood Unified School District declares that it is opposed to the proposed expansion of LAX which will not be in the best interest of students and the Inglewood Unified School District community;

BE IT FURTHER RESOLVED, that the Board of Education calls on its Congressional Representatives to publicly oppose expansion of LAX and to make a statement thereto in the Congressional Record; and calls on its State Representatives to sponsor and pass resolutions opposing this expansion; and that the City Council make written statements of opposition to LAX expansion as part of the EIR/EIS process.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-77

Comment:

WHEREAS, the Los Angeles World Airports of the City of Los Angeles (LAWA) is developing a Master Plan for Los Angeles International Airport (LAX) to guide the development and operation of the airport through the year 2015; and

WHEREAS, the proposed expansion of LAX includes nearly doubling the number of passengers serviced annually by the airport and increasing cargo operations by nearly 150%; and

WHEREAS, the current operations of LAX far exceed projections that are contained within its only comprehensive environmental assessment that was published in 1975; and

WHEREAS, the other cities and localities have estimated that the current operations at LAX may produce as much as 524 tons of air pollution each day from air and surface vehicles, which equals a pound of pollution per person per day for approximately 1 million people within a five-mile radius of LAX; and

WHEREAS, the Master Plan as presently proposed by LAWA does not presently address adequately the interest and concerns of citizens of Inglewood and Ladera Heights, which concerns and interests must be adequately addressed; and

WHEREAS, the airport expansion as proposed will place unsafe, unfair, and unacceptable burdens on the students, parents, faculty, community and staff of the Inglewood Unified School District, as well as other school districts and communities in the region; and

3. Comments and Responses

WHEREAS, the students, parents, faculty, staff and community of the Inglewood Unified School District have had to endure, for many years, increased air and noise pollution that is disproportionate to other communities in the region, with disruptions to classrooms other student activities; and

WHEREAS, the voters of the Inglewood Unified School District community have taken on additional responsibilities imposed by Measure K, our much-needed bond issue, which will have to, in part, deal with the negative effects of the current and proposed operations of LAX, as they impact our facilities; and

WHEREAS, the Lennox Unified School District, the City Councils of Inglewood, Hawthorne and El Segundo have drafted public statements and resolutions opposing the proposed expansion of LAX;

NOW THEREFORE, BE IT RESOLVED, that the Board of Education of the Inglewood Unified School District declares that it is opposed to the proposed expansion of LAX which will not be in the best interest of students and the Inglewood Unified School District community;

BE IT FURTHER RESOLVED, that the Board of Education calls on the Mayor and Inglewood City Council to develop a comprehensive strategy in opposition to the proposed expansion in concert with the Board of Education, and to send letters of opposition to the National and Western Regional Directors of the Federal Aviation Administration, the Chair of the LAWA Commission, Congressional Representatives for Inglewood and California, the President and Members of Los Angeles City Council, the Board of Supervisors, Speaker of the Assembly, President Pro Tempore of the Senate, and members of the Legislature who represent the residents of the Inglewood Unified School District;

BE IT FURTHER RESOLVED, that the Board of Education urges the Inglewood City Council to oppose efforts to facilitate LAX expansion through zoning changes, traffic planning, relaxation or modification of building and safety ordinances or regulations, or any other action that may be taken by the City that would support LAX expansion; and further, the Board of Education requests that the City Council develop an ordinance that would provide a 30 day notice to the public for LAX-related actions, facilitate and widely publicize public hearings on any measures considered by the City Council that would aid expansion of LAX, using school facilities when desirable;

BE IT FURTHER RESOLVED, that the Board of Education calls on its Congressional Representatives to publicly oppose expansion of LAX and to make a statement thereto in the Congressional Record; and calls on its State Representatives to sponsor and pass resolutions opposing this expansion; and that the City Council make written statements of opposition to LAX expansion as part of the EIR/EIS process.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-78

Comment:

MANHATTAN BEACH UNIFIED SCHOOL DISTRICT

Resolution 1998-16, To Urge the Federal Aviation Administration to Discontinue the Practice of Routing Aircraft Over the City of Manhattan Beach

WHEREAS, the Manhattan Beach Unified School District is required to provide a safe and positive learning environment for all of its students, and

WHEREAS, the Federal Aviation Administration has recently redirected the flight paths of departing aircraft by redirecting their take off pattern to loop back eastbound over the city of Manhattan Beach, and

WHEREAS, the loop flight path has become an increased annoyance to students, staff and community members due to the significantly lowered aircraft traveling altitude as a result of the Federal Aviation Administration's new direction, and

WHEREAS, the proposed expansion of Los Angeles International Airport will increase the number of low altitude departure flights directly over the Manhattan Beach Unified School District, thus adding to the disruption of the learning environment for students, and

WHEREAS, the continued and proposed increase in low-level aircraft traffic over the Manhattan Beach Unified School District will negatively impact the current positive learning environment for students and will result in a lesser degree of student learning.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Trustees of the Manhattan Beach Unified School District concludes that:

1. The Federal Aviation Administration should take whatever steps necessary to rescind or redirect the present loop flight path over the Manhattan Beach Unified School District, Manhattan Beach City Proper, and any and all other South Bay school districts, and
2. A copy of this resolution should be sent to the cities and school districts in the South Bay areas affected by the new departure patterns from the Los Angeles International Airport, and
3. The various school districts within the South Bay communities take similar action.

Response:

Comment noted. Please see Topical Response TR-N-3 regarding aircraft flight procedures. In addition, the Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to classroom disruption in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

AR00006-79

Comment:

RESOLUTION 1998-17

A RESOLUTION OF THE MANHATTAN BEACH UNIFIED SCHOOL DISTRICT, MANHATTAN BEACH, CALIFORNIA, IDENTIFYING AREAS OF CONCERN WHICH NEED TO BE ADDRESSED IN THE ENVIRONMENTAL REVIEW PROCESS FOR THE LAX MASTER PLAN

WHEREAS, the City of Los Angeles Department of airports is developing a Master Plan for LAX to guide the development and operation of the airport to meet the demands for aviation services through the year 2015; and

WHEREAS, the anticipated demand for aviation services in the southern California region is expected to significantly increase through the year 2015 including a 69% increase in the number of air passengers and a 121% increase in the amount of air cargo; and

WHEREAS, the City of Los Angeles Department of airports expects the annual number of aircraft operations at Los Angeles World Airport to increase 30% or from 763,000, to one million aircraft operations annually to accommodate this demand for aviation services; and

WHEREAS, the Los Angeles World Airport is currently considering four (4) concepts which would significantly expand the operations of the airport to accommodate the increase in aircraft operations; and

WHEREAS, the expansion of the Los Angeles World Airport and the associated impacts of the proposed expansion will have a significant affect on the Manhattan Beach Unified School District in the city of Manhattan Beach; and

WHEREAS, the Los Angeles World Airport and the Federal Aviation Administration will be conducting an environmental review process and drafting an Environmental Impact Report concerning the LAX Master Plan; and

3. Comments and Responses

WHEREAS, the airport is in close proximity to the Manhattan Beach Unified School District in the city of Manhattan Beach and the impacts of its operation are of critical interest to the entire community.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Trustees of the Manhattan Beach Unified School District in the city of Manhattan Beach, expects the Environmental Impact Report regarding the LAX Master Plan to address the environmental and economic impacts of each of the four proposed concepts with regards to several issues including, but not limited to noise, air quality, safety, utilization of existing flight patterns, changes in flight patterns and/or development of new flight patterns and the impacts of such changes, watershed changes and associated impacts, groundwater quality, light and glare, crime, and increased vehicular traffic.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed a full range of environmental impacts under the No Action/No Project Alternative and the Master Plan build alternatives. Included in the environmental analyses in both documents was a discussion of noise impacts (Section 4.1, Noise), air quality impacts (Section 4.6, Air Quality), impacts related to aviation safety (Section 4.24.3, Safety), groundwater basin changes and impacts to groundwater quality (Section 4.7, Hydrology and Water Quality), light and glare impacts (Section 4.18, Light Emissions), crime (Section 4.26.2, Law Enforcement), and traffic impacts (Section 4.3, Surface Transportation). The environmental analyses included in the Draft EIS/EIR and Supplement to the Draft EIS/EIR took into account any changes in flight patterns under the Master Plan alternatives. In addition, the economic impacts associated with the Draft LAX Master Plan were discussed in Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AR00006-80

Comment:

WISEBURN SCHOOL DISTRICT

RESOLUTION #00.1

CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, Expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, Communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, Airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, There are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED,

that the Wiseburn School District calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-81

Comment:

RESOLUTION NO. 99-01

RESOLUTION OF THE RIVERSIDE COUNTY TRANSPORTATION COMMISSION CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposal will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and,

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burden on communities near LAX.

3. Comments and Responses

NOW, THEREFORE, BE IT RESOLVED THAT, the Riverside County Transportation Commission calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional Representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-82

Comment:

RESOLUTION NO. 99-01

RESOLUTION OF THE RIVERSIDE COUNTY TRANSPORTATION COMMISSION CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger end cargo activity as proposal will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and,

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burden on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED THAT, the Riverside County Transportation Commission calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional Representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-83

Comment:

RESOLUTION NO. 99-004

A RESOLUTION OF THE COACHELLA VALLEY ASSOCIATION OF GOVERNMENTS CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and,

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environment burden on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED THAT, the Coachella Valley Association of Governments calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional Representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

3. Comments and Responses

AR00006-84

Comment:

RESOLUTION NO. JPA-98-13

SUPPORTING THE DEVELOPMENT AND IMPLEMENTATION OF A "REGIONAL AIRPORT PLAN" FOR SOUTHERN CALIFORNIA

WHEREAS, the March Joint Powers Authority (JPA) created the "March Inland Port" as a joint use commercial airport in cooperation with the United States Air Force; and

WHEREAS, the development of commercial cargo operations at the March Inland Port is a key strategy in the pursuit of economic development and the creation of new jobs by the March JPA; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by taxpayers in the region; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint use military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be environmentally superior, demand less public investment, and offer a more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, DETERMINED AND ORDERED by the Joint Powers Commission of the March Joint Powers Authority at its regular meeting held on December 16, 1998, that the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura, the State of California, and the Southern California Congressional delegation join together in developing a new "Regional Airport Plan" for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-85**Comment:**

RESOLUTION NO. 98-114

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF INGLEWOOD, CALIFORNIA, WITH RESPECT TO THE PROPOSED EXPANSION OF LAX

WHEREAS, the proposed expansion of LAX would place unsafe, unfair, and unacceptable burdens on the community of Inglewood and many other communities in the region; and

WHEREAS, expanding air traffic at LAX is not necessary for the region's prosperity, since future air traffic demand can be met at other airports in communities throughout Southern California, especially at airports in communities that will experience the highest rates of population growth in the region over the next two decades; and

WHEREAS, serving the regional air transportation needs of Southern California by way of airports dispersed throughout the region will reduce environmental impacts, particularly air quality and traffic impacts, in comparison to a massive expansion of LAX; and

WHEREAS, the interests and concerns of Inglewood citizens are of paramount importance in all discussions related to the LAX Master Plan and the Inglewood City Council demands that the interests of its residents are adequately and effectively addressed by Los Angeles World Airports (LAWA); and

WHEREAS, LAWA must assist the City of Inglewood in mitigating the current damage that has been caused by aircraft noise and airport traffic before any regional expansion should be considered, including all eligible homes in Inglewood must be sound insulated and grant funding must be made available for public safety services directly related to airport traffic and aircraft disaster preparedness; and

WHEREAS, other cities surrounding LAWA must begin to share some of the air flight traffic that disproportionately burdens the City of Inglewood before any expansion should be considered.

NOW, THEREFORE, the City Council of the City of Inglewood, California, does hereby resolve as follows:

SECTION 1. That the City Council strongly opposes the proposed expansion of Los Angeles International Airport.

SECTION 2. That this Resolution shall take effect immediately.

SECTION 3. That the City Clerk shall certify to the passage and adoption of this Resolution, shall enter the same in the book of original resolutions of said City, and shall make a minute of the passage and adoption thereof in the records of the proceedings of the City Council of said City, in the minutes of the meeting at which the same is passed and adopted.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-86**Comment:**

RESOLUTION NO. 99-10

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LAKE ELSINORE, CALIFORNIA SUPPORTING THE "JOINT RESOLUTION FOR GENERAL ASSEMBLY"

3. Comments and Responses

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, aviation demand within the entire region is forecast to exceed 157 million air passengers per year and 8.9 million tons of air cargo per year by 2020; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passengers per year to an expected 98 million per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given LAX's location in the built-out, intensely congested west side of the South Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infrastructure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of airport resources in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Lake Elsinore does hereby support SCAG's policy to encourage the development of aviation facilities in areas experiencing growth in demand; and

NOW, THEREFORE, BE IT FURTHER RESOLVED that the City Council of the City of Lake Elsinore, working through the Southern California Association of Governments and its Aviation Task Force, shall participate with cities and counties of Southern California to prepare a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passenger and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternative.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-87

Comment:

RESOLUTION NO. 3642

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WESTMINSTER CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, The Los Angeles Dept of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED that the City Council of Westminster calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that promotes LAX and its outlying Regional Commercial Airports in Southern California to work together to serve the expanding air commerce marketplace in a spirit of cooperation.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-88

Comment:

RESOLUTION NO. 99-071

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RANCHO CUCAMONGA, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and,

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

3. Comments and Responses

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is nearest to communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE BE IT RESOLVED THAT, THE CITY COUNCIL OF THE CITY OF RANCHO CUCAMONGA calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing a regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-89

Comment:

CC RESOLUTION NO. 99-22

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF NORCO, CALIFORNIA SUPPORTING SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) AND ITS AVIATION TASK FORCE IN THEIR PREPARATION OF A LONG-RANGE REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, access to commercial and cargo aviation opportunities is important to economic vitality and job creation throughout the region; and

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Masterplan for Los Angeles International Airport (LAX) that advocates expansion of its passenger activity from 60 million air passenger per year to an expected 98 million per year, and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, airport officials estimate that the expansion of LAX to accommodate the proposed level of aviation activity would cost as much as 12 billion dollars, and would necessitate the expenditure of billions of dollars more to lessen its impact on the ground transportation system; and

WHEREAS, the proposed expansion, given the location of LAX in the built-out, intensely congested west side of the south Coast Air Basin where its contribution to air pollution is greatest, appears to be a high-cost, high-impact approach to meeting the region's need for added aviation capacity; and

WHEREAS, there are at least nine other developing or existing commercial airports in Southern California, several of which are located in areas expected to experience the greatest growth in population and employment over the next 20 years, while the LAX area is expected to experience the region's least growth; and

WHEREAS, developing airport capacity in areas of high growth and lower infra-structure costs rather than concentrating airport development at LAX may be an environmentally superior, lower cost, and more equitable strategy for serving future growth in air commerce in Southern, California; and

WHEREAS, the development of airport researched in the high-growth areas of the region will lead to a more equitable distribution of jobs and opportunities for economic growth, while reducing the burden on the regional transportation system.

NOW THEREFORE, BE IT RESOLVED THAT SCAG affirms its policy to encourage the development of aviation facilities in areas experiencing growth in demand; and

The City Council of the City of Norco supports the Southern California Association of Government and its Aviation Task Force in their preparation of a long-range Regional Airport Plan for Southern California that includes one or more fully-developed alternatives that distribute the growth in airline passengers and cargo operations among the region's commercial aviation facilities, with full consideration given to both freight and passenger ground access, and the economic and environmental opportunities and impacts associated with each alternatives.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-90

Comment:

RESOLUTION NO. 99-46

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF INDIAN WELLS, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and,

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will paid for by regional taxpayers; and,

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce In Southern California; and,

3. Comments and Responses

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitable throughout the region, and reduce the public health and environmental burden on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Indian Wells, California, calls upon the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our Congressional Representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-91

Comment:

RESOLUTION NO. 2000-57

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DIAMOND BAR TO SUPPORT A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 92 million passengers per year and its cargo activity from its current 1.8 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding LAX's passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from the operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, and greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate the LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional tax payers; and

WHEREAS, there are many other commercial airports in Southern California, some with significant histories as commercial airports, and some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next 20 years, while LAX is nearest to communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF DIAMOND BAR DOES HEREBY RESOLVE AS FOLLOWS:

That the communities of Southern California, including the City of Los Angeles, the Counties of Los Angeles, Orange, San Bernardino, Riverside and Ventura; the State of California; and our congressional representatives to join together in developing a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-92

Comment:

RESOLUTION NO. 98-R087

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding the passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the Airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the Airport; and

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE, as follows:

SECTION 1. The City of Culver City calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

3. Comments and Responses

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-93

Comment:

RESOLUTION NO. 99-58

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CHINO, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR THE SOUTHERN CALIFORNIA AREA

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for the Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding its passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport; and

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion, not including the costs of transportation improvements required to facilitate access to LAX which will be paid by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmental superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burden on communities near LAX.

NOW, THEREFORE, BE IT RESOLVED, that the Chino City Council calls upon the Counties of Los Angeles, Orange, Riverside, and San Bernardino; the State of California; and our Congressional Representatives to join together in developing a regional airport plan for Southern California which will take into account the current and future needs of air travelers throughout the Southern California region, including San Bernardino, Riverside, and Orange Counties, by evaluating and comparing the needs of residents throughout these counties with the availability of air travel resources in their local areas, along with taking into account the current and potential availability of facilities throughout these counties which could be transformed for public airport uses more easily and cost effectively than by expanding LAX.

Response:

Comment noted. Please see Response to Comment AR00006-1.

AR00006-94**Comment:**

Redondo Beach Unified School District
R:98-99:5

Resolution to Urge the Federal Aviation Administration to Discontinue the Practice of Routing Aircraft Over the City of Redondo Beach

Whereas, the Redondo Beach Unified School District is required to provide a safe and positive learning environment for all of its students, and

Whereas, the Federal Aviation Administration has recently re-directed the flight paths of departing aircraft by re-directing their take-off pattern to loop back eastbound over the City of Redondo Beach, and

Whereas, the loop flight path has become an increased annoyance to students, staff and community members due to the significantly lowered aircraft traveling altitude as a result of the Federal Aviation Administration's new direction, and

Whereas, the proposed expansion of Los Angeles International Airport will increase the number of low altitude departure flights directly over the Redondo Beach Unified School District, thus adding to the disruption of the learning environment for students, and

Whereas, the continued and proposed increase in low level aircraft traffic over the Redondo Beach Unified School District will negatively impact the current positive learning environment for students and will result in a lesser degree of student learning;

Now, Therefore Be It Resolved, that the Board of Education of the Redondo Beach Unified School District:

1. Encourages the Federal Aviation Administration to take whatever steps necessary to rescind or re-direct the present loop flight path over the Redondo Beach Unified School District, Redondo Beach City Proper, and any and all other South Bay school districts, and
2. Encourages the City of Los Angeles to reject current proposals to expand Los Angeles International Airport until a regional approach to transportation can be studied further by the Los Angeles County Board of Supervisors, and
3. Encourages the various school districts within the South Bay communities to take similar action, and
4. Directs that a copy of this resolution be sent to the cities and school districts in the South Bay area affected by the new departure patterns from Los Angeles International Airport.

Response:

Comment noted. Please see Response to Comment AR00006-1. Also, please see Topical Response TR-N-3 regarding aircraft flight procedures. In addition, the Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to classroom disruption in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

AL00001**Warford, Richard****City of Los Angeles****1/22/2001****AL00001-1****Comment:**

PROJECT DESCRIPTION

3. Comments and Responses

This proposed master plan improvements including potential construction of one runway on either the north or south side of the airport; relocation of runways; construction of new taxiways and runway extensions; construction of new terminal buildings and parking garages and a rental-car consolidated facility west of the existing Central Terminal Area; construction of a ring road and connection to I-405; construction of new and relocated air cargo and maintenance facilities and roads; extension of the Metro Green Line into the airport; and land acquisition.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in Los Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 6-9 G.P.M. from 4 fire hydrants flowing simultaneously.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed Los Angeles Fire Department (LAFD) recommended design features in Section 4.26.1, Fire Protection. Master Plan Commitment FP-1 ensures fire protection design recommendations are incorporated into the LAX Master Plan. Since preparation of the Draft EIS/EIR, Master Plan Commitment FP-1 was revised to incorporate recommendations of the LAFD as stated in their July 1, 1997 comment letter on the LAX Master Plan NOI/NOP (see Appendix A of the Draft EIS/EIR). The revised Master Plan Commitment FP-1 is presented in subsection 4.26.1.5 of the Supplement to the Draft EIS/EIR. As stated on pages 4-736 and 4-737 of the Supplement to the Draft EIS/EIR, the design recommendations were developed in consultation with the LAFD and address: emergency access, fire flow requirements, fire hydrants, street dimensions, road turns, private roadway access, dead-end streets, fire lanes, building setbacks, building heights, construction/demolition access, and aircraft fire protection systems. As relates to fire flow, Master Plan Commitment FP-1 indicates that fire flow requirements for individual Master Plan improvements will be determined in conjunction with LAFD and will meet, or exceed, fire flows in effect at the time.

AL00001-2

Comment:

B. Response Distance

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 80
6911 World Way West
Los Angeles, CA 90045
Crash Unit

Fire Station No. 51
10435 Sepulveda Boulevard
Los Angeles, CA 90045
Single Engine Company

Fire Station No. 5
6621 W. Manchester Avenue

Los Angeles, CA 90045
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Battalion 4 Headquarters

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed existing fire station locations in Section 4.26.1, Fire Protection. The locations and corresponding descriptions of Fire Stations 80, 51, and 5 are consistent with those identified in Section 4.26.1 of the Draft EIS/EIR. This information is also consistent with the Los Angeles Fire Department's July 1, 1997 comment letter on the LAX Master Plan NOI/NOP, as included in Appendix A of the Draft EIS/EIR.

AL00001-3

Comment:

C. Firefighting Access, Apparatus, and Personnel.

At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed fire protection design features in Section 4.26.1, Fire Protection. Master Plan Commitment FP-1 ensures fire protection design recommendations are incorporated into the LAX Master Plan. The design recommendations were developed in consultation with the Los Angeles Fire Department and address: emergency access, fire flow requirements, fire hydrants, street dimensions, road turns, private roadway access, dead-end streets, fire lanes, building setbacks, and aircraft fire protection systems. While the design recommendations in the Draft EIS/EIR are generally consistent with the specifications in this comment letter, FP-1 has been refined and updated to be consistent with these current LAFD recommendations. Please see Section 4.26.1 (subsection 4.26.1.5), of the Supplement to the Draft EIS/EIR.

AL00001-4

Comment:

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Response:

Please see Response to Comment AL00001-1.

AL00001-5

Comment:

Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

Response:

Please see Response to Comment AL00001-3.

AL00001-6

Comment:

Businesses that intend to handle hazardous materials may have to participate in the Unified Hazardous Waste and Hazardous Materials Management Program (Unified Program). Businesses are required to register with the Fire Department and complete a hazardous materials inventory if they handle hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for

3. Comments and Responses

compressed gases; or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR parts 30, 40 or 70. Businesses that operate underground storage tanks must apply for permits to install, modify, abandon or operate those tanks. Businesses that generate, treat, recycle or otherwise handle hazardous waste must register with the Unified Program Agency and receive a permit for these activities.

Response:

The Draft EIS/EIR described the hazardous materials handling, storage and transportation requirements in Section 4.23, Hazardous Materials (subsection 4.23.3), including the Certified Unified Program.

AL00001-7

Comment:

Submit plot plans indicating access road and turning area for Fire Department approval.

Response:

Please see Response to Comment AL00001-3.

AL00001-8

Comment:

During demolition, the Fire Department access will remain clear and unobstructed.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed emergency access in Section 4.26.1, Fire Protection. Furthermore, Master Plan Commitments PS-1, Fire and Police Facility Relocation Plan (Alternatives A, B, C, and D), C-1, Establishment of a Ground Transportation/Construction Coordination Office (Alternatives A, B, C, and D), and FP-1, LAFD Design Recommendations (Alternatives A, B, C, and D), address emergency access during demolition and construction.

AL00001-9

Comment:

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

Response:

Please see Response to Comment AL00001-3.

AL00001-10

Comment:

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708).

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed applicable fire protection codes, ordinances, plans, and guidelines in Section 4.26.1, Fire Protection.

AL00002 Brazill, Debbie City of Fontana 4/27/2001

AL00002-1

Comment:

Thank you for the opportunity to review and comment on the above referenced Joint Draft Environmental Impact Statement/Environmental Impact Report for the Los Angeles International Airport.

The City of Fontana has no comment(s) to make concerning this project. The City would appreciate receiving the Final Joint Environmental Impact Statement/ Environmental Impact Report on this project. Kindly direct all submittals to the undersigned.

Response:

Comment noted.

AL00003 Moore, P.E., Gary City of Los Angeles 5/21/2001
Lee

AL00003-1

Comment:

LAX MASTER PLAN DRAFT EIS/EIR

The Department of Public Works, Bureau of Sanitation, Stormwater Management Division (SMD) has reviewed the draft Environmental Impact Statement/Environmental Impact Report of the above mentioned Master Plan and offers the following comments:

- The draft EIS/EIR referenced the Hydrology and Water Quality-Master Plan Commitments (HWQ-1) as the master plan for stormwater mitigation measures. The HWQ-1 shall include, at a minimum, detailed drawings of the various proposed land use developments such as the terminal complex, LAX Expressway, midfield concourses, air cargo facilities, Westchester Southside project, and their associated support facilities such as parking lots, loading docks, etc. In addition, the HWQ-1 shall clearly indicate the type and location of structural BMPs to be installed for each respective element of the project. The following table summarizes some suggested BMP categories that can be used for each pollutant identified in the draft EIS/EIR:

BMP Categories	Pollutants					
	Total	Total				Oil &
	Suspended Solids	Phosphorus	Nitrogen	Heavy Metals	BOD/COD	
Vegetative Systems						X
Infiltration/Retention	X					X
Porous Pavements						X
Catch Basin Filter Inserts	X	X	X	X	X	X
Vortex/Hydrodynamic Systems	X	X	X	X	X	X
Clarifiers	X				X	X
Media Filtration	X	X	X	X	X	X
End-of-Pipe Systems	X	X	X	X	X	X

The above table lists structural BMPs that are applicable to various pollutants identified. However, appropriate BMPs should be selected for each specific land use development. For example, although a vegetative system can be used to remove oil and grease, an installation of this BMP in the middle of a new runway is obviously not appropriate. More detailed information on specific BMPs covered under the above listed categories and their associated costs can be found in the Reference Guide For Stormwater Best Management Practices at www.lastormwater.org.

3. Comments and Responses

Response:

Please see Response to Comment AR00005-1 regarding selection of BMPs and Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AL00003-2

Comment:

- A Wet Weather Erosion Control Plan (WWECP) must be prepared if construction is to be done during the rainy season between October 1 and April 14. For guidance on the preparation of the WWECP, please refer to Development Best Management Practice Handbook, Part A - Construction Activities at www.lastormwater.org. The WWECP must be posted at the project site and is subject to review by the Department of Public Works, Bureau of Contract Administration inspectors during their routine jobsite inspections.

Response:

LAWA will prepare a WWECP for construction activities performed during the rainy season and will comply with all associated requirements. Also, please see Topical Response TR-HWQ-2 regarding compliance with regulations.

AL00004

Hill, Tamara

Lennox School District Board of Trustees 6/9/2001

AL00004-1

Comment:

It would be hard to imagine another school district in the Los Angeles metropolitan area that has its children exposed to greater levels of noise and air pollution than the children of Lennox.

Response:

Comment noted. Please see Responses to Comments below. In addition, the Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

AL00004-2

Comment:

For the past eight years, the UCLA School of Medicine has conducted Health Fairs at the six Lennox schools. During this time, medical professionals have screened more than 3,500 students and adults. One consistent finding has been a high incidence of children demonstrating asthma and allergy symptoms.

Response:

The content of this comment is essentially the same as comment AF00001-36; please refer to Response to Comment AF00001-36.

AL00004-3

Comment:

The medical evidence clearly suggests aberrations in the immune system that are directly linked to increased levels of air pollution which are the result of the district's location directly adjacent to LAX and two major freeways-the 105 and the 405.

Response:

Please refer to Topical Responses TR-HRA-2 and TR-HRA-3 regarding airport emissions and link with adverse health effects and human health impacts.

AL00004-4

Comment:

The AQMD has also tested air quality at one of our schools, Felton, and the amount of particulate matter in the air was higher there than in any of the other testing locations.

Response:

Comment noted.

AL00004-5

Comment:

The issue of noise pollution is of equal concern to us in the Lennox School District. Almost the entire community falls within the Community Noise Equivalent Level (CNEL) of 65 decibels or greater. The 65 CNEL is considered an unhealthy noise level for many land uses that include residential dwellings, schools, and outdoor recreation.

Response:

Section 4.2, Land Use of the Draft EIS/EIR identified incompatible land uses as noise-sensitive uses (i.e., residential, schools, churches, hospitals, parks, and libraries) that are exposed to high noise levels, as defined by the 1996 65 CNEL or greater noise contours. The Supplement to the Draft EIS/EIR provided an update to the 1996 baseline to identify Year 2000 conditions for informational purposes. Specifically, Figures 4.2-1 and 4.2-5 of the Draft EIS/EIR, and Figures S4.2-1 and S4.2-2 of the Supplement to the Draft EIS/EIR, showed the community of Lennox and the extent of 65 CNEL noise levels under 1996 baseline and Year 2000 conditions within this community. Noise sensitive uses within the County of Los Angeles, including the community of Lennox, exposed to noise levels of 65 CNEL or greater are identified in Technical Report 1, Land Use Technical Report, Tables 13 and 14 of the Draft EIS/EIR and Technical Report S-1, Supplemental Land Use Technical Report, Tables S2 and S3 of the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00034-25 regarding aviation easements, prior noise mitigation payments, and other provisions of the "Settlement Agreement" which resolved land use incompatibility and noise mitigation issues associated with airport operations and the Lennox School District. See Response to Comment AL00034-38 regarding the potential for noise impacts on the Lennox School District under the Master Plan alternatives. See also Response to Comment AL00006-2 regarding schools within the Lennox School District that are currently impacted by high noise levels.

AL00004-6

Comment:

The Executive Summary of the Draft EIR, on page ES-28, recognizes the necessity to have the impact of Environmental Justice adequately addressed. The report indicates that the FAA will make the final determination as to whether the Master Plan has a disproportionately high and adverse human health or environmental effect on minority or low-income populations. This is abundantly obvious in Lennox in that we are the most affected, due to our location; and, our community is the poorest in the area and has a minority population in the schools of 99%.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed disproportionate impacts on minority or low-income populations for a variety of technical topics, including noise, air quality, and health risk, in Section 4.4.3, Environmental Justice. Supporting technical reports and analyses are provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR.

3. Comments and Responses

AL00004-7

Comment:

However, in contradiction, on page 4-67 the report indicates that one of the schools in Lennox would be exposed to outdoor noise levels that would remain significant after mitigation; yet, no mitigation measures are required since "enrollment impacts are considered less than significant." This analysis is logically flawed and totally unacceptable.

Response:

The comment links two different issues together. The paragraph referenced by the commentor (which is on page 4-1233, rather than 4-67 of the Draft EIS/EIR) states that one public school in the Lennox School District would be exposed to significant outdoor noise levels that would remain significant after mitigation. This is a discussion regarding non-enrollment impacts. The impact to the school in the Lennox Elementary School District would be outdoor noise levels from aircraft noise that would result under Alternative B. This was discussed on page 4-423 of Section 4.4.3, Environmental Justice, in the Draft EIS/EIR. The discussion under Environmental Action Plan on page 4-1219 which states "No mitigation measures are required since enrollment impacts are considered less than significant with the required payment of school impact fees" was regarding project impacts to school enrollment. The analysis regarding impacts to enrollment concluded that with the required payment of school impact fees, the project would not result in a significant impact. However, as was discussed on page 4-423, although mitigation (through sound insulation or acquisition) is expected to address the majority of aircraft noise impacts on schools, under Alternative B one public school within the Lennox Elementary School district would be subject to outdoor noise levels that are considered significant and unavoidable. This impact would not occur under Alternative D or the other build alternatives.

Section 4.2, Land Use (subsections 4.2.6 and 4.2.8), of the Supplement to the Draft EIS/EIR included additional analysis of schools that would be subject to high single event noise levels that would result in classroom disruption and includes analysis of Alternative D. A listing of schools newly exposed to high single event noise levels under Alternatives A, B, C, and D, was presented in Tables S4.2-11, S4.2-15, S4.2-19, and S4.2-28, respectively. Mitigation Measures MM-LU-3 and MM-LU-4 were provided to address these impacts.

As was concluded on page 4-767, in Section 4.27, Schools, of the Supplement to the Draft EIS/EIR, impacts on schools newly exposed to high single event noise levels would remain significant after mitigation when classroom activities take place outdoors. See also Topical Response TR-LU-5 regarding noise impacts on schools.

As was stated on page 4-764, in Section 4.27, of the Supplement to the Draft EIS/EIR, enrollment impacts for Alternative D are considered less than significant with required payment of school fees.

Regarding aircraft noise mitigation as applies to the Lennox School District, please see Response to Comment AL00034-23 and AL00034-38.

AL00004-8

Comment:

The expansion of LAX will have a disproportionate negative impact on the Lennox community, which is not adequately addressed in this document. The requirement to mitigate against environmental injustice has not been met.

Response:

The reason the Draft EIS/EIR did not include a program with mitigation measures and benefits fully reflective of community input, was because the preliminary findings on environmental justice were not known until the document was finalized. It was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected communities and their representatives.

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

AL00005 Feinstein, Michael City of Santa Monica 8/1/2001

AL00005-1

Comment:

Thank you for the opportunity to review the Draft Environmental Impact Report / Environmental Impact Statement ("DEIR") for the Los Angeles International Airport Master Plan Improvements ("Master Plan"). The Master Plan presents significant environmental consequences for Santa Monica and the entire region.

On July 10, 2001, the Santa Monica City Council adopted a formal position in opposition to the LAX Master Plan due to the significant and unavoidable environmental impacts associated therewith. The DEIR does not fully analyze the environmental consequences of the Master Plan, nor does it provide acceptable mitigation for impacts on Santa Monica.

Response:

Comment noted. Responses to Comments AL00005-6 through AL00005-14 address the City's specific concerns regarding the analysis of environmental consequences and the identification of mitigation measures.

AL00005-2

Comment:

The Master Plan does not provide for guaranteed infrastructure, facilities, and airside acreage to fully support transient business aircraft and fixed-base business operations, which should include a minimum of three fixed-base operations for business jets and an exclusive runway for small to mid-size jets; nor does it provide for appropriate phasing of surface transportation enhancements relative to air transportation enhancements;

Response:

The unconstrained forecast projected minimal increases in general aviation activity (see Chapter III, Section 10.4 of the Draft LAX Master Plan). Due to the runway constraints, even this minimal growth in general aviation activity is not expected to materialize. Each of the alternatives has projected that general aviation activity will maintain current operations levels. This assumption reflects that as a busy air carrier airport such as LAX becomes more congested, general aviation activity tends to use other, less congested local airports.

The facility requirements analysis determined that no additional general aviation facilities were needed through 2015 due to the insignificant increase in projected activity and comparisons of similar facilities

3. Comments and Responses

at other airports (see Chapter IV, Section 6.2.1 of the Draft LAX Master Plan). All of the build alternatives would provide modern and efficient facilities to accommodate forecast general aviation operations. Alternative A would provide 219,000 square feet of general aviation facilities, and Alternative C would provide 244,000 square feet of general aviation facilities. The No Action/No Project Alternative envisions no changes to the existing facilities.

The number of fixed-base operations ("FBOs") at LAX would not impact projected general aviation activity. Currently, there are two FBOs, and each of the build alternative's facilities could accommodate an additional FBO. The runway system in each alternative would be sufficient to accommodate the projected general aviation activity without the need for an exclusive runway for small to mid-size jets.

Surface transportation improvements would be phased to coincide with capacity enhancements to minimize impacts to the surrounding street network. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology. The airport is a public facility and so is the airspace. The accessibility to public facilities cannot be restricted in any discriminatory way. Therefore, LAWA does not have the legal authority to exclude small private aircraft (general aviation activity) at LAX. General aviation activity must be permitted to fly in and out of the LAX airspace in the future, as do commercial aircraft.

Following the publication of the Draft EIS/EIR, LAWA developed a new alternative that, consistent with public comments calling for a regional approach alternative, is designed to accommodate passenger and cargo activity at LAX that would approximate those of the No Action/No Project Alternative, has fewer environmental impacts, and improves airport safety and security. As described in Chapter 2.6.8, General Aviation, of the Draft Master Plan Addendum, Alternative D would accommodate two GA facilities that encompass 265,000 square feet.

AL00005-3

Comment:

nor does it include the relocation and expansion of the LAX Transit Center as a Master Plan commitment at a location that will promote the use of transit.

Response:

This comment suggests that the LAX Transit Center's new conceptual location in the Master Plan alternatives would not promote the use of transit. In fact, every effort would be made to relocate the LAX Transit Center in a location that is easy to use and promotes transit. Alternative D, LAWA staff's preferred alternative, includes a major Intermodal Transportation Center (ITC) that would replace the functions of the LAX Transit Center. The ITC would be located near the Green Line and would be connected via people mover directly to the terminals.

AL00005-4

Comment:

The Westside Cities have sent a joint comment letter regarding the inadequacy of the Master Plan environmental documents. The following provides additional information regarding critical Master Plan and DEIR issues for the City of Santa Monica.

Response:

Comment noted. Please see responses to comment letter AL00009 for the responses to the Westside cities joint comment letter.

AL00005-5

Comment:

GENERAL ISSUES

Overall, the DEIR provides insufficient analysis of the environmental impacts of the proposed project. On July 25, 1997, the City of Santa Monica submitted comments regarding the Notice of Preparation of the DEIR ("NOP letter"). Several critical issues that we requested be analyzed in the DEIR have not been analyzed, in spite of obvious environmental impacts on Santa Monica. In order to fully understand the environmental impacts of the Master Plan, it is imperative that these issues are adequately analyzed.

Response:

Comment noted. Please see Responses to Comments AL00005-6 through AL00005-14 for responses specific to each of the City's concerns.

AL00005-6

Comment:

SURFACE TRANSPORTATION

Environmental Impacts and Analysis

Figure 4.3.2-4 of the DEIR identifies street segments that will experience more airport traffic with implementation of the LAWA staff-recommended Alternative C. Several street segments in Santa Monica are identified to receive more airport traffic. However, the DEIR fails to analyze any traffic intersections in Santa Monica, in spite of our NOP letter's identification of 22 intersections in Santa Monica for analysis. The DEIR is clearly flawed in this analysis of the surface transportation impacts of the Master Plan.

Response:

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please refer to the Subtopical Response TR-ST-2.1 for a discussion of the study area definition and identification of facilities analyzed. As a part of the CMP traffic impact analysis, increases in traffic due to the project were estimated for all regional transportation facilities in Los Angeles County (including Santa Monica) and, as described in Section 6 of Technical Reports 3b and S-2b, those locations where the increase met the CMP threshold were analyzed for CMP impacts.

AL00005-7

Comment:

The DEIR analysis relies upon several Master Plan transportation improvements, including the LAX Expressway, people mover, and Green Line transit extension, to help mitigate the Master Plan surface transportation impacts. However, the creation of new on-site airport facilities, including new terminal facilities, is proposed to occur during Phase 1 of the Master Plan, while the aforementioned transportation improvements occur after Phase 1. This phasing creates a multi-year period where surface transportation impacts will be severely exacerbated prior to implementation of improvements that help mitigate those impacts.

Response:

Please see Topical Response TR-ST-3 regarding phasing. Also, a mitigation phasing plan was included as Table S4.3.2-13 in the Supplement to the Draft EIS/EIR.

AL00005-8

Comment:

Appropriate Mitigation Measures

3. Comments and Responses

The DEIR must fully evaluate the surface transportation impacts associated with the Master Plan, and provide mitigation measure to minimize those impacts. For any Santa Monica intersections that are negatively impacted, mitigation measures that are acceptable to the City of Santa Monica must be proposed.

Any Master Plan improvements that help mitigate the surface transportation impacts of increased passengers and cargo must be implemented prior to development of new terminal facilities.

Response:

Any mitigation measures within Santa Monica would be approved by the City of Santa Monica prior to implementation. Impacts were fully evaluated and mitigations prepared where necessary. A phasing plan has been developed, and will continue to be refined, that helps ensure that all necessary mitigations are in place prior to the opening of new facilities. This was further addressed in the Supplement to the Draft EIS/EIR.

AL00005-9

Comment:

The DEIR forecasts a 50 percent increase in transit usage as a result of implementation of Phase I, which includes an improved location for the transit center and additional fly-away locations. In order to ensure the maximization of transit possibilities, the siting and development of a new transit center must be identified and approved by bus services providers, including the Santa Monica Big Blue Bus.

Response:

This comment suggests that the siting and development of the LAX Transit Center should be done in concert with all participating transit operators. That will indeed be LAWA's intention as work moves forward on implementation once a Master Plan alternative is selected, cleared environmentally, and approved. Please see Topical Response TR-ST-5 (see Section 3 on Transit) for more information.

AL00005-10

Comment:

GENERAL AVIATION

Environmental Impacts and Analysis

A critical concern for Santa Monica is the impact of any Master Plan changes on the general aviation (GA) facilities and operations at LAX. Reduction of LAX facilities and/or displacement of operations, particularly business jet operations, create a substantial impact on other airports in the basin. This is already a problem that has created significant and unmitigated impacts on Santa Monica because of the congestion and lack of adequate business jet facilities at LAX.

Santa Monica Airport (SMO) has been subjected to increases in transient business jets using our air field due to inadequate air side and landside facilities at LAX. Additionally these aircraft using Santa Monica Airport are also increasingly of a size that appear inappropriate in scale and character for both the airport facility and the surrounding West Los Angeles and Santa Monica community ---- which is tightly situated in densely populated residential areas. This represents a very substantial concern and problem which requires any developments at LAX to not only stop the displacement of business jet aircraft but to, in fact, return this previously displaced traffic to its proper setting.

As the proposed LAX Master Plan repeatedly states, LAX is the "gateway" facility for the region and the hub of economic activity. The re-positioning of LAX as the center of business jet aircraft activity will allow better integration of connections and coordination of business travel and meeting. LAX is the most appropriate setting for business jet aircraft accessing the Southern California area, particularly the westside of the region.

Business jet aircraft are more appropriately served at LAX as it can provide for a higher margin of safety with longer runway surfaces and safety areas, more high speed turn outs and taxiways, dedicated airspace, continuous tower support and a full complement of emergency facilities and services. The re-

focusing of business business jet aircraft activity to LAX will provide opportunities for better integration with commercial air operations, rental cars, customs and better maintenance and support services for such aircraft.

The DEIR states that under all the development alternatives, including the LAWA staff-recommended Alternative C, the total acreage committed to GA will be reduced from 14 acres to between 5 and 6 acres. A stunning 62% reduction can only further displace GA operations. Sharing any space with air carrier maintenance activity would likely diminish or overwhelm less financially lucrative GA jet service. The continued displacement of GA operations from LAX has had, and will continue to have, significant environmental consequences for the Santa Monica Airport and the City of Santa Monica. The DEIR must evaluate these environmental impacts, especially in the areas of noise, surface transportation, airspace safety and air quality.

Response:

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

AL00005-11

Comment:

GA has always been a vital part of LAX history and should remain so, particularly the business jet aircraft, which are becoming a significant part of the GA fleet. In all of the alternatives presented in the draft LAX Master Plan, the plan indicates an expansion in GA facilities by increasing total square footage from 144,000 square feet to 244,000 square feet with the addition of a new 100,000 square foot hangar facility at Sepulveda and Century. However this is not analyzed in the DEIR, nor reconciled with the intended reduction of acreage for GA use.

Response:

The reduction in GA facility acreage is associated with the apron area and not with the footprint of the buildings. Alternatives A, B, and C would accommodate two general aviation facilities. The existing 144,000 square foot facility, currently occupied by Garrett Aviation, at Imperial and Sepulveda would remain under Alternatives A and C. In addition to the existing facility, Alternatives A and C would add a new facility in a different location. Alternative A would add a new 75,000 square foot facility on Imperial Highway east of Main Street. Alternative C would add a new 100,000 square foot facility located at the southeast corner of Sepulveda and Century Boulevards. Alternative B would accommodate two new 86,000 square foot facilities at the northwest corner of Century and Aviation Boulevards. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient. The No Action/No Project Alternative and Alternative D envision no changes to existing general aviation facilities. The runway system in each alternative would be sufficient to accommodate the projected general aviation activity.

AL00005-12

Comment:

Appropriate Mitigation Measures

The DEIR must fully evaluate the environmental impacts associated with decreased GA facilities, and provide mitigation measure to minimize those impacts. In order to provide adequate opportunities for the basing of business aircraft, as well as to adequately handle transient business, larger areas of unimpaired space are needed for vehicle parking and servicing. We recommend that no reduction in GA-committed acreage be made. LAWA should provide a covenant or land restriction to the permanence of dedicated acreage, expanded facilities and perpetual operating Fixed Base Operations (FBOs) for business jets. LAX should provide for three FBOs, which would truly allow a full range of services and healthy competition.

The proposed airside improvements with additional taxiways and aircraft movement areas are of significant importance to improving GA-business jet services. An existing and rapidly growing problem at LAX is the airfield congestion and related delays resulting in uncertain scheduling. The proposed

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extensive aircraft taxiway and other movement area improvements could provide readier access to and from runways for GA-business jet aircraft. The improved separation of runways could increase the number of aircraft that can takeoff and land in tandem, allowing for better interposition of GA business jet aircraft ---- if the additional capacity isn't consumed by "sharing" facilities with air carrier or cargo uses.

The dedication of one runway, exclusive of air carrier service, for small to mid-size jets (small to mid-size in terms of LAX but unquestionably too large for adjacent GA airports) has great potential to not only stem the rate of displacement of GA jet aircraft, but also to be an affirmative support for the operations of GA jet aircraft and to provide a positive basis for the return of those previously displaced to SMO. In order for the business community to make appropriate decisions and investments, such as basing jet aircraft operations, the plan needs to formally dedicate a runway to use by GA jet aircraft in perpetuity, otherwise air carrier and cargo demand will overwhelm the less financially lucrative business jet users.

The provision of a dedicated runway for business aircraft would also enhance operations and safety in the region surrounding LAX. Instrument departures from Santa Monica must be integrated with LAX departures as their pathways intersect. This requires intense coordination between the two air traffic control towers and the region and often results in aircraft having to sit idling for extended periods of time at Santa Monica waiting clearance at LAX. These aircraft should all be operating under the control and guidance of a single tower, which has the essential benefit of direct visual contact and a single voice. In addition, the establishment of a primary business operations center at LAX will also allow for the development of more efficient air space planning and procedures for both departures and arrivals. A dedicated GA runway must also have full operational support services such as a dedicated instrument landing system, approach lights and air traffic control tower.

Total airside acreage committed to general aviation support facilities must expand beyond the current 14 acres in order to fully support general aviation, including business jet operations, with a full complement of both based aircraft and transit parking spaces, executive terminal facilities, vehicle parking and pick-up/ drop facilities and transport to rental vehicle sites and local hotels.

The Master Plan must provide for, at minimum, three full-service fixed-base operators specifically for general aviation. The Master Plan must include expanded and enhanced general aviation capacity, services, and facilities, particularly for jet aircraft. An increase in facility space to at least 244,000 square feet should be accomplished as soon as possible. Enhanced, fully incorporated and dedicated ground transportation improvements, particularly access roadways and services, to and from general aviation facilities, including general aviation / business user exclusive access roadways and entries, should be incorporated in the Master Plan. Parking improvement plans must include enhanced vehicular parking, as well as dedicated drop off/pick up accommodations at all general aviation facilities.

The development of an operational and business plan is essential for the maintenance and enhancement of general aviation, particularly with regard to GA jet aircraft operations at LAX, including appropriate long-range feasibility and trend studies. A business plan and aggressive marketing program is necessary to attract and recapture general aviation jet aircraft activity at the earliest possible date.

Response:

The commentor's comment in support of general aviation activity at LAX is noted. The reduction in GA facility acreage is associated with the apron area and not with the footprint of the buildings. Currently, there are two FBOs at LAX, and it is the decision of individual FBO companies to initiate service at LAX. LAWA does not have control over the addition of another FBO. Please see Chapter V, Section 2.1.3, 2.1.4, 3.2, and 3.3 of the Draft LAX Master Plan regarding airside options including a dedicated general aviation runway option. In addition, please see Response to Comment AL00005-11 regarding increase in GA facility space for Alternatives A, B, and C. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient. The No Action/No Project Alternative and Alternative D envision no changes to existing general aviation facilities. The runway system in each alternative would be sufficient to accommodate the projected general aviation activity.

AL00005-13**Comment:**

INDUCED SOCIO-ECONOMIC IMPACTS

Environmental Impacts and Analysis

The DEIR finds that the Master Plan alternatives will induce between 13,000 and 30,000 new households in the region, including between 2,600 and 4,800 new households in a 10-mile radius. A significant proportion of these new households are expected to be in need of affordable housing. The DEIR concludes that this is a small amount in comparison to expected total growth in the region. However, given the high cost of housing in the region, and particularly in the Westside areas near LAX, providing affordable housing for these new households will be a critical local and regional impact.

Response:

Please see Topical Response TR-RBR-1 regarding housing issues, including affordable housing.

AL00005-14**Comment:**

Appropriate Mitigation Measures

The DEIR must identify measures to ensure the creation of affordable housing for new household growth that will be induced by the Master Plan.

Response:

Please see Topical Response TR-RBR-1 regarding housing issues, including affordable housing.

AL00006**Carrio, Hector****Lennox School District Board of Trustees****6/9/2001****AL00006-1****Comment:**

The following information is provided on behalf of the Lennox School District relative to input for the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the LAX Master Plan Project. While the Lennox School District is cognizant of the financial benefits of increasing the capacity of Los Angeles International Airport, it does not believe that this should occur at the expense of our students or staff.

Response:

Comment noted. See Responses to Comments below.

AL00006-2**Comment:**

A recent noise contour map reflects that five of the six schools in the Lennox School District are in the state-defined airport noise impact area (the area exposed to 65 decibels or more as measured on the community noise equivalent noise level scale). It is our belief that these existing noise levels are already higher than appropriate and should be brought down to approved levels at the schools, as well as for the neighborhoods surrounding them.

3. Comments and Responses

Response:

Noise conditions for 1996 baseline and Year 2000 were described in subsections 4.1.3.1 and 4.2.3 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analysis provided in Appendix D, Aircraft Noise Technical Report, and Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR, and Appendix SC-1, Supplemental Aircraft Noise Technical Report and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR. However, the general focus of the document, pursuant to NEPA and CEQA, is to evaluate the potential future environmental effects of the project and to provide feasible mitigation measures to address significant impacts.

It is accepted that aircraft activity at LAX has and continues to generate high levels of noise that are incompatible with residential and other noise-sensitive land uses. These issues are currently addressed by LAWA, the FAA, Caltrans, the County of Los Angeles, the City of Inglewood and the City of El Segundo, through a number of efforts including implementation of Aircraft Noise Mitigation Programs. The programs for these jurisdictions mostly focus on providing sound insulation for residential properties, although some programs also include acquisition of noise sensitive uses with their subsequent conversion to noise compatible land uses (i.e., industrial or commercial). As of June 2002, 6,685 properties within the LAX noise impact area have been mitigated through these programs. LAWA also maintains a complaint hotline and provides an on-line noise complaint form as well as an Internet Flight Tracking System that allows the public to track the movement of flights and air traffic patterns throughout the Los Angeles region. Additionally, the LAX Community Noise Roundtable and Los Angeles International Airport Area Advisory Committee provide forums for the public and government officials to discuss issues and means for reducing and mitigating adverse noise impacts on the surrounding community.

The LAX Community Noise Roundtable was created by LAWA in September 2000 to reduce and mitigate adverse noise impacts from LAX operations on the surrounding communities. Members of the Roundtable consists of County Board of Supervisors or City Council members representing portions of the County of Los Angeles (i.e., the 2nd and 4th Districts), the City of Los Angeles, Manhattan Beach, Hermosa Beach, Inglewood, Montebello, Monterey Park, Torrance, Rancho Palos Verdes, and Palos Verdes Estates. In addition, other government agencies and groups are represented such as the Federal Aviation Administration, LAWA Management, Airline Transportation Association, LAX Area Advisory Committee, Westchester Playa del Rey Council and P.A.N.I.C. (Peninsula Aircraft Noise/Safety Council). The Roundtable generally meets the second Wednesday of every other month. The Roundtable is developing a work program to address such issues as enforcing over ocean departure at night, reducing overflight and early turns, and eliminating aviation easement requirements in association with residential soundproofing. Subcommittees on Noise, Flight Track Data, and Policy and Legislative study these issues and report to the Roundtable on a periodic basis. The LAX Area Advisory Committee was formed in 1975 by the Board of Airport Commissioners. Members of the LAX Area Advisory Committee include three representatives from each of the communities surrounding LAX, including Marina del Rey, Westchester/Playa del Rey, El Segundo, Hawthorne, Lennox, Inglewood, and Culver City. The mayors of these cities and the Board of Supervisors in the unincorporated communities appoint the representatives, who are primarily chosen based on their technical background. The Committee meets every second Thursday of the month. The LAX Area Advisory Committee works in conjunction with the Board of Airport Commissioners and LAWA Community Relations staff to address concerns in their respective communities resulting from airport operations, including noise, traffic, and signs. Current issues of interest to the Committee that relate to the noise mitigation include eliminating the aviation easement requirements for residential properties that receive soundproofing.

Technical Report 1, Land Use Technical Report, identifies areas that are exposed to 1996 baseline noise levels of 65 CNEL or greater on Figure 11; and Tables 13 and 14 present a summary and listing of noise-sensitive uses, respectively. Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, shows the areas exposed to the 65 CNEL contours under Year 2000 conditions and provides a summary and listing of these uses in Tables S3 and S4, respectively. Noise-sensitive residential uses exposed to areas of significant single event noise levels that result in nighttime awakening (as defined by the 94 dBA SEL noise contour) under 1996 baseline and Year 2000 conditions were shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR and summarized in Tables S6 and S7 in the Supplemental Land Use Technical Report. Schools exposed to significant single event or cumulative noise levels that result in classroom disruption under the 1996 baseline and Year 2000 conditions are listed in Table S9 of the Supplemental Land Use Technical Report.

See also Topical Response TR-LU-3 regarding sound insulation under the ANMP and Topical Response TR-LU-4 regarding outdoor noise levels.

Five schools in the Lennox School District fall within the airport noise impact area as listed in Table 14 of the Land Use Technical Report (for 1996 baseline conditions) and Table S4 in the Supplemental Land Use Technical Report (for Year 2000 conditions). The five schools within the Lennox School District exposed to 65 CNEL noise levels under 1996 baseline and Year 2000 conditions are: Buford Elementary, Felton Elementary, Jefferson Elementary, Lennox Middle School, and Whelan Elementary. Moffett Elementary school is located outside the 1996 and 2000 65 CNEL noise contours.

Please see Response to Comment AL00034-25 regarding aviation easements, prior noise mitigation payments, and other provisions of the "Settlement Agreement" which resolve land use incompatibility issues associated with airport operations and the Lennox School District. Residential uses in the vicinity of schools in the Lennox School District that are exposed to noise levels of 65 CNEL or greater are eligible for noise mitigation under the ANMP as was described in subsection 4.2.3 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

As analyzed in Table S9 of the Supplemental Land Use Technical Report, under 1996 baseline and Year 2000 conditions, the following schools within the Lennox School District would be exposed to significant aircraft noise levels that result in classroom disruption: Buford Elementary, Felton Elementary, Jefferson Elementary, Lennox Middle School and Whelan Elementary.

AL00006-3

Comment:

Although the District has implemented a sound attenuation program of its school buildings that process does not fully mitigate against the negative impacts which are continuing to be felt in the school district. Students residing in this area are compelled to attend our schools and spend approximately one and a quarter to one and a half hours per day, while at school, outside of these buildings. Clearly, the nature of the normal school day requires students to have physical education activities, recess, classroom passing periods, and a number of other activities outside of the protection of sound-proof buildings.

Response:

Please see Topical Response TR-LU-4 regarding outdoor noise levels. As stated in TR-LU-4, significant noise impacts are identified for schools exposed to the 75 CNEL or greater noise contours. In addition, outdoor noise levels within the 65 to 75 CNEL noise contour range could affect outdoor speech and the quality of outdoor activities (although this affect is not considered to be significant). As was shown on Figure 4.2-5 of the Draft EIS/EIR, and Figure S4.2-2 of the Supplement to the Draft EIS/EIR, no schools within the Lennox School District are located within the 75 CNEL or greater noise contour under 1996 baseline or Year 2000 conditions. However, Buford Elementary, Felton Elementary, Jefferson Elementary, Whelan Elementary, and Lennox Middle School, are exposed to noise levels greater than 65 CNEL under 1996 baseline and Year 2000 conditions, as described in Response to Comment AL00006-2. Although this comment is on existing conditions, the general focus of the document, pursuant to NEPA and CEQA, is to evaluate the potential future environmental effects of the project and to provide feasible mitigation measures to address significant impacts. As was stated in Section 4.2, Land Use (subsection 4.2.9.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, a significant unavoidable impact was identified for those outdoor areas where classroom activity takes place where areas are newly exposed to outdoor noise of 75 CNEL. As was stated in Section 4.2, Land Use (subsection 4.2.6) of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, within the Lennox School District, Felton Elementary School would be newly exposed to 75 CNEL noise levels under Alternative B compared to 1996 baseline and Year 2000 conditions. Refer also to Response to Comment AL00034-25 regarding aviation easements, prior noise mitigation payments, and other provisions of the "Settlement Agreement" which resolve land use incompatibility and aircraft noise mitigation issues associated with airport operations and the Lennox School District.

3. Comments and Responses

AL00006-4

Comment:

It is clearly evident that overflights interrupt instruction and activities. In a recent study published in the Journal of Environment and Behavior, Gary W. Evans and Lorraine Maxwell, Cornell University, found that children who attend schools that are beset by frequent airport noise do not learn to read as well as children who attend quiet schools.

Response:

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

AL00006-5

Comment:

Some district staff members, such as physical education teachers and gardeners, literally spend their entire work day outside of buildings. These employees are exposed to noise beyond acceptable levels on a continuous day-long basis.

Response:

Please see Response to Comment AL00006-3 regarding significant outdoor noise levels and affected schools within the Lennox School District. In addition, existing noise levels at schools within the Lennox School District do not exceed OSHA and CalOSHA Standards, as presented in Table 4.24.2-1 of the Draft EIS/EIR.

AL00006-6

Comment:

In summary, the Lennox School District is opposed to airport expansion, which will increase negative environmental effects on our students and staff.

Response:

Comment noted. Please see Responses to Comments above. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

AL00007	Randolph, William	County of San Bernardino	6/26/2001
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AL00007-1

Comment:

The County of San Bernardino has considered the proposed LAX Master Plan Draft EIS/EIR. We noted with interest that LAWA has emphasized the regional setting in its brief Statement of the Purpose and Objectives of the proposed expansion plan. Indeed, the regional significance of the proposed project was central to not only the general goal statement, but also the component elements as restated below:

"The purpose and objectives of the Master Plan are to provide, in an environmentally sound manner that is compatible with surrounding land uses, sufficient airport capacity for passengers and freight in the Los Angeles region to sustain and advance the economic growth and vitality of the Los Angeles region. In particular, the proposed project intends to achieve these objectives:

- To respond to local and regional demand for air transportation during the period 2000 to 2015, taking into consideration the amount, type, location, and timing of such demand.
- To ensure that new investments in airport capacity are efficient and cost effective, maximizing the return on existing infrastructure capital.
- To sustain and advance the international trade component of the regional economy and the international commercial gateway role of the City of Los Angeles."

Appropriately, the EIS/EIR defines the "region" as encompassing a five-county area that includes the counties of Los Angeles, Orange, Ventura, Riverside, and San Bernardino.

In this context, the County of San Bernardino is concerned that LAWA made no effort to include our agency in the Scoping Outreach effort, as documented in Appendix A, Scoping Coordination Letter Mailing List. Nor did LAWA outreach to any of the municipalities or non-LAWA owned the airport facilities located within our boundaries.

Response:

Comment noted. LAWA and FAA conducted an extensive scoping process for the Master Plan, in accordance with Section 21083.9 of CEQA, Sections 15082 and 15083 of the CEQA Guidelines, and the federal Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR §1501.7). Appendices A and B of the Draft EIS/EIR provide information pertaining to the scoping process that was completed for the environmental analysis. As indicated therein, a Notice of Preparation (NOP) for the EIR was published in 1997 and a Supplemental NOP was published in 1999. A Notice of Intent (NOI) was published in the Federal Register on June 11, 1997. Six public informational meetings/workshops, three formal public scoping meetings, and one agency scoping meeting were conducted between September 1996 and July 1997. Public notification for the NOP, NOI, public workshops, and scoping meetings occurred in a variety of means ranging from direct mailings to advertisements/notices published in the Los Angeles Times. Such information was also posted on LAWA's website (www.laxmasterplan.org).

AL00007-2

Comment:

The County of San Bernardino has a vital interest in this project proposal. Our interest stems in large measure from our support for a regional system of airports as well as our understanding of the significance of LAX to the highly interconnected, five-county economy that comprises Southern California - a key factor that is documented in the EIS/EIR. Our interest is equally an outgrowth of our strong desire to see San Bernardino County's Ontario International, San Bernardino International and Southern California Logistics Airports reach their full potential as an element of a regional airport and transportation system that supports the entire Southern California regional economy.

Response:

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

3. Comments and Responses

AL00007-3

Comment:

For these reasons, the County of San Bernardino would have taken very seriously its obligation to work closely with LAWA during the scoping process to identify key issues and to develop an appropriate range of alternatives for study in this EIS/EIR. Unfortunately, LAWA did not permit such an opportunity to occur.

Response:

Comment noted. Please see Responses to Comments AL00007-1 and AL00007-2 above.

AL00007-4

Comment:

The omission of San Bernardino County from the scoping process represents more than a lost opportunity. We view this as an abridgement of the requirements of NEPA and CEQA. The outcome is an inadequate EIS/EIR that is based on project alternatives that entirely fail to meet LAWA's own Statement of Purpose and Objectives. The County of San Bernardino requests that LAWA remedy this omission with a fresh effort at meeting the statutory requirements embodied in CEQA and NEPA. We request that this effort begin with a scoping process that allows for the full participation of all relevant agencies. The County of San Bernardino looks forward to fulfilling its role in this effort and will work diligently to that end.

Response:

The scoping process for the Draft EIS/EIR was completed in full accordance with the requirements of NEPA and CEQA. Please see Response to Comment AL00007-1 above.

AL00008

Kurtz, Barry

County of Los Angeles

6/9/2001

AL00008-1

Comment:

General Comment on the Project and Proposed Transportation Improvements

- LAX expansion project comes with a comprehensive package of transportation improvements.
- We generally support a new transportation system that provides direct access from the freeway system to the airport, similar to other airports in many major cities.
- Currently motorists enroute to the airport must get off the freeway system and use several routes. La Tijera, Century, Sepulveda...etc.
- The map shows the planned transportation system.
- The main access routes in connection with the project are:
- The new LAX Expressway from s/o Route 90 to the proposed Ring Road shown in orange.
- Ring Road to the north, west, and south sides of the airport.

The Ring Road would follow like a freeway without any interruption because of grade separations or bridges over Lincoln, Aviation and Sepulveda.

- The traffic analysis for the airport expansion generally shows better traffic conditions with project and with transportation improvements than the No Project traffic conditions.

Response:
Comment noted.

AL00008-2

Comment:
Traffic Study Document

- We have several major concerns that have not been addressed.
- Traffic study is inadequate and incomplete.

Response:
Comment noted. The transportation analysis in the Draft EIS/EIR and Supplement to the Draft EIS/EIR adequately addressed the potential surface traffic impacts of the alternatives. Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed surface transportation, with supporting technical data and analyses provided in Technical Reports 3a, 3b, S-2a, and S-2b. Also, Appendix K of the Draft EIS/EIR provides a Supplemental Environmental Evaluation of LAX Expressway and State Route 1 Improvements.

AL00008-3

Comment:
- County's traffic impact analysis guidelines were not used for County intersections and roadways.

Response:
Please see Topical Response TR-ST-1, in particular Section 3.3, regarding surface transportation analysis methodology and results.

AL00008-4

Comment:
- The study needs to be expanded to analyze the impact on all nearby unincorporated areas including Athens, Baldwin Hills, Del Aire, El Camino Village, Ladera Heights, Lennox, and Marina del Rey.

Response:
Please refer to Topical Response TR-ST-2 for a discussion of the study area definition and identification of facilities analyzed. Fourteen intersections were added in the analysis of Alternative C, including four intersections in or bordering unincorporated Los Angeles County areas. In addition to the intersections and freeway ramps analyzed for Alternative C, ten additional intersections located east of I-405 were added to the analysis of Alternative D (see Figure S4.3.2-1 on page 4-215 of the Supplement to the Draft EIS/EIR).

AL00008-5

Comment:
- Transportation model based on outdated data (1996) and partially validated.

Response:
Please see Topical Response TR-ST-2, in particular Section 2.0, regarding the surface transportation analysis methodology and results.

3. Comments and Responses

AL00008-6

Comment:

- How will the LAX Expressway and realignment of Route 1 be funded? Are they feasible?

Response:

A specific funding plan has not yet been prepared for the Master Plan; however, it is anticipated that a joint funding effort will be pursued, involving Federal and State grants and other efforts. Much of the project will likely be funded with airport-generated revenues, such as concession fees, landing fees, revenue bonds, leases, and passenger facility charges (PFCs). It is not anticipated that any local tax revenue would be used for this project. Also, please see Topical Response TR-ST-2 regarding the airport's funding abilities outside of the airport.

AL00008-7

Comment:

- We're concerned about overloading the 405 north of LAX Expressway and spillover traffic onto congested north/south arterials such as La Cienega, Lincoln, and Sepulveda.

Note: South Bay Cities Council of Governments expressed same concern south of the airport. Independent study showed approximately 30% using the surface streets to and from the airport.

- Impact on the 405 south of airport and impact of spillover onto those arterials.
- The study should consider extending the LAX Expressway further north to the 10 Freeway.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. With regards to the comment of extending the LAX Expressway further north to the 10 Freeway, the study area for the off-airport surface transportation analysis fulfills the requirements of the program level document, per NEPA and CEQA. Please see Topical Response TR-ST-2 regarding the transportation analysis study areas. Also, Appendix K of the Draft EIS/EIR provides a Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements. Regarding impacts to I-405, please see Topical Response TR-ST-4. Please note that Alternative D does not include the LAX Expressway or the Ring Road.

AL00008-8

Comment:

- What will be the impact if the south Arbor Vitae ramps are not built?

Response:

FHWA has withdrawn its support for a half interchange at Arbor Vitae and the proposed half interchange is not part of the LAX Master Plan. FHWA policy is to only consider proposed full interchanges, not partial ones. The analyses in the Draft EIS/EIR and Supplement to the Draft EIS/EIR assumed that no portion of the Arbor Vitae interchange would be built in any pre-2015 scenarios. The Year 2005 analysis in the Draft EIS/EIR, Supplement to the Draft EIS/EIR, and in Technical Reports 3b and S-2b, therefore showed project impacts without the Arbor Vitae interchange for the Year 2005. The Arbor Vitae half-interchange is not proposed as a mitigation measure for the LAX Master Plan, nor is it an element of the Master Plan itself. The half-interchange is on the list of background transportation improvements to be implemented in the future. As shown in Table 2.3 of Technical Report 3b, all Year 2015 scenarios analyzed in the Draft EIS/EIR (all baseline alternatives and all project alternatives) include the assumption that one-half of the Arbor Vitae Interchange at I-405 would be built by the Year 2015. This assumption is consistent with the requirements of NEPA and CEQA. The half-interchange

project was funded in the Regional Transportation Improvement Program (RTIP) and included in the Regional Transportation Plan (RTP) at the time the EIS/EIR project began, and is in both adopted documents. The Southern California Association of Governments (SCAG) removed the Arbor Vitae half-interchange from the RTP and RTIP on April 12, 2001 but then amended the RTP and RTIP on March 9, 2002 to incorporate the half-interchange. The Draft EIS/EIR and Supplement to the Draft EIS/EIR analyses indicated that only a small number of airport trips would use this half-interchange. In the project scenarios, vehicles on I-405 to/from the north wishing to connect to Arbor Vitae Street and the LAX Ring Road would not be able to use the Arbor Vitae ramps (they do not connect to/from the north). Vehicles connecting between I-405 north and Arbor Vitae west/Ring Road would have a separate expressway facility that makes the connection. Vehicles wishing to connect between LAX and I-405 south generally would not use the Arbor Vitae ramps but instead would have several more convenient opportunities further south, including ramps at Century Boulevard, Sepulveda Boulevard, Imperial Highway, and I-105. Also, please see Topical Response TR-ST-2 regarding the Arbor Vitae interchange.

AL00008-9

Comment:

- We would like more information on how Imperial Highway will look.
- How will it provide access to Main Street in the City of El Segundo? They indicate a grade separation from the Ring Road to Main Street.

Response:

There would be a grade separation from the Ring Road to Main Street. At this location, it is anticipated that the Ring Road would be below grade, with the extension of Main Street passing overhead. On the north side of the Ring Road, the Main Street extension would curve to the east to provide access to various ancillary facilities on the north side of the Ring Road. Freeway ramps would be provided to and from the east, accommodating westbound Ring Road traffic exiting to Main Street/ancillary facilities, and providing eastbound Ring Road access for Main Street/ancillary facilities. All new construction would take place north of the existing southern right-of-way boundary of Imperial Highway. Further design details will be provided during the design process for this project and LAWA will closely coordinate with the regional agencies, including LA County, at that time. Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

AL00008-10

Comment:

- Why was the HOV 405/105 car pool ramp dropped? How will this affect the traffic study?

Response:

Early in the development of Alternatives A, B, and C, HOV lanes were considered along the extension of I-105 to the west terminal. Ramps between the new I-105 HOV lanes and the I-405 HOV lanes to the south were considered at that time. After some of the early findings were obtained, however, it was determined that the benefits of these particular HOV lanes would not justify their costs. The HOV lanes were therefore removed from the project definition for Alternatives A, B, and C, and were not considered in the analysis of Alternative D. For Alternatives A, B, and C, ramps between the I-105 extension and I-405 to the south were modified such that both the mainline lanes and the HOV lanes have direct ramps to the I-105 extension. This accomplishes the same advantages for HOVs as the previously considered HOV ramps had accomplished. As a mitigation to Alternative D, this traffic would be accommodated via a new I-405 interchange opposite Lennox Boulevard, and HOV lanes would be not necessary.

AL00008-11

Comment:

Conclusion

3. Comments and Responses

- We have not received all the information needed to complete our reviews. However, the limited information provided indicates better traffic conditions with the package than without the project and without the transportation improvements.

- That's because today we do not have direct, easy access from the freeway system to the airport.

The airport now has 68 million annual passengers (MAP).

LAWA claims it will grow to 79 MAP without the project and without the transportation improvements and 89 MAP with the project and transportation improvements.

- We have difficult access to the airport today.

- Any of us that drive the San Diego Freeway know it's congested between the airport and Route 90 almost any time - weekdays and weekends, unless it's 2:00 in the morning.

- The transportation improvements, the Ring Road, LAX Expressway and Arbor Vitae ramps are needed for today's traffic demand.

- So the \$64,000 question is, will we get the much needed transportation improvements as the demand at LAX increases?

- Will future traffic conditions with airport expansion and transportation improvements be better than no airport expansion and no transportation improvements?

- We do not have all the traffic data yet to answer those questions.

Response:

In general, traffic conditions would be better with the project than without. Los Angeles World Airports (LAWA) has worked closely with Los Angeles County to ensure that the County has the necessary information it needs to conduct a thorough review of the proposed LAX Alternatives A, B, and C. Section 4.3, Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed surface transportation improvements with supporting technical data and analyses provided in Technical Reports 3a, 3b, S-2a, and S-2b. Also, Appendix K of the Draft EIS/EIR provides a Supplemental Environmental Evaluation of LAX Expressway and State Route 1 Improvements. The surface transportation analyses conducted as part of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR concluded that future traffic conditions with airport expansion and transportation improvements would be better than no airport expansion and no transportation improvements.

Transportation improvements were identified for each of the alternatives, and a detailed phasing study will be created after the conclusion of the NEPA/CEQA process including the selection of a preferred alternative and the issuance of a Record of Decision (ROD). The surface transportation analyses related to the published technical reports and the Draft EIS/EIR and the Supplement to the Draft EIS/EIR have fulfilled the requirements of the program level document, in accordance with NEPA and CEQA.

Additional traffic information was provided to Los Angeles County as part of the new Enhanced Safety and Security Plan Alternative, Alternative D, which was analyzed in detail in the Supplement to the Draft EIS/EIR. Alternative D proposes a drastically different surface transportation plan by not using the LAX Expressway/Ring Road combination nor a western terminal airport entrance. Instead, it incorporates the concepts of remote passenger parking on the east side of LAX with people mover systems.

AL00008-12

Comment:

- Another concern we have is if the expansion project is approved, what is to prevent the growth from increasing far beyond the 89 MAP the same as the airport usage increased from its design of 40 MAP to the actual 68 MAP and projected 79 MAP?

Response:

An extensive analysis of capacity and delay was prepared for each alternative. The capacity of each alternative was defined based on the capacity of its facilities. Based on this analysis, the Alternative C capacity was defined at 89.6 MAP. Please see Response to Comment AL00033-438 regarding how the capacity of Alternative C was defined. Serving 89.6 MAP with four runways means delays would increase to an average of 10 to 15 minutes per operation. While the Master Plan assumes a maximum average delay of 15 minutes, the airport would experience fluctuations from year to year, including periods where average delays may exceed this maximum level. However, it is unlikely that average delays over 15 minutes would be sustainable over the 15-year forecast horizon. Therefore, the Master Plan analysis predicts that passenger levels would not exceed 89.6 MAP with Alternative C. The 89.6 MAP capacity number is based on a number of factors, in particular the reaction of the airlines to increasing congestion and delays. However, there is no cap or limit proposed that would limit activity to the predicted 89.6 MAP (please see Response to Comment AS00007-5 regarding the ability of airport operators to limit activity at an airport). Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient.

AL00009**Egerman, Mark****City of Beverly Hills****7/24/2001****AL00009-1****Comment:**

While the Westside Cities recognize the importance of airports in supporting economic development in Southern California, we are deeply concerned about the negative and unmitigated impacts the proposed LAX expansion will have on the Westside Cities.

Overall, we believe the Draft EIS/EIR fails to adequately analyze and address potential significant impacts to the Westside Cities caused by the proposed expansion of LAX. The Draft EIS/EIR is inadequate because it does not contain adequate information regarding clear environmental impacts to the Westside Cities, despite our close proximity to the airport. The Draft EIS/EIR and associated documents primarily focus on an analysis of impacts and proposed mitigation measures for only the immediate area of the airport.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR provided a comprehensive analysis of environmental effects of each Master Plan alternative, including impacts to communities nearby. This can be seen in the many figures, tables, and text throughout Chapter 4 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Much of the impacts and mitigation discussion focused on the areas located close to LAX because such areas have a greater potential to be significantly impacted by the project and, if significantly impacted, require discussion of mitigation measures. Communities that are comparatively more distant from LAX, such as the City of Beverly Hills, are not expected to be significantly impacted by the proposed project, and, therefore, were not discussed in detail.

AL00009-2**Comment:**

Traffic accessing and leaving LAX on already congested roadways and freeways serving the Westside is a primary concern. Pass-through traffic from Downtown, the Wilshire corridor, and other areas north of the airport on its way to LAX creates impacts to our residents and businesses.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan alternatives, please see Topical Response TR-ST-4.

3. Comments and Responses

AL00009-3

Comment:

The Master Plan does not appropriately phase surface transportation enhancements to precede air transportation enhancements.

Response:

Please see Topical Response TR-ST-3 regarding phasing. Also, a mitigation phasing plan is included as Table S4.3.2-13 in the Supplement to the Draft EIS/EIR.

AL00009-4

Comment:

Further, the relocation and expansion of the LAX Transit Center is not included as a Master Plan commitment at a location that will promote the use of transit.

Response:

Comment noted. Please see Subtopical Response TR-ST-5.3 for more information.

AL00009-5

Comment:

Other common areas of concern that have been expressed by the communities in the Westside include, but are not limited to, impacts of increased aircraft overflight noise and air pollution resulting from both increased air traffic at LAX as well as the diversion of business aircraft to other municipal airports. Since these significant impacts are not addressed in the Draft EIS/EIR, not only is it impossible to assess the levels of impact, no mitigation measures are proposed.

Response:

Comment noted. Please see Response to Comment AL00009-1 regarding the geographic extent of the Draft EIS/EIR and Supplement to the Draft EIS/EIR analysis.

AL00009-6

Comment:

This letter communicates our shared positions on the LAX Draft EIS/EIR, and is not intended to replace and/or supercede any individual City's comments on the Draft EIS/EIR.

On behalf of the Westside Cities, thank you for the opportunity to provide our comments regarding the LAX Draft EIS/EIR. We appreciate the complexity of this project and look forward to receiving a response to our comments, which better reflects the concerns of the Westside Cities over unmitigated impacts from the proposed LAX Master Plan.

Response:

Comment noted. In accordance with the provisions of NEPA and CEQA, FAA and LAWA have prepared written responses to all comments received on the Draft EIS/EIR. These responses are provided herein as part of this Final EIS/EIR. Responses to individual comments included in this comment letter are provided above.

AL00010

Wolkowitz, Edward

City of Culver City

7/24/2001

The content of this comment letter is identical to comment letter AL00009; please refer to the responses to comment letter AL00009.

AL00011 Feinstein, Michael City of Santa Monica 7/24/2001

The content of this comment letter is identical to comment letter AL00009; please refer to the responses to comment letter AL00009.

AL00012 Heilman, John City of West Hollywood 7/24/2001

The content of this comment letter is identical to comment letter AL00009; please refer to the responses to comment letter AL00009.

**AL00013 Feger, Daniel Burbank-Glendale-Pasadena
Airport Authority 7/19/2001**

AL00013-1

Comment:

This letter constitutes the Burbank-Glendale-Pasadena Airport Authority's ("Authority") written comments on the City of Los Angeles' ("City") Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") evaluating the various development alternatives set forth in the City's Master Plan ("Master Plan") for Los Angeles International Airport ("LAX"). The Authority's concern is that the City's EIS/EIR fails to analyze whether the City's proposed development alternatives will cause significant environmental impacts on regional airports such as the Burbank-Glendale-Pasadena Airport ("Burbank-Airport") and their surrounding environment. Specifically, the City's Master Plan makes clear that the City does not intend to develop LAX to meet all the demands for aviation services which exists for LAX. Moreover, each of the City's alternatives, with the arguable exception of the no action alternative, implements to varying degrees the City's announced goal of increasingly focusing LAX on international and air cargo operations. The Authority's question is where will the unmet demand for non-international, non-cargo flights go. Will it shift to the region's secondary airports, such as the Burbank Airport?

On August 22, 2000, Mr. Maury Laham, the Environmental Manager for LAX, pointed out the interrelationship between the two airports while publicly commenting on the possibility that the Authority would seek federal approval to impose a curfew on the Burbank Airport to combat nighttime noise. Mr. Laham expressly requested of the Authority that "when doing its study and considering alternatives, compute in both the costs and consequences to LAX." Similarly the City acknowledged the interrelationship between the two airports in a City study, published on February 28, 2000, entitled "Air Transportation in the Los Angeles Region" ("February Document"). The February Document asserted, inter alia, that while LAX is the primary airport for the Los Angeles region the Burbank Airport is a secondary airport which augments the air service provided by LAX. The City's February Document further asserted that: (1) the passenger service areas (from which an airport draws its passengers) overlap for LAX and Burbank Airport; (2) air travel demand will increase for both LAX and Burbank Airports; (3) LAX will increasingly handle a higher proportion of international flights and air cargo; and (4) thus, secondary airports, such as Burbank Airport, must increase their capacity to handle non-cargo, non-international flights. The City's February Document also asserted that the City fully expects LAX's focus on international and air freight flights to shift commuter passenger flights to so called secondary airports, potentially including Burbank Airport. The City's April 25, 2000 news release announcing the February Document summarized it as follows:

The inescapable conclusion of this study is that all the region's airports must grow for the region to continue to prosper. LAX cannot and should not capture all of the new demand for air transportation. LAX's unique role in the future should be to focus on handling most of the international component of the region's air service needs.

3. Comments and Responses

On July 28, 2000, the City also sent to the Authority (which it identified as an "LAX Stakeholder") a brochure ("July Document") detailing the City's plans for modernizing LAX. The City's cover letter to the July Document described LAX as the "West Coast's leading international gateway for both passengers and air freight." The Cover letter further stated that the City continues "to encourage growth at other airports on the basis that they must share responsibility for accommodating air traffic demand." Consistent with the February Document, the City's July Document made two key points: (1) air transportation is a regional issue, thus what happens at one of the region's airports impacts the other airports; and (2) LAX expects to "redistribute" passenger demand over the next two decades to prevent "LAX from shouldering a disproportionate percentage of that new demand, and allowing the airport to focus more on handling international travel and transport."

Given the City's acknowledged interrelationship between LAX and regional airports such as Burbank Airport, the Authority believes the City's current EIS/EIR failure to study whether the City's project will shift demand to the region's other airports renders the EIS/EIR inadequate. The City should include such analysis in its EIS/EIR. Just as the City's Mr. Laham requested that the Authority "when doing its study and considering alternatives, compute in both the costs and consequences to LAX," LAX now must examine any possible consequences to regional airports, including Burbank Airport, of the development alternatives for LAX under consideration by the City.

Response:

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00014 Doty, Ed.D., Wendy El Segundo Unified School 7/11/2001
District

AL00014-1

Comment:

The El Segundo Unified School District is asking for your support for a regional approach to resolving the air traffic needs of the Southern California region.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00014-2

Comment:

The current airport was designed to handle 40 million passengers per year and now serves 67 million. The proposed expansion of LAX will likely generate far more than the 89 to 98 million passengers projected by the LAX Master Plan.

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

AL00014-3**Comment:**

The region's heavy dependence on LAX has increased traffic congestion, added to air pollution and greatly increased airport noise.

Response:

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; air quality in Section 4.6, Air Quality; and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

AL00014-4**Comment:**

LAX is already the region's largest single source of smog-forming NO_x emissions. It is expected that the expansion plan will triple the NO_x emissions.

Response:

Please note, as shown in the 1997 Air Quality Management Plan, all aircraft sources in the South Coast Air Basin account for 1 percent of the NO_x emissions. Also mitigated NO_x emissions from on-airport operational sources for Alternative D, the LAWA-staff preferred alternative, are predicted to be below baseline emissions as shown in Table S4.6-19 of the Supplement to the Draft EIS/EIR.

AL00014-5**Comment:**

Approximately 31,000 homes and 36 schools near LAX currently suffer from noise exceeding the 65 decibel noise level.

Response:

It is not clear from the comment where the referenced information was obtained. The number of schools exposed to noise levels of 65 CNEL or greater under 1996 baseline and Year 2000 conditions is presented in Technical Report 1, Land Use Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report. As shown in Tables 13 and 14 in Technical Report 1, 16,973 dwelling units and 31 schools are exposed to noise levels of 65 CNEL or greater under 1996 baseline conditions. As presented in Tables S3 and S4 in Technical Report S-1, 16,782 dwelling units and 31 schools are exposed to noise levels of 65 CNEL or greater under Year 2000 conditions. Please see Topical Response TR-LU-3 for a description of the Aircraft Noise Mitigation Program and other measures that address homes and schools currently and historically exposed to 65 CNEL or greater noise levels.

AL00014-6**Comment:**

We are also concerned about public safety. Over the past three years, LAX has averaged 11 near misses a year. The number of near misses considered acceptable by the FAA is four. More flights would further endanger safety.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

3. Comments and Responses

AL00014-7

Comment:

I have enclosed a copy of the resolution calling for a Regional Airport Plan for Southern California, which was adopted by the El Segundo Unified School District Board of Education on December 8, 1998. We urge you to take our concerns to the Leadership of Congress and the Administration to ensure that a Regional Airport System is implemented for the Southern California area.

Response:

Please see Response to Comment AL00014-1 above.

AL00014-8

Comment:

WHEREAS, The Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and,

Response:

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

AL00014-9

Comment:

WHEREAS, Expanding its passenger and cargo activity as proposed will greatly Increase the number of flights and nearly double ground traffic going to and from LAX; and,

WHEREAS, School Districts and communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the airport can expect greatly increased noise and air pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the airport: and,

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; air quality in Section 4.6, Air Quality; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-ST-1 regarding cargo truck traffic. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

AL00014-10

Comment:

WHEREAS, There are many other commercial airports in Southern California, some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and,

WHEREAS, Several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and,

WHEREAS, Developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and,

WHEREAS, The development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX,

NOW, THEREFORE, BE IT RESOLVED, THAT the Board of Education of the El Segundo Unified School District calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

Response:

Please see Response to Comment AL00014-1.

AL00015 Hardison, Dee City of Torrance 7/17/2001

AL00015-1

Comment:

The City of Torrance appreciates the opportunity to comment on the Draft EIS/EIR on the proposed Master Plan for LAX. As a member of the South Bay Cities Council of Governments (SBCCOG), Torrance concurs with the comments submitted by the SBCCOG with respect to the adequacy of the Draft EIS/EIR. We find that the Draft EIS/EIR fails to adequately address many potential environmental impacts on the cities to the south of the airport as a result of expanded airport operations, as identified in detail in the comments submitted by the SBCCOG.

Response:

Please see responses to comment letter AR00003, which responds to each of the comments on the Draft EIS/EIR submitted by the South Bay Cities Council of Governments.

AL00015-2

Comment:

Moreover, this letter constitutes comments from the City of Torrance on five issues of particular concern to the City. Our comments with regard to these issues are as follows:

Response:

Please see Responses to Comments below.

AL00015-3

Comment:

(1) NOISE: The Draft EIS/EIR understates potential noise impacts from expanded airport operations. It fails to address both existing problems with overflight noise resulting from the re-routing of over congested airport traffic and potential increases in such flight diversions associated with increased operations. Nor is there any address of impacts resulting from greater lateral dispersion over the coastal waters that could lead to premature easterly turns over Torrance and consequent increases in overflight noise. In addition, although the Draft EIS/EIR depicts additional new routes over noise-sensitive areas, including coastal areas within the South Bay and Torrance, it fails to analyze the noise effects of these new routes. Finally, as is set forth in some detail in the comments submitted by the

3. Comments and Responses

SBCCOG, the Draft EIS/EIR utilizes faulty base line assumptions and modeling parameters, particularly in regard to the South Bay.

Response:

Simulation modeling of the airfield/airspace capacity, relative to the forecast demands that would be placed upon them by the various alternatives indicated that the anticipated levels of traffic could be handled within the existing airspace design. In an effort to accommodate South Bay community requests for the rerouting of traffic to reduce noise effects, the FAA developed a series of modifications to the departure routes existing in 1996 and implemented them in 2000 to provide greater lateral separation between jets and propeller aircraft. Routes for propeller aircraft have again been revised to remove a portion of those flights from over the Torrance area and place them off shore until clear of the South Bay communities. The Draft EIS/EIR was conducted for master plan improvements, and not for independent airspace modifications. The South Bay communities are well-beyond the area of significant thresholds of noise impact as was detailed in Section 4.1, Noise, of the Draft EIS/EIR. The Supplement to the Draft EIS/EIR, Section 4.1, Noise, provided additional information on noise impacts from expanded airport operations and overflights under Alternatives A and D. For further information regarding overflights of the South Bay, please see Subtopical Response TR-N-3.1 and Subtopical Response TR-N-2.2. As to the use of baseline assumptions and modeling parameters, please see Subtopical Response TR-N-1.3, Subtopical Response TR-N-1.4, and Subtopical Response TR-N-1.2.

AL00015-4

Comment:

(2) TRAFFIC: The Draft EIS/EIR does not provide a complete analysis of off-airport surface traffic impacts. There is a disproportionate assumption of trip distribution to north of the airport that results in the inadequate analysis of airport related traffic impacts on local streets south of the airport. At a minimum this issue must adequately be addressed, as must include the impacts on local streets resulting from trips coming off the freeway south of the airport and onto local streets to avoid freeway congestion. Further, additional analysis is warranted on the southerly freeway offramps and surrounding intersections.

Response:

The traffic impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The distribution of airport trips is derived from surveys of airport passengers and employees and other information specific to LAX. Please refer to the Topical Response TR-ST-2 for a discussion of the assumptions and analytical techniques used in the analysis.

AL00015-5

Comment:

(3) MITIGATION MONITORING PROGRAM: The Draft EIS/EIR fails to adequately specify mitigation measures or methods to enforce them.

Response:

Please see Response to Comment AR00003-63.

AL00015-6

Comment:

(4) COMMUTER AIRPORTS: The Draft EIS/EIR fails to address the potential cumulative impacts on surrounding commuter airports resulting from the possible displacement of commuter flights at LAX as result of increased commercial traffic. This situation has the potential to significantly alter existing flights volumes at nearby community airports such as at Torrance Airport.

Response:

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

AL00015-7**Comment:**

(5) RELOCATION OF ENDANGERED SPECIES: The Draft EIS/EIR identifies as a mitigation to the loss of on-site vernal pools the relocation of a population of Riverside Fairy Shrimp, a federally listed endangered species. The mitigation identified is the relocation of this entire shrimp population to an off-site vernal pool in the surrounding area. Although not specifically identified in the Draft EIS/EIR, the consultant who prepared the Draft EIS/EIR has been in contact with the City of Torrance regarding the possible relocation of the Riverside Fairy Shrimp to the Madrona Marsh. The City is concerned with the ramifications of becoming home to a federally listed endangered species, and feels that this issue needs to be addressed in some detail.

Response:

Comment noted. Please see Topical Response TR-ET-2 regarding Riverside fairy shrimp mitigation. LAWA has coordinated with the City of Torrance regarding the repercussions of harboring an endangered species. LAWA has also provided the City of Torrance with contact information at the U.S. Fish and Wildlife Service for them to better understand the ramifications.

AL00015-8**Comment:**

In conclusion, the proposed expansion of LAX has significant environmental implications. Those communities closest to the airport facility will undoubtedly bear the brunt of those impacts. The California Environmental Quality Act requires at a minimum the full disclosure of all potential environmental impacts resulting from a project. The comments provided herein, in conjunction with those provided by the SBCCOG indicate there is significant work ahead in the preparation of the required environmental analysis. We thank you for your consideration in this matter and look forward to the opportunity of reviewing a revised Draft EIS/EIR that addresses all of our comments.

Response:

Please see Responses to Comments AL00015-1 through AL00015-7 above.

AL00016	Prichard, Douglas	City of Rolling Hills Estates	7/16/2001
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AL00016-1**Comment:**

The purpose of this letter is to provide written comment (due by July 25, 2001) on the Draft EIR/EIS Documents for the proposed LAX Master Plan Improvements. The City of Rolling Hills Estates has been working with the South Bay Cities Council of Governments (SBCCOG) for the past several months to identify the South Bay region's concerns on the LAX Master Plan. As you may be aware, the SBCCOG has retained legal counsel and a team of consultants to review and comment on several sections of the Draft EIS/EIR Documents.

Attached, please find a copy of a letter from the SBCCOG addressed to LAWA, which explains in detail areas of the Draft EIS/EIR Documents that should be further clarified, expanded, and/or made consistent with other sections of the Document(s).

On July 10, 2001, the Rolling Hills Estates City Council reviewed and concurred with the comments from the SBCCOG on the Draft EIS/EIR Documents. Therefore, the City of Rolling Hills Estates is requesting a formal written response to the issues raised in the attached letter.

3. Comments and Responses

Response:

Comment noted. Please see Responses to Comments below. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

AL00016-2

Comment:

The following constitutes the comments of the South Bay Cities Council of Governments (ASBCCOG@), pursuant to the requirements of the California Environmental Quality Act, Public Resources Code ' 21000, et seq., (ACEQA@) and the National Environmental Policy Act, 42 U.S.C. ' 4321, et seq., (ANEP@), concerning the Draft Environmental Impact Statement/Environmental Impact Report (ADraft EIS/EIR@) for the Los Angeles International Airport (AAirport@) Proposed Master Plan Improvements (AProject@), prepared jointly by the Federal Aviation Administration (AFAA@) and the City of Los Angeles (ALos Angeles@).¹ The issues raised by these comments fall into six general categories, although they are by no means limited only to those categories: (1) the baseline used in the Draft EIS/EIR, against which the various environmental impacts of the Project are compared, is not properly designated; (2) the noise impacts of the Project are inadequately addressed; (3) the potential air quality impacts of the Project are not fully disclosed; (4) the discussion of the Project=s surface traffic impacts is misleading; (5) the Draft EIS/EIR does not explore all reasonable alternatives, and, thus, paves the way for its ultimate conclusion that expansion of the Airport=s airside and groundside facilities are the sole way to meet future demand; and (6) the Draft EIS/EIR fails to adequately specify mitigation measures or methods to enforce them.

¹ The FAA and Los Angeles shall, for the remainder of this letter, be referred to collectively as AProject Proponents@.

Response:

Please see Responses to Comments AL00016-3 through AL00016-60 below.

AL00016-3

Comment:

I. THE DRAFT EIS/EIR DOES NOT PROPERLY DESIGNATE THE BASELINE FOR ANALYSIS.²

The specification of a baseline for comparison with Project impacts is a critical component of analysis under CEQA, because without an accurate specification of the baseline, Aanalysis of impacts, mitigation measures and project alternatives becomes impossible.@ County of Amador v. El Dorado County Water Agency, 76 Cal.App.4th 931, 953 (1999). A central concept of CEQA is that Aa baseline figure must represent an environmental condition existing on the property prior to the project.@ Save Our Peninsula Committee, et al. v. Monterey County Board of Supervisors, et al., 87 Cal.App.4th 99, 124 (2001). The regulations implementing CEQA, 14 Cal. Code Regs. ' 15000, et seq., (ACEQA Guidelines@) are specific as to the definition of Aprior to the project@:

AAan environmental impact report must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or, if no Notice of Preparation is published, at the time the environmental analysis is commenced . . . This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.@ CEQA Guidelines ' 15125(a).

While the courts have taken the position that the Adate for establishing a baseline cannot be a rigid one@, Save Our Peninsula Committee, supra, 87 Cal.App.4th at 125, they have also held unequivocally that Aan EIR must focus on impacts to the existing environment, not hypothetical situations@, County of Amador, supra, 76 Cal.App.4th at 955. The baseline for analysis in the Draft EIS/EIR does not meet these tests.

² Later sections more fully discuss the pitfalls arising out of the use of the three separate and distinct baseline assumptions used in that analysis; Environmental Baseline, Adjusted Environmental Baseline, No-Project/No-Action.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues.

AL00016-4

Comment:

A. The Draft EIS/EIR's Base Year Does Not Reflect the Physical Conditions on the Project at the Time of the Publication of its Notice of Preparation.

The Airport Master Plan, November, 2000, Technical Analysis (AMaster Plan@) is the basis of the analysis contained in the Draft EIS/EIR (Master Plan, Preface, page i). The analyses contained in Master Plan, Chapter II, Existing Conditions Working Paper, 4/19/96, use data from the base year 1994 (see, e.g., ' 2.3.1, page II-2.1, re: Annual Weather Conditions; Figure II-2.17, page II-2.53, re: Design Day Hourly Distribution of Operations and Tables following). The Notice of Preparation, however, was published in July, 1997 (Draft EIS/EIR, page ES-2), almost three years after the conditions reflected in the original Master Plan data and analysis. Courts have consistently taken the position that a baseline should not be set a number of years earlier than the commencement of the current project@. See Our Peninsula Committee, *supra*, 87 Cal.App.4th at 127.

Moreover, the Master Plan and Draft EIS/EIR contain a plethora of base years such that it is impossible for the public to ascertain which base year is used for a given purpose. On the one hand, the Draft EIS/EIR (page ES-2) states that the environmental analysis normally describes existing conditions as of the July, 1997 date on which the Notice of Preparation was published (even though none of the data in the Master Plan upon which the Draft EIS/EIR is based reflects a 1997 origin). On the other hand, the Draft EIS/EIR states that, where a full year's worth of data is needed, data from 1996 is used (see, e.g., Draft EIS/EIR Technical Report on Surface Traffic), and sometimes earlier years [unspecified], and sometimes even data from the later years 1999 and 2000 (even though these latter are more than two years after the publication of the Notice of Preparation). Additionally, the Master Plan is unclear as to whether 1994 or 1995 data is used. Finally, different base years are used for different components of the analysis, e.g., 1996 for surface traffic and noise, 2000 for water resources.

Response:

This comment is essentially the same as comment AR00003-4; please see Response to Comment AR00003-4.

AL00016-5

Comment:

The implications of these shifting baselines are not insignificant. For example, the use of a 1994 (or even 1996) baseline in the noise analysis artificially elevates the baseline for analysis by incorporating noise from the larger numbers of Stage 2 aircraft in the fleet in 1994/96. These aircraft were totally phased out of the United States fleet by the year 2000.

Response:

The 1996 environmental baseline for the Draft EIS/EIR includes many of the noisier Stage 2 aircraft that were phased out in the year 2000. Please see Topical Response TR-N-1, in particular Subtopical Response TR-N-1.3, regarding a comparison of the 1996 baseline and Year 2000 conditions relative to the noise analysis, Topical Response TR-N-3, in particular Subtopical Response TR-N-3.3, regarding noise related to the phase out of Stage 2 aircraft, and Topical Response TR-GEN-1 regarding general baseline issues. The Supplement to the Draft EIS/EIR analyzed and compared Year 2000 conditions to baseline conditions in Section 4.1, Noise, and Section 4.2, Land Use.

3. Comments and Responses

AL00016-6

Comment:

Further, the use of a 1994 (or 1996) baseline year in the air quality analysis potentially overstates the baseline level of criteria pollutants in the L.A. region which has since come into attainment for all criteria pollutants except Ozone and Particulate Matter.³ In short, the nonspecificity of both the Master Plan and Draft EIS/EIR with respect to the base year for analysis renders the results of their analyses questionable.

3 The Draft EIS/EIR also states that its use of earlier years results in a more Aconservative@ analysis, because there were fewer passengers and operations in earlier years, and, thus, less noise and fewer emissions to compare against those generated by the Project. This claim is inaccurate at least with respect to noise and air quality analyses as set forth below. In any event, it does not account for the opposite effect of using later years 1999/2000 as the baseline, which would, by the logic used in the Draft EIS/EIR, artificially elevate the baseline and, consequently minimize the environmental impacts of the Project. As neither the Master Plan nor Draft EIS/EIR are specific as to the distribution of various baseline years throughout the analysis, it is impossible to ascertain the degree of distortion that may have occurred through the use of these various baselines.

Response:

The content of this comment is essentially the same as comment AR00003-6; please see Response to Comment AR00003-6.

AL00016-7

Comment:

B. The Master Plan and Draft EIS/EIR Baseline Analyses Are Based On Incomplete and/or Inaccurate Data.

The Master Plan defines the capacity of the Airport=s existing airside facilities as Athe number of aircraft operations, arrivals and departures, that the Airport can accommodate with a reasonable amount of aircraft delay.@ (Master Plan, ' 2, page II-2.1) The correct determination of existing airside capacity is critical to identification of the Airport=s potential to accommodate future air traffic demand and plan future airport=s development. (Master Plan, Chapter 2, page II-2.1) Various independent variables are used in the modeling of existing airport capacity, including, but not limited to: (1) runway operating configurations; (2) noise abatement procedures; (3) airspace operating assumptions; and (4) airfield operating assumptions. (Master Plan, ' 2.3, page II-2.21) Delay is also apparently a contributing variable. The relationships within the model are such that, if the definition of a given variable, or the value assigned to it, are questionable, the capacity determination resulting from the model is prejudiced.

Here, even if, for argument=s sake, the Draft EIS/EIR had specifically and accurately designated a base year, critical data used in the Master Plan baseline demand/capacity/delay analysis is incomplete or in some cases inaccurate.

Response:

The content of this comment is essentially the same as comment AR00003-7; please see Response to Comment AR00003-7.

AL00016-8

Comment:

As a threshold matter, the Master Plan demand/capacity/delay analysis is predicated on Aircraft Communications, Addressing and Reporting System (AACARS@), and Official Airline Guide (AOAG@) data sources. These two data sources may exaggerate, or, inaccurately report delay. The Master Plan defines delay as Athe difference between the actual time it takes an aircraft to perform an arrival or departure and the normal time it would take to perform the same operation with no interference from

other aircraft.@ (Master Plan, ' 2.1, page II-2.2) ACARS data is generated by the airlines, and is based on activities such as push back, parking at the gate, or opening or closing cabin doors. ACARS data includes data regarding on-time performance, based on the arrival and departure times developed by each airline for each segment of flight.

Since the data is airline generated, airline definitions of delay are automatically built into the report.⁴

Further, the OAG is published for the express purpose of identifying the arrival and departure times of various airlines. When the airlines set up their schedules, they factor in the average delay for each leg of flight between city pairs. Thus, the OAG also builds delay into the departure and arrival times based on each airline's historical data and operating experience for that segment of flight.

In summary, ACARS data is not original source data but is the product of third party intervention. It is manipulated by various airline third party functionaries before a final report is released. Similarly, OAG data is manipulated to include delay not after, but before the fact. Therefore, because both sources of data already include a delay factor, their use in the Master Plan's modeling, as set forth below, may cause a double counting of delay.⁵

Instead of ACARS or OAG data, the Master Plan should have relied on radar data. Radar data is a memorialization of the movement of arriving aircraft from a specified distance outside the terminal control area until touchdown and, conversely, for departing aircraft, from the aircraft's lift-off from the runway to the same distance outside the airport's control area. Every operation is tracked in real time without the intervention of third party interpretation or manipulation.

4 When an aircraft pushes back from the gate or closes the cabin door, the aircraft could be late for a variety of reasons. Many delays are due to factors that are airline controllable such as late boarding of passengers, customer service delays, maintenance delays, late arriving equipment, catering, fueling, baggage and the unavailability of crew members, to name but a few. Other types of delay would be attributable to airport, runway or taxiway design, airport acceptance rates, airport construction, noise abatement regulations, air traffic control restrictions and weather. These items are also introduced and incorporated into the ACARS report as a delay factor.

5 In addition, the Master Plan analysis relies on numerous sources other than ACARS or OAG data including personal observations, a small sampling of users and an unique determination of aircraft speeds and routes, none of which is suitable, let alone optimal, for developing baseline analyses or formulating assumptions. (See, e.g., Master Plan, ' 2.1.3, pages II-2.5 - II-2.6)

Response:

The content of this comment is essentially the same as comment AR00003-8; please see Response to Comment AR00003-8.

AL00016-9

Comment:

The effects of this data problem are reflected in the Master Plan's modeling of demand/capacity/delay. The FAA's Simulation Model (ASIMMOD@), Version 2.1, was apparently used in the Master Plan's demand/capacity/delay analysis. SIMMOD simulates the movement of arriving and departing aircraft from their entry/exit into the Los Angeles Terminal Air Traffic Airspace through approach and landing phase, or taxi and takeoff, to their exit from the terminal air traffic airspace. The proper calibration of the SIMMOD is essential since the resulting statistics are dependent on the data used to develop the baseline assumptions and operating instructions for the model. In this case, ACARS and OAG data were used to calibrate SIMMOD. Because of the potential double counting inherent in these data sources, and the consequent exaggeration of delay in the model, the principal conclusion that is drawn from SIMMOD is that the only way to remedy delay is to build additional airport infrastructure. The primary shortcoming of such an analysis is that it eliminates, at the outset, opportunities to gain efficiency through improvements in operating practices and minor modifications to the air traffic system. Thus, what seems like a relatively minor data collection/designation problem pervades the demand/capacity/delay modeling upon which the Draft EIS/EIR's environmental analysis is based, and subtly biases the results.

3. Comments and Responses

C. The Draft EIS/EIR is Based on Implausible Modeling Assumptions.

The accuracy of SIMMOD=s results depends on an accurate Adescription@ of the Aairport=s operating environment@. (Master Plan, ' 2.1, page II-2.2) Both the Master Plan and Draft EIS/EIR acknowledge that the Adescription@ is made up not merely of data purporting to represent actual current conditions, but also assumptions arising from that data (see, e.g., Master Plan, ' 2, page II-2.1). Therefore, to the extent data and assumptions are incorrect or incomplete, so too will be the results of the model. In addition to the data problems specified above, SIMMOD, as used in the Master Plan, incorporates implausible, or biased, assumptions which, in turn, call into question the integrity of its output.

Response:

This content of this comment is essentially the same as comment AR00003-9; please see Response to Comment AR00003-9.

AL00016-10

Comment:

1. Assumptions Concerning Aircraft Delay Are Unexplained and Unsupported.

The Master Plan=s (and Draft EIS/EIR=s definition and description of the delays at the existing (pre-Project) Airport are based on consultants= opinions and not on factual data. First, while the Master Plan acknowledges that Aa standard definition of acceptable delay is not used in the industry@ (Master Plan, ' 2.1.3, page II-2.5), it then concludes that Adelay levels of six to ten minutes indicate the need for additional facilities@; that Aas average aircraft delay increases above six minutes, passengers tend to perceive service reliability problems@; Aas delay approaches ten minutes per operation, further increases in demand are limited@, and, Aflight cancellations were assumed when delays exceed 20 minutes per average annual aircraft operation.@ (Master Plan, ' 2.1.3, pages II-2.5 - II-2.6) These assumptions are apparently based on information derived from prior studies by the Master Plan consultants at airports other than Los Angeles, in years as early as 1988. In other words, the delay standards relied upon in the Master Plan are based on outdated data concerning potentially irrelevant subject airports all of which have unique characteristics that may have influenced creation or perception of delay, none of which are mentioned, let alone discussed, in the Master Plan or Draft EIS/EIR.

Further, these unsupported assumptions do not reflect an understanding of the diverse ways in which delay is determined by the airlines, Air Traffic Control and the Department of Transportation. First, a typical airline will develop performance criteria for each phase of flight based on company goals and performance percentages, including arrival and departure delay. Airlines use Azero variance@ as a standard for Aon time@ performance (i.e., zero difference between arrival and/or departure times and published schedules). The percentage goal for each activity will be based on the level of performance the airline hopes to, or, in some cases, must attain in order to remain competitive. Some airlines track on time performance plus five minutes and most will track on time performance plus 14 minutes.

FAA Air Traffic Control, on the other hand, computes delay based on actual delay time en route. An arriving aircraft is considered delayed only if the aircraft is held en route to the destination for 15 minutes or more at any given moment during the flight. It is possible that these aircraft could be held at more than one interval during a flight. However, if each holding period does not exceed the 15 minute threshold, no delay is recorded, even though the total delay might well be in excess of 15 minutes. Further, inbound delay is kept separate from outbound delay. A departing aircraft is not counted as delayed until: (1) the average taxi time for the airport; (2) the time from the gate to the runway; and (3) 15 minutes have cumulatively elapsed. Air Traffic Control delays do not consider airline schedules or internally generated delays in their reporting system. The majority of Air Traffic Control delays are as a result of weather and not system capacity. Finally, the Department of Transportation grades airline performance on the time of arrival at the destination airport within 14 minutes of the scheduled arrival time. The Master Plan utilizes none of those benchmarks. Thus, it fails to adequately explain the basis for its demand/capacity/delay analysis.

Response:

The content of this comment is essentially the same as comment AR00003-10; please see Response to Comment AR00003-10.

AL00016-11

Comment:

2. The Master Plan=s Assumptions Concerning Turbo Prop Operations are Manifestly Inaccurate.

Referring to its analysis of existing noise abatement procedures as they pertain to the creation or maintenance of demand/capacity/delay, the Master Plan states that Abased on actual information obtained by the Los Angeles Noise Management Bureau, turboprop departures were permitted to turn slightly earlier than jet departures at the Airport VOR, which is located between runways 7L and 7R, west of Pershing Drive@ (Master Plan, ' 2.3.3, page II-2.31). In addition, Figures II-2.11 and II-2.12 indicate that, when the Airport is operating on a west flow, turbo prop aircraft turn at the VOR.

These representations are inaccurate and lead to incorrect assumptions about flight paths. In fact, if such a turn were permitted, it would occur prior to the shoreline, contrary to current noise abatement procedures. Turning the turbo props early allows faster aircraft to depart behind the turbo props at a more accelerated rate than is currently allowed, thus allowing more aircraft to depart in a given interval. The results of this inaccurate assumption is that: (1) the baseline departure capacity is artificially elevated to a level higher than would be realized had actual air traffic data been used and the noise abatement procedures modeled as they are actually used; and (2) turbo props, as depicted in the Master Plan and Draft EIS/EIR, are directed over noise sensitive areas not previously overflown, and, as a result, elevate the baseline noise levels, thereby concomitantly reducing the apparent noise impacts of the Project.

Response:

The content of this comment is essentially the same as comment AR00003-11; please see Response to Comment AR00003-11.

AL00016-12

Comment:

3. The Master Plan=s Flight Schedule Assumptions Are Outdated.

The Master Plan reports the results of a SIMMOD analysis conducted in 1994, using 1994 data and 1994 assumptions. In addition to this obsolete data, the ACARS data upon which the SIMMOD analysis is based includes only 50.81% of commercial operations and 46.3% of the total operations in the design day flight schedule. As not all of the aircraft operators were considered, operational configurations long pre-date the commencement of the environmental process, and current schedules were not used (although available), the assumptions concerning a typical day=s traffic are substantially unsupported.

Response:

The content of this comment is identical to comment AR00003-12; please see Response to Comment AR00003-12.

AL00016-13

Comment:

4. The Master Plan=s Fleet Mix Assumptions are Inaccurate.

The Master Plan relies on a fleet mix distribution derived from AAugust 11, 1994 OAG, NMB Do Daily Operations Records and LADOA 1994 Monthly Air Traffic Volumes@ (Master Plan, Table II-2.16, page II-2.58). This 1994 fleet mix distribution is outdated and, thus, inadequate for use in SIMMOD. Specifically, it includes a large number of Stage 2 aircraft which are no longer in operation at the Airport. Not only are Stage 2 aircraft noisier, but they have different emissions characteristics (some of which are an improvement) from the newer high bypass ratio, Stage 3 aircraft. If the correct 1997 base year had been used (or better yet, an even more recent year), the proportion of Stage 2 aircraft would have been smaller, and the noise baseline lower, and, thus, more accurate.

3. Comments and Responses

Response:

The content of this comment is essentially the same as comment AR00003-13; please see Response to Comment AR00003-13.

AL00016-14

Comment:

5. The Master Plan=s Assumptions Concerning Aircraft Speed Are Inaccurate.

The Master Plan=s assumptions concerning aircraft speeds were apparently inflated to fit the underlying assumption of unconstrained aircraft flows. The Master Plan model calls for all aircraft to operate at the same constant air speed before proceeding to the Airport and landing. The model further assumes that all aircraft exit the runway at the same point and within the same amount of time in order to reach the modeled flow rate. In actual conditions, the speeds of the aircraft vary, with high airspeed greatly reduced as the aircraft approaches the airport. Nor would all aircraft exit the runway at the same location. In short, this assumption of high constant speed will have an as yet unascertained impact on the model=s results but would tend to overstate capacity of the existing facility, and, thus, the baseline for comparison with the Project=s improvements.

Response:

The content of this comment is essentially the same as comment AR00003-14; please see Response to Comment AR00003-14.

AL00016-15

Comment:

D. The Master Plan=s Model Omits Critical Variables.

Another crucial issue revolves around variables the Master Plan fails to include in its model. Specifically these include: (1) the capacity of the airspace beyond the Airport Terminal Control Area (ATRACON@); and (2) gate capacity for future scenarios.

1. The Master Plan Should Have Considered Airspace Capacity Beyond The Airport=s Terminal Area Airspace.

According to the Master Plan, airspace considerations were limited to entry (and exit) from the Airport=s TRACON airspace. (Master Plan, ' 2.1.1, page II-2.3) The failure to consider airspace capacity beyond that point is a material omission from the analysis. This is because the majority of aircraft delays are absorbed in the en route environment before an aircraft arrives in TRACON airspace. By modeling only the terminal area, the results of the model are skewed for both arriving and departing aircraft. For departing aircraft, if the model does not consider the inherent constraints of the en route air traffic system, including differences in aircraft performance and the impacts of other air traffic transiting the area for other airports, the departure flow pictured in the model will remain unconstrained and aircraft can take off at a constant, predetermined rate. When reaching the boundary, the aircraft are dropped from the scenario, and the model does not further consider constraints of the en route system which naturally impact the TRACON airspace. Unfortunately, this unconstrained flow scenario is not normally possible in today=s complex air traffic control system.

Similar problems exist in modeling arrivals without consideration of airspace outside the TRACON. Inbound aircraft are assumed, in the Master Plan model, to be at the entry point of terminal airspace when required by the model. Aircraft proceed inbound at a set speed, reduce speed at a predetermined point, land and proceed unimpeded to their gate. This is not a true representation of a typical aircraft arrival. In fact, there is almost no probability that aircraft can be delivered to the terminal inbound fix at a rate consistent with the model=s assumptions.

Instead, the Master Plan=s arrival model was developed to insure that an arriving aircraft would be at the inbound fix at the specific time required in order to maximize the arrival rate for the airport. Although Air Traffic Control consistently tries to keep the aircraft sequenced as closely as possible Aen trail@, it

is not possible to consistently space aircraft a set distance apart for extended periods of time. The availability of aircraft to fit into the sequence, aircraft speeds, the mix of large and small aircraft, a lack of demand, aircraft deviations due to weather, en trail restrictions though an en route sector or en trail restrictions required for an airport approach control facility and other variables cause the en trail spacing of arrival aircraft to be inconsistent. As a result of these and many other factors, there is unused capacity in each of these arrival sequences. In summary, the Master Plan=s failure to adequately consider constraining factors outside the TRACON airspace calls into question the validity of the model=s result.

Response:

The content of this comment is essentially the same as comment AR00003-15. Please see Response to Comment AR00003-15 regarding analysis of the airspace capacity beyond the terminal area airspace and Response to Comment AR00003-14 regarding the assumptions used in the simulation analysis.

AL00016-16

Comment:

2. The Master Plan Should Have Modeled Gate Capacity.

The Master Plan did not include in its modeling aircraft gate operations for future activity levels, allegedly because of the inability of the existing gate facilities to accommodate the higher activity levels.⁶ (Master Plan, ' 2.5.3, page II-2.104) The Master Plan disclaims the importance of this omission [AThe inability to model gate operations in detail does not impact the results of the airside capacity analysis since at higher activity levels the runway system tends to be the primary constraint . . .@ Master Plan, ' 2.5.3, page II-2.110] The Master Plan is in error.

If an aircraft cannot get to the gate unimpeded, the resulting delay must be factored into the analysis. In the Master Plan, taxi patterns are consistent and aircraft are dropped from the model when they reach the gate area. The model does not capture any delays in the gate area or any delays that might occur in reaching the gate due to congestion on the ramp. The same is true for departing aircraft. If a departing aircraft cannot leave the gate due to inbound traffic or other traffic in the gate area, the departure demand at the airport may not be as even as is assumed in the Master Plan=s model.

The importance of this omission is that it precludes development of a clear picture of the delay reduction, and consequent capacity enhancing, attributes of the Project. Without estimation of the potential groundside/terminal structure constraints on operations (capacity), the actual delay reducing, and capacity enhancing, benefits of the Project as a whole cannot be accurately ascertained.

6 Performance measures contained in the Master Plan, ' 2.5.1, include Aoutbound ground delay@ which, in turn, appear to include gate related variables such as Agate push-back delay@. This performance measure was apparently used in the modeling of existing gate operations but not future ones. (Master Plan, ' 2.5.1, page II-2.97)

Response:

The content of this comment is essentially the same as comment AR00003-16; please see Response to Comment AR00003-16.

AL00016-17

Comment:

3. The Master Plan Should Have Considered Currently Implemented Air Traffic Procedures.

While the Master Plan acknowledges the existence of the current Dual Civet Arrival procedure, it fails to analyze its delay reducing, or consequent capacity enhancing efficiencies. The procedure is mentioned, then drops off the Aradar@ screen. The Dual Civet Arrivals, however, have so greatly reduced arrival delay at the Airport that no national delay program for the airport has been established since the procedure=s implementation. Ignoring the impacts of Dual Civet Arrivals results in an exaggeration of existing delay and a consequent exaggeration of the Project=s delay reducing, and capacity enhancing benefits.

3. Comments and Responses

Response:

The content of this comment is essentially the same as comment AR00003-17; please see Response to Comment AR00003-17.

AL00016-18

Comment:

E. Demand, as Defined in the Master Plan, is an Identity with Capacity.

Inaccurate data and assumptions are not alone in influencing the outcome of a modeling effort. Inadequate specification of a variable may also lead to an unrepresentative result. In this case, the independent variable, demand, as defined, is not independent but is an identity with, or surrogate for, the dependent variable, capacity. Thus, the demand variable has an interactive relationship with the dependent variable which influences the model's outcome in significant ways.

For example, the Master Plan defines aircraft demand as Aa 24-hour flight schedule representative of design day activity. (Master Plan, ' 2.1.2, page II-2.3) The A24-hour flight schedule definition is almost identical to the definition of Acapacity, A the number of aircraft operations, arrivals and departures, that the Airport can accommodate with a reasonable amount of aircraft delay. (Master Plan, ' 2, page II-2.1) The two variables, therefore, vary together, i.e., as Acapacity increases, Ademand will also increase, rendering demand useless as a predictor of capacity. The precise degree in which the interaction of the independent and dependent variables in the model affect the analysis cannot be ascertained at this point without re-running SIMMOD. Suffice it to say that a new surrogate for demand, derived, for example, from airline market surveys, or annual enplanements, is necessary to insure the integrity of the model's results.

Response:

The content of this comment is essentially the same as comment AR00003-18; please see Response to Comment AR00003-18.

AL00016-19

Comment:

II. THE DRAFT EIS/EIR DOES NOT FULLY ANALYZE THE PROJECT'S OFF-AIRPORT SURFACE TRAFFIC IMPACTS.

While the Draft EIS/EIR's off airport surface traffic analysis adequately depicts some aspects of the Project's surface traffic generation potential, it is notably deficient in the following ways: (1) the analysis gives little consideration to surface traffic impacts on South Bay Communities other than those directly proximate to the airport;

Response:

Please see Subtopical Response TR-ST-2.1 for a discussion of the study area and facilities analyzed.

AL00016-20

Comment:

(2) the use of the Adjusted Environmental Baseline for comparison with the Project's surface traffic impacts creates a misleading picture of the magnitude of those impacts;

Response:

Please see Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios.

AL00016-21**Comment:**

(3) the Draft EIS/EIR improperly equates the direct and cumulative impacts of surface traffic;

Response:

This comment is identical to comment AR00003-21. Please see Response to Comment AR00003-21.

AL00016-22**Comment:**

(4) the Draft EIS/EIR provides inadequate information regarding the Northside/Westchester Southside Project;

Response:

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

AL00016-23**Comment:**

(5) the Draft EIS/EIR transportation planning horizon is improperly attenuated;

Response:

This comment is identical to comment AR00003-23. Please see Response to Comment AR00003-23.

AL00016-24**Comment:**

and (6) the Draft EIS/EIR lacks a mitigation monitoring program detailing implementation of mitigation measures for the impacts of surface traffic.

Response:

This comment is similar to comment AR00003-24. Please see Response to Comment AR00003-24.

AL00016-25**Comment:**

A. The Draft EIS/EIR Surface Traffic Analysis Lacks Adequate Consideration of the South Bay Communities.

The Draft EIS/EIR analyzed 61 intersections, with an additional 15 intersections selected for focused analysis. Only nine of the 76 intersections were south of the I-105 (Century) freeway. The apparent explanation for the focus on the north side of the airport is presented in the Draft EIS/EIR, pages 4-284 - 4-289:

ASouth of LAX, there is a higher percentage of LAX traffic on I-405 and a lower percentage on the arterials, indicating that airport traffic is in fact staying on the freeway system as desired. However, this is not the result of I-405 operating well, but is more a result of the layout of the roadway network south of LAX. There are no alternative arterial routes that closely parallel I-405 south. In fact, south of LAX, all major arterial routes change to a north/south orientation, while I-405 south of Rosecrans Avenue continues in a northwest/southeast direction.@

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This explanation does not account, however, for at least three conditions acknowledged in the Draft EIS/EIR which exist south of the Airport: (1) airport traffic south of the airport represents a significant component of traffic on local streets; (2) interviews at freeway intersections south of the airport indicate a large percentage of airport trips; and (3) the Draft EIS/EIR claims a benefit from redistribution of traffic south of the airport off the freeway and onto local streets.

1. Airport Traffic Represents a Significant Component of Traffic on Local Streets South of the Airport.

The Draft EIS/EIR notes that 8% of the afternoon peak on Sepulveda Boulevard south of El Segundo Boulevard is airport related, but concludes A. . . even if all the Airport bound traffic were removed, there would be little noticeable difference on most roads outside of the immediate vicinity of the airport, particularly during the morning and evening rush hours.@ (Draft EIS/EIR, page 4-289) The 8% reported in the Draft EIS/EIR is, however, more important to traffic flow than it appears. For example, the intersection of Sepulveda and El Segundo Boulevards has a reported 1996 Volume to Capacity (V/C) of .869 and a projected 2005 V/C ratio of 1.062 (Draft EIS/EIR, Table 4.3.2-23, page 4-334). Eight percent of the 1996 traffic represents an airport contribution at this intersection of .069. The benchmark of A significant impact@ is defined in the Draft EIS/EIR as a change in V/C ratio of .01 for an intersection operating at Level of Service (ALOS@) F (Draft EIS/EIR, page 4-291). Therefore, at the intersection of Sepulveda and El Segundo Boulevards, a contribution of .069 to the V/C ratio can hardly be considered as representing A. . . little noticeable difference . . .@

2. Freeway Ramp Data Shows Traffic Exiting the I-405 South of the Airport.

Master Plan, Chapter II, Section 7.3, reports the results of a survey conducted at area intersections during the a.m. and p.m. peak hours. The results of that survey call into question the assumption that traffic is not diverted off the I-405 onto local streets south of the Airport, where it demonstrates that more than 30% of the trips at northbound I-405 ramps at El Segundo were Airport related.

3. The Draft EIS/EIR Is Internally Contradictory with Respect to Use of Off-Freeway Traffic Routes South of the Airport.

The Draft EIS/EIR states, in pertinent part: AFurther, although it would be ideal for airport access to be provided directly via freeways, the dispersion of Airport traffic onto many arterial and freeway routes does have a side benefit in that its impact is minimized on any given route@ (Draft EIS/EIR, page 4-289). This statement directly contradicts the Draft EIS/EIR=s initial assumption that the roadway system is designed such that freeway traffic is not diverted to the local street system south of the airport. If, in fact, airport traffic is diverted from the freeway, as claimed for traffic to and from the north, would not a similar set of traffic solutions be applicable to the south as well?

In addition, Master Plan, Table II-7.12 also sets forth data that calls into question the assumption of the limited diversion of freeway traffic onto local streets south of the airport. Table II-7.12 illustrates that, by absolute volume, only 3 of 30 Akey roadway segments@ carry more Airport related morning peak hour traffic than does Sepulveda Boulevard north of Rosecrans Avenue, and in the afternoon only four key segments carry more peak hour traffic than that intersection.

In short, the failure to consider traffic impacts south of Rosecrans Avenue appears arbitrary. At a minimum, the Draft EIS/EIR and its technical appendices need to provide a much clearer statement of why the intersections evaluated were selected, and why no consideration was given to areas south of Rosecrans Avenue.

Response:

This comment is similar to comment AR00003-25. Please see Response to Comment AR00003-25.

AL00016-26

Comment:

B. The Use of the Adjusted Environmental Baseline for Comparison With the Project=s Surface Traffic Impacts Leads to Misleading Results.

Three scenarios were used as baselines against which to evaluate the surface traffic effects of the proposed Master Plan improvements: (1) Environmental Baseline; (2) Adjusted Environmental Baseline; and (3) the No-Project/No-Action alternative. The Environmental Baseline is the existing condition pre-project. It includes existing roadways and land uses, and the current airport configuration. The year used in this baseline changed during the development of the Master Plan. At the initiation of the Master Plan process, the baseline year used was 1994. Information is reported in different Master Plan sections for 1994 and 1995. For the third iteration of the Master Plan, the baseline became 1996. The technical reports for the Draft EIS/EIR used 1996.

The Adjusted Environmental Baseline uses the current airport configuration but assumes that future off airport roadways and land uses already in the pipeline will be completed (see Section B.1 below). As with the Environmental Baseline, the definition of Adjusted Environmental Baseline changed with the development of the Master Plan. The existing condition section of the Master Plan (Chapter IV, Section 7) used horizon years of 2000 to 2015. The Aconstrained@ alternatives section (Chapter V, Section 3) used the years 2005 and 2015. Finally, the No-Action/No-Project Alternative is the converse of the Adjusted Environmental Baseline and assumes that off-airport development will remain constant, but currently approved airport projects will be completed.

There are at least two issues of importance raised by reliance on the Adjusted Environmental Baseline: (1) accuracy of the Adjusted Environmental Baseline and its resulting projections; and (2) applicability of the Adjusted Environmental Baseline to the environmental impact analysis.

1. The Uncertain Definition of the Adjusted Environmental Baseline Makes the Results of its Comparison With Project Impacts Questionable.

The initial question about the Adjusted Environmental Baseline is the accuracy of the definition of AExisting Condition/Environmental Baseline@ on which it is purportedly based. There are significant differences between the 1995 data concerning the AExisting Condition/Environmental Baseline@ contained in the proposed Master Plan and the 1996 data contained in the Draft EIS/EIR. A comparison of Master Plan, Table II-7.2 and Draft EIS/EIR, Table 4.3.2-24, for the a.m. peak hour, shows changes in the AExisting Conditions/Environmental Baseline@ between 1995 and 1996. As illustrated in the following Table, some intersections got significantly better and some significantly worse. In all but one case, the difference in V/C ratios between 1995 and 1996 exceeds thresholds used for determining significance in the Draft EIS/EIR.

Intersection	Master Plan Table II 7.2 1995 V/C*	EIS/EIR Table 4.3.2-24 1996 V/C	V/C Difference
Aviation/El Segundo	0.981(E)	0.835(D)	-.146
Aviation/Rosecrans	0.915(E)	1.121(F)	.206
Highland/Rosecrans	0.714(C)	1.069(F)	.335
Sepulveda/El Segundo	0.840(D)	0.869(D)	.029
Sepulveda/Mariposa	0.776(C)	0.730(C)	-.046
Sepulveda/Rosecrans	1.238(F)	1.220(F)	-.018
Vista Del Mar/Grand	0.755(C)	0.749(C)	-.006
Vista Del Mar/Imperial	0.821(D)	0.465(A)	-.356

* In Master Plan Table II 7.2 the first column heading is apparently mislabeled

Moreover, the Aadjustments@ to the AExisting Conditions/Environmental Baseline@ involved adding additional roadways and additional traffic to the system based on anticipated projects. The definitions of these Aadjustments@ is not consistent within the Draft EIS/EIR, or between it and the Master Plan. For example, the Draft EIS/EIR states that: AA list of approved development projects were developed . . . (Draft EIS/EIR, page 4-279)@ [Emphasis added.] The traffic technical report on which the Draft EIS/EIR is based states: AA list of planned development projects was developed . . . @ (Technical Report, ' 3b, page 2-3)@ [Emphasis added.] Master Plan, Table IV-8.3; Master Plan, Chapter V, Appendix L; and Technical Report, 3b, Table 2-3, present projected regional roadway improvements. Master Plan, Chapter V, Section 2.6 indicates that the future roadway network used in the analysis includes those projects A. . . currently funded and approved or which have a high probability for completion by 2015 . . . @ Clearly, the distinction between Aapproved@ and Aplanned@ projects is critical to a functional definition of Adjusted Environmental Baseline. The baseline will be set much

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higher (and the consequent relationship of the Adjusted Environmental Baseline with the Project's impacts much lower) if all planned projects are included in addition to all approved projects.

Finally, Chapter IV of the Master Plan (Table VI-8.1, page IV-8.5) provides a Preliminary list of related projects that differs from the list presented in Table 2.2 of the Draft EIS/EIR Traffic Technical Report, 3b. While differences are to be expected between the 1996 version of the Master Plan and the Updated 2000 version of the Traffic Technical Report, one difference may be more crucial than others - the projected size and resulting traffic impact of the Playa Vista Project. For example, according to the Master Plan, Table IV-8.1, the Playa Vista Project will contain 13,156 single-family units and 8,262 multi-family units. Master Plan, Chapter V, Appendix L, and the Draft EIS/EIR Traffic Technical Report specifies 13,085 multi-family units and no single-family units for the same Project. There is no explanation for the change, nor any reference to the source of either number. The difference is crucial because the traffic analysis assumed three people for each single-family home, and only two for each multi-family residence. The change therefore results in a significant diminution in traffic if the latter multi-family numbers are correct. Considering the potential of over 13,000 housing units for traffic generation, a complete explanation is needed to render the Draft EIS/EIR surface traffic analysis.

2. The Applicability of the Adjusted Environmental Baseline to the Draft EIS/EIR Traffic Analysis is Questionable.

As set forth above, the off airport surface traffic analysis in the Draft EIS/EIR uses the Adjusted Environmental Baseline as the basis of comparison under CEQA for future mitigation for the three build alternatives (Draft EIS/EIR, page 4-276). The Adjusted Environmental Baseline reflects projected conditions in the years 2005 and 2015 with off airport land use activities completed and regional circulation improvements in place, but without any increased use of the airport. This approach minimizes the potential direct impact from the adoption of the proposed Master Plan because: (1) the future traffic volumes without the Project increase thereby reducing the proportional effect of the added airport traffic from the Project and (2) additional circulation system improvements provide additional capacity. While it is reasonable to assess particular impacts at the time at which they might occur, relying on this approach requires assurances that the projected circulation improvements will actually be in place. No such assurances are provided in the Draft EIS/EIR.

The Off Airport Technical Report lists circulation system improvements that were included in the modeling process. This listing provides an indication of when certain improvements are anticipated. Without these improvements, the circulation system for the Adjusted Environmental Baseline would, apparently, be the same as for the 1996 condition, and many more intersections and roadway segments would be subject to significant adverse impacts as a result of the proposed Master Plan.

Response:

Please see Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios.

AL00016-27

Comment:

It is important, therefore, that the Draft EIS/EIR traffic analysis include projected phasing of the anticipated improvements relative to the additional traffic resulting from airport use. This should include a discussion of the phasing of airport improvements as they pertain to traffic generation with respect to the circulation improvements used in the Adjusted Environmental Baseline. Limitations should be placed on airport traffic generation if anticipated circulation improvements off-airport do not occur. Once the Adjusted Environmental Baseline is accepted as accurate and the conditions to achieve it are assured, the next issue concerns the significance of surface traffic impacts and the mitigation measures needed to reduce those impacts.

Response:

Please see Topical Response TR-ST-3 regarding construction traffic and Topical Response TR-ST-2 regarding the Adjusted Environmental Baseline. A mitigation phasing plan is included in Table S4.3.2-13 in Section 4.3, Surface Transportation, of the Supplement to the Draft EIS/EIR.

AL00016-28

Comment:

C. The Direct and Cumulative Impacts of Surface Traffic Are Improperly Equated.

The surface traffic analysis uses traffic volumes from airport and non-airport projects. (See, e.g., Master Plan ' 2.6.2, page V-2.279). Therefore, it is at least partially a cumulative impact analysis.⁷ Because the surface traffic analysis is based on cumulative traffic volumes, the significance of the direct impacts and the cumulative impacts are equated. However, the use of the Adjusted Environmental Baseline makes this equation between direct and indirect effects inappropriate. While comparing the Project to the adjusted future conditions may be appropriate for assessing direct impacts, the cumulative impact is the impact of all traffic relative to the existing condition, not expected future conditions as contained in the Adjusted Environmental Baseline.

The result of this improper equation of direct and indirect effects is material. The following Table (derived from Draft EIS/EIR, Table 4.3.2-24) for the a.m. peak hour illustrates the problem. The reported change in congestion between the existing conditions and Alternative C, the preferred project alternative, is often significant, while the comparison of Alternative C with the Adjusted Environmental Baseline (which incorporates future conditions) is not.

Intersection	Existing V/C(LOS)	Adjusted Baseline V/C(LOS)	Alternative C (w/mit) V/C(LOS)
Aviation/El Segundo	0.835(D)	1.097(F)	0.865(F)*
Aviation/Rosecrans	1.121(F)	1.164(F)	1.171(F)
Highland/Rosecrans	1.069(F)	1.211(F)	0.947(E)
Sepulveda/El Segundo	0.869(D)	1.190(F)	1.161(F)
Sepulveda/Mariposa	0.730(C)	0.772(C)	0.803(D)
Sepulveda/Rosecrans	1.220(F)	1.275(F)	1.243(F)
Vista Del Mar/Grand	0.749(C)	0.918(E)	0.729(C)
Vista Del Mar/Imperial	0.465(A)	1.098(F)	0.903(E)

* Apparent error in Table 4.3.2-24 of the EIS/EIR (page 4-340)

Using this concept of the Adjusted Environmental Baseline, the result is that the cumulative impacts of the Project are often significant and not mitigated even when the Project=s direct effects have been.

⁷ AThe cumulative impact from several projects is the change in the environment which results from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable probable future projects.@ (CEQA Guidelines, ' 15355(b))

Response:

Please see Response to Comment AR00003-21 regarding cumulative impacts.

AL00016-29

Comment:

D. The Draft EIS/EIR Inadequately Documents the Northside/Westchester Southside Project.

The Draft EIS/EIR=s impact analysis for off airport surface traffic is dependent upon the assumption that there will be a substantial reduction in the number of trips generated from the Northside Project. By Areconstituting@ the Northside Project into the Westchester Southside Project, the Draft EIS/EIR projects that there will be a significant decrease in collateral trips with the adoption of the proposed Master Plan.

The source of the collateral trip reduction is the change in the land use for the Northside Project and Continental City Project. Attachment A of Technical Report 3b provides the basis for the reduction in collateral trips.

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	AM PEAK			PM PEAK		
	Adjusted No Baseline	Alternative Project	C	Adjusted Baseline	No Alternative Project	C
Northside	0	7,217	3,922	0	7,131	4,423
Continental City	0	5,323	0	0	5,348	0
Manchester Square	0	0	212	0	0	233
Total	0	12,540	4,134	0	12,479	4,656

The issue here is the same as that concerning the Adjusted Environmental Baseline, i.e., the actions needed to insure that the reduction is achieved. The principal question is what specific discretionary actions are required to modify the allowable land uses in the Northside Project and in Continental City property, and how will compliance be assured?

The land use component of the Draft EIS/EIR and Condition LU- 1 in Chapter V, Environmental Action Plan, presents a Master Plan commitment@ that:

At the maximum extent feasible, all [Q] conditions . . . from the City of Los Angeles Ordinance No. 159,526 that address the Northside project area will be incorporated by LAWA into the Zoning Code Amendment and LAX Master Plan Implementing Ordinance for the Westchester Southside Project. Accepting that certain conditions may be updated, revised, or determined infeasible as a result of changes to the LAX Northside project, the final [Q] conditions for the Westchester Southside Project will ensure that the level of environmental protection afforded by the full set of LAX Northside projects [Q] conditions is maintained.@ (Draft EIS/EIR, Chapter V, page 5-2).

Since this traffic reduction is critical to the projected Master Plan trip generation, the detail associated with this property needs to be firmly established. It is unacceptable to assume that certain conditions may be updated, revised or determined infeasible@ if they are necessary to bring about the decrease in collateral trips upon which the Master Plan projections are based. While there are some discussions of the Northside/Westchester Southside Project in the Draft EIS/EIR=s purpose and need chapter and Master Plan, Appendix Q, these are brief, general presentations lacking in specificity as to the actions needed to commit the City to limit these uses.

The importance of this lack of specificity in the definition of Project actions, as they relate to the Northside/Westchester Southside Project, is that there is no commitment by Los Angeles to insure that the traffic reduction represented by the changes in allowable land use will occur. The surface traffic capacity for the Project claimed through the reduction of traffic generation from the Westchester Southside Project is significant. Without a more adequate demonstration of the Master Plan=s ability to achieve that reduction, and a concrete commitment to meeting those goals, the Draft EIS/EIR will remain inadequate.

Response:

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

AL00016-30

Comment:

E. The Transportation Planning Horizon Used in the Draft EIS/EIR is Improperly Attenuated So As To Minimize the Full Build Out Surface Traffic Impacts of the Project.

The Draft EIS/EIR modeled future conditions for the years 2005 and 2015. The current regional transportation plan, however, uses 2025 as the horizon year. The use of a later year between 2015 and 2025 for analysis is proper in light of the fact that the Project is anticipated to take 16 years to complete.8 If the Project commences as early as 2002, it will not be completed until 2018, three years after the 2015 horizon has expired. With the year 2013 being the second greatest peak construction year (Draft EIS/EIR, page 4-270), the proposed Master Plan improvements will not be complete by the time the present horizon year of 2015 is reached. The import of the choice of 2015 as horizon year, before the Project is completed, is that the full build-out (Aworst case@) impacts of the Project will remain unanalyzed.

8 The Draft EIS/EIR, Purpose and Need Section (Chapter 2, pages 2-12 through 2-13) indicates that the Project will be implemented in two phases. The first phase will last six years and the following phase 10 more years.

Response:

Please see Response to Comment AR00003-23 regarding the horizon year used in the analysis.

AL00016-31

Comment:

Further, while the impacts resulting from the adoption of the proposed Master Plan are generally evaluated against the Adjusted Environmental Baseline, much of the Draft EIS/EIR=s discussion of surface traffic is compared to the No-Project/No-Action alternative (i.e., the alternative that assumes growth in operations and passenger demand at the Airport, along with completion of improvements already planned, but no off airport traffic or other development improvements). The comparison of the Project with two separate baselines in the years 2015 presents a misleading picture. While the reconstitution of the Northside Project may provide a reduction in the traffic generated in 2015, the existing airport improvements clearly permit growth beyond that currently possible.

Response:

Please see Subtopical Response TR-ST-2.2 regarding the adjusted environmental baseline.

AL00016-32

Comment:

Therefore, the further into the future conditions are projected, the greater the effect of the proposed Master Plan improvements on traffic.

Response:

This comment is similar to comment AR00003-23. Please see Response to Comment AR00003-23.

AL00016-33

Comment:

F. The Draft EIS/EIR Lacks a Mitigation Monitoring Program.

The Draft EIS/EIR, Chapter V is entitled AEnvironmental Action Plan@. It is not specific as to whether this constitutes a Mitigation Monitoring Program required by CEQA (CEQA Guidelines ' 15091(d)). If it does represent a Draft Mitigation Monitoring Program, it is inadequate. The Section lacks a clear statement of the party responsible for implementing the mitigation, the mechanism for enforcement of the mitigation and the timing of implementation. Moreover, it lacks detailed explanation of the way in which the diminution of traffic from the Northside Project, as well as other surface traffic mitigation measures will be achieved.

Response:

This comment is similar to comment AR00003-38. Please see Response to Comment AR00003-38.

AL00016-34

Comment:

III. THE DRAFT EIS/EIR NOISE ANALYSIS UNDERSTATES THE PROJECT=S NOISE IMPACTS.

The Draft EIS/EIR minimizes the Project=s noise impacts by artificially inflating the Environmental Baseline and by failing to disclose the Project=s overflight noise impacts.⁹

A. The Draft EIS/EIR Does Not Designate the Proper Baseline for Its Noise Analysis.

3. Comments and Responses

As set forth in detail above, a threshold issue in environmental analysis is the establishment of a Baseline. The function of a Baseline is to provide a benchmark of existing conditions against which the environmental impacts of a project may be measured. If the baseline is incorrectly designated at too high a level, the impacts of the Project will be artificially minimized. In this case, the Draft EIS/EIR utilizes three separate and distinct baselines for analyzing the impacts of the Project: (1) the Environmental Baseline (1996), i.e., the purported conditions in existence before implementation of the Project; (2) A No-Project baseline for 2005 (and 2015) which includes a natural growth on the airport resulting from implementation of already approved airport projects continued in the current Master Plan that purportedly would have occurred even if the Project is not implemented; and (3) Adjusted Environmental Baseline predicated on projected conditions in the years 2005 and 2015 with off-airport land use activities completed and regional circulation improvements in place, but without any improvement to airport facilities.

The Draft EIS/EIR chooses 1996 (i.e., the Environmental Baseline) as the base year for evaluation of noise impacts, and states that in 2015, the Project's horizon year, Alternative C would reduce the total number of people exposed to aircraft noise above 65 CNEL compared to current conditions as represented by the Environmental Baseline year. (Draft EIS/EIR, page 4-11) By using 1996 as the benchmark, the Draft EIS/EIR's noise analysis artificially minimizes the apparent growth in noise impacts associated with the Project. This is because, in 1996, many noisy Stage 2 aircraft remained in the fleet (which were then phased out in late 1999). When the Notice of Preparation was published in July 1997, the Project proponents knew with certainty at that time that some of the noisiest aircraft in its fleet would not operate after December 31, 1999, and that the removal of these aircraft from the fleet serving the Airport would reduce the size of the noise contours. The Draft EIS/EIR concedes that the reduction in noise exposure is the result of a federally mandated phase out of older, noisier Stage 2 jets, and not the implementation of the Project. Despite that fact, or perhaps, because of it, the Draft EIS/EIR consciously skews the analysis by using 1996 as the Base Year for its noise analysis.

The Draft EIS/EIR also reflects a cavalier disregard for the fleet mix changes brought about by the Stage 2 phase out. The Draft EIS/EIR's Average Annual Day Operations and Fleet Mix - Environmental Baseline (Draft EIS/EIR, Appendix D, page 11) includes a total of 139 noisy Stage 2 aircraft in the daily operations mix. In other words, nearly 7% of the aircraft included in the calculation of the baseline noise contour analysis are high noise producing aircraft the inclusion of which will increase the size of the baseline noise contours and, thereby minimize the apparent impacts of the Project.

Courts have displayed flexibility in dealing with cases involving complex long term environmental review. They have agreed that, for lengthy environmental review such as that at issue here, the analysis of such impacts as surface traffic (and aircraft operations) which normally fluctuate over time are properly assessed against a later baseline than the time of the publication of the Notice of Preparation. (Save our Peninsula Committee, supra, 87 Cal.App.4th at 125-126) Therefore, Project proponents are not tied to the 1996 baseline, the last full year of data before the year of Notice of Preparation Publication, but should, more properly, have used a year no earlier than 1999, the last full year of data available before publication of the Draft EIS/EIR. Moreover, that data should have been updated with available data from the year 2000. Absent such an update, the Draft EIS/EIR noise analysis is incomplete and, thus, inadequate.

9 Project proponents apparently did not use the most recent Integrated Noise Model (INM) Version 6.0 to calculate aircraft noise as the Draft EIS/EIR discusses INM, Version 5.1a. Draft EIS/EIR, Appendix D, page 6.

Response:

The content of this comment is essentially the same as comment AR00003-39; please see Response to Comment AR00003-39.

AL00016-35

Comment:

B. The Draft EIS/EIR Fails to Disclose the Project's Overflight Noise Impacts.

Under FAA Rules, changes in operations above an altitude of 3,000 feet Above Ground Level (AGL) are categorically excluded from environmental review under NEPA. FAA Order 1050.1D, Appendix 3, paragraph 3.a.10 However, FAA Order 1050.1D, paragraph 32 also mandates that Aextraordinary circumstances@ such as actions which are likely to have a significant impact on noise levels over noise sensitive areas, or a significant impact on coastal zones, Ashall be the subject of an environmental assessment.@ (Id., paragraph 32)

Here, the noise analysis in the Draft EIS/EIR narrowly focuses on cumulative aircraft noise impacts created by aircraft approaching the Airport from the east, and from start-of-takeoff roll. However, it completely dismisses the impact of single event overflight noise on the South Bay communities: (1) by failing to depict and analyze the noise impacts from additional new routes over areas not previously over-flown; (2) by failing to acknowledge a potential increase in lateral separation of aircraft which could lead to an increase in overflight noise; (3) by failing to report or study the noise impacts of increased operations over coastal zones; and (4) by using an outdated modeling system to justify the decision not to study the noise impacts to South Bay communities.

1. The Draft EIS/EIR Depicts Additional New Routes Over Noise-Sensitive Areas Within the South Bay Communities but Fails to Analyze the Noise Effects of These New Routes.

CEQ Guidelines ' 1502.15 11 state that A[t]he environmental impact statement shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration.@ [emphasis added] The Draft EIS/EIR=s failure to comply with this mandate is two-fold. First, the Preferred Alternative includes new routes over areas not previously impacted. Second, the Draft EIS/EIR does not analyze the noise impact created by these new routes over noise sensitive areas, thereby failing to describe the environment of the areas to be affected or created.

Master Plan Maps (pages II-2.36 - II-2.37, Figures II-2.11 and II-2.12) illustrate that when the Airport is operating on a west flow, M-class or turbo-prop aircraft turn at the VOR. This is contrary to stated airport policy and noise abatement procedures which require aircraft to proceed past the shoreline before starting a turn. In fact, twelve of the departure tracks for turbo-props used to establish the baseline integrated noise monitor data are routed over residential areas not previously overflown. (Draft EIS/EIR, Appendix D, page 7, Exhibit 2). The use of these incorrect flight tracks and early turns potentially affects the noise contour on both sides of the airport.

Moreover, if the turbo-prop aircraft turn early, the designated routes will cause them to fly over noise sensitive areas such as parts of El Segundo, thus requiring further review under the Aextraordinary circumstances@ exception of FAA Order 10501.1D paragraph 32. In short, the development of these new routes could potentially violate Airport noise abatement policy and could create unacknowledged impacts which must be analyzed.

10 The Draft EIS/EIR improperly relies on draft FAA Order 1050.1E and the City of Los Angeles= Draft L.A. CEQA Thresholds Guide (May 14, 1998) as authority for several of its assertions.

11 The Draft EIS/EIR is also a federal document subject to the requirements of the National Environmental Policy Act, 42 U.S.C. ' 4321, et seq., and its implementing regulations, 40 C.F.R. ' 1500, et seq. (ACEQ Guidelines@).

Response:

The content of this comment is essentially the same as comment AR00003-40; please see Response to Comment AR00003-40.

AL00016-36

Comment:

2. Greater Lateral Dispersion of Aircraft Will Potentially Occur to Accommodate the Increase in Operations at the Airport Which May Lead to Premature Easterly Turns Over the South Bay Communities and Consequent Increases in Overflight Noise.

Even if no new routes were contemplated, the Draft EIS/EIR states that over 90% of the operations at the Airport are in a west flow with climb out over the ocean. The aircraft then turn either south-east or

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north-east towards their easterly destination. The Draft EIS/EIR anticipates that the Project will lead to an increase in operations. The Draft EIS/EIR does not, however, discuss the way in which these increased operations will be integrated into the existing Airport air traffic flows. If it did, it would also have to reveal the potential for increased overflights of South Bay communities.

In order to accommodate this increase in air traffic, greater separation between aircraft at climb out may have to occur. Air traffic controllers create this separation in two ways, laterally and vertically. Generally speaking, since heavy departing aircraft are resistant to increasing vertical separations for reasons of both cost and performance, aircraft are dispersed laterally. As lateral separation between departing aircraft must be maintained, a greater number of offshore aircraft may come closer and over the shoreline, which may also lead to premature easterly turns from the initial southerly headings of departing flights. These premature turns will potentially lead to an increase in overflight noise over South Bay Communities, noise sensitive areas not previously included in standard departure tracks. At a minimum, the Draft EIS/EIR should contain a supplementary single-event noise analysis for communities south of the airport.

Response:

The content of this comment is essentially the same as comment AR00003-41; please see Response to Comment AR00003-41.

AL00016-37

Comment:

3. The FAA Fails to Study the Project=s Noise Impacts over Coastal Zones.

FAA Order 1050.1D, paragraph 32, Extraordinary Circumstances, mandates that a normally categorically excluded proposed Federal action which is likely to have a significant impact on natural, ecological, cultural, or scenic resources of national, state, or local significance, including... coastal zones, (FAA Order 1050.1D, paragraph 32) shall be the subject of, at a minimum, an environmental assessment. Included in South Bay communities are the coastal zones south of the airport. As California=s coastal zones are of national, state, and local significance, they fall within the mandate contained in FAA Order 1050.1D. Nevertheless, the Draft EIS/EIR fails to acknowledge, let alone analyze, impacts on South Bay coastal zones.

Response:

The content of this comment is essentially the same as comment AR00003-42; please see Response to Comment AR00003-42.

AL00016-38

Comment:

4. The Draft EIS/EIR Ignores FAA Order 1050.1D, Paragraph 32 and Uses a Modeling System Which Lacks Any Legal or Scientific Basis in Order to Justify the Draft EIS/EIR=s Failure to Examine the Noise Impacts to Communities in the South Bay.

The Draft EIS/EIR noise analysis assumes that noise in the South Bay communities which lies outside the parameters established for the noise analysis, does not exist. The noise analysis is, therefore, incomplete. First, as discussed above, the turbo-prop routes and the potential for increased lateral separation of aircraft will have a material impact on noise levels of noise sensitive areas including coastal zones. Therefore, FAA Order 1050.1D, paragraph 32 calls for at least an assessment of changes in operations above 3,000 feet AGL. Nevertheless, the Draft EIS/EIR, in two paragraphs, completely dismisses this requirement and categorically states that no further noise review@ above 3,000 feet is necessary since the noise associated with jet aircraft weighing more than 75,000 pounds will not change more than five decibels CNEL. (Draft EIS/EIR, Appendix D, page 65)

Second, the methodology used to make this determination is unexplained and unjustified under either legal or scientific standards. The five decibel CNEL standard is not acknowledged in the procedures and policies of NEPA, FAA Order 1050.1D, or FAA Order 5050.4A. The Draft EIS/EIR=s methodology is further flawed by the use of a patently erroneous measure. The FAA=s benchmark for the

measurement of overflight is AAbove Ground Level@ (AGL).¹² The measure employed in the Draft EIS/EIR is AAbove the Airport.@ (Draft EIS/EIR, Appendix D, page 65). The potential for mischief with the latter measure is clear. If the Project proponents analyze noise at altitudes greater than 3,000 feet above an airport=s elevation,@ then communities in the South Bay and elsewhere which are located well above the airport=s elevation would be at a severe disadvantage. For instance, Palos Verdes is at approximately 1,480 feet elevation,¹³ while the Airport is located at 126 feet.¹⁴ Due to the difference in elevation between Palos Verdes and the Airport, an aircraft may be 3,001 feet Aabove the airport@, and its noise not subject to environmental review, while it is only 1,521 feet above Palos Verdes. Thus, while the noise impact may not meet the Aabove the airport@ criteria, the noise over Palos Verdes would be significantly greater but remain unaccounted for in the model.

Third, the Draft EIS/EIR claims to have relied upon the Air Traffic Noise Screening Model (ATNS), Version 2.0, to:

Aassess the effects of noise level changes associated with air traffic procedure changes at altitudes greater than 3,000 feet above an airport=s elevation. This methodology requires that changes in aircraft noise be evaluated if the noise associated with jet aircraft weighing more than 75,000 pounds changes by more than five decibels of DNL (CNEL in California) over residential areas and the aircraft is in flight at an altitude between 3,000 and 18,000 feet above the airport.@ (Draft EIS/EIR, Appendix D, page 65) [Emphasis added.]

It did not. In fact, it appears that the outdated and obsolete checklist from FAA Notice 7210.360 was utilized instead. ATNS is a computerized version of the former FAA Notice 7210.360, and supercedes the checklist method. It requires actual data input, performs the calculations, and prepares written documentation on the findings. The Draft EIS/EIR contains only a checklist. After checking off five boxes from the Adeparture@ N 7210.360 checklist, (Draft EIS/EIR, Volume D, pages 79-86) the Project proponents determined that:

Asince the flight tracks of the new and relocated runways will be located within close proximity to the present flight tracks of the existing runways, and the aircraft activity on these tracks will not result in an increase of 5 decibels of DNL (CNEL) over any residential area when the aircraft are above 3,000 feet, the checklist indicates that no further noise review under this requirement is necessary.@ Draft EIS/EIR, Volume D, pg. 65. (Italics added for emphasis.)

The checklist itself is proof that the drafters never used the actual ATNS aircraft noise screening modeling system, but, instead, chose to work with its former outdated and obsolete checklist version. The Draft EIS/EIR misleads the public into believing that an actual, scientific analysis was conducted to determine whether noise decibels would increase above 3,000 feet.

In short, the Draft EIS/EIR does a disservice to the South Bay communities by ignoring the potential noise impacts that the new flight tracks and lateral separation of aircraft will cause to the area. Not only should the Project proponents conduct a full environmental review of the noise impacts to the area under FAA 1050.1D, paragraph 32, but a more accurate, and scientifically appropriate methodology should be used to make the determination of the significance of noise impacts over South Bay communities.

¹² See, in general, FAA Order 1050.1D which uses the benchmark AABOVE GROUND LEVEL@ as a starting point for altitude measurements.

¹³ <http://pointvicenteinterpretivecenter.com/rpv/recreationparks/content/rpvfactsheet2000.htm> (accessed June 22, 2001).

¹⁴ <http://www.airnav.com/airport/LAX> (accessed June 22, 2001).

Response:

The content of this comment is essentially the same as comment AR00003-43; please see Response to Comment AR00003-43.

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AL00016-39

Comment:

IV. THE DRAFT EIS/EIR AIR QUALITY ANALYSIS IS INADEQUATE.

The Draft EIS/EIR's air quality analysis exhibits serious deficiencies, not the least of which is the total absence of a formal air quality conformity analysis required under federal law where, as here, the Project's air quality impacts are not claimed to be insignificant (see 42 U.S.C. ' 750615). The absence of a conformity analysis necessarily renders the following comments preliminary, and SBCCOG reserves the right to comment further upon issuance of the conformity analysis.

15 A No department, agency, or instrumentality of the federal government shall engage in, support in any way or provide financial assistance for, license, permit or approve any activity which does not conform to an implementation plan . . . @ (42 U.S.C. ' 7506(c)(1))

Response:

Please see Response to Comment AF00001-4 regarding the general conformity determination.

AL00016-40

Comment:

A. The Baseline for the Draft EIS/EIR Air Quality Analysis is Not Appropriately Estimated.

The Draft EIS/EIR assumes that annual aircraft operations will be essentially identical regardless of whether the Preferred Alternative is implemented. Under the No-Action/No-Project Alternative, total operations are expected to be 98 percent of operations under the expanded capacity scenario (air passenger operations activity will actually be higher under the No-Action/No-Project Alternative). At the same time, the Preferred Alternative moves about 15 percent more passengers through higher aircraft load factors. Basic economic theory, however, dictates that under free market conditions demand will reach equilibrium for a given level of supply at a certain market cost (including time costs associated with delays, congestion, etc.). If the supply curve (for air transportation) is then shifted, as would occur under an increased capacity situation such as that proposed,¹⁶ the supply/demand equilibrium for the same level of market cost will shift to a point of higher demand. This shift is often referred to as induced demand, and analyses which do not consider this effect (or which assume demand levels counter to market behavior as appears to be the case with the Draft EIS/EIR) are not accurate in general, or specifically with respect to future air quality conditions under any of the various alternatives. Viewed from a practical rather than theoretical perspective, the Draft EIS/EIR presumes that the Airport will support over 391,000 aircraft landing and takeoff (LTO) cycles in 2015 by doing nothing other than carrying through with those projects already adopted. Without question, however, operations without the Project would be constrained by greater delays, excessive times to reach the airport. Nevertheless, under whatever severe burdens are placed on air travelers, they and the airlines that support them are assumed to utilize the Airport for nearly 400,000 LTOs per year. Under the Preferred Alternative specifically designed to relieve these very problems by easing congestion, reducing delays, the total number of expected annual LTOs increases by less than 2 percent to 398,000 over the No-Action/No-Project Alternative. There are only two possible explanations for this relationship: (1) either usage under the No-Action/ No-Project baseline is overstated; or (2) usage under the Preferred Alternative is understated.

16 The Preferred Alternative lengthens and reconfigures runways, adds a new West Terminal, and improves traffic flow.

Response:

The content of this comment is essentially the same as comment AR00003-45; please see Response to Comment AR00003-45.

AL00016-41**Comment:**

Correspondingly, either emissions for the No-Action/No-Project baseline are overstated or emissions for the Preferred Alternative are understated. The result is an artificial (and erroneous) minimization of the difference in emissions between baseline conditions and those of the Project.

Response:

The content of this comment is essentially the same as comment AR00003-46; please see Response to Comment AR00003-46.

AL00016-42**Comment:**

This same issue affects stationary source emissions. Increased airport capacity can be expected to attract associated industrial and commercial activity into the area. This attraction would not occur without the increased capacity and, therefore, must be accounted for if a true assessment of airport emission impacts are to be determined. Note that this commercial development is distinct from currently planned commercial development, in that it occurs due to airport capacity expansion, but outside the formal planning process of the airport. One must recognize that the estimates of reduced emissions under the action alternatives (either the preferred or alternative scenarios relative to a No-Action/No-Project scenario) are due almost entirely to Aflow@ improvements in the form of reduced taxiway congestion and improved traffic movement both on and offsite. If these congestion reductions are eliminated or reduced through increased air travel or associated demand that is not properly accounted for in the Draft EIS/EIR, the predicted emissions impacts will not be accurate.

Response:

The content of this comment is identical to comment AR00003-47; please see Response to Comment AR00003-47.

AL00016-43**Comment:**

B. Future Background Pollutant Concentrations Are Not Appropriately Estimated.

Background pollutant concentrations are required to accurately estimate the impact of the proposed Airport expansion on National Ambient Air Quality Standards/California Ambient Air Quality Standards (ANAAQS/CAAQS@) compliance. These concentrations must account for the combined impacts of the universe of emission sources not explicitly accounted for in the airport analysis. In effect, the background concentrations determine the emissions baseline upon which Airport emissions are placed. If this base is underestimated, the overall affect of airport expansion on NAAQS/CAAQS compliance could be similarly understated. Alternatively, if the base is too high, the Draft EIS/EIR analysis could be conservative. While the Draft EIS/EIR implies the latter, it contains no data to support such a conclusion and some reason to believe that the converse may be true. Current short term (sub-annual) background concentrations for the Draft EIS/EIR are based on measurements taken at an onsite monitoring station located just east of the southern runway configuration. Current annual concentrations are based on data collected at a Southern California Air Quality Management District (ASCAQMD@) monitoring facility (Hawthorne) located near, but southeast of the Airport. On the premise that measurements from these sites inherently include emissions from the Airport, the Draft EIS/EIR concludes that such emissions represent conservative background concentration baselines for air quality analysis (since Airport emissions will be added on top of a background that already includes Airport emissions). However, the prevailing wind direction for the Airport area is southwest to northeast. Therefore, there is probably little influence from the Airport on the offsite concentrations used as background, as well as only moderate influence on the onsite-based background concentrations. The bulk of airport activity, including all terminal and motor vehicle operations occur under the influence of a prevailing wind plume that is further north than the onsite monitoring station. While certain aircraft

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takeoff and queuing emissions are undoubtedly accounted for in the onsite baseline concentrations, these represent only a small fraction of overall airport emissions. Comparative data for concentrations from both monitoring stations could demonstrate the validity of the claim of conservatism, (i.e., do the observed concentrations for identical monitoring periods show a higher background at the onsite station?), but the Draft EIS/EIR apparently contains no data for the offsite monitoring station (other than the specific background concentrations used in the Draft EIS/EIR and associated documents).

More importantly, the emissions inventory rollback techniques used to forecast future background concentrations are of questionable validity for the Airport area. Background concentrations as well as future emission reduction influences around the Airport are constrained by geography. Since the prevailing wind flows southwest to northeast, the Pacific Ocean represents a physical constraint that may significantly influence emission reduction impacts on background concentrations. In effect, the implemented rollback procedure to estimate future background concentrations reduces current background concentrations in proportion to expected regional emission inventory reductions over the same time period. Therefore, this procedure inherently assumes that inventory reductions are homogeneous throughout the region in terms of their influence on background concentrations. This is perhaps a viable assumption in instances where one part of a region has similar source characteristics with another, but the Airport region is clearly constrained to those source characteristics along the Pacific coastline to the immediate south of the Airport. It is the expected reductions from these sources in particular that should be used to adjust Airport background concentrations. Generally background concentrations for 2005 are reduced 30 to 40 percent while concentrations for 2015 are reduced 50 to 60 percent from the current measured data. Clearly this assumes significant emission reductions will affect coastal monitoring sites and provides substantial headroom for emissions increases within the confines of the NAAQS/CAAQS. These reductions probably represent the most significant influence on forecast pollutant concentrations in 2005 and 2015. It is critical that the propriety of the assumed background concentrations at least be supported by comparative analysis of current Airport and offsite monitoring data as well as analysis of emissions source classifications for the area immediately to the south of the Airport with the remainder of the air basin. This comparison will either provide the proper support for the currently implemented approach or suggest a more appropriate alternative.

Response:

Please see Response to Comment AF00001-28 regarding future background concentrations.

AL00016-44

Comment:

C. Reverse Thrust Emissions from Aircraft Are Not Included in the Draft EIS/EIR Air Quality Analysis.

The Draft EIS/EIR makes an affirmative determination not to address emissions from aircraft reverse thrust operations, ostensibly on the basis of inadequate emission factors and short usage times. Both of these claims are misleading. First, reverse thrust is essentially a high thrust operating mode and emission factors for such modes (i.e., climbout and takeoff) are readily available. Common practice is to use takeoff emission factors. Second, it is true that the time in mode for reverse thrust operations is short, however high thrust modes produce very high unit time NO_x. For example, at a commonly utilized reverse thrust mode time of 15 seconds, overall effective takeoff time would be increased by 35 percent (0.7 minutes plus 0.25 minutes versus 0.7 minutes), which in turn increases NO_x by 35 percent relative to takeoff alone. Since takeoff accounts for about 35 percent of total aircraft NO_x (according to the Draft EIS/EIR), the overall aircraft NO_x inventory could increase by nearly 13 percent simply due to the inclusion of reverse thrust-related emissions. Without some affirmative determination that such operations will be prohibited under the action alternatives, reverse thrust emissions should be included in the Draft EIS/EIR air quality analysis.

Response:

Please see Response to Comment AF00001-21 regarding the use of reverse thrust in air quality emissions estimates.

AL00016-45

Comment:

D. The Applicability of the Construction Equipment NO_x Standard is Overstated.

The Draft EIS/EIR states that only construction vehicles meeting a 2.5 grams per brake horsepower-hour (g/bhp-hr) NO_x standard will be used for airport construction projects by 2005. Furthermore, this requirement will be phased in between 2001 and 2005, beginning at 20 percent of vehicles and increasing at a rate of 20 percent per year. This requirement raises several concerns as it is applied to the construction equipment emissions analysis in the Draft EIS/EIR.

First, the 3.0 g/bhp-hr NMHC+NO_x standard for construction vehicles does not take effect until 2005 for 300-750 horsepower (hp) engines, 2006 and 2007 for 100-300 hp engines, or not at all for engines of other hp. Mandating this equipment beginning in 2001 may or may not be successful and clearly requires some statement of commitment by the regulated parties. Voluntary, so-called ABLE Sky Series engines can be certified by manufacturers before 2005 but there is no requirement to do so (and little incentive since these engines cannot be used in the emissions averaging programs associated with non-ABLE Sky engines). In short, construction firms will only be able to provide equipment that is available on the market and it is dubious that the number of engines meeting the suggested standard in the required years will be significant.

Second, the mandatory AClean engine standards that do begin in 2001 require NO_x at levels around 4.0 g/bhp-hr (an exact value is not possible since the standard is again expressed as NMHC+NO_x, in this case 4.8 g/bhp-hr). However, these standards also only apply to 300-750 hp equipment. While a number of construction engines fall into this category, many others range from as low as 25 hp up through 300 hp. For these lower hp categories, standards do not begin until 2003 or 2004 and get progressively less stringent as engine size decreases (to 5.6 g/bhp-hr for engines below 100 hp).

Third, even if this low emissions requirement could be enforced (i.e., use of only new ABLE Sky Series engines at the Airport), an assumption of 100 percent in-use compliance is overly optimistic. While it is not possible to say with certainty what fraction of equipment may operate at emissions levels above certification standards, experience has demonstrated that engines employing sophisticated engine management strategies and aftertreatment controls (as is expected for these engines) are subject to both malperformances and malmaintenance effects. For first generation engines, such problems are usually exacerbated. What can be stated with certainty is that construction emissions impacts will be larger than the level acknowledged in the Draft EIS/EIR.

Response:

The content of this comment is essentially the same as comment AR00003-50; please see Response to Comment AR00003-50.

AL00016-46

Comment:

E. General Emissions Factors for Offroad Equipment are Understated.

In general, it appears that the emission factors employed for offroad engines, even in the absence of the 2.5 g/bhp-hr issue noted above, are significantly underestimated. This underestimation affects not just construction equipment, but both baseline and ongoing Ground Support Equipment (AGSE) operations, and results from the fact that outdated emission factor sources were utilized. The net effect is that airport emission and air quality impacts are underestimated.

Offroad engine emissions knowledge is currently in a state of rapid development and estimation techniques need to maintain currency with the latest methods. In California, this would imply use of the California Air Resources Board's (CARB) OFFROAD emission factor model, while nationally a similar model termed NONROAD has been developed by the U.S. Environmental Protection Agency (EPA). While development continues on both, they clearly represent the most up-to-date compendiums of current offroad engine emissions estimation techniques. For example, these models

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employ the most recent emission factor test data, emissions deterioration test data, and equipment size and activity factors. References cited in the Draft EIS/EIR, such as the EPA=s AP-42 and Procedures for Emissions Inventory Preparation documents as well as the SCAQMD=s CEQA Handbook, employ less developed and seriously outdated data.

An example of the magnitude of the emissions underestimation can be derived by comparing emission factors across the alternative methods. The Draft EIS/EIR relies on the use of EDMS to generate GSE emission estimates. However, EDMS includes significantly outdated GSE emissions data.¹⁷ A quick comparison indicates that CARB OFFROAD model and EPA NONROAD model GSE (average) emission rates (for the same equipment activity distribution assumed in the EIS/EIR) are, for diesel equipment, from 7 to 13 times greater for VOC, 5 to 10 times greater for PM, 5 to 9 times greater for CO, 4 to 5 times greater for NOx, and 4 to 5 times greater for SO2. For gasoline GSE, the models produce average emission rates 10 to 20 times greater for VOC, 1 to 6 times greater for PM, 15 to 16 times greater for CO, 6 to 9 times greater for NOx, and 2 to 4 times greater for SO2. The impact of using outdated emission rates is clearly significant and should be reevaluated if realistic air quality impacts are to be derived.

F. Ground Support Equipment Populations Are Not Appropriately Specified.

The Draft EIS/EIR uses the FAA=s EDMS model to estimate GSE emissions. An inherent assumption within this approach is that EDMS properly estimates GSE populations. Since the current GSE population at the Airport is known, it would be appropriate to determine whether EDMS assumptions are consistent with the Airport=s actual population and use-hour statistics. This would provide support for the validity of EDMS equipment estimation algorithms and allow for a more appropriate assessment of the accuracy of the GSE emissions estimates and air quality impacts of the Draft EIS/EIR.

¹⁷ This may be improved in the latest version released subsequent to the completion of the Draft EIS/EIR.

Response:

The content of this comment is essentially the same as comment AR00003-51; please see Response to Comment AR00003-51.

AL00016-47

Comment:

G. Emissions Benefits of Conversion of GSE to Electric, Hybrid, and Alternative Fuels are Overstated.

The Draft EIS/EIR contemplates a widespread GSE replacement program under all three of the action alternatives, while retaining primarily fossil fuel powered GSE for the No-Action/ No-Project Alternative. While this could be construed as a mitigation measure and, in fact, is listed as the single most effective mitigation measure on the list of potential mitigation measures included in the Draft EIS/EIR, it is arbitrary to apply the measure only to the action alternatives, as there are no specific constraints to such substitution today or under the No-Action/ No-Project Alternative. Electric GSE is cost effective from a market standpoint today. Therefore, whatever incentive or mandate will be offered under the action alternatives to move toward electrification could just as readily apply today. The infrastructure modifications are relatively modest and implicate no limitation of use to any of the action alternatives. But by far the most troubling issue is that the replacement program already appears to be accounted for in the Aunmitigated@ emission estimates for all three action scenarios. If this is the case, no additional emission reductions will be achieved through GSE electrification.

Response:

The content of this comment is essentially the same as comment AR0003-52; please see Response to Comment AR0003-52.

AL00016-48

Comment:

H. Incorrect Aircraft PM Emission Factors Are Used in the Draft EIS/EIR Air Quality Analysis.

Two issues exist with respect to the PM analysis that result in an underestimation of the Project's potential air quality impacts. First, it appears that the Draft EIS/EIR is based on the incorrect emission factors from the analysis undertaken to develop those factors. Second, it appears that the approach used to develop PM emission factors for aircraft¹⁸ produces estimates that are not consistent with previous PM emissions testing results.¹⁹

Analysis of PM emission factor estimation reveals that the basic estimation approach used in the Draft EIS/EIR yields an emission factor that only considers the basic non-volatile portion of particulate. An adjustment factor (that varies with fuel sulfur content) exists and should be used to correct the estimate to total PM. This factor is calculated to be about 2.6 for low sulfur (about 70 ppmW) jet fuel and 14.7 for high sulfur (about 675 ppmW) jet fuel.²⁰ Since existing EPA data demonstrates that U.S. jet fuel averages about 600 ppmW sulfur, the appropriate adjustment factor for the Draft EIS/EIR would be about 13.2. However, from figures presented in the Draft EIS/EIR, it appears that the unadjusted emission factors were used for all emissions analysis. If so, PM emission impacts are significantly underestimated and should be reassessed after applying an adjustment to increase the PM emission rate by a factor of 13.

In addition there is a potential deficiency in the approach employed to estimate PM emission factor data. The underlying need for a statistical estimation technique such as that employed cannot be disputed as the available PM emissions testing database is both small and dated. However, the Draft EIS/EIR statement that the age of that data renders it valueless are questionable. Engine technology has advanced relative to the engines represented in the test database, but the fundamental combustion characteristics that give rise to PM formation have not. While advances in reducing one (or multiple) pollutant(s) have occurred, those advances do not come without penalties²¹ in regard to other pollutants. For example, several low emission combustors are marketed for aircraft and these do result in substantially reduced NO_x production relative to standard combustor engines. However, they also generate significantly increased HC and CO emissions as a tradeoff. The additional claim that the existing aircraft emission factors are not of value since they reflect total PM as opposed to PM-10 is without merit. Virtually 100 percent of combustion-related PM is PM-10, so any error resulting from the substitution of total PM for PM-10 will be insignificant. In fact, the PM emission factor estimation approach employed in the Draft EIS/EIR requires an assumption of equivalency between total PM and PM-10.

If relationships between aircraft PM and another pollutant can be developed in one or more operating modes, then values for the independent²² pollutant can be used to estimate PM emission rates in that mode or modes. Such a statistical approach can take advantage of the limited existing PM emissions database while at the same time recognizing the substantial progress that has been made in aircraft engine performance. It is, however, critical that such relationships consider possible mode-specific differences, as engine and combustion efficiency vary substantially across modes. For example, one would expect PM emission rates to be inherently low in high efficiency (high NO_x) modes of operation since the same high temperature, high pressure conditions that give rise to high NO_x also favor more complete fuel combustion. Conversely, they would be high in low efficiency combustion modes. It is not clear, however, that the significance of the inter-species relationships are invariant across the full range of operating modes.

A very strong statistical relationship between measured PM and the inverse of measured NO_x is observed in three of the four standard operating modes (approach, takeoff, and climbout), with coefficient t statistics all significant at 99-plus percent confidence. A strong coefficient can also be observed for the taxi mode, but it explains virtually none of the observed variation in PM and NO_x (whereas variance explanatory significance exceeds 99 percent confidence for the other three modes). The magnitude of the relationship coefficients varies from 28.4 in takeoff mode to 45.0 in climbout mode and 33.0 in approach mode. While all three modes exhibit significant relationships, takeoff mode serves as a good relationship basis as it statistically produces the smallest root mean square error based on regression data (an error 35 to 40 percent lower than those of climbout and approach modes). With this lynchpin to the ICAO emissions database in place, PM emission rates for the other three modes (climbout, approach, and taxi) can be developed based on observed statistical relationships with takeoff PM (i.e., PM-to-PM regressions across modes). Linear coefficients for all three modes (1.42 for climbout, 1.53 for approach, and 3.10 for taxi, all in pounds per thousand pounds fuel burned space) are significant at 99-plus percent confidence, with adjusted correlation coefficients for climbout and approach at 0.78 and 0.83 respectively. Taxi mode correlation is poor, but the PM-to-PM relation does account for the observed variance at greater than 99 percent confidence.

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The net result of this calculation is a determination that this alternative approach produces PM emission rates that are 4 to 37 times higher than those used in the Draft EIS/EIR. The smallest differentials are observed at the highest thrust modes, and differentials potentially grow with reducing thrust because the Draft EIS/EIR approach does not take operating efficiency differentials between modes into consideration. Nevertheless, for a typical LTO cycle (as per Draft EIS/EIR times-in-mode), the aggregate PM emission factor will be underpredicted by a factor of 17 using the Draft EIS/EIR approach. The effect on PM air quality analyses is obvious.²¹

18 The International Civil Aviation Organization emissions certification process does not include PM.

19 Adjustments not employed in the Draft EIS/EIR may compensate for most of this deficiency.

20 This calculation is based on data presented in the Draft EIS/EIR.

21 Interestingly, if the appropriate carbon-to-total PM emission factor correction of 13.2 is implemented as suggested in the support material for the Draft EIS/EIR, the bulk of the emission factor differentials between the two estimation approaches virtually disappear (i.e., a correction factor of 13 versus an underestimation factor of 17 for an aggregate LTO). Nevertheless, significant differences would still exist on a mode specific basis.

Response:

The content of this comment is essentially the same as comment AR00003-53; please see Response to Comment AR00003-53.

AL00016-49

Comment:

I. Aircraft SO₂ Emissions are Underpredicted.

The Draft EIS/EIR relies on version 3.2 of the EDMS model to predict aircraft SO₂ emissions. This model underestimates aircraft SO₂ emissions by a factor of two due to reliance on an incorrect AP-42 emission factor (the factor was developed without accounting for the factor of two ratio between SO₂ mass and fuel sulfur mass). To the extent that the Draft EIS/EIR already demonstrates potential ambient SO₂ concerns, those concerns would be exacerbated by this underprediction.

Response:

The content of this comment is essentially the same as comment AR00003-54; please see Response to Comment AR00003-54.

AL00016-50

Comment:

J. The Assumption of Gate-Based Power and Air for All Aircraft is Questionable.

The Draft EIS/EIR assumes that 100 percent of air carrier gate power and conditioned air needs will be satisfied by gate-based electrically powered systems as opposed to fossil fuel powered auxiliary power units (APU) or GSE. Experience has shown that even under conditions where gate-based equipment is available, not all airlines or aircraft will utilize it consistently. This seems to be especially true for quick-turnaround airlines such as Southwest. Although the assumption of 100 percent availability and usage affects the no action and action scenarios equally, it is important from an ambient air quality perspective to account for the full range of expected emissions. Without some definitive airport policy that gate-based systems (both power and air) be used and that any on-board APU be shut down until needed for main engine startup, the Draft EIS/EIR would present a more realistic assessment of aircraft emissions if it adjusted the percentage of gate-based system usage to match currently observed use rates at the Airport.

K. APU Emission Factors for SO₂ and PM Not Considered.

APU emission factors for both SO₂ and PM are assumed to be zero. This results from deficiencies in the EDMS model and should be corrected to properly estimate aircraft-related air quality impacts. SO₂ emissions are a function of fuel sulfur and emission rates can be readily calculated and applied. APU PM emission rates can be developed using the same methodology applied to main aircraft engines. The potential impacts of this deficiency would be magnified were the Draft EIS/EIR to properly attribute some fraction of gate power and air support to APU.

Response:

The content of this comment is essentially the same as comment AR00003-55; please see Response to Comment AR00003-55.

AL00016-51

Comment:

L. Aircraft Taxi Times are Not Included in the Draft EIS/EIR or Supporting Data.

Aircraft taxi-idle times are not included in the Draft EIS/EIR, its technical appendices or supporting documentation.²² It can be deduced from the included emissions estimates for aircraft taxiing that those emissions decrease substantially under the action scenarios, but the actual times should be included to allow the public an opportunity to better evaluate their propriety. In addition, the ability of SIMMOD to accurately estimate aircraft taxi times must be demonstrated by comparing SIMMOD predictions for current conditions at the Airport to observed taxi times at the Airport. The issue of aircraft taxi times is critical. The bulk of Aircraft VOC and CO emissions are generated during taxiing. In addition, although NO_x emissions rates are low during taxiing, the amount of time spent in taxi mode results in a significant contribution to overall NO_x emissions. Clearly, it is important that taxi times be accurately modeled. However, sufficient information is not included in the Draft EIS/EIR to determine that accurate modeling occurred.

²² The Draft EIS/EIR contains references to the development of the taxi/idle times using SIMMOD, but no actual indications of what those times were.

Response:

The content of this comment is essentially the same as comment AR00003-56; please see Response to Comment AR00003-56.

AL00016-52

Comment:

M. The Project's Conformity Cannot Be Determined from Data and Analysis Contained in the Draft EIS/EIR.

Even without consideration of the various issues noted above, the Draft EIS/EIR presents several air quality concerns relative to the NAAQS/CAAQS under the Preferred Alternative. Although a series of mitigation measures are discussed and preliminary emission reduction estimates presented, these estimates are not documented and methodologies cannot be evaluated. The Draft EIS/EIR defers formal review of potential mitigation measures until a Final EIS/EIR is developed. Similarly, the Draft EIS/EIR acknowledges the applicability of federal conformity requirements, but defers both the conformity analysis and a proposed conformity determination to the Final EIS/EIR. Unfortunately, such an approach makes it impossible to comment constructively on either potential emission mitigation measures or the conformity process, since these processes will be released for comment only after the underlying decision-making has been finalized.

Response:

The Supplement to the Draft EIS/EIR presented an enhanced discussion and evaluation of air quality mitigation measures in Section 4.6.8, Mitigation Measures, and in Appendix S-E, Section 2.3. Also, please see Response to Comment AF00001-4 regarding the general conformity determination.

3. Comments and Responses

AL00016-53

Comment:

V. THE DRAFT EIS/EIR=S ALTERNATIVES FAIL TO SATISFY THE APURPOSE AND NEED@ FOR THE PROJECT.

The mandate to evaluate and compare alternatives is the Aheart@ of an EIS (CEQ Guidelines, ' 1502.14). FAA Order 1050.1D, paragraph 63, implementing NEPA, mandates that an EIS Ashall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.@ The FAA Order further requires that the EIS Alternatives analysis include a rigorous exploration and objective evaluation of all reasonable alternatives. Courts have concluded that to be reasonable, the suggested alternatives must meet the goals of the proposed action.²³

The Draft EIS/EIR=s alternatives analysis fails to meet the stated goals of the Project. The Draft EIS/EIR states that the general A[p]urpose and objectives of the Master Plan are to provide... sufficient airport capacity for passengers and freight in the Los Angeles region to sustain and advance the economic growth and vitality of the Los Angeles region.@ (Draft EIS/EIR, volume 1, pg. 2-1) More specifically, the Draft EIS/EIR outlines three objectives which the Project needs to satisfy: (1) Ato respond to the local and regional demand for air transportation during the period 2000 to 2015, taking into consideration the amount, type, location, and timing of such demand@; (2) Ato ensure that new investments in airport capacity are efficient and cost-effective, maximizing the return on existing infrastructure capital@; and (3) Ato sustain and advance the international trade component of the regional economy and the international commercial gateway role of Los Angeles.@²⁴

²³ See, generally, *City of Carmel-By-The-Sea v. United States DOT*, 123 F.3d 1142 (1997); *National Wildlife Federation v. Federal Energy Regulatory Commission*, 912 F.2d 1471 (1990).

²⁴ Id.

Response:

The Draft EIS/EIR presents the purpose and need, and project objectives, in Chapter 2, Purpose and Need for the Proposed Action, describes the basis and nature of a reasonable range of alternatives for the proposed action in Chapter 3, Alternatives, and provides a comprehensive comparative analysis of those alternatives in Chapter 4, Affected Environment, Consequences, and Mitigation Measures. Neither NEPA or CEQA require that all alternatives meet the purpose and need/project objectives to the full extent and the same degree. Section 15126.6(a) of the CEQA Guidelines requires an EIR to include a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects. Section 15126.6(b) of the CEQA Guidelines goes on to state that an EIR focus on alternatives to the project which are capable of avoiding or reducing significant impacts, even if these alternatives would impede to some degree the attainment of the project objectives. The Draft EIS/EIR provide the public and decision-makers with a range of alternatives that provide relatively greater or lesser environmental impacts, depending on the particular alternative and specific environmental discipline, recognizing that the comparative differences in impacts can be weighed against the degree to which each alternative meets the purpose and need/project objectives. Additionally, the Supplement to the Draft EIS/EIR expanded the range of alternatives being considered through the introduction of Alternative D, which avoids or substantially reduces many of the significant environmental impacts associated with the other alternatives, while also responding to the purpose and need/project objectives to a degree different than the other alternatives. Both the process and the documentation provided for the LAX Master Plan EIS/EIR relative to purpose and need/project objectives and alternatives are consistent with the requirements of NEPA and CEQA. Please also see Topical Response TR-ALT-1 for additional discussion regarding the range of alternatives evaluated for the proposed project.

AL00016-54

Comment:

It is not clear, however, that the proposed runway improvements that form an integral part of Alternative C, the Preferred Alternative, constitute a superior, or even an efficient way to accomplish the Project=s stated purposes. For example, all three of the Project=s objectives could potentially be, at least partially, achieved through airspace/air traffic modifications, both within the terminal airspace and in the en route system. This alternative is neither acknowledged nor explored in the Draft EIS/EIR. Nevertheless, this conclusion is supported by the fact that the Dual Civet arrival configuration has reduced arrival delay for operations from the east significantly since 1998 and has resulted in an average time-savings of 4.4 minutes per Civet turbojet arrival aircraft. In fact, since the Dual Civet arrival procedures were implemented, there have been no national delay programs set up for the Airport, since delay has not been an issue. However, the Draft EIS/EIR does neither addresses nor incorporates the capacity or delay reduction efficiencies gained through this procedure in any of its modeling.²⁵

²⁵ Where the Master Plan does address air traffic procedures, it is in error. The Master Plan states that the Departure Sequencing Program (DSP), a program that provides the capability to sequence departures from Los Angeles basin airports, would enhance capacity at the Airport. (Master Plan, ' 2.6.1.3, page II-2.137) However, the DSP program has been cancelled by the FAA due to a lack of benefit. Essentially, the Southern California TRACON consolidation effort occurred many years ago and the references to it in the Master Plan and the Draft EIS/EIR are outdated. Many innovations and changes in airspace and procedures at the TRACON over the past few years have occurred, and none are referenced or adequately considered in the Draft EIS/EIR. Basically, the Draft EIS/EIR does not address the changes in airspace design or the new routes that have been developed as a result of airspace enhancements in Southern California.

Response:

The content of this comment is essentially the same as comment AR00003-59; please see Response to Comment AR00003-59.

AL00016-55

Comment:

Moreover, a closer examination of the Master Plan and the Draft EIS/EIR reveals that the Draft EIS/EIR may have ignored relatively inexpensive improvements in air traffic procedures in favor of very expensive, physical changes to the airfield. This is apparently because the Project=s true purpose does not include the first two claimed in the Draft EIS/EIR, i.e., the broad ones of providing Asufficient airport capacity for passengers and freight in the Los Angeles region@ (Draft EIS/EIR, Volume 1, page 2-1), in an Aefficient and cost effective@ way (Draft EIS/EIR, page 2-1). Instead, the Project=s principal purpose is the narrow and singular one of accommodating ANew Large Aircraft@ (ANLA@) that, with their long haul capabilities, would potentially serve the Airport in order to Asustain and advance the international trade component of the regional economy.@ (Draft EIS/EIR, page 2-1)²⁶

This conclusion is substantiated by the fact that the current aircraft fleet does not require 12,000 feet of runway to take off. Even today=s heavy aircraft such as the B-747-400 and the B-777-400 only need 8,000 - 10,000 feet of runway for take-off and landing (under the weather conditions prevailing at the Airport). The Airport=s existing runways are 8,295-feet, 10,285-feet, 12,091-feet, and 11,096-feet in length. Thus, even the shortest runway at the Airport can accommodate the heaviest and largest aircraft in the fleet under prevailing circumstances today.

The result of the Draft EIS/EIR=s failure to acknowledge the Project=s primary purpose, i.e., to increase the proportion of super long-haul aircraft in the fleet, is a concomitant failure to analyze the full range and magnitude of environmental impacts that may arise from the desired change in fleet mix. While it is, as yet, early in the NLA development process, some technical facts about the aircraft are already known, sufficient to make at least some educated projections concerning its impact. For instance, ascertaining the projected climb rate will enable an estimate of whether the NLA can meet current airport noise abatement operational requirements; or whether those will have to be altered; or whether

3. Comments and Responses

the NLA will, ultimately, overfly noise sensitive communities at lower (or higher) altitudes, resulting in higher (or lower) noise levels over those communities. Similarly, preliminary data concerning engine type and emissions characteristics would enable at least a preliminary analysis of the air quality impact of the NLA, as well as the GSE needed to support it, if different from those categories already in use. Finally, the Draft EIS/EIR should have included the capacity/delay impacts from the increased use of NLA. As the Draft EIS/EIR fails to model ground operations in detail, the delay impacts that may result are not considered in developing an accurate analysis of arrival and departure flows and the congestion which may ensue even after Project implementation.

26 The Draft EIS/EIR comes close to admitting as much: ADevelopment of NLA aircraft is driven by increasing demand and constrained international gateway airports around the world, including LAX ... Development of the NLA will allow these airports to continue to meet the growing demand for travel between primary trading partners. As one of the three major (and busiest) gateway airports in the nation, LAX would be one of the first airports to be served by NLA.@ (Draft EIS/EIR, page 2-11)

Response:

The content of this comment is essentially the same as comment AR00003-60; please see Response to Comment AR00003-60.

AL00016-56

Comment:

In summary, because the alternatives analysis is the Aheart@ of the NEPA process; because the Draft EIS/EIR fails to consider, or analyze, the impacts of eminently reasonable alternatives such as airspace changes to meet the Project=s stated purposes; because Alternative C does not alone meet the Project=s stated purposes; and because the most significant result of implementing Alternative C, the increased capacity to accommodate NLAs, remains unanalyzed from an environmental perspective, the Draft EIS/EIR=s alternatives analysis is seriously flawed.

Response:

Comment noted. Please see Responses to Comments AL00036-30 regarding airspace issues, AL00016-53 regarding the relationship between the purpose and need/objectives of the project and the alternatives evaluated in the EIS/EIR, and PC00686-2 regarding NLAs.

AL00016-57

Comment:

VI. THE DRAFT EIS/EIR DOES NOT ADEQUATELY SPECIFY MITIGATION MEASURES OR METHODS TO ENFORCE THEM.

CEQA requires that agencies identify the environmental impacts of a project, and implement mitigation measures to lessen the adverse environmental impacts. (CEQA Guidelines ' 15002 (a)(3)). However, the Draft EIS/EIR fails to comply with CEQA by (1) failing to provide a complete list of mitigation measures, and (2) failing to specify, at a minimum, a Draft Mitigation Monitoring Program to inform the public of how the project proponents intend to ensure the implementation of mitigation measures.

Response:

Please see Response to Comment AR00003-63.

AL00016-58

Comment:

A. The Draft EIS/EIR Delays Disclosure of the Full List of Mitigation Measures Until the Final EIS/EIR.

CEQA Guidelines ' 15126.4(a)(1)(B) mandates that the A[f]ormulation of mitigation measures should not be deferred until some further time.@ While the Draft EIS/EIR acknowledges the existence of significant unmitigable impacts, it also states that, AA final package of design features, Master Plan

Commitments, and Mitigation Measures will be developed ... The resulting Environmental Action Plan will be published in the Final EIS/EIR. (Draft EIS/EIR, Executive Summary, pg. ES-30) By deferring to the Final EIS/EIR to reveal the mitigation measures, the public's opportunity comment will have been attenuated. The SBCCOG, therefore, reserves the right to comment on items, including the Draft Conformity and Mitigation Monitoring Program that should have been included, but were omitted from the Draft EIS/EIR.

Response:

The content of this comment is essentially the same as comment AR00003-63; please see Response to Comment AR00003-63.

AL00016-59

Comment:

B. The Draft EIS/EIR Fails to Provide a Draft Mitigation Monitoring Program.

California Public Resources Code ' 21081.6 requires that a public agency adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. (Cal. Pub. Resources Code ' 21081.6 (a)(1)). If an EIR identifies one or more significant environmental effects of the project, CEQA Guidelines ' 15091(a) requires an agency to make one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. With these findings, the CEQA Guidelines mandate that the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. (CEQA ' 15091(d))

The Draft EIS/EIR violates CEQA Guidelines ' 1509(d) and California Public Resources Code ' 21081.6 in that it fails to set forth a program that monitors or reports on each mitigation measure. Although the Draft EIS/EIR cites some mitigation measures to combat the environmental impacts of the Project, it makes no mention of the permit conditions, agreements, or other measures (CEQA Guidelines ' 15091(d)) which would ensure compliance with mitigation measures. In other words, it does not specify the steps necessary to ensure compliance, the responsible party to ensure compliance, or the resulting consequences should compliance not occur.

Response:

Please see Response to Comment AR00003-63 regarding the mitigation monitoring and reporting program.

AL00016-60

Comment:

Please address the above mentioned in your response letter for the LAX Master Plan Improvements.

Response:

Responses to individual comments included in this comment letter are provided above.

AL00017

**Dickerson, III, Esq., City of Inglewood
Charles**

7/10/2001

AL00017-1

Comment:

INTRODUCTION

3. Comments and Responses

On January 18, 2001, Los Angeles World Airports ("LAWA") and the Federal Aviation Administration ("FAA") released a Draft LAX Master Plan ("Master Plan") and Draft Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") that are meant to describe and analyze plans for expansion of Los Angeles International Airport ("LAX") over the next fifteen years. The Master Plan and EIS/EIR, which comprise approximately 12,000 pages including appendices and some supporting technical documents, were released pursuant to the requirements of the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"). They demonstrate that the FAA and LAWA have created a plan for massive expansion of LAX at a cost of many millions of dollars.¹

Pursuant to applicable provisions of CEQA and NEPA, interested parties are permitted to comment on the Master Plan and EIS/EIR CEQA Guidelines § 15086 (a)(4).

The City of Inglewood ("Inglewood") is an interested party 2 and, as such, has reviewed and analyzed the Master Plan and EIS/EIR. Inglewood hereby submits its comments to the Master Plan and EIS/EIR.

In performing its review and analysis, Inglewood retained qualified experts in the areas of human health risk assessment, air emissions regulation and planning, aircraft noise assessment and mitigation, and environmental justice. These experts have submitted written reports to Inglewood, and copies of these reports are attached hereto as exhibits and made a part hereof by reference.

In sum, Inglewood respectfully submits that neither the Master Plan nor the EIS/EIR satisfies the requirements of CEQA or NEPA. As such, Inglewood respectfully suggests that both the Master Plan and EIS/EIR are insufficient and, at a minimum, must be substantially revised.

The insufficiencies in the Master Plan and the EIS/EIR, all of which are addressed in detail below, may be summarized as follows:

SUMMARY

I. THE DRAFT EIS/EIR IS INSUFFICIENT AS A MATTER OF LAW BECAUSE IT DOES NOT SATISFY ENVIRONMENTAL JUSTICE REQUIREMENTS

A. The Master Plan and EIS/EIR Unfairly Burden the Minority and Lower-Income Communities Surrounding LAX in Violation of Federal and California Law.

B. The EIS/EIR Fails to Disclose LAWA's Economic Gain from the Proposed Expansion at the Expense of Surrounding Minority and Low Income Populations

C. The Master Plan creates a Disproportionate and Unfair Distribution of Incremental and Total Direct Job Impacts

D. The Economic Benefits of the Master Plan are not Proportionate to the Environmental Burdens it imposes on Surrounding Minority and Low Income Communities

II. THE DRAFT EIS/EIR FAILS TO SATISFY PROVISIONS OF LAW REQUIRING LAWA TO ADEQUATELY CONSIDER ALTERNATIVES TO EXPANSION AT LAX

A. LAWA's Consideration of Alternatives to Expansion at LAX does not conform to CEQA

B. LAWA's Consideration of Alternatives to Expansion at LAX does not conform to NEPA

III. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES ENVIRONMENTAL IMPACTS

IV. THE LAX MASTER PLAN AND DRAFT EIS/EIR FAIL TO SATISFY APPLICABLE LAW BECAUSE THEY DO NOT CONFORM TO OTHER RELEVANT PLANS

A. The LAX Master Plan Fails to Conform to The Air Quality Maintenance Plan

B. The LAX Master Plan Fails to Conform to SCAG's 2001 Regional Transportation Plan

V. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT DOES NOT ADEQUATELY ADDRESS THE IMPACT OF TOXIC AIR POLLUTANTS

- A. The Draft EIS/EIR Lacks A Proper Baseline Regarding Air Toxics
- B. LAWA Failed To Properly Study Toxic Air Emissions
- C. LAWA's Health Risk Assessment Does Not Adequately Factor Time As A Variable
- D. LAWA's Study Of Air Pollutants Fails to Consider Relevant Issues

VI. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES HUMAN HEALTH RISKS

- A. LAWA's Study Does Not Adequately Factor Time as a Variable
- B. The Draft EIS/EIR Fails to Adequately Delineate Health Risks
- C. The Draft EIS/EIR Fails to Consider Health Risks on a Regional Basis
- D. LAWA Failed to Conduct a Sensitivity Analysis of Its Human Health Risk Assessment

VII. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ASSESSES AIR EMISSIONS

- A. The Draft EIS/EIR Does Not Adequately Assess The Impact Of Air Emissions Mitigation Measures Upon The Surrounding Environment
- B. LAWA'S Comparison To The No Action/No Project Alternative Is Flawed

VIII. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES TRAFFIC IMPACTS

- A. The Draft EIS/EIR Ignored Cumulative Impacts Of The Lax Master Plan By Not Analyzing The Traffic Impacts In The City Of Inglewood
- B. LAWA Did Not Fully Assess Traffic Mitigation In The Draft EIS/EIR
- C. The Draft EIS/EIR's Traffic Congestion Relief Congestion Package Is Inadequate
- D. The Study Of The Effects Of The Proposed Lax Expressway Is Inadequate
- E. LAWA'S Baseline For Traffic Is Questionable

IX. THE LAX MASTER PLAN FAILS TO SATISFY APPLICABLE LAW BECAUSE IT DOES NOT CONFORM TO LOCAL TRAFFIC PLANS

X. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES NOISE INCREASES

- A. The Draft EIS/EIR Uses An Improper Baseline For Noise Analysis
- B. LAWA's Noise Exposure Contours Are Understated
- C. The Draft EIS/EIR Fails To Consider The Economic Impact of The LAX Master Plan on Housing Values
- D. LAWA's Assertions Regarding Nighttime "Over-Ocean Operation" Are Wrong

XI. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES THE HEALTH EFFECTS OF AIRCRAFT NOISE

3. Comments and Responses

A. The Draft EIS/EIR Must Consider The Health Effects Of Aircraft Noise

B. The Draft EIS/EIR Needs to Address Aircraft Noise Interference With Classroom Activities and Sleep

XII. COMMENTS BY THE SOUTH BAY CITIES COUNCIL OF GOVERNMENTS ARE INCORPORATED BY REFERENCE

XIII. COMMENTS BY CITIZENS OF THE CITY OF INGLEWOOD ARE SUBMITTED HERewith

CONCLUSION

1 For ease of reference, authorship of the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report will be attributed to LAWA herein.

2 Pursuant to CEQA Guidelines, the City of Inglewood constitutes an interested party herein due to its proximity to LAX and the significant environmental effects LAX causes to the City of Inglewood. CEQA Guidelines Section 15086.

Response:

Please see Responses to Comments AL00017-2 through AL00017-279 below.

AL00017-2

Comment:

DISCUSSION

I. THE DRAFT EIS/EIR IS INSUFFICIENT AS A MATTER OF LAW BECAUSE IT DOES NOT SATISFY ENVIRONMENTAL JUSTICE REQUIREMENTS

A. The Master Plan and EIS/EIR Unfairly Burden the Minority and Lower-Income Communities Surrounding LAX in Violation of Federal and California Law.

Federal law requires that each federal agency "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (Executive Order 12898, February 11, 1994). Environmental Justice is also a requirement of California law. Cal. Pub. Res. Code §72000-72001. Under California law Environmental Justice means "the fair treatment of all people of all races, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations, and policies." Cal. Pub. Res. Code §72001. The California Environmental Protection Agency is charged with the responsibility to "[P]romote enforcement of all health and environmental statutes within its jurisdiction in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state." Cal. Pub. Res. Code §72000(b). These requirements imposed on LAWA the responsibility to consider the impacts of LAX expansion on lower income and minority communities.

Response:

LAWA has fully evaluated environmental justice issues pursuant to relevant requirements and guidance. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental justice, including relevant regulatory requirements and guidance, in Section 4.4.3, Environmental Justice, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR.

AL00017-3

Comment:

Several of the communities surrounding LAX, and to the east of LAX, in particular, contain predominantly minority populations and lower income populations. The Draft EIS/EIR contains a

demographic analysis of the communities surrounding LAX that will be impacted by the LAX Master Plan. LAWA analyzed seventy census tracts, comprising parts of the City of Los Angeles, El Segundo, Inglewood, Hawthorne, and unincorporated areas of Los Angeles County. Draft EIS/EIR, Appendix F, Environmental Justice Technical Report pp. 5-6. Fifty-four of the seventy census tracts within the study area are considered to be predominantly minority. A tract is so defined when more than fifty percent of the population is minority. Id. at 10.

Similarly, thirty-three of the seventy census tracts within the Impact Study Area are considered to be low-income. Low-income is defined as having more than 15% of the resident population below the poverty level. Id. Thirty-two of the thirty-three census tracts identified as low-income are predominantly minority. Id. at 15.

LAWA's analysis shows that the distribution of minority and non-minority populations may cause differential impacts between these two groups:

"This data reveals a readily discernible pattern of minority and low-income communities in the areas surrounding LAX. While the areas to the north and south of LAX are predominantly non-minority, the area east of I-405 within the study area is predominantly minority. Furthermore, within these areas east of I-405 minority populations are heavily concentrated: 39 of the 70 minority census tracts with the study area have minority percentages greater than 90 percent. The uneven distribution of minorities throughout the study area, as evidenced by the data showing that most census tracts have less than 20 percent or greater than 90 percent minorities, increases the potential for differential impacts on minorities and non-minorities."

Id.

Response:

Comment noted. Also see Section 4.4.3, Environmental Justice and Appendix S-D of the Supplement to the Draft EIS/EIR which contain new information and analysis, including demographics for Year 2000 conditions.

AL00017-4

Comment:

Minority and low-income populations are and have been-disproportionately burdened by the impacts of LAX long before the massive expansion planned under the LAX Master Plan:

"[M]inority and low-income residential communities within the study area are currently concentrated east of LAX, separated from the airport by predominantly commercial and industrial airport-related land uses and the I-405 freeway. In contrast, residential areas of El Segundo and Playa Del Rey/Westchester, to the immediate north and south of the airport, do not have high concentrations of minority and low-income populations. LAX has always had an east-west runway configuration to take advantage of the prevailing wind pattern and to maximize efficient use of airspace. The combination of the long-standing runway orientation and more recent changes in the demographic patterns in the area around LAX means that minority and low-income residential communities are directly under the primary arrival flight path. The primary impacts on minority and low-income communities from current airport operations are therefore mostly associated with aircraft noise and air emissions. While residential areas of El Segundo and Playa Del Rey/Westchester directly adjacent to the airport are also exposed to high levels of side-line noise, the areas of exposure are much smaller in comparison to the noise-impacted residential communities to the east."

Id. at 16.

Response:

Comment noted.

3. Comments and Responses

AL00017-5

Comment:

Inglewood is one of the predominantly minority communities located east of LAX which receives a disproportionate share of the impacts of LAX. Inglewood's population is 46.4% African-American, 46% Hispanic, 4.1% White, 1.6% Multi-racial, 1.1 % Asian, 0.3% Pacific Islander, 0.2% Native American, and 0.2% Other. California Department of Finance, Demographic Research Unit, California State Census Data Center, Census 2000, "Table Two, Population by Race/Ethnicity, Incorporated Cities by County, p. 5, attached hereto as Exhibit "A." In addition, a large percentage of the low-income census tracts in LAWA's study area are located in Inglewood. Draft EIS/EIR, Appendix F, Environmental Justice Technical Report, Figure 3, "Low-Income Census Tracts Within the Study Area."

Response:

Comment noted. Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR contains updated demographic information based on the 2000 U.S. Census. Although this new demographic information is carried through the new analysis, as indicated in Section 4.4.3, Environmental Justice (subsection 4.4.3.3), of the Supplement to the Draft EIS/EIR, the new demographic data does not materially change the findings in the Draft EIS/EIR.

AL00017-6

Comment:

LAWA's plan for massive expansion of LAX unfairly burdens the minority and lower-income communities surrounding LAX. LAWA failed to consider alternatives that would have shifted burdens away from minority or low-income populations, or that would at least have distributed the burdens and benefits of expansion more equitably. Instead of planning for massive expansion of LAX, LAWA should have considered alternatives to massive expansion of LAX.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed effects on minority and low-income communities in Section 4.4.3, Environmental Justice, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR.

The LAX Master Plan build alternatives were selected in accordance with the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Please see Chapter 3, Alternatives, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for a discussion of the alternative selection process.

As further described below in Response to Comment AL00017-7, subsequent to publication of the Draft EIS/EIR, a new alternative, Alternative D, was added to the range of alternatives to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D, which is not considered a massive expansion plan, is fully considered in the Supplement to the Draft EIS/EIR.

AL00017-7

Comment:

LAWA admits that its Master Plan for expansion of LAX imposes a disproportionate burden of noise impacts upon persons of color and/or low income, and that it does not know if the Plan also imposes a disproportionate burden of toxic air emissions on those same groups. LAX Master Plan Draft EIS/EIR, Chapter 4.4.3 Environmental Justice, p. 4-395. As discussed in the report of Dale Hattis, PhD., attached hereto as Exhibit "B," if LAWA had chosen to seriously consider alternatives that did not include massive expansion at LAX, LAWA would have been able to consider alternatives that would reduce the human health risk overall and spread the environmental burden more equitably among the general population of Southern California. Hattis Report p. 3. Dr. Hattis observes:

"The framing of the options for analysis in the current draft is exclusively focused on engineering changes. Future "demand" for air services is estimated from a single set of assumptions about future population and economic growth in Southern California, and future national average costs of air travel in revenue per seat-mile, and then "build" options are designed to meet this projected "demand" either in full or in part. There is no apparent recognition or analysis of the possibility that at least some of the growth in "demand" for air services could be shifted to outlying airports downwind of major population concentrations (or out of the South Coast Air Basin entirely, in the case of connecting flights) by changes in economic pricing-such as airport user fees. Such economic measures might not completely avoid the need to expand capacity at LAX, but they seem worthy of explicit consideration at least as supplements to the existing engineering options..."

Hattis Report p. 3.

For these reasons, LAWA should have considered alternatives to massive expansion of LAX. Dr. Hattis notes three specific reasons why such an analysis of alternatives should take place: (1) User fees, in addition to re-directing demand, could be used for mitigation measures; (2) This approach would allow LAWA to slow growth at LAX, which would allow expansion at a much slower pace, which, in turn, will reduce congestion and, therefore, the significant impacts on the environment from construction; and (3) without such fees the real beneficiaries could be the airlines rather than the flying public. Hattis Report p. 3. LAWA should immediately and seriously consider other alternatives and analyze them to the same degree that it analyzed Alternatives A, B, and C in its current Master Plan. Anything less fails to adequately address Environmental Justice, as required by law.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. As further described in TR-EJ-3, Alternative D would also be consistent with the stated RTP desire to address disproportionately high and adverse aircraft noise impacts by distributing growth regionally and limiting growth at LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 and Topical Response TR-EJ-3, regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Also, please see Response to Comment AL00017-6 above.

AL00017-8

Comment:

B. The EIS/EIR Fails to Disclose LAWA's Economic Gain from the Proposed Expansion at the Expense of Surrounding Minority and Low Income Populations.

The LAX Master Plan Draft EIS/EIR fails to disclose the increased revenues that LAWA and the City of Los Angeles expect from the massive expansion plan, or that it comes at the expense of local low income and minority communities. As Dr. Hattis notes:

"[T]here are some glaring omissions of important effects from the economic impact analysis. Economic impacts are assessed in terms of changes in employment, and overall economic activity, for the South Coast as a whole, Los Angeles County, and the City of Los Angeles. Changes in on-airport employment are also described, as are the expected capital costs of the various policy options. Unaccountably, there does not seem to be any readily locatable presentation of expected effects on operating revenues and costs for the major economic actors that are directly affected by the proposed project - LAWA itself, the City of Los Angeles as owner and taxing authority, and the airlines. Projections of these expected impacts must exist. Moreover, they are highly relevant to judgments of the equity (fairness) of the distribution of expected good and bad effects on the different policy options for different groups, including an expanded Environmental Justice analysis."

3. Comments and Responses

Hattis Report p. 6.

Response:

LAX is a public use airport. Rates and charges are imposed to cover the cost of maintaining and upgrading the facility for public use. LAX is a public entity not a "for profit" entity. It is an agency of the City and any "economic gain" in the form of increased revenue must be utilized for airport purposes.

Although benefits may be taken into account in making findings regarding a project's potential for disproportionately high and adverse environmental and health effects pursuant to U.S. Department of Transportation Order 5610.2, there is no legal requirement under NEPA or CEQA for economic benefits, or for benefits to be proportionate to environmental burdens. The primary focus of the EIS/EIR under NEPA and CEQA is to disclose and mitigate physical impacts on the environment. Regarding firm commitments, the mitigation measures and benefits set forth in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, will be conditions of project approval implemented pursuant to a Mitigation Monitoring and Reporting Program.

Also note, as described in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, that activity levels and resulting aircraft noise and related effects under Alternative D would be generally equivalent to what would occur if the project were not approved, as represented under the No Action/No Project Alternative. Alternative D cannot be accurately characterized as a "massive expansion plan." Accordingly, the revenues that would be derived from Alternative D, in light of its limited increase in activity and design and construction costs, are expected to be modest.

AL00017-9

Comment:

LAWA and the City of Los Angeles stand to reap tremendous financial benefits from LAX expansion. Since these benefits are not specified, the comparative benefit to local low income and minority communities--or the lack thereof--cannot be and has not been evaluated. LAWA must disclose these figures for a meaningful analysis of the relative benefits and burdens to be considered.

Response:

Please see Response to Comment AL00017-8.

AL00017-10

Comment:

C. The Master Plan Creates a Disproportionate And Unfair Distribution of Incremental an Total Direct Job Impacts

The LAX Master Plan does not fairly distribute new jobs among local minority and low-income communities. According to LAWA's own economic analysis, cities in the "Primary LAX Area" (El Segundo, Hawthorne, Inglewood, Del Aire and Lennox) receive only 3.8% of the incremental "direct jobs" at LAX due to expansion. LAX Master Plan Draft EIS/EIR, Economic Impacts Technical Report, Table 46, "Distribution of Incremental Direct Job Impacts of the LAX Master Plan Alternatives, By County and City, 1996-2015", p. 95. This same area also receives only 3.4% of the total direct job impacts from LAX in 2015. LAX Master Plan Draft EIS/EIR, Economic Impacts Technical Report, Table 47, "Distribution of Total Direct Job Impacts of the LAX Master Plan Alternatives, By County and City, 2015," p. 96. Compared to the year 1996, the City of Inglewood shows a net increase of only 489 jobs in "LAX- Related Employment" if LAWA adopts Alternative C. LAX Master Plan Draft EIS/EIR, Economic Impacts Technical Report, Table 48, "LAX-Related Employment in the South Bay and North Bay Cities and Communities For the LAX Master Plan EIS/EIR Alternatives, 1996, 2005, and 2015," p. 97. Conversely, the environmental burdens of LAX fall most directly upon those living in its immediate vicinity, like Inglewood. LAWA should make firm commitments to take all reasonably practical steps to ensure that a proportionate share of the economic benefits of LAX also reach those communities, Under the LAX Master Plan, according to LAWA's own jobs projections, that does not occur.

Response:

Please see Topical Response TR-EJ-2 regarding a detailed description of the environmental justice program, economic benefits, and employment and business opportunities for low income and/or minority communities. Also see Section 4.4.1, Employment/Socio-Economics, of the Supplement to the Draft EIS/EIR, and note the much more modest economic benefits of Alternative D as compared to the other Master Plan build alternatives.

AL00017-11

Comment:

D. The Economic Benefits Of The LAX Master Plan Are Not Proportionate to the Environmental Burdens it Imposes on Surrounding Minority and Low Income Communities

LAWA should share the economic benefits that flow from LAX with the surrounding communities to the same degree that the environmental burdens are borne by those communities. Offsetting environmental burdens with economic benefits is an important part of Environmental Justice: "In making determinations regarding disproportionately high and adverse effects...mitigation and enhancement measures...and all offsetting benefits to the affected minority may be taken into account." Department of Transportation Order 5610.2 -Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, April 15, 1997. Firm commitments in this regard should be made by LAWA in the Draft EIS/EIR.

Response:

Please see Response to Comment AL00017-8.

AL00017-12

Comment:

For example, regarding increased cargo capacity at LAX, the Draft EIS/EIR states:

"It is possible that some of the increased demand [for cargo handling] could be met nearby in Inglewood where the City's General Plan indicates a priority for expanding existing industrial firms and providing increased employment opportunities while mitigating residential areas significantly impacted by aircraft noise."

Draft EIS/EIR "Induced Socio-Economic Impacts," Section 4.5, page 4-446.

Although it acknowledges the potential symbiosis of cargo expansion for LAWA and Inglewood, the Draft EIS/EIR fails to incorporate a reasonable and proportionate distribution of the economic benefits of LAX expansion. If the burdens of LAX expansion are to be thrust upon the City of Inglewood, fair treatment requires that efforts be made to direct potential benefits to the communities impacted by those effects--effects that are significant and cannot and will not be mitigated. The proposed redevelopment along Century Boulevard is a good first step in this direction; however, more needs to be done. LAWA should make concrete commitments to address this issue, and its failure to do so renders the EIS/EIR insufficient as a matter of law.

Response:

Please see Response to Comment AL00017-8.

AL00017-13

Comment:

II. THE DRAFT EIS/EIR FAILS TO SATISFY PROVISIONS OF LAW REQUIRING LAWA TO ADEQUATELY CONSIDER ALTERNATIVES TO EXPANSION AT LAX.

A. LAWA's Consideration of Alternatives Does Not Conform To CEQA

3. Comments and Responses

The LAX Master Plan and Draft EIS/EIR fail to conform to CEQA because they do not properly consider alternatives to expansion at LAX. Proposals that entail expansion at other airports instead of LAX should have been analyzed and considered. Instead of considering only three "build" alternatives, each of which called for massive expansion of LAX (in comparison to a flawed No Action/No Project Alternative), LAWA and the FAA should have considered alternatives that included expansion and/or construction at Ontario Airport, El Toro Marine Corps Air Station, Palmdale Airport and March Air Force Base.

In discussing alternative locations for a project, the CEQA Guidelines state, "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." CEQA Guidelines § 15126.6(f)(2). The CEQA Guidelines further state:

"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which 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.

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."

CEQA Guidelines §§15126.6(a), (f).

According to LAWA, its "preferred" alternative, Alternative "C," causes fewer substantial impacts to the environment surrounding LAX than its other alternatives, "A" and "B." However, the impacts that it does cause are substantial. Moreover, the analysis does not consider whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location, as required by CEQA Guidelines, Section 15126.6(f)(2) cited above. The CEQA Guidelines state that alternatives that cause less environmental harm must be considered. Accordingly, inasmuch as the Draft EIS/EIR fails to consider another location, i.e., Ontario, Palmdale, El Toro, etc., the Draft EIS/EIR fails to follow the CEQA Guidelines.

Feasible alternatives to massive expansion of LAX do exist. The Guidelines set forth a number of factors to consider when determining whether or not an alternative is feasible.

"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 (projects with a regionally significant impact should consider the regional context), 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)."

CEQA Guidelines section 15126.6.

Considering these feasibility factors in connection with expansion at LAX illustrates why the LAX Master Plan and the Draft EIS/EIR are not consistent with CEQA. LAX is located in the midst of a heavily populated residential area. The area is not well suited for the airport operations that currently exist, let alone massive expansion.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. As indicated in the topical responses, all three of the build alternatives analyzed in the Draft EIS/EIR assume that regional airports will accommodate an increasing share of the regional demand in the future, with a resulting reduction in LAX's share of the regional market from 75 percent in 1997 to 67 percent in 2015. The Draft LAX Master Plan assumed that passenger activity at Ontario International Airport would grow from its 1997 activity level of 6.3 MAP to as much as 20.7 MAP (see Table 1-13 of the Draft EIS/EIR). Palmdale Regional Airport, which currently has no scheduled air service, was assumed to accommodate up to 0.7 MAP in 2015. (It should be noted that LAWA is currently in the process of preparing Master Plans for Ontario International and Palmdale Regional

airports.) Other airports in the region were also projected to assume an increasing share of the regional demand, including build out of a commercial airport at the closed Marine Corps Air Station El Toro.

Nevertheless, in response to public comments received on the three alternatives included in the Draft EIS/EIR, subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - is designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP), and shifts the accommodation of future aviation demand to other airports in the region. The environmental impacts of Alternative D were evaluated in a Supplement to the Draft EIS/EIR, which was circulated for public review and comment.

Regarding the commentor's assertion that the CEQA Guidelines require that an EIR consider another location, Section 15126.6 of the CEQA Guidelines indicates that an EIR shall discuss "alternatives to the project OR its location which are capable of avoiding or substantially lessening any significant effects of the project" (emphasis added). The section further states that "the lead agency is responsible for selecting a range of project alternatives for examination" and "there is no ironclad rule governing the nature or scope of the alternatives to be discussed."

AL00017-14

Comment:

LAX is economically viable, but expansion of LAX offers little, if any, additional economic benefit regionally when compared to other expansion scenarios considered by the planning body for Southern California, the Southern California Association of Governments ("SCAG"). "Southern California Aviation Industry Impact Analysis," CIC Research, Inc., July 11, 2000, p. v, attached hereto as Exhibit "C".

Response:

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. In addition, please see Topical Response TR-RC-1 that discusses the roles and responsibilities of LAWA, the City of Los Angeles, SCAG, and SCRAA in meeting regional demand.

AL00017-15

Comment:

The LAX Master Plan contemplates massive construction at LAX because, as it stands today, the infrastructure at LAX is not sufficient to handle the expanded operations in the plan. In reality, however, this places LAX in a similar position to that of every other airport in the area. If LAX is to expand, massive construction will have to take place. The LAX Master Plan is simply not consistent with other plans, in particular SCAG's 2001 Regional Transportation Plan ("RTP") (see below for further discussion) and the 1999 and 2001 Air Quality Maintenance Plan's ("AQMP's"). Lastly, the LAX Master Plan virtually ignores the regional approach to airport expansion, by failing to fully analyze any alternative that does not call for massive expansion at LAX. Given the fact that LAWA owns several of the other airports in Southern California, this failure is inexplicable. The feasibility of expansion of other airports in the region meets or exceeds the feasibility of expansion of LAX, when considering the factors mandated by CEQA.

3. Comments and Responses

Response:

Please see Response to Comment AL00017-13 regarding the alternatives analysis and its relationship to SCAG's RTP, and Response to Comment AL00017-19 regarding conformity with the SCAQMD's AQMP.

AL00017-16

Comment:

B. LAWA's Consideration of Alternatives Does Not Conform to NEPA

LAWA failed to comply with NEPA by only examining in depth alternatives that involve expansion of LAX. NEPA has twin aims. First, it places upon an agency the obligation to consider every significant aspect of the environmental impact of a proposed action. Second, it ensures the agency will inform the public that it has indeed considered environmental concerns in its decision making process. *Baltimore Gas and Electric Co. v. NRDC*, 462 U.S. 87 (1983). An Environmental Impact Statement must discuss reasonable alternatives to the project. 42 U.S.C. §4332(2)(C)(iii); *Alaska Wilderness Recreation v. Morrison*, 67 F.3d 723, 729 (9th Cir. 1995). Consideration of alternatives is at the heart of the environmental impact statement. 40 C.F.R. § 1502.14.

NEPA requires that a Federal agency - to the fullest extent possible - consider alternatives to its actions that would reduce environmental damage. *Calvert Cliffs' Coordinated Committee v. Atomic Energy Commission*, 449 F.2d 1109, 1114 (D.C. Cir. 1971), cert. denied, 404 US. 942 (1972). Considerations of administrative difficulty, delay or economic cost will not suffice to strip the procedural requirements of NEPA of their fundamental importance. *Id.* at 1115.

The Environmental Impact Statement need not consider an infinite range of alternatives, only reasonable or feasible ones. 40 C.F.R. § 1502.14(a)-(c). However, "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate. *Alaska Wilderness Recreation v. Morrison*, supra, 67 F.3d at 729. An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action, and sufficient to permit a reasoned choice. *Id.* The Draft EIS/EIR fails to meet these requirements.

The FAA's Airport Environmental Handbook requires detailed examination of possible alternatives where airport expansion will significantly affect the surrounding environment:

"When section 509(b)(5) of the 1982 Airport Act is applicable, the FAA shall authorize no project under the Airport Improvement Program involving airport location, a major runway extension, or runway location found to have a significant adverse effect unless the agency shall render a finding in writing, followed by a full and complete review, that no feasible and prudent alternative to the project exists and that all possible steps have been taken to minimize such adverse effect."

FAA Airport Environmental Handbook, Chapter 8., p. 2, attached hereto as Exhibit "D." Section 4(f) of the DOT Act requires a finding that "no feasible and prudent alternative" exists. *Id.* The FAA's Airport Handbook also states "To comply with section 4(f), it is necessary to show that a rejected alternative to a proposed action presents unique problems or that the costs or community disruption it entails reaches extraordinary magnitudes." *Id.*

A reasonable alternative to massive expansion of LAX is a regional solution that looks to meeting increased airport demand by expanding other airports in Southern California. The Draft EIS/EIR does not establish that such an alternative to massive expansion at LAX presents "unique problems," or that the costs or community disruption associated with such an alternative will reach "extraordinary magnitudes." On the contrary, the alternatives are dismissed without any such consideration.

As discussed above, the Draft EIS/EIR does not adequately consider alternatives that will reduce the environmental impact upon the community surrounding LAX. Nor does the Draft EIS/EIR consider a "regional" approach that would include substantial expansion at other airports in the region instead of LAX. The Draft EIS/EIR therefore fails to conform to the requirements of NEPA regarding alternatives to the project as presented.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR in compliance with NEPA and Topical Response TR-RC-1 regarding the role of the LAX Master Plan in a regional approach to meeting demand. It should be noted that, subsequent to publication of the Draft EIS/EIR, Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP). Alternative D will make the airport safer and more secure, convenient, and efficient, and will have the fewest negative impacts to the local communities and the region.

AL00017-17

Comment:

III. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT MEASURES ENVIRONMENTAL IMPACTS IMPROPERLY

CEQA Guidelines section 15125(a) states "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time of notice of preparation is published . . . The environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." Under CEQA the impacts of the project must be measured against the real conditions on the ground. *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 121.

The Draft EIS/EIR fails to utilize a proper baseline. LAWA utilized three different baselines when examining the environmental effects of its Master Plan for LAX. LAWA's "environmental baseline" reflects the conditions in 1996. LAWA's "adjusted environmental baseline" reflects the current use of LAX, with the addition of future road projects and certain land uses. LAWA's "No Action/No Project" Alternative reflects the future road projects and certain land uses, and projects future airport use. LAWA has failed to create a sufficient baseline from which to analyze its alternatives. LAWA's "No Action/No Project" Alternative reflects future conditions. This is inconsistent with CEQA and incorrectly minimizes the environmental effects of the other alternatives. LAWA should develop a proper baseline from which to evaluate its alternatives.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues.

AL00017-18

Comment:

IV. THE LAX MASTER PLAN AND DRAFT EIS/EIR FAIL TO SATISFY APPLICABLE LAW BECAUSE THEY DO NOT CONFORM TO OTHER RELEVANT PLANS

Federal regulations require that all airport development conform to local plans. The FAA's Airport Environmental Handbook clearly states that any airport plan must conform to the local air emissions plans:

"Section 176(c) of the Clean Air Act Amendments of 1977 states in part that no Federal agency shall engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to a State Implementation Plan after it has been approved or promulgated under section 110 of that Act. It is FAA's responsibility to assure that Federal airport actions conform to state Plans for controlling area wide air pollution impacts."

Airport Environmental Handbook, Chapter 5 p. 12. In addition, the Airport Environmental Handbook states that the 1982 Airport Act requires that Airport Improvement Program applications for projects involving airport location, runway location, or a major runway extension shall not be approved unless the governor of the state in which the project is located certifies that there is a "reasonable assurance" that the project will be located, designed, constructed, and operated in compliance with applicable air and water quality standards. Airport Environmental Handbook Chapter 5 p. 14. Finally, the FAA's Airport Environmental Handbook states that all airport development must conform to local plans:

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"For all airport development there shall be evidence to support the following Airport Improvement Program grant assurances as required by the 1982 Airport Act.

(a) The project is reasonably consistent with existing plans of public agencies for development of the area (section 509(b)(1)(A));

(b) Fair consideration has been given to the interest of communities in or near the project location (section 509(b)(4)); . . .

(d) Appropriate air and water quality certificates have been or will be obtained for projects involving airport location, runway location, or a major runway extension (section 509(b)(7))."

Airport Environmental Handbook, Chapter 9, p. 3.

The LAX Master Plan and Draft EIS/EIR fail to conform to two key local plans. How the Master Plan and EIS/EIR fail to conform is discussed in the two paragraphs that immediately follow. However, it should be noted as an initial point that since the Master Plan and EIS/EIR fail to conform to two key local plans, they violate Section (a) referred to immediately above.

First, the LAX Master Plan fails to conform to the relevant Air Quality Maintenance Plan. Mr. David Calkins, an expert in air emissions planning and compliance issues, reviewed the LAX Master Plan and Draft EIS/EIR. His reports are attached hereto as Exhibits "E" and "F." In his report, Mr. Calkins states, "Review of Chapter 4.6 found several inconsistencies in LAWA's reference to the conformity and SIP planning process." Calkins Phase I Report, p. 11.

Second, Mr. Calkins has found that the Draft EIS/EIR fails to conform to the Regional Transportation Plan ("RTP") in at least eight different ways. These differences are discussed in detail below. In addition to the Federal law requirements discussed above, under CEQA an EIR must discuss any inconsistencies between the proposed project and applicable general plans and regional plans. CEQA Guidelines § 15125 (d). The Draft EIS/EIR fails to meet these requirements.

Response:

Please see Responses to Comments AL00017-19 through AL00017-27 below.

AL00017-19

Comment:

A. The LAX Master Plan Fails To Conform To The Air Quality Maintenance Plan

The LAX Master Plan does not conform to the local air pollution reduction plan. Southern California is designated a "non-attainment area"³ under the 1990 Clean Air Act. Therefore all major projects must be constructed with assurance to the Federal Government that the project fits into the current air pollution reduction plan, known as the Air Quality Maintenance Plan ("AQMP"). See Calkins Phase II Report pp. 11-12. Mr. Calkins has determined that the LAX Master Plan Draft EIS/EIR fails to conform to the relevant AQMP in regards to the following:

1. Emission Inventory - the 2001 AQMP, currently in development, will require changes to the Draft EIS/EIR's emission inventory.

2. Mitigation Measures - LAWA's failure to commit to specific mitigation measures in the Draft EIS/EIR inhibits development of the 2001 AQMP.

3. Baseline Issues - use of the "adjusted" environmental baseline for off-airport traffic impacts does not allow comparison of the Draft EIS/EIR alternatives with current conditions, but actually compares the alternatives to a future condition.

4. Aircraft Mix - the Draft EIS/EIR assumes a aircraft mix of mostly jumbo airliners, in conflict with the adopted 2001 RTP calculations, which will cause differences in projected emissions between the Draft EIS/EIR and the AQMP.

5. Stationary Source Emissions - LAWA's alternatives do not take into account the increase in nearby, off-airport stationary source emissions, despite LAWA's assertions to the contrary; thus, it cannot conform to the regional plan.

6. Ground Support Equipment - LAWA failed to follow the California Air Resources Board's ("CARB") latest off-road emission model when concluding that emissions for future Ground Support Equipment would be zero.

Calkins Phase II Report at 13-14. These are serious conformance problems that must be first detailed, then remedied by LAWA before any action can be taken on the LAX Master Plan or its Draft EIS/EIR.

3 A "non-attainment area" has monitored air pollution levels in excess of the National Ambient Air Quality Standards ("NAAQS").

Response:

It should be noted that SCAQMD did not release an AQMP in 2001, but it did release an AQMP in August 2003. The air quality analyses completed for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR were based upon approved/adopted air quality data available at the times they were published. The Final General Conformity Determination for Alternative D, as summarized in the Final EIS/EIR, accounts for the 2003 AQMP as well as the approved SIP. Accordingly, the Final EIS/EIR includes updated air quality analyses for the No Action/No Project Alternative and the mitigated Alternative D.

Those mitigation measures which LAWA will implement as part of the LAX Master Plan will not only comply with but will exceed the requirements of the 2003 AQMP. LAWA currently complies with all applicable federal, state, regional, and local air quality requirements and will comply with new requirements that become applicable in the future, such as new rules stemming from the 2003 AQMP.

The Draft EIS/EIR provided the definition and rationale for the "adjusted environmental baseline" in the Introduction to Chapter 4. See also Topical Response TR-GEN-1 regarding baseline issues.

The aircraft fleet mix assumed in the Draft EIS/EIR represented the collective professional judgment of experienced airport planners developing the LAX Master Plan.

Neither LAWA nor FAA exercises control over stationary sources operated off LAX property. The air quality dispersion analyses presented in the Draft EIS/EIR utilized background concentrations for all criteria pollutants based on recent ambient air monitoring conducted in the vicinity of LAX which account for contributions from all stationary and mobile sources near by and far from LAX. These current measures of background concentrations were used to project future background concentrations following techniques consistent with those used by SCAQMD in the 1997 AQMP; see subsection 4.6.2.4 of the Draft EIS/EIR.

As part of the air quality mitigation measures proposed for the LAX Master Plan, LAWA expresses its commitment to obtain virtual elimination of emissions from GSE operated at LAX by 2015, to the extent technically feasible. See the Supplement to the Draft EIS/EIR Appendix S-E Section 2.3.2.2 for additional discussion of the recommended air quality mitigation measures for operational sources. The EDMS model was used to calculate emissions from GSE; the updated analyses presented in the Final EIS/EIR for the No Action/No Project Alternative and mitigated Alternative D used emission factors from CARB's OFFROAD emissions model input into EDMS to calculate GSE emissions.

AL00017-20

Comment:

B. The LAX Master Plan Fails To Conform To SCAG's 2001 Regional Transportation Plan

The LAX Master Plan does not conform to the local Regional Transportation Plan ("RTP"). The Southern California Association of Governments ("SCAG") is the main planning body for Southern California. At least every three years, SCAG adopts an RTP for the area, which sets forth its plan for the foreseeable future, usually 25 years. SCAG adopted a new RTP in April 2001. This RTP replaced

3. Comments and Responses

SCAG's previous plan, which was adopted in 1998. The Final RTP has not yet been formally released, but its contents in most areas relevant to LAX are known.

As discussed in the Calkins Phase II Report, attached as Exhibit F, the LAX Master Plan Draft EIS/EIR fails to conform to the RTP as follows:

1. Projected Passenger Load - the LAX Master Plan Draft EIS/EIR projects LAX handling over 92 million annual passengers ("MAP") in 2015; the RTP limits LAX to handling what is considered to be its current physical capacity of 78 MAP.

Response:

Comment noted. In response to the direction of Mayor Hahn, LAWA has developed a new alternative for consideration as part of the LAX Master Plan. Alternative D - Enhanced Safety and Security Plan - is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. To ensure that the LAX Master Plan Alternative D has been fully analyzed to the level of the previous Master Plan alternatives, LAWA prepared a supplement to the January 2001 Draft EIS/EIR. Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR, provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP. In addition, please see Topical Response TR-MP-2 regarding the compatibility between the Draft EIS/EIR and Supplement to the Draft EIS/EIR and the SCAG Regional Transportation Plan (RTP).

AL00017-21

Comment:

2. On-Road Emissions Factors - The Draft EIS/EIR utilizes EMFAC2000, but the RTP uses emission factors based upon EMFAC7G. This inconsistency makes it quite difficult to compare the air quality impacts of the Draft EIS/EIR upon the RTP.

Response:

For purposes of conformity, the most recently available modeling methodologies should be utilized. Since publication of the Draft EIS/EIR, an updated version of EMFAC has become available. The EMFAC2002 model was used in the analyses presented in the Supplement to the Draft EIS/EIR, published in July 2003, for all on-road, mobile emission sources.

AL00017-22

Comment:

3. Different Model Years -The Draft EIS/EIR models years 2005 and 2015, but the RTP models 2025 as its model year.

Response:

Please see Topical Response TR-MP-2 regarding the compatibility between the Draft EIS/EIR and the SCAG Regional Transportation Plan (RTP).

AL00017-23

Comment:

4. Market Incentives - There are significant differences between the two plans in choice of market incentives, which causes potential conflicts between the two plans.

Response:

In response to the direction of Mayor Hahn, LAWA has developed a new alternative for consideration as part of the LAX Master Plan. Alternative D, the Enhanced Safety and Security Plan Alternative, is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. To ensure that the LAX Master Plan Alternative D has been fully analyzed to the level of the previous Master Plan alternatives, LAWA prepared a Supplement to the Draft EIS/EIR. Chapter 3,

Alternatives, of the Supplement to the Draft EIS/EIR provides extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP.

AL00017-24

Comment:

5. Aircraft and Passenger Characteristics -These differ in regards to projected aircraft types and passenger growth during the relevant periods.

Response:

Comment noted. The nature of, and basis for, the aircraft and passenger characteristics forecast for each of the alternatives addressed in Section 3.1.3 of the Draft EIS/EIR and Section 3.1 of the Supplement to the Draft EIS/EIR are documented in the Chapter 3 of the Draft Master Plan and the Chapter 3 of the Draft Master Plan Addendum.

AL00017-25

Comment:

6. Cargo Handling Projections - The Draft EIS/EIR projects much larger cargo handling for LAX than that planned for in the RTP.

Response:

Comment noted. Please see Topical Response TR-MP-1 regarding cargo handling and Topical Response TR-MP-2 regarding the role of SCAG in the LAX Master Planning process and the effect of SCAG's 2001 RTP on the Supplement to the Draft EIS/EIR. The new Enhanced Safety and Security Plan Alternative, Alternative D, analyzed in the Supplement to the Draft EIS/EIR, was added to provide a build alternative designed to serve a level of future (2015) airport activity, including cargo activity, comparable to the No Action/No Project Alternative. Chapter 3 of the Supplement to the Draft EIS/EIR provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP.

AL00017-26

Comment:

7. High Speed Rail Projections - The Draft EIS/EIR rejects this project as too speculative, but the RTP bases projections on passenger and cargo demand in part upon the inclusion of this transportation mode.

8. Funding Projections - The RTP does not include the Ring Road, 105 Freeway extension, or 405 Freeway Connector Projects in its funding projections. The Draft EIS/EIR plans for funding for all of these projects, presumably from Federal Highway funds.

Calkins Phase II Report at pp. 9-10.

Response:

In accordance with NEPA and CEQA, the only regional transportation improvements included in the background assumptions for the LAX Master Plan are those projects that are currently funded and have a reasonable expectation of completion by 2005 or 2015. While the Regional Transportation Plan includes the Maglev (High Speed Rail) project in its constrained network, it does not indicate any commitment of public funding, and it does not derive any benefits from the project until the year 2025. The LAX Master Plan analysis is consistent with the RTP in assuming no benefits from High Speed Rail in 2005 or 2015. Speculation that the Ring Road, 105 Freeway extension, or 405 Connector (LAX Expressway) will be funded by Federal Highway funds is purely on the part of the commentor.

A specific financial plan has not yet been prepared for the Master Plan; however, it is anticipated that a joint funding effort will be pursued, involving Federal and State grants and other efforts. Much of the project will likely be funded with airport-generated revenues, such as concession fees, landing fees,

3. Comments and Responses

revenue bonds, leases, and passenger facility charges (PFCs). It is not anticipated that any local tax revenue would be used for this project.

AL00017-27

Comment:

LAWA's failure to even discuss these issues is a serious deficiency in the Draft EIS/EIR. The Draft EIS/EIR cannot be acted upon until it is modified to conform to the RTP, assuming that is possible to do so without simply scratching the entire analysis and starting over. If it is possible to salvage some small part of the plan, such as the mitigation measures, then the Draft EIS/EIR must be reissued for public comment.⁴

4 When new significant information becomes available after the public review period, Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5 require re-circulation of an EIR prior to certification.

Response:

Please see Responses to Comments AL00017-20 through AL00017-26 above regarding the issues of concern. Alternative D has been added to the range of alternatives being considered for the LAX Master Plan to provide, among other things, an alternative that is consistent with the policy framework of the SCAG 2001 RTP Regional Transportation Plan which calls for no expansion of LAX. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and, in accordance with CEQA and NEPA requirements, was circulated for public review and input.

AL00017-28

Comment:

V. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT DOES NOT ADEQUATELY ADDRESS THE IMPACT OF TOXIC AIR POLLUTANTS

A. The Draft EIS/EIR Lacks A Proper Baseline Regarding Air Toxics

The Draft EIS/EIR does not contain a proper baseline for air toxics emissions from LAX and LAX-related sources. As a result, it does not adequately address the effects of toxic air pollutants upon human health, including the health of the residents of the City of Inglewood.

CEQA requires that an EIR includes a description of the environment in and around the project at the time of the Notice of Preparation. CEQA Guidelines § 15125(a). Such a description, or baseline, serves as the basis for the EIR's analysis of the environmental impacts of a project. CEQA also requires that detailed analysis of the potential environmental impacts from each of the projects contained in the aviation alternatives cannot be deferred to subsequent environmental documents. Public Resources Code § 21100; Stanislaus Natural Heritage Project v. County of Stanislaus (1996) 48 Cal.App.4th 182. The Draft EIS/EIR does not contain an adequate basis from which to determine the current impact on human health of air toxics emitted by LAX. "The HHRA did not evaluate impacts of toxic air pollutants associated with current airport operations." Calkins Phase I Report, p. 8. As noted by Mr. Calkins, this oversight means that LAWA does not provide a sufficient baseline from which to draw later conclusions. Without a baseline, LAWA cannot adequately assess the environmental effects of its plans to expand LAX.

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In accordance with CEQA guidelines the Draft EIS/EIR uses the date of July 1997, the date on which the Notice of Preparation (NOP) was published, as the baseline for its environmental analysis. The environmental baseline used in the Human Health Risk Assessment of the Draft EIS/EIR reflects historical airport activity for the full year 1996 and the physical facilities of the airport as they existed in 1997. For a discussion of baseline conditions associated with LAX operations please refer to Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, Section 3.3, Emissions Estimates for TAPs, of Technical Report 14a and Attachment F of that Technical Report, which is the Air Quality Modeling

Protocol for Toxic Air Pollutants, LAX Master Plan EIS/EIR (Attachment F). The use of an earlier rather than later baseline date generally results in a more conservative environmental analysis. This conservatism is due to the steadily increasing number of passengers and cargo that use LAX, and the correspondingly greater levels of traffic and congestion-related air pollution. By using earlier years for baseline environmental conditions, impacts associated with future activity levels are measured against lower levels of airport activity and therefore incremental impacts are greater.

Data representative of more current airport operations (Year 2000) were available for the Supplement to the Draft EIS/EIR and air toxic-related risks were estimated under Year 2000 conditions as a basis for comparison to air toxic-related risks estimated using the 1996 baseline presented in the Draft EIS/EIR. Due to the decrease in air travel following terrorist actions in September 2001, the data for 2001 was not representative of typical or expected conditions, and, therefore, were not used.

AL00017-29

Comment:

B. LAWA Failed To Properly Study Toxic Air Emissions

The Draft EIS/EIR does not properly study toxic air emissions related to LAX. LAWA's Health Risk and Air Toxics evaluation is deficient due to the failure to organize and complete a study, such as the Air Quality and Source Apportionment Study, prior to the release of the Draft EIR/EIS. The Air Quality and Source Apportionment Study are not yet complete. This study will shed important information on the health impacts to the surrounding community as well as identify mitigation measures. It will also determine the contribution of various airport-related activities on selected air pollutant concentrations in relation to those pollutants caused by other, non-airport sources in the surrounding community without the Source Apportionment study. LAWA cannot assess the incremental impact of LAX operations on local air quality. Therefore, LAWA has failed to investigate this area fully before preparing the Draft EIS/EIR. A prudent course of action would be to place any LAX expansion plans on hold until completion of this study. This would allow proper consideration of the serious human health issues addressed in this study. Without this study, the Draft EIS/EIR will not withstand scrutiny under CEQA and NEPA.

Response:

Please see Topical Response TR-AQ-2 regarding the LAX Ambient Air Quality and Source Apportionment Study. In addition, please also see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and TR-HRA-4 concerning human health mitigation strategies.

AL00017-30

Comment:

C. LAWA' s Health Risk Assessment Does Not Adequately Factor Time as a Variable

The Health Risk Assessment in the Draft EIS/EIR should be extended to consider a longer time period. There do not appear to be any tables or data in the Draft EIS/EIR on cancer and non-cancer health risks for any year after 2015. However, the operation of the expanded airport during those latter years may well have continuing impacts on the residents of the surrounding communities. Health impacts are often seen in the resident population over a much longer time span than the 15-20 years assessed in the Draft EIS/EIR tables. Other major planning assessments, such as the RTP (2025) and the AQMP (2030), examine impacts of their action over a much longer time frame. Calkins Phase II Report p. 22. The Health Risk Assessment in the Draft EIS/EIR should be extended to conform to this model.

Response:

One of the project objectives is to respond to local and regional demand for air transportation, taking into consideration the amount, type, location, and timing of such demand. Horizon year 2015 was selected for evaluation based upon the schedule for completion of the two phases of the LAX Master Plan. Year 2015 is the first year when full operations are expected after implementation. Maximum emissions were estimated for the proposed alternatives, including the No Action/No Project Alternative. Based upon airfield and passenger constraints, potential future LAX emissions were adequately

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characterized by estimated maximum emissions for the 2015 scenario. The level of activity at this horizon year is influenced by the landside component (i.e., the curbside) as well as by the gate and airfield capacity. Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR described how these, and other, factors influence the future (2015) activity levels for each of the five alternatives.

The risk assessment characterized incremental cancer risks and non-cancer hazards for adult and child residents, school children, and on-airport workers using maximum estimated chemical concentrations in air. People were assumed to be exposed to maximum concentrations over an extended period of time. Health impacts should not be construed to represent "point in time" estimates or to have a "cut-off" period of the horizon year. For example, risk calculations for the horizon year 2015 assumed that adult residents were exposed to maximum chemical concentrations for an exposure duration of 30 or 70 years. The longer exposure duration was used in the Supplement to the Draft EIS/EIR in response to comments from the South Coast Air Quality Management District (SCAQMD). School children and child residents were assumed to be exposed to the maximum chemical concentrations in air estimated for the year 2015 for an exposure duration of 6 years.

As described above, horizon years evaluated in the Draft EIS/EIR were based upon project specifics. Timeframes evaluated in planning documents such as the Air Quality Management Plan (AQMP) and the Regional Transportation Plan (RTP) were based upon regulatory guidelines. Both the AQMP and RTP have a 20-year horizon. The 1997 Air Quality Management Plan provided projected emissions up to the year 2010. In addition, it provided a first look at air quality analysis for the year 2020; the year 2020 analysis was provided for informational purposes only and did not serve as part of the maintenance plan.

AL00017-31

Comment:

D. LAWA's Study Of Air Pollutants Fails to Consider Relevant Issues

It is unclear in the Draft EIS/EIR what LAWA criteria are for determining net change in chronic and acute hazard indices for air pollutants. LAWA does not include the criteria pollutants in this analysis, and this is a critical, indeed fatal, omission. The results of the Source Apportionment study, which was only recently initiated, would have provided valuable input to assessing criteria (NAAQS) as well as various toxic air pollutant impacts on health, if it were available to the LAWA at the time of preparation of the Draft EIS/EIR.

Response:

No criteria were established for determining the net change in chronic and acute hazard indices. Net change was calculated as the difference, at each grid point in the air dispersion modeling domain, between baseline conditions and those predicted for the No Action/No Project and the build alternatives. For additional information, please refer to Response to Comment AF00001-38. Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment).

Acrolein is the only TAP of concern in emissions from LAX that might be present at concentrations approaching a threshold for acute effects, and thus was the only TAP further assessed for such hazards. As discussed in the Supplement to the Draft EIS/EIR, Technical Report S-9a, Section 4.2.2, Assessment of Acute Hazards, incremental (i.e., net change) acrolein concentrations predicted from ISC3 modeling of build alternatives or the No Action/No Project Alternative were calculated by subtracting baseline concentrations (either baseline year 1996 or Year 2000 conditions) at each of the approximately 50 grid nodes in the study area selected for quantitative assessment. These concentrations represent the increment above current impacts that might be associated with each of the alternatives. Acute risks were then estimated at each grid point by comparison with the acute REL for acrolein.

The Draft EIS/EIR addresses criteria pollutants in Section 4.6, Air Quality, separate from the analysis of TAPs in Section 4.24.1, Human Health Risk Assessment. Regarding potential impacts of interaction between TAPs and criteria pollutants, please refer to Response to Comment AF00001-38. Please refer to Topical Response TR-HRA-1 regarding the use of the Source Apportionment study to assess criteria pollutants and toxic air pollutants.

AL00017-32

Comment:

The Draft EIS/EIR also appears to ignore the incremental cancer and non-cancer risks to people who do not "receive a certain hazard level criterion." Calkins Phase II Report p. 22. These issues must be addressed and resolved in the Draft EIS/EIR.

Response:

First, the Draft EIS/EIR does not ignore risks or hazards below threshold criteria. Section 4.24.1, Human Health Risk Assessment, of the document provided maps that show changes in incremental risks and hazards to levels far below significance thresholds for several miles east of LAX. Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR provided additional information using such maps and related data. In general, exposure to chemicals is associated with some degree of cancer risk or non-cancer health effect. Activities such as wearing dry-cleaned clothes, refueling or driving a vehicle, using household cleaners, smoking cigarettes, drinking alcohol, and using household cleaners are associated with potential cancer risk or non-cancer health effects. Similarly, implementation of a project may result in chemical emissions and potential health effects. People may be exposed to chemicals emitted by activities conducted at LAX; therefore, LAX activities may be associated with some degree of cancer risk or non-cancer health effect. The potential for a risk of cancer or non-cancer health effect does not necessarily imply significance; if this were the case, many everyday activities that people engage in might be considered too "risky" to be permitted.

Thresholds of significance are quantitative or qualitative measures used to determine whether an environmental effect of a project (e.g., potential risks) would be considered significant. Where possible, validation of the choice of thresholds is provided by federal, state, and local guidelines, particularly the Guidelines for California Environmental Quality Act (State CEQA Guidelines) and related guidance and the Draft Los Angeles CEQA Thresholds Guide, published by the City of Los Angeles Environmental Affairs Department. For environmental disciplines mandated solely by NEPA, thresholds of significance are not included, as they are not required by NEPA. In lieu of federal thresholds, federal standards are used that are relevant to the analysis. These thresholds were subsequently revised and expanded in the Supplement to the Draft EIS/EIR (see Section 4.24.1).

Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.4.1, CEQA Thresholds of Significance), of the Draft EIS/EIR described selection of the cancer and non-cancer thresholds of significance. The threshold of significance for increased incremental cancer risk is 10 in one million. For non-cancer health effects, the threshold of significance is a total incremental chronic or acute hazard index of 5. These thresholds of significance were selected based on South Coast Air Quality Management District (SCAQMD) policies. No regulations exist that establish thresholds of significance for an entire facility such as LAX. The thresholds selected are consistent with the SCAQMD CEQA Handbook (1993) for assessing impacts of new developments as well as recent, publicly available correspondence from SCAQMD.

The risk assessment calculated health risks and hazards for maximally exposed people living in areas where maximum concentrations of toxic air pollutants were predicted by air dispersion modeling. In addition, the risk assessment evaluated risks and hazards for locations distributed throughout a large geographic area that extended into communities adjacent to, and north, east, and south of the airport. Risks and hazards were evaluated for the No Action/No Project Alternative and the four build alternatives for the horizon years 2005 and 2015 for pre- and post-mitigation conditions. Risk assessment results were discussed in terms of total incremental risks and hazards, as well as in comparison to thresholds of significance, to give decision-makers and the public a sufficient description of the overall health impacts. Risks and hazards were reevaluated in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR based on reevaluation of baseline conditions. In addition, risks and hazards were characterized by census tracts in Section 4.24.1, Human Health Risk Assessment (subsection 4.4.3), of the Supplement to the Draft EIS/EIR.

Regarding the difference between a Hazard Index of 1 and 5, the measure used to describe the potential for noncarcinogenic toxicity to occur in an individual is not expressed as the probability of an individual suffering an adverse effect. Hazard indices should not be interpreted as statistical probabilities nor do they imply fractions of people who may experience adverse effects. A hazard index

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is the ratio between the concentration of a noncarcinogenic compound at the receptor and the concentration of that compound that has been found through scientific research to cause a health effect.

AL00017-33

Comment:

VI. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES HUMAN HEALTH RISKS

A. LAWA's Study does not Adequately Factor Time as a Variable

LAWA analyzes environmental health impacts for two years - 2005 and 2015; however, the environmental health impacts will occur over time. Accordingly, LAWA's analysis inaccurately minimizes certain risks and fails to consider numerous cumulative impacts.

Further, as noted by Dr. Hattis, "2005 does not represent even the peak year for construction-related impacts," Hattis Report p.4. In fact, emissions of particulate matter in year 2004 are expected to be more than twice those in 2005 (approximately 44,000 lbs/day versus 19,000 lbs/day). For a proper analysis, LAWA should "analyze and express impacts in terms of both peak-year and integrated bottom-line measures of effect over a reasonably foreseeable extended time over which the facilities will be built and operated." Hattis Report p. 4.

Response:

In addition to the information and analysis pertaining to human health risk provided in the Draft EIS/EIR, the Supplement to the Draft EIS/EIR provided extensive new analysis designed to address the types of issues raised in the comment.

The comment implies a misunderstanding of the risk assessment process. For chronic impacts, a long term average exposure is most appropriate, and is provided in the human health risk assessment. Such a long term average will account for higher possible exposure during a year such as 2004, and lower exposures during all other construction years. This practice of evaluating a long term average is well established in risk assessment methods. Horizon year 2005 was selected as a representative interim date where health impacts during the construction process could be evaluated. This year actually will overestimate a long term average and was selected to help ensure a conservative assessment.

Contrary to the implication in the comment, the risk assessment does provide an integrated assessment over a suitably conservative timeframe. Chronic risks and hazards are assessed as average exposure over a long time period, often a whole lifetime or some substantial fraction of a lifetime. For example, California EPA defines chronic exposure as either Lifetime Average Daily Dose (LADD) for carcinogens, or Average Daily Dose (ADD) for non-carcinogens. Year 2005 was chosen as representative -- that is, higher than most years, lower than others. Emissions from this year were then assumed to continue year-after-year until the project was complete. Extra time was allowed in the calculations in case construction took longer than expected. The result is a conservative (protective) estimate of emissions during the entire construction period.

Horizon year 2015 was selected for evaluation based upon the schedule for completion of the two phases of the LAX Master Plan. Year 2015 is the first year when full operations are expected after implementation. The assessment assumes that the level of activity predicted for 2015 would remain constant indefinitely, and risks were calculated based on this assumption. Since air traffic is expected to be limited by landside constraints for the build alternatives, this assumption is reasonable.

The risk assessment characterized incremental cancer risks and non-cancer hazards for adult and child residents, school children, and on-airport workers using maximum estimated chemical concentrations in air. People were assumed to be exposed to maximum concentrations over an extended period of time. Health impacts should not be construed to represent "point in time" estimates or to have a "cut-off" period of the horizon year. For example, risk calculations for the horizon year 2015 assumed that adult residents were exposed to maximum chemical concentrations for an exposure duration of 30 or 70 years. The longer exposure duration was used in the Supplement to the Draft EIS/EIR in response to comments from the South Coast Air Quality Management District (SCAQMD). School children and child

residents were assumed to be exposed to the maximum chemical concentrations in air estimated for the year 2015 for an exposure duration of 6 years.

Cumulative cancer risks were estimated using SCAQMD data on air quality in the Los Angeles basin. MATES-II results were used to estimate current background concentrations of TAPs. If MATES-II underpredicts background concentrations of TAPs in the South Coast Air Basin for the year 2015, cumulative impacts of the build alternatives may be underestimated. However, CARB data indicate that carcinogenic risks have decreased up to 63 percent since 1990 due to decreased air concentrations of TAPs. If continuing progress is made toward reductions in TAPs emissions in the South Coast Air Basin, MATES-II could over predict potential background risks for horizon year 2015. Cumulative risks would also be overestimated. As discussed in TR-HRA-1, baseline and cumulative risks were reevaluated in the Supplement to the Draft EIS/EIR (Section 4.24.1). In addition, construction risks were evaluated for Alternative D in the Supplement to the Draft EIS/EIR. Risks are characterized using integrated average chemical exposure concentrations over the construction period and compared to risks for the peak year of construction emissions. Please refer to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR for characterization of risks associated with construction activities.

Background concentrations for assessment of cumulative chronic non-cancer impacts were evaluated in the Supplement to the Draft EIS/EIR using data developed by USEPA on a census tract basis. These data were taken from various sources of information on emissions and used in large scale air dispersion modeling to arrive at estimates of average ambient air concentrations. The results of the analysis suggest that current concentrations of acrolein in western Los Angeles County may be substantially larger than those that may be associated with airport operations.

AL00017-34

Comment:

B. The Draft EIS/EIR Fails to Adequately Delineate Health Risks

The increased health risks associated with the LAX Master Plan should be set forth with more clarity and specificity in the Draft EIS/EIR. Impacts are expressed primarily in terms of "significance" of effects for the most exposed individual, or, when considering certain carcinogenic effects, in terms of the areas or numbers of people exposed to concentrations expected to exceed a 1/100,000 lifetime incremental cancer risk criterion or an unusual criterion for non-cancer effects of a hazard index of 5. Hattis Report p. 4.

However, the usual criterion used in many impact assessments under other environmental statutes, including Superfund, is a hazard index of 1.5. Dr. Hattis notes:

"These ways of expressing health impact results are of some relevance because they help the audience judge the fairness of the burden of extra risk imposed for residents of the areas most affected by the project options. However, exclusive definition of impacts in terms of the area or number of people who receive an increment of risk or (for non-carcinogenic agents) exposure to pollutants from LAX-related sources alone that is deemed to exceed a single bright line of 'significance' ignores the incremental cancer and non-cancer risks to people who do not happen to be moved across such a criterion level. Further, these ways of summarizing impacts can not, by themselves, give decision-makers and the public a sufficient description of the overall health impacts to arrive at a reasoned judgment of whether the mix of economic, human health, and environmental impacts of the proposed "build" option is more desirable overall than the comparable impacts of other options. The current analysis of economic activity describes projected aggregate changes in jobs and overall economic activity for the City of Los Angeles, Los Angeles County, and the whole Southern California area. To be comparable with these aggregate economic impacts, aggregate measures of health impacts must be created and the current artificial limitation of the study area for quantifying air pollution impacts must be transcended."

Hattis Report pp. 4-5.

5 The difference between a hazard index of 1 and 5 is fivefold in the toxicity-weighted concentrations of the pollutants covered by the index in terms of risk. The fraction of people who suffer irritation and other

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non-cancer effects is likely to be larger than fivefold, depending on the shape of the dose response relationship.

Response:

In general, exposure to chemicals is associated with some degree of cancer risk or non-cancer health effect. Activities such as wearing dry-cleaned clothes, refueling or driving a vehicle, using household cleaners, smoking cigarettes, drinking alcohol, and using household cleaners are associated with potential cancer risk or non-cancer health effects. Similarly, implementation of a project may result in chemical emissions and potential health effects. People may be exposed to chemicals emitted by activities conducted at LAX; therefore, LAX activities may be associated with some degree of cancer risk or non-cancer health effect. The potential for a risk of cancer or non-cancer health effect does not necessarily imply significance; if this were the case, many everyday activities that people engage in might be considered too "risky" to be permitted.

Thresholds of significance are quantitative or qualitative measures used to determine whether an environmental effect of a project (e.g., potential risks) would be considered significant. Where possible, validation of the choice of thresholds is provided by federal, state, and local guidelines, particularly the Guidelines for California Environmental Quality Act (State CEQA Guidelines) and related guidance and the Draft Los Angeles CEQA Thresholds Guide, published by the City of Los Angeles Environmental Affairs Department. For environmental disciplines mandated solely by NEPA, thresholds of significance are not included, as they are not required by NEPA. In lieu of federal thresholds, federal standards are used that are relevant to the analysis. These thresholds were subsequently revised and expanded in the Supplement to the Draft EIS/EIR (see Section 4.24.1).

Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.4.1, CEQA Thresholds of Significance), of the Draft EIS/EIR described selection of the cancer and non-cancer thresholds of significance. The threshold of significance for increased incremental cancer risk is 10 in one million. For non-cancer health effects, the threshold of significance is a total incremental chronic or acute hazard index of 5. These thresholds of significance were selected based on South Coast Air Quality Management District (SCAQMD) policies. No regulations exist that establish thresholds of significance for an entire facility such as LAX. The thresholds selected are consistent with the SCAQMD CEQA Handbook (1993) for assessing impacts of new developments as well as recent, publicly available correspondence from SCAQMD.

The risk assessment calculated health risks and hazards for maximally exposed people living in areas where maximum concentrations of toxic air pollutants were predicted by air dispersion modeling. In addition, the risk assessment evaluated risks and hazards for locations distributed throughout a large geographic area that extended into communities adjacent to, and north, east, and south of the airport. Risks and hazards were evaluated for the No Action/No Project Alternative and the four build alternatives for the horizon years 2005 and 2015 for pre- and post-mitigation conditions. Risk assessment results were discussed in terms of total incremental risks and hazards, as well as in comparison to thresholds of significance, to give decision-makers and the public a sufficient description of the overall health impacts. Risks and hazards were reevaluated in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR based on reevaluation of baseline conditions. In addition, risks and hazards were characterized by census tracts in Section 4.24.1, Human Health Risk Assessment (subsection 4.4.3), of the Supplement to the Draft EIS/EIR.

Regarding the difference between a Hazard Index of 1 and 5, the measure used to describe the potential for noncarcinogenic toxicity to occur in an individual is not expressed as the probability of an individual suffering an adverse effect. Hazard indices should not be interpreted as statistical probabilities nor do they imply fractions of people who may experience adverse effects. A hazard index is the ratio between the concentration of a noncarcinogenic compound at the receptor and the concentration of that compound that has been found through scientific research to cause a health effect.

AL00017-35

Comment:

Decision-makers and the public should be informed of the differences among options in overall cases of cancer that are expected to arise over the lifetimes of the individuals exposed over particular periods of construction and operation of the proposed facilities. This should be done for the entire geographic area

of the South Coast Air Basin that receives incremental changes in exposures. Hattis Report p. 5. Human health impacts can and should be expressed in aggregate incremental cancer cases, aggregate incremental deaths, aggregate incremental hospitalizations and aggregate incremental asthma effects for the entire Los Angeles basin associated with the LAX Master Plan. Hattis Report p. 5. These calculations are certainly feasible and would inform the decision makers and the public of the true human health effects of the project. Until this is done, the document is deficient in addressing this topic.

C. The Draft EIS/EIR Fails to Consider Health Risks on a Regional Basis

The Draft EIS/EIR's human health risk assessment should study risks created by the Master Plan in the entire Southern California region, not simply in those areas immediately surrounding LAX. Failure to so conceals the advantages in terms of health risks from expanding other airports instead of LAX. As Dr. Hattis notes:

"Were the analysis expanded to include some options shifting additional air service to outlying airports (as recommended above), continued use of the more localized health impact analysis method would cause analysts to miss important benefits that would accrue from placing emissions downwind rather than upwind of the major population centers of the Los Angeles area."

Hattis Report p. 5. Restricting the environmental impact analyses to the immediate LAX area and the options considered only to expansion of LAX prevents considering the relative burdens of LAX expansion on minority and lower-income communities versus expansion of air service at other airports. The City of Inglewood appears to be substantially included in the existing boundaries of the air dispersion modeling study, but it is important to have impacts broken down by various political jurisdictions covering the most affected communities. Hattis Report pp. 5-6. LAWA's current approach on this risk assessment fails to fully capture all relevant data.

Response:

The Supplement to the Draft EIS/EIR provides an evaluation of health risks associated with LAX operations for communities to help identify risks by jurisdiction. As required by CEQA, the analysis of health impacts associated with the expansion of LAX was carried out geographically to the point where health impacts are considered negligible, or below those represented by thresholds of significance. Thresholds of significance are quantitative or qualitative measures used to determine whether an environmental effect of a project (e.g., potential risks) would be considered significant. Wherever possible, validation of the choice of thresholds was provided by federal, state, and local guidelines, particularly the Guidelines for the California Environmental Quality Act (State CEQA Guidelines) and related guidance and the Draft L.A. CEQA Thresholds Guide, published by the City of Los Angeles Environmental Affairs Department. For environmental disciplines mandated solely by NEPA, thresholds of significance were not included, as they are not required by NEPA. In lieu of federal thresholds, federal standards were used that are relevant to the analysis.

Most TAP emissions are generated at or near ground level. Therefore, maximum offsite impacts are expected to occur at the fence line. Emissions from LAX would be carried primarily to the east by prevailing winds. As TAPs move downwind, they would be diluted, photodegraded, and/or deposited so that air concentrations would eventually be reduced to negligible amounts. The health risk assessment assessed risks and hazards for locations throughout a large geographic area, extending into communities adjacent to, and north, east, and south of LAX. A Cartesian grid system was used for receptor grid spacing and varied in density as distance from the theme building increased. In addition to the receptor grid, specific receptor locations of regulatory and community concern were identified. These sensitive receptors included schools, hospitals, nursing homes, and day-care facilities. Pollutant concentrations were predicted at all sensitive receptor locations within a radius of 3 kilometers from the LAX theme building. Dispersion and air modeling results were used to identify specific locations representing the most impacted resident, school and worker locations for quantitative risk assessment. Additionally discrete receptors were placed at the deposition monitoring station and project air quality monitoring station locations. Model outputs included maximum one-hour concentrations for evaluation of short-term impacts from airport operations and annual average concentrations for evaluation of chronic health impacts from toxic air pollutants on and near the airport. Cumulative risks for maximally exposed adult and child residents, school children, and in-airport workers were estimated using maximum estimated chemical concentrations in air. MATES II results were used to estimate background concentrations of TAPs, and to estimate the cumulative impacts of airport releases on local

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air quality. The MATES-II study was intended to characterize basin background risks from all sources of toxic air pollutants in the region.

Methodologies used to define the study area are discussed in Technical Report 14.a, Section 4.2.3, Definition of the Study Area, in the Human Health Risk Assessment, of the Draft EIS/EIR. Areas of potential impact around LAX were identified using the results of the selection of TAPs of concern, screening level air dispersion modeling, and measured urban background concentrations. Pollutant concentrations produced from airport sources were predicted at sufficient receptor locations to capture all risks above 10 in one million and hazard indices greater than 5 and to identify the maximum ambient air quality impacts from airport sources on site as well as beyond the fence line. The health risk assessment presented incremental risk and hazard estimates geographically to include areas that would experience risk and hazards above and below those represented by thresholds of significance. This approach was taken to avoid complete dependence on single number comparisons. Estimates of risk and hazard focused on specific communities were developed from modeled risks and hazards from air dispersion modeling results. Risks and hazard estimates for communities were discussed in Section 4.24 Human Health and Safety (CEQA) of the Supplement to the Draft EIS/EIR. Figures presenting the geographical extent of incremental cancer risks and health hazards by community under post mitigation conditions in 2015 for Alternatives A, B, C, and D were presented in Section 4.24, Human Health and Safety, of the Supplement to the Draft EIS/EIR. Figures presenting risk and hazards for communities include: Figure S4.24.1-13 Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative A, Figure S4.24.1-16, Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative B, Figure S4.24.1-17, Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative C, and Figure S4.24.1-18, Geographical Extent of Incremental Cancer Risks and Health Hazards, Compared to Baseline 1996, Horizon Year 2015 Post Mitigation Conditions, Alternative D. Additional figures presenting the geographical extent of incremental cancer risks and health hazards for horizon years 2005, 2013 and 2015 under pre-mitigation conditions and for interim years under post-mitigation conditions are available in Attachment B of S-9a, Supplemental Human Health Risk Assessment Technical Report, of the Supplement to the Draft EIS/EIR.

Aggregate impacts are not required under CEQA. Simple observations of adverse effects cannot be used to establish a link between these effects and any source, including airport emissions. Given the inherent uncertainties associated with observations of hospitalizations and number of asthma cases observed in populations living in areas near LAX and the difficulties posed in trying to tie observed effects to a cause, use of approved risk assessment methodologies is the most appropriate way to evaluate potential health impacts associated with LAX emissions. In addition, please see Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00017-36

Comment:

D. LAWA Failed to Conduct a Sensitivity Analysis of Its Human Health Risk Assessment

LAWA failed to conduct a sensitivity analysis of its health risk assessment. This failure means that the health risk assessment does not attempt to assess and communicate uncertainties in a quantitative way. Whether through sensitivity analysis, or use of a more sophisticated model, such analysis can be and is used to inform interested parties of the uncertainties in key results. Hattis Report p. 6. One aspect of the modeling that needs such analysis is the assumed behavior responses of airlines to increasing delays as the intensity of usage of airport facilities increases. Id. This variable affects "capacity" calculations, emissions estimates and economic results. LAWA should perform such sensitivity analysis of its methods and conclusions.

Response:

Each of the Master Plan alternatives is constrained by their limited airside capacity. Under these conditions, the assumption that airlines will modify their air service to maximize their opportunities in the constrained airfield conditions to meet forecast demand is reasonable. Some projected airline modifications would include an increase in the average aircraft size, higher priority would be given to growth in international passenger activity (O&D and connecting), commuter service would be reduced in

order to maximize the number of passengers that could be served with a limited number of operations, and "over-served" regional markets would be eliminated. For further discussion of all airline service assumptions made in each of the Master Plan alternatives in reaction to constrained airside capacity please see Chapter 4, subsection 4.3.2 of the Draft LAX Master Plan. Please also refer to Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR for a description of alternatives and their associated capacities.

Please see Appendix G, Air Quality Impact Analysis, of the Draft EIS/EIR regarding capacity calculations. SIMMOD, FAA's airport and airspace simulation model was used to address design and procedural aspects of all air traffic operations and produces measures of airport capacity, aircraft travel time, aircraft delay, and aircraft fuel consumption. Hour-of the day temporal factors specific for each aircraft-runway combination modeled for each alternative are determined directly from SIMMOD data.

Aircraft engine emissions are based on the aircraft fleet mixes for each alternative. Engines were selected to represent the most commonly used engines when the analysis was originally conducted. Updates of engine emissions were developed using EDMS 4.11 default engines for each airframe. While a formal sensitivity analysis of aircraft emissions has not been conducted, using the most common engines for each airframe will reduce the variation between modeled emissions and actual operating emissions at LAX.

Sensitivity analyses are common aspects of a risk assessment, but are not specifically required under standard guidance. Ideally, as the Hattis report implies, one would like to carry through the risk assessment the uncertainty associated with each parameter in order to characterize the uncertainty associated with final risk estimates. A highly quantitative statistical uncertainty analysis is usually not practical or necessary. A more practical approach for risk assessments is to describe qualitatively how uncertainties might be magnified or biased through the risk models used. This reasonable approach was used in lieu of the quantitative sensitivity analysis suggested in the Hattis report.

Additional analyses are provided in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. Included in the analysis are the assessment of a fourth build alternative (Alternative D) and the revision of health risk and hazards after mitigation measures are implemented using a revised set of mitigation measures. Please refer to Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR for a description of the recommended revised mitigation measures.

A qualitative approach was used to describe uncertainties for parameters and to indicate the possible influence of these uncertainties on the final risk estimates in the human health risk assessment for the LAX Master Plan. Key parameter uncertainties are discussed in Chapter 7, Uncertainties, Technical Report 14a, Human Health Risk Assessment, of the Draft EIS/EIR. Additional uncertainties are presented in Chapter 7, Uncertainties, of Technical Report S-9a; Supplemental Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR.

To evaluate potential impacts resulting from the expansion of LAX, the health risk assessment assessed risk and hazards for maximally exposed individuals using upper bound predictions of exposure; i.e., receptors were assumed to be exposed to maximum predicted concentrations of TAPs at reasonable maximum exposure periods. The analysis treated outdoor concentration estimates as equivalent to actual personal exposure to the population. However, human exposures to air pollution depend on concentrations in both indoor and outdoor environments and the amount of time people spend in various locations, including their homes, schools workplaces and commuting. The methods used in the human health risk assessment were conservative, that is, methods used were more likely to overestimate than underestimate possible health risks.

AL00017-37

Comment:

VII. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES ASSESSES AIR EMISSIONS

A. The Draft EIS/EIR Does Not Adequately Assess The Impact Of Air Emissions Mitigation Measures Upon The Surrounding Environment

3. Comments and Responses

The Draft EIS/EIR does not adequately assess proposed mitigation measures for increased air emissions caused by the LAX Master Plan. Federal law requires that an Environmental Impact Statement include a detailed statement concerning adverse environmental effects of the project that cannot be avoided. 42 U.S.C. § 4332(2)(C)(ii). Federal regulations require that the sponsoring agency discuss possible mitigation measures in defining the scope of the EIS, in discussing the consequences of and alternatives to the proposed action, and in explaining its ultimate decision. 40 C.F.R. §§ 1508.25(b), 1502.14(f), 1502.16(h), 1505.2(c); 40 C.F.R. § 1502.16(h); *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 351-352; 109 S.Ct. 1835, 1846-47, 104 L.Ed. 351 (1989). While a complete mitigation plan is not required, "omission of a reasonably complete discussion of possible mitigation measures would undermine the action-forcing goals of the National Environmental Policy Act." *Id.* Absent such discussion, neither the proponents nor the opponents of a project can properly evaluate the adverse effects that will occur. *Id.*

The Draft EIS/EIR does not adequately assess the impact of air emissions mitigation measures upon the surrounding environment. As stated by Mr. Calkins, "While the document conducts a fairly extensive effort to identify potential measures, the specific impacts of implementing such measures upon the surrounding county does not appear adequate." Calkins Phase I Report p.9. Mr. Calkins notes that although LAWA examined the effect of mitigation measures on seventeen intersections, all of these intersections were located west of the 405 Freeway. Further investigation is needed on this topic, in particular upon the efficacy of the mitigation measures for reducing impacts in affected areas, like the City of Inglewood. Mr. Calkins further states:

"Furthermore, emission reductions from the select measures are somewhat questionable. At a minimum, LAWA should provide some analysis of the impacts of the mitigation measures and roadway reconfigurations upon the City of Inglewood."

Calkins Phase I Report p. 9. This analysis is needed for decision makers and the public to be fully informed. Without it, the Draft EIS/EIR fails as an informational document and therefore does not conform to CEQA.

Response:

The FAA is aware of the state and federal mandates surrounding the analysis and inclusion of mitigation measures. The Supplement to the Draft EIS/EIR included a detailed discussion of air quality mitigation measures in Section 4.6, Air Quality.

The Draft EIS/EIR identified the most severely impacted intersections associated with LAX traffic. The Air Quality impact analysis calculated the ambient air quality at those intersections and found that without mitigation, the carbon monoxide (CO) standards would be met for all alternatives considered. Other intersections in Inglewood, El Segundo, Culver City and elsewhere would have lower impacts than the 17 intersections modeled in the Draft EIS/EIR. The implementation of mitigation measures to reduce automobile emissions would simply reduce the magnitude of these already less than significant impacts.

Please note that the local CO intersection analysis was updated in the Supplement to the Draft EIS/EIR to include the latest available, approved emission factor model (EMFAC2002) and additional intersections. Please see Topical Response TR-ST-2 regarding the traffic analysis. Again, all intersections, before implementation of any mitigation measures, were below the CO standards for all alternatives. Please see Section 4.6.2.3, Air Dispersion Modeling, and Section 2.2.4 of Appendix S-E, of the Supplement to the Draft EIS/EIR for additional information on the updated CO intersection analysis. The Supplement to the Draft EIS/EIR also addressed the regional off-airport, on-road emission inventory analyses which included the entire South Coast Air Basin.

Please see Section 4.3, Surface Transportation, of the Supplement to the Draft EIS/EIR, and supporting technical data and analyses in Technical Reports S-2.

AL00017-38

Comment:

LAWA should expand the scope of its study of the air quality impacts of the LAX Master Plan. The Draft EIS/EIR focuses its discussion of air quality impacts upon the "immediate areas" surrounding LAX.

Calkins Phase II Report at 14. These areas lie almost exclusively within the City of Los Angeles. The impact of the Master Plan upon air quality for the areas bordering upon those "immediate areas," however, which include the City of Inglewood, are not well documented. This constitutes a major deficiency of the Report. Calkins Phase II Report at 15-17, 19. Among other problems, the growth-inducing aspects of LAX expansion are not identified for Inglewood, or other specific communities in the surrounding area, due to the broad nature of the socio-economic impact analysis of the Draft EIS/EIR. Calkins Phase II Report at 16. CEQA requires analysis of economic effects that cause physical changes to the environment. This analysis must be sufficient to trace the chain of causation from the economic effect to the physical change. CEQA Guidelines § 15131(a). This analysis has not been undertaken in the Draft EIS/EIR.

Response:

Please see Response to Comment AR00003-47 regarding regional air quality impacts and the potential effects of growth in the LAX area.

AL00017-39

Comment:

B. LAWA'S Comparison To The No Action/No Project Alternative Is Flawed

The comparison in the Draft EIS/EIR of the No Action/No Project alternative and the three "build" alternatives is seriously flawed. The comparison fully assigns future growth impacts, including non-Master Plan expansions and growth of LAX, to the No Action/No Project alternative. In addition, the build alternatives take credit for mitigation measures and the construction of five major arterials to ease traffic, which have no identified funding in the 2001 RTP. Calkins Phase II Report p. 18.

LAWA's approach underestimates the environmental impacts of the project. If LAWA is incorrect about the extent of growth that will occur in and around LAX absent the Master Plan, or if it is incorrect regarding its ability to conduct the currently unfunded mitigation, then the impacts of the LAX Master Plan will be much larger than LAWA currently represents. These issues must be addressed and corrected before the Draft EIS/EIR can be considered.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and Topical Response TR-GEN-1 regarding the use of an adjusted environmental baseline for the traffic analysis. As indicated in Topical Response TR-GEN-1, in accordance with the State CEQA Guidelines, conclusions regarding the significance of impacts for all the build alternatives are based on the 1996 baseline or the adjusted environmental baseline, not on the No Action/No Project Alternative. The regional traffic and land use development assumed to occur in the adjusted environmental baseline as forecast by appropriate planning agencies is listed in Appendix L to Chapter V of the Draft LAX Master Plan. Consistent with the requirements of NEPA and CEQA, the Draft EIS/EIR and Supplement to the Draft EIS/EIR identified appropriate mitigation measures for the identified significant impacts, including traffic impacts. Such mitigation is not required to be limited to only improvements that have identified funding in the 2001 RTP. LAWA would be responsible for funding, on a fair-share basis, the recommended mitigation measures. Please see Response to Comment AL00008-6 regarding funding sources.

AL00017-40

Comment:

VIII. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES TRAFFIC IMPACTS

A. The Draft EIS/EIR Ignored Cumulative Impacts Of The Lax Master Plan By Not Analyzing The Traffic Impacts In The City Of Inglewood

LAWA improperly ignored the cumulative impacts of the LAX Master Plan by failing to analyze the impacts of the plan upon the traffic in the City of Inglewood. Under both Federal and California law the

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cumulative impacts of the LAX Master Plan must be analyzed in the Draft EIS/EIR. The FAA's own Airport Environmental Handbook states:

"CEQ 1508.7 states that 'Cumulative impact' is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

FAA's Airport Environmental Handbook, Chapter 3, p. 5. In addition, CEQA requires that the cumulative impacts of the project be considered and analyzed in the environmental impact report. CEQA Guidelines § 15130. This was not done with respect to the impacts of the Master Plan on surface traffic in all affected areas, like the City of Inglewood.

Response:

Please see Response to Comment AR00003-21 regarding cumulative impacts.

AL00017-41

Comment:

The traffic analysis contained in the Draft EIS/EIR does not review all necessary surrounding areas. Traffic Engineer Paul Cook reviewed the traffic analysis contained in the Draft EIS/EIR. His report is attached hereto as Exhibit "G." Mr. Cook states that the Draft EIS/EIR lacks analysis on communities surrounding LAX, and that this is a deficiency of the report. Cook Report p.5. This deficiency must be remedied before there can be any further work on the LAX Master Plan. Without such analysis the Draft EIS/EIR fails to consider all of the cumulative impacts of the Master Plan, which is a fatal error under NEPA and CEQA.

B. LAWA Did Not Fully Address Traffic Mitigation in the Draft EIS/EIR

The Draft EIS/EIR fails to properly discuss the specific impacts of implementing potential mitigation measures upon the City of Inglewood. Cook Report p.6. Mr. Cook notes:

"While most of the City of Inglewood is within the Land Use Study Area as shown in the attached Figure 4.2-1, the analysis on the impacts of the project on intersections and roadway segments east of the 405 are minimal."

Id. Analysis of additional intersections and roadway segments east of the 405 freeway is appropriate and necessary to determine the need for additional mitigation measures other than those already included in the Draft EIS/EIR. Id. LAWA must conduct this additional analysis immediately and make the results available for public review as part of the EIS/EIR analysis and process._

C. The Draft EIS/EIR's Traffic Relief Congestion Package Is Inadequate

The Draft EIS/EIR contains a "congestion relief package". This package is inadequate and should be expanded. Cook Report pp. 6-7. On preliminary review, it appears that the South Bay Cities are excluded from this relief package. Id.

Response:

Please see Topical Response TR-ST-2, for a discussion of the study area definition and identification of facilities analyzed. The Draft EIS/EIR analyzed four intersections that are entirely within the City of Inglewood boundaries, four additional intersections that are on the border of Inglewood, four roadway links in Inglewood, and thirteen freeway ramps within the boundaries of the City of Inglewood. Please also see Topical Response TR-ST-2, for a discussion of the study area definition and identification of facilities analyzed. Alternative D shifts more airport activity eastward, closer to I-405. Because of this shift, additional intersections and four additional roadway links east of I-405 in Inglewood were analyzed in the Supplement to the Draft EIS/EIR (Figure S4.3.2-1). The Draft EIS/EIR and Supplement to the Draft EIS/EIR recommended transportation mitigation measures in the South Bay cities of Inglewood, Hawthorne, and El Segundo as well as unincorporated County areas in the South Bay.

AL00017-42**Comment:**

The source of the funding for these roadway improvements is uncertain. Id. LAWA must include the South Bay Cities in its "congestion relief package," and should take necessary steps to ensure funding of this aspect of the Plan. Identification of a certain source for the funding of these roadway improvements must be included in the Draft EIS/EIR.

Response:

Please see Response to Comment AL00008-6 regarding funding. The congestion relief package addressed the facilities significantly impacted by the proposed project, as discussed in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR.

AL00017-43**Comment:**

LAWA'S review of the impact of its "LAX Expressway" must be expanded because it fails to consider impacts of this project on the City of Inglewood. Cook Report p.7. "An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project," CEQA Guidelines § 15121. Pursuant to CEQA, the Draft EIS/EIR must consider all significant environmental effects of the LAX Expressway. The Draft EIS/EIR must also take into account traffic impacts to the City of Inglewood, in particular intersections and roadway links east of I-405 that have not been so analyzed. Cook Report p.9. Failure to analyze and comment on these vital traffic/transportation links renders the EIS/EIR inadequate.

Response:

The comment is noted. Please refer to Topical Response TR-APPK-1 regarding additional data and technical analyses regarding the LAX Expressway State Route 1. If an alternative to the LAX Master Plan is adopted that includes the proposed LAX Expressway as a project component, then a project-specific traffic analysis which details the existing and future (no build condition) traffic demands along the proposed LAX Expressway corridor would be conducted. This traffic study would be based upon the specific adopted alignment of the proposed LAX Expressway and incorporate operational assumptions that would become available when more detailed design plans are developed.

Please refer to Topical Response TR-ST-2 for a description of the surface transportation analysis methodology used for the Draft EIS/EIR. This topical response includes a discussion of the methodology used to determine a geographic distribution of airport trips. This topical response also includes a description of the goals of the LAX Master Plan to minimize impacts to local streets and to project neighborhoods.

Please also refer to Topical Response TR-ST-4 for a discussion of airport area traffic concerns, and Topical Response TR-ST-6 for a discussion of neighborhood traffic impacts.

Alternative D, the Enhanced Safety and Security Plan, evaluated in the Supplement to the Draft EIS/EIR published in July 2003, does not include the LAX Expressway.

Finally, please also see Responses to Comments PC02207-8, AL00017-43, and AL00018-13.

AL00017-44**Comment:**

E. LAWA'S Baseline For Traffic Is Questionable

The baseline that LAWA used to evaluate "levels of service"6 in the Draft EIS/EIR is dubious:

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"Two baseline scenarios were used to determine the effect of the proposed Master Plan improvements on off-airport roadways. First, the environmental baseline is the surface condition existing in 1996. Second, the adjusted environmental baseline uses the current airport use, but assumes future roadways and land uses. Two issues are raised when using this approach:

1. It does not provide for a comparison of project alternatives with existing conditions. CEQA requires that the existing condition of an EIR be established at the time the Notice of Preparation (NOP) is issued. The use of so-called existing condition for the years 2005 and 2015 does not meet this requirement.
2. It minimizes the extent of change on area roads between the existing conditions and the future conditions associated with the project. It is clear that not all future roadway adverse conditions will be a result of the LAX Master Plan. However, comparing the project to a future condition seems to limit the evaluation of cumulative effects and the project's contribution to their mitigation."

Cook Report pp. 7-8.

6 "Levels of service" measure the effectiveness of an intersection or roadway segment in terms of delay, fuel consumption, and lost travel time.

Response:

Please see Topical Response TR-ST-2, regarding surface transportation analysis methodology and results, including definition of baseline scenarios and incorporation of local/regional plans and programs.

AL00017-45

Comment:

In addition the Draft EIS/EIR modeled future conditions for 2005 and 2015, but the current SCAG RTP uses 2025 as its horizon year. The 2025 horizon year is more appropriate because "the project will take as least 16 years to complete... [so a] discussion of a longer planning horizon would be appropriate." Cook Report p. 8.

Response:

LADOT traffic study policies require traffic impacts to be identified for the year the project is to be completed. The construction program envisioned for the LAX Master Plan in 1997, when the environmental process began, was to construct the entire project beginning in 1999 and ending in 2015. Alternative D has a shorter construction period that will be completed by 2015. It is detailed in the Supplement to the Draft EIS/EIR (see subsection 4.3.2.6.2, Construction Impacts). Consistent with LADOT policies, 2015 is the appropriate year to analyze.

AL00017-46

Comment:

Finally, the validity of LAWA's model depends on certain improvements being in place, but there is no guarantee that these improvements will be made in a timely manner. Inasmuch as a proper baseline is necessary for a proper analysis, without such, the EIS/EIR is inadequate.

Response:

Please see Topical Response TR-ST-2, regarding surface transportation analysis methodology and results, including definition of baseline scenarios and incorporation of local/regional plans and programs.

AL00017-47**Comment:**

IX. THE DRAFT EIS/EIR IS INSUFFICIENT BECAUSE IT DOES NOT CONFORM TO LOCAL TRAFFIC PLANS

The LAX Master Plan and Draft EIS/EIR must conform to area-wide transportation plans. See Section 5, supra. There are substantial differences, however, between the Draft EIS/EIR and the RTP recently adopted by SCAG. The Draft EIS/EIR refers to the 1998 SCAG RTP and its data; however, more current information is available and should be utilized. In addition, the RTP projects 78 million annual passengers ("MAP") at LAX, not the 86 MAP projected in the Draft EIS/EIR preferred Alternative "C." "Failure to conform could lead to potential funding sanctions and other Federal restrictions that could affect the City of Inglewood." Cook Report p.9. These conformance problems jeopardize many aspects of the LAX Master Plan, including important mitigation measures.

Response:

There are no substantial differences between the 1998 RTP and the 2001 Amended RTP regarding transportation improvements to be completed by the year 2015. One new RTP improvement is the addition of a parking lane on Sepulveda Boulevard that would free up one additional travel lane during the airport peak hour only (this would not affect the travel lanes during the AM and PM peak hours because no peak hour parking was assumed). High Speed Rail is not assumed to be effective until 2025. Therefore the LAX Master Plan assumptions regarding future growth and transportation improvements to the year 2015 are consistent with the most recently adopted (and amended) RTP and Regional Transportation Improvement Program. The RTP makes the assumption that the future demand at LAX will be 78 million annual passengers, based on current physical constraints. Any changes to LAX itself that are approved with the Master Plan will be brought before the appropriate agencies for incorporation into the regional plans, either by amendment or by inclusion in the next adopted plan. This procedure is consistent with federal and state mandates for project development. The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan (RTP).

AL00017-48**Comment:**

X. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES NOISE INCREASES

A. The Draft EIS/EIR Uses An Improper Baseline For Noise Analysis

The baseline used to analyze noise impacts in the Draft EIS/EIR is inappropriate. LAWA's baseline for its analysis of noise issues is 1996. However, as discussed in the Report of John C. Freytag ("Freytag Report"), attached as Exhibit "H," the 1996 baseline year occurred mid-way during the phase out of Stage 2 aircraft,⁷ which is now complete. According to Mr. Freytag, "the current noise exposure at LAX is below the 1996 baseline." Freytag Report at p.2. Since LAWA uses the higher baseline, it improperly minimizes the noise increases to be caused by the LAX Master Plan. LAWA easily could have utilized more recent information, and must do so to bring the EIS/EIR into conformance with law. Id.

⁷ The Airport noise and Capacity Act required the graduated phase-out of the older and noisier Stage 2 aircraft by the year 2000.

Response:

Please see Topical Response TR-GEN-1 regarding the environmental baseline, Topical Response TR-N-1, particularly Subtopical Response TR-N-1.3 regarding use of 1996 baseline noise levels from which to measure increases associated with proposed alternatives, and Subtopical Response TR-N-6.2 regarding relationship between traffic levels and noise levels.

3. Comments and Responses

AL00017-49

Comment:

B. LAWA's Noise Exposure Contours Are Understated

The noise exposure contours in the Draft EIS/EIR fail to capture and convey the true parameters of the noise increase that will occur under the LAX Master Plan. LAWA utilizes "simplified line drawings" for its flight tracks meant to demonstrate current conditions and future alternatives. This was most likely done in an effort to simplify modeling efforts; however, it also understates the resulting CNEL contour. Freytag Report at 3. LAWA should break down each of its flight tracks, as discussed in the Freytag Report, in order to obtain an accurate depiction of the CNEL contours that will be created under each alternative. Failure to do so will lead to inaccurate modeling and therefore decision makers and the general public will be deprived of their right to know the full extent of the environmental impact of the LAX Master Plan.

Response:

For more information, please see Topical Response TR-N-1 regarding the noise modeling approach, particularly TR-N-1.4 regarding simplified line drawing flight tracks vs. track dispersion.

AL00017-50

Comment:

C. The Draft EIS/EIR Fails To Consider The Economic Impact of The LAX Master Plan on Housing Values

The Draft EIS/EIR fails to discuss the adverse economic effects of expansion upon housing, commercial structures, schools and other land use. Freytag Report at 4. Several studies exist which have assessed this effect, making this investigation feasible. It is important to capture all costs that will be borne by the residents of the City of Inglewood in order to adequately assess the LAX Master Plan from an Environmental Justice perspective. LAWA must examine this issue and correct this deficiency. Indeed, failure to do so renders the EIS/EIR deficient.

Response:

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values. Also see Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR as well as Topical Responses TR-EJ-2 and TR-EJ-3 regarding environmental justice concerns.

AL00017-51

Comment:

D. LAWA'S Assertions Regarding Nighttime "Over-Ocean Operation" Are Wrong

LAWA's discussion in the Draft EIS/EIR concerning nighttime operations at LAX raises questions and does not provide answers. The Master Plan Chapter II is entitled "Existing Conditions Working Paper" and it is dated April 19, 1996. Section 2.2.3 is entitled "Noise Abatement Operating Procedures." It states, "Over-Ocean Operation -Over-Ocean operation procedures shall be in effect between the hours of 24:00 and 06:30 a.m. Over-ocean operations consist of departures on Runway 24L and arrivals on Runway 7L." II-2.30. However, this analysis ignores the fact that these operation rules, which are already in effect, are suspended frequently due to weather constraints. Therefore, to the extent this condition was utilized in connection with noise or emissions calculations or modeling, the accuracy and validity of such calculations must be considered carefully.

Response:

For modeling purposes, all operating conditions present at the airport were considered, including deviations from the preferred over-ocean procedures during the late-night hours. Consistent with LAWA's long-standing policy, over-ocean procedures are suspended when adverse wind and weather

conditions require. These exceptions are modeled in the preparation of the CNEL noise contours for LAX. For all development alternatives, the dominant operating configuration during the period when over ocean procedures are in effect consists of approaches to the north inboard runway (Runway 6R) and departures from the south inboard runway (Runway 25R). Also reflected in the nighttime usage is the continuation of the airport's policy that, to the extent practicable, operations between 10 p.m. and 7 a.m. will be made to and from the inboard runways. Minor fluctuations in the use of specific runways between 2005 and 2015 would be the result of the simulation model's assignment of individual flights to specific runways based largely on minimizing separation requirements between various aircraft types to increase operational efficiency and reduce delay. For further elaboration on this topic, please see Subtopical Response TR-N-5.1.

AL00017-52

Comment:

XI. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES THE HEALTH EFFECTS OF AIRCRAFT NOISE

A. The Draft EIS/EIR Must Consider The Health Effects Of Aircraft Noise

The Draft EIS/EIR must fully consider all of the adverse health effects of aircraft noise. LAWA admits that its LAX Master Plan will create increased noise impacts upon the residents of the City of Inglewood. "Under Alternative C, which does not add a new runway, a decrease in noise exposure would occur in the City of El Segundo and the community of Del Aire with increases in portions of the community of Westchester and the City of Inglewood." Draft EIS/EIR Section 4.24.2 page 4-1040. There is strong scientific evidence of the adverse health effects of noise pollution on humans. Studies have shown clear health effects on animals, and these studies indicate the certainty of such effects on humans as well.

"A study sponsored by the EPA, constituting one of the most notable studies of animal noise exposure, examined cardiovascular effects of noise on monkeys. This research demonstrated that monkeys subjected to industrial noise at levels between 85 to 90 dba for several months developed significant elevations of systolic and diastolic blood pressure. It is particularly notable that these changes persisted long after exposure ceased, demonstrating that noise has a chronic effect on blood pressure."

Fred M. Svinth, Illingworth & Rodkin, Inc. "The Effects of LAX Aircraft Noise on Local Communities," January 2001, p. 9, attached hereto as Exhibit "I." LAWA admits that such studies exist and that noise has effects, but refuses to seriously consider such reports. Instead, LAWA simply concludes that such studies are controversial and, therefore, that no in-depth analysis is required.

"Some studies suggest that there are indicators that high noise levels, particularly from aircraft, may have a detrimental effect on the cardiovascular system, mortality rates, birth defects, achievement scores, psychiatric admissions, sleep disturbance, and overall psychological well being; others show no conclusive evidence of these effects. However, the results of such studies continue to be controversial and are not accepted by the general scientific community at this time. Specifically, the scientific community has cited methodological and epidemiological problems with the studies and none of the studies has gained the universal acceptance from researchers that would allow them to be used as a basis for impact assessment."

Draft EIS/EIR Section 4.24.2 page 4-1041.

However, LAWA argues that it is impossible to "quantify" the relationship between noise and adverse human health effects. LAWA argues that no "threshold of significance" exists:

"Although there is consensus that noise has some health effects, there is no agreement as to the degree of the effects or the level at which they become significant. The scientific community and regulatory agencies have not developed numerical thresholds beyond which the health effects of noise are considered to be significant."

Draft EIS/EIR Section 4.24.2 page 4-1046.

3. Comments and Responses

In other words, LAWA takes the position that the absence of a specific threshold absolves it from having to address this issue in any meaningful way in the Draft EIS/EIR. Instead, LAWA focused on overall noise exposure caused by its expansion plan. 'Since it is not possible to quantify noise health impacts for a population, such as the people who live in the vicinity of an airport, this analysis focused by necessity on quantifying overall noise exposure.' Draft EIS/EIR Section 4.24.2 page 4-1039.

LAWA's admitted inability to fully analyze the Health Effects of Aircraft Noise itself renders the planned expansion violative of existing law. LAWA improperly fails to consider the admitted potentially significant adverse health effects of noise. "Significant and unavoidable impacts associated with aircraft noise are expected to occur. Such noise exposure is considered to pose a potential significant and unavoidable impact relative to health effects of noise, to the extent there is such a relationship between the two." Draft EIS/EIR Section 4.24.2 page 4-1050.

"The U.S. Environmental Protection Agency (USEPA) has taken the following position: 'Research implicates noise as one of several factors producing stress-related health effects such as heart disease, high blood pressure and stroke, ulcers and other digestive disorders. The relationship between noise and these effects has not yet been quantified.'"

Draft EIS/EIR Technical Report 14b. Health Effects of Noise Technical Report. No Master Plan Commitments for the health effects of noise are proposed. Draft EIS/EIR Section 4.24.2 page 4-1046. LAWA must fully examine the health effects of aircraft noise in order to fulfill the requirements of NEPA and CEQA.

Response:

The comment and the discussion within Exhibit "I" attached thereto reference and reflect many of the same studies discussed and referenced in the Draft EIS/EIR and Technical Report 14b of the Draft EIS/EIR. Similarly, many of the main points made in the comment and exhibit regarding the types of noise-related health effects identified in those studies are consistent with the information presented in the Draft EIS/EIR and Technical Report 14b. The comment and the exhibit do not, however, provide any scientific evidence or other basis for determining the nature, extent, and significance of noise-related health effects due to any of the Master Plan alternatives. Pursuant to the intent and requirements of NEPA and CEQA, the purpose of the EIS/EIR is to assess, disclose, and compare the effects of each alternative currently being considered for the LAX Master Plan. As stated in the Draft EIS/EIR and repeated in the comment, "Although there is consensus that noise has some health effects, there is no agreement as to the degree of the effects or the level at which they become significant." Lacking any standards, scientific basis or other proven means for discerning the nature, level, and conditions at which a demonstrable effect on human health would or would not occur from aircraft noise, it would be speculative to draw conclusions regarding the health effects of noise particular to each alternative. Such speculation is contrary to the purpose and requirements of NEPA and CEQA. It should be noted that for each of the build alternatives, LAWA has concluded that the increases in operations at LAX would result in "potentially significant and unavoidable" adverse health effects. In addition, LAWA has proposed numerous steps to reduce exposure to aircraft noise. With the exception of hearing damage, there are no quantifiable standards to be used as a basis for impact assessment with respect to the health effects of noise. However, numerous studies of human perception and annoyance have indicated that the 65-decibel (dB) level of Community Noise Equivalent Level (CNEL) is a reliable standard for determining when the community will become "highly annoyed" by aircraft noise. The Federal Aviation Administration has developed criteria, which describe what land uses are acceptable within a certain noise level contour. These compatibility criteria and an analysis of the build alternatives are described in Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00017-53

Comment:

B. The Draft EIS/EIR NEEDS TO ADDRESS Aircraft Noise Interference With Classroom Activities and Sleep

The Draft EIS/EIR fails to adequately address the interference of aircraft noise upon classroom activities and sleep. Interference with classroom activities and sleep are two of the most sensitive impacts of

aircraft noise. LAWA admits the problem of interference with classroom activities, but fails to analyze this problem to the degree required under CEQA. According to LAWA:

"Interference with classroom activities and learning from aircraft noise has been the subject of much recent research. Several studies have been performed, including studies at LAX, London's Heathrow Airport, and Munich International Airport. These studies indicate that a relationship between aircraft-related noise and learning effects does exist, but that additional research is required to clarify how close that relationship is and at what noise levels the relationship appears. The relationship has been particularly difficult to document due to the confounding factors of background noise, school quality, and socioeconomic status. Additional research is being performed to try to account for these factors."

Draft EIS/EIR Section 4.24.2 page 4-1043. Similarly, LAWA admits but dismisses summarily the very real problem of sleep disturbance caused by aircraft noise. LAWA states:

"Generally, laboratory studies have shown considerably more disturbance than field studies, perhaps due to the subject's lack of familiarity with the location and experience. Sleep disturbance studies have also involved the collection of cumulative data from subjects.... A review of existing studies and literature indicates that additional research is required to clarify the relationships between aircraft-related noise and sleep disturbance."

Draft EIS/EIR Section 4.24.2 page 4-1044.

LAWA tries to minimize the sleep disturbance caused by aircraft operations at LAX. LAWA states, "LAX undertakes a different operational procedure for takeoffs and landings between midnight and 6:30 a.m. These 'over-ocean' procedures route both arrivals and departures over Santa Monica Bay, directing aircraft noise away from residential areas to the east of LAX during nighttime hours." Draft EIS/EIR Section 4.24.2 page 4-1045. However, due to constraints caused repeatedly by weather conditions, residents of Inglewood and other nearby communities are subjected to late night overflights. The Draft EIS/EIR fails to adequately analyze these issues.

Response:

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. In addition, please see Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00017-54

Comment:

XII. COMMENTS BY THE SOUTH BAY CITIES COUNCIL OF GOVERNMENTS ARE INCORPORATED BY REFERENCE

Given the scope and complexity of the LAX Master Plan Draft EIS/EIR and the limited time available for their review, a collaborative analysis of the document was undertaken by the South Bay Cities Council of Governments, of which the City of Inglewood is a member.

By this letter the City of Inglewood hereby incorporates by reference, all of the comments submitted on the LAX Master Plan Draft EIS/EIR by the South Bay Cities Council of Governments as if fully set forth herein, and each comment contained therein should be considered as a separate comment from the City of Inglewood.

Response:

Comment noted. Please see responses to comment letter AR00003.

AL00017-55

Comment:

XIII. COMMENTS BY CITIZENS OF THE CITY OF INGLEWOOD ARE SUBMITTED HERewith

3. Comments and Responses

On June 30, Inglewood sponsored a public meeting during which Inglewood solicited both written and oral comments from citizens and residents of this City concerning the EIS/EIR. The meeting was video taped, and persons present were also encouraged to submit their comments in writing.

By this letter the City of Inglewood hereby submits all of the comments submitted on the LAX Master Plan Draft EIS/EIR by citizens and residents of the City of Inglewood at the June 30 meeting. Each comment should be considered as a separate comment from citizens and residents of the City of Inglewood.

Response:

Responses to the comments in the referenced attachments are provided in Comment Letters PC01942 through PC01945 and PFL00001 through PFL00035.

AL00017-56

Comment:

CONCLUSION

The comments on the Draft LAX Master Plan and Draft EIS/EIR presented in this letter are the result of careful review by representatives of the City of Inglewood and expert consultants in the areas of human health risk assessment, air emissions and planning, aircraft noise impacts, traffic engineering and environmental justice. As discussed above, serious issues exist with regard to these two documents which must be addressed by LAWA and the FAA prior to any further action.

The City of Inglewood and its residents look forward to having the comments presented in this letter responded to in detail, with adequate time review time prior to any action by LAWA and/or the FAA.

Response:

Comment noted. In accordance with the provisions of NEPA and CEQA, FAA and LAWA have prepared written responses to all comments received on the Draft EIS/EIR. These responses are provided herein as part of this Final EIS/EIR. Responses to individual comments included in this comment letter are provided above.

AL00017-57

Comment:

Summary of Principal Conclusions (NOTE: Please see original for list of references cited in text.)

A good policy analysis for a new construction project needs to accomplish three basic tasks. The first of these is to define the full range of choices that are realistically available to address (or not to address) the perceived needs for the project. Second, the analysis team needs to fairly and comprehensively assess and compare the expected consequences of each of the choices (policy options) defined in the first task. The extent of the analysis of different outcomes should be sufficient that the all consequences are elucidated that have a reasonable chance of influencing the choices among policy options. Finally, the report of the effort should make the methods and results of the analysis clear and accessible to all interested parties and the general public. This is important so that every citizen and group can judge the relative desirability of the various options from their own perspectives, and act to influence the policy choices through the processes of available decision making fora. The existing LAX Master Plan and Draft EIR/EIS has significant deficiencies in each of these areas that can and should be remedied.

Response:

The Draft EIS/EIR accomplishes all three basic tasks, and the environmental review process for the LAX Master Plan was taken a step further through the addition of a new alternative - Alternative D-Enhanced Safety and Security Plan, and the preparation and circulation of the Supplement to the Draft EIS/EIR.

AL00017-58

Comment:

2.1 Framing the Options for Comparison

The framing of the options for analysis in the current draft is exclusively focused on engineering changes. Future "demand" for air services is estimated from a single set of assumptions about future population and economic growth in Southern California, and future national average costs of air travel in revenue per seat-mile, and then "build" options are designed to meet this projected "demand" either in full or in part. There is no apparent recognition or analysis of the possibility that at least some of the growth in "demand" for air services could be shifted to outlying airports downwind of major population concentrations (or out of the South Coast Air Basin entirely, in the case of connecting flights) by changes in economic pricing-such as airport user fees. Such economic measures might not completely avoid the need to expand capacity at LAX, but they seem worthy of explicit consideration at least as supplements to the existing engineering options because:

- They would generate additional revenue, which could be used in part for additional impact mitigation options for both LAX's existing and forecast expanded impacts.

- They might well be expected to change the rate of increase in demand for air services at LAX, allowing the construction of additional infrastructure on a more extended schedule. Stretching out the schedule for expansion might be beneficial both in reducing costs and allowing the use of cheaper and lower-polluting technology for construction, such as the replacement of existing diesel-powered equipment with either better-controlled diesel equipment or equipment powered by cleaner-burning natural gas or electric engines.

- If public entities do not take the opportunity to control the growth of demand with increases in revenue-generating user fees, and if a policy choice is made that does not accommodate the full projected increase in demand for air service at LAX (such as the currently preferred "Option C"), that would not necessarily mean that the passengers and freight shippers would benefit. In that case it can be expected that a substantial part of the economic benefits of access to the restricted supply will flow to the other major economic actors involved-the airlines. Differential pricing between airports with and without capacity restrictions might well be estimated by examining cases such as Dulles vs Regan airports in Washington, D.C.,* if not comparisons among airports with more- vs less-serious current capacity constraints in the Los Angeles area.

* The author does not know of systematic research on this subject. However he is a frequent traveler between Boston and Washington, D. C. and has often encountered a substantial price differential in flights available to the two Washington D.C. airports. A recent example was a purchase of a round trip ticket from Boston to Dulles for \$313, when the comparable fare to the more capacity-constrained Regan airport would have been more than \$250 greater.

Response:

The aviation activity forecast for LAX was developed using industry standard methodologies. The forecast represented the unconstrained demand at the airport. For the purposes of aviation planning there is no such thing as a connecting flight. Virtually all flights contain a combination of local (O&D) and connecting passengers. Thus, the idea of moving connecting flights to some other airport, either within the region or outside of the region, does not reflect the nature of commercial aviation activity. In the case of LAX, some and likely most of the passengers on any given flight are destined for locations within the Los Angeles region. The City of Los Angeles owns and LAWA controls the operation and potential expansion of four airports: LAX, Ontario, Palmdale, and Van Nuys. The other regional airports are controlled by other jurisdictions that are responsible for their respective operation and expansion.

In response to public comments received on the Draft EIS/EIR, LAWA developed Alternative D, the Enhanced Safety and Security Plan, which was evaluated in the Supplement to the Draft EIS/EIR. LAWA made the policy decision in planning Alternative D to not meet projected passenger demand. In exchange for improving safety, security, and customer service standards, the plan gives up the economic benefits to the region of the passenger demand that is not served, as shown in Section 4.4.1, Employment/Socio-Economics, of the Supplement to the Draft EIS/EIR.

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On a number of occasions since the airlines were deregulated, airport operators have sought to implement more economic-based pricing models with limited and mixed success. The U.S. Department of Transportation rejected Massport's peak period pricing theory because it was based on a faulty cost-allocation methodology. The Port Authority of New York and New Jersey was successful in promulgating a congestion pricing recommendation through the FAA's Notice of Proposed Rule Making procedure in 2000. The NPRM has been set aside for now due to the downturn in activity since mid-2001. The FAA's current Rule on Rates and Charges, under the principle of Prohibition of Unjust Discrimination does not allow discriminatory restrictions or fees on the use of a public use airport in order to force aircraft operators to use another airport. The landing fees and terminal rentals at a given airport typically represent between 4 and 6 percent of an airline's cost to operate at that airport. Differential pricing between airports in a region would be a minor factor among the many that an airline would consider when deciding whether to provide service to a given airport.

AL00017-59

Comment:

2.2 Assessing and Comparing the Consequences of Different Policy Choices

The assessments of major impacts also leave much to be desired. One pervasive problem is that nearly always, the reader is shown only impacts expected for two specific years-2005 and 2015-rather than the full stream of impacts expected from the various alternatives over time. These years may have been chosen to represent conditions before and after completion of construction, however 2005 does not represent even the peak year for construction-related impacts. There is a recognition in the analysis of the "criteria" air pollutants (Section 4.6) that construction-related emissions peak in 2004** rather than 2005, but there does not seem to be a similar recognition in the toxic air pollutant analysis of cancer and non-cancer risks in Section 4.24. Rather than providing 2005 and 2015 "snapshots" of the comparative emissions, population exposures, and health effects, the final EIS/EIR should also analyze and express impacts in terms of both peak-year and integrated bottom-line measures of effect over a reasonably foreseeable extended time over which the facilities will be built and operated (such as, for example, 2002-2021 or even 2041).

** For example in one of the final appendices on the last of 3 CD ROM disks of the EIR/EIS ("Attachment G-Construction Activities Emissions Inventories" to the annex labeled "4. Air Quality Technical Report", one can learn that for one of the air pollutants of most concern, particulate matter, year 2004 emissions are expected to be more than twice those in 2005 (approximately 44,000 lbs/day in comparison to slightly over 19,000 lbs/day).

Response:

The comment implies a misunderstanding of the risk assessment process. For chronic impacts, a long term average exposure is most appropriate, and is provided in the human health risk assessment. Such a long term average will account for higher possible exposure during a year such as 2004, and lower exposures during all other construction years. This practice of evaluating a long term average is well established in risk assessment methods. Horizon year 2005 was selected as a representative interim date where health impacts during the construction process could be evaluated. This year actually will overestimate a long term average and was selected to help ensure a conservative assessment.

Contrary to the implication in the comment, the risk assessment does provide an integrated assessment over a suitably conservative timeframe. Chronic risks and hazards are assessed as average exposure over a long time period, often a whole lifetime or some substantial fraction of a lifetime. For example, California EPA defines chronic exposure as either Lifetime Average Daily Dose (LADD) for carcinogens, or Average Daily Dose (ADD) for non-carcinogens. Year 2005 was chosen as representative -- that is, higher than most years, lower than others. Emissions from this year were then assumed to continue year-after-year until the project was complete. Extra time was allowed in the calculations in case construction took longer than expected. The result is a conservative (protective) estimate of emissions during the entire construction period.

Horizon year 2015 was selected for evaluation based upon the schedule for completion of the two phases of the LAX Master Plan. Year 2015 is the first year when full operations are expected after

implementation. The assessment assumes that the level of activity predicted for 2015 would remain constant indefinitely, and risks were calculated based on this assumption. Since air traffic is expected to be limited by landside constraints for the build alternatives, this assumption is reasonable.

The risk assessment characterized incremental cancer risks and non-cancer hazards for adult and child residents, school children, and on-airport workers using maximum estimated chemical concentrations in air. People were assumed to be exposed to maximum concentrations over an extended period of time. Health impacts should not be construed to represent "point in time" estimates or to have a "cut-off" period of the horizon year. For example, risk calculations for the horizon year 2015 assumed that adult residents were exposed to maximum chemical concentrations for an exposure duration of 30 or 70 years. The longer exposure duration was used in the Supplement to the Draft EIS/EIR in response to comments from the South Coast Air Quality Management District (SCAQMD). School children and child residents were assumed to be exposed to the maximum chemical concentrations in air estimated for the year 2015 for an exposure duration of 6 years.

Cumulative cancer risks were estimated using SCAQMD data on air quality in the Los Angeles basin. MATES-II results were used to estimate current background concentrations of TAPs. If MATES-II underpredicts background concentrations of TAPs in the South Coast Air Basin for the year 2015, cumulative impacts of the build alternatives may be underestimated. However, CARB data indicate that carcinogenic risks have decreased up to 63 percent since 1990 due to decreased air concentrations of TAPs. If continuing progress is made toward reductions in TAPs emissions in the South Coast Air Basin, MATES-II could over predict potential background risks for horizon year 2015. Cumulative risks would also be overestimated. As discussed in TR-HRA-1, baseline and cumulative risks were reevaluated in the Supplement to the Draft EIS/EIR (Section 4.24.1). In addition, construction risks were evaluated for Alternative D in the Supplement to the Draft EIS/EIR. Risks are characterized using integrated average chemical exposure concentrations over the construction period and compared to risks for the peak year of construction emissions. Please refer to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR for characterization of risks associated with construction activities.

Background concentrations for assessment of cumulative chronic non-cancer impacts were evaluated in the Supplement to the Draft EIS/EIR using data developed by USEPA on a census tract basis. These data were taken from various sources of information on emissions and used in large scale air dispersion modeling to arrive at estimates of average ambient air concentrations. The results of the analysis suggest that current concentrations of acrolein in western Los Angeles County may be substantially larger than those that may be associated with airport operations.

AL00017-60

Comment:

Another related generic deficiency in the analyses of human health impacts is that these impacts are expressed primarily in terms of the "significance" of effects for the most exposed individual (judged by exceedance of national ambient air quality standards, in the case of Section 4.6) or, in the case of some of the carcinogenic impacts in Section 4.24, in terms of the areas or numbers of people exposed to concentrations expected to exceed a 1/100,000 lifetime incremental cancer risk criterion or an unusual criterion for non-cancer effects of a hazard index of 5 (the usual criterion used in many impact assessments under Superfund and other national legislation is a hazard index of 1).

Response:

The health risk assessment presented incremental risk and hazard estimates geographically to show areas that would experience risk and hazards to levels far below those represented by thresholds of significance. This approach was taken expressly to avoid complete dependence on single number comparisons. These analyses were presented in the Draft EIS/EIR, Section 4.24 and in the health risk assessment document, Technical Report 14a. Thresholds of significance are, however, critical to the CEQA process and are further clarified below.

Thresholds of significance are quantitative or qualitative measures used to determine whether an environmental effect of a project (e.g., potential risks) would be considered significant. Where possible, validation of the choice of thresholds is provided by federal, state, and local guidelines, particularly the Guidelines for California Environmental Quality Act (State CEQA Guidelines) and related guidance and

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the Draft Los Angeles CEQA Thresholds Guide, published by the City of Los Angeles Environmental Affairs Department. For environmental disciplines mandated solely by NEPA, thresholds of significance are not included, as they are not required by NEPA. In lieu of federal thresholds, federal standards are used that are relevant to the analysis. These thresholds were subsequently revised and expanded in the Supplement to the Draft EIS/EIR (see Section 4.24.1).

Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.4.1, CEQA Thresholds of Significance), of the Draft EIS/EIR described selection of the cancer and non-cancer thresholds of significance. The threshold of significance for increased incremental cancer risk is 10 in one million. For non-cancer health effects, the threshold of significance is a total incremental chronic or acute hazard index of 5. These thresholds of significance were selected based on South Coast Air Quality Management District (SCAQMD) policies. No regulations exist that establish thresholds of significance for an entire facility such as LAX. The thresholds selected are consistent with the SCAQMD CEQA Handbook (1993) for assessing impacts of new developments as well as recent, publicly available correspondence from SCAQMD.

The SCAQMD Rule 1401 (g)(3) allows for selection of alternate hazard index levels, not to exceed 10. Rule 1402, which is for existing sources and more pertinent to the evaluation at hand, identifies a significant risk level of 5 for total acute and chronic hazard indices. The SCAQMD 1997 Air Quality Management Plan Draft EIR, Chapter 4 - Potential Environmental Impacts and Mitigation Measures, Subchapter 4.4 - Hazard/Human Health Impacts, identifies a threshold of significance for noncancer effects of 5.

AL00017-61

Comment:

These ways of expressing health impact results are of some relevance because they help the audience judge the fairness of the burden of extra risk imposed for residents of the areas most affected by the project options. However, exclusive definition of impacts in terms of the area or number of people who receive an increment of risk or (for non-carcinogenic agents) exposure to pollutants from LAX-related sources alone that is deemed to exceed a single bright line of "significance" ignores the incremental cancer and noncancer risks to people who do not happen to be moved across such a criterion level. Further, these ways of summarizing impacts can not, by themselves give decision-makers and the public a sufficient description of the overall health impacts to arrive at a reasoned judgment of whether the mix of economic, human health, and environmental impacts of the proposed "build" option is more desirable overall than the comparable impacts of other options. The current analysis of economic impacts describes projected aggregate changes in jobs and overall economic activity for the City of Los Angeles, Los Angeles County, and the whole Southern California area. To be comparable with these aggregate economic impacts, aggregate measures of health impacts must be created and the current artificial limitation of the study area for quantifying air pollution impacts must be transcended.* For example, decision-makers and the public should be informed of the differences among options in the overall cases of cancer that are expected to arise over the lifetimes of the individuals exposed over particular periods of construction and operation of the proposed facilities and the entire geographic area of the South Coast Air Basin that receives incremental changes in exposures. For genetically-acting carcinogenic agents, which are thought to have simple straight-line dose response relationships at low doses 1,2, it is feasible to utilize available information on mean estimates of cancer potency^{3,4} and mean estimates of incremental exposures to calculate incremental cancer cases (although such calculations are not without their complications) and present results that depict the overall extra cancer burden that is to be expected for communities. In the non-cancer area, it is at least possible to draw on the extensive documentation of dose response relationships for particulate matter and ozone^{5,6,7} in the supporting documentation for EPA national ambient air quality studies and other data in the scientific literature for the "criteria" pollutants to create aggregate estimates of incremental deaths and hospital admissions for incremental particulate matter exposures, and incremental respiratory effects in the case of ozone. For example, calculations can now be made for PM₁₀ and general mortality, based in part on a recent study of the effects of PM₁₀ (airborne particulate matter less than 10 microns in diameter) on daily mortality in 90 cities across the United States, including several in Southern California.⁸ This study has confirmed relationships observed between particulate matter and morbidity and mortality in the prior literature. Overall, it appears that the mortality effect is approximately a 0.5% to 1% increase in total nonaccidental deaths per 10 µg/m³ change in PM₁₀. For comparison, the projected unmitigated construction-related concentrations of PM₁₀ at the point of maximum impact for the peak construction

year range from 39 to 63 µg/m³ over the 1996 "Environmental Baseline" concentration of 36 µg/m³ (Table 4.6-13, p. 4-500). Human health impact results therefore can and should be expressed in aggregate incremental cancer cases, aggregate incremental deaths, aggregate incremental hospitalizations, and aggregate incremental asthma effects. Comparisons among these readily understandable and relevant indices of harm for various LAX and other air service expansion options are important inputs for decision-making by decision-makers and the general public.

* The current area assessed for air pollution impacts is limited at a particular boundary (very roughly, about 10 miles) in the down wind direction (east) from the airport. This boundary was not selected entirely arbitrarily. Based on initial modeling, the boundary was designated to be sure to include the full area (and then some) where excess cancer risks were expected to be 10 per million (on a lifetime exposure basis) or more-the definition of a "significant" incremental impact for this study and also for other pieces of legislation in California (e.g., Proposition 65). However incremental exposures for people further removed from the airport certainly occur and should be part of the assessment of basin-wide population aggregate incremental impacts.

Response:

Section 4.24.1, Human Health Risk Assessment of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided detailed discussions of risks and hazards to potentially impacted populations. The discussion included populations who do not exceed the threshold of significance. Detailed figures were provided that depict the range of potential cancer risks associated with alternatives, including those areas where risks and hazards are less than thresholds of significance.

The effort associated with evaluation of health risks and impacts to residents for the entire South Coast Basin would not be required under CEQA. Risks and impacts were evaluated for each of the alternatives and the analysis was carried to the point geographically where any incremental impacts could be regarded as negligible. Aggregate impacts are also not required under CEQA, and the requested predictions could only be made for incremental cancer cases. Please refer to Section 4.24.1 of the Supplement to the Draft EIS/EIR for an evaluation of incremental cancer risks by community. Information is not available to accurately predict noncancer impacts such as deaths, hospitalizations, and asthma. The study cited in the comment (i.e., The National Morbidity, Mortality, and Air Pollution Study: Morbidity and Mortality from Air Pollution in the United States) indicated that individual estimates of PM₁₀ effect varied for each of the 90 cities. Differences in PM₁₀ effect on mortality were seen by region of the US; the largest effect was evident in the Northeast. The investigators did not identify any factor or factors that might explain these differences. Further evaluation of regional differences will be performed to advance the understanding of the association between PM₁₀ and mortality. Concentration-response analyses for mortality is now under way using data from 20 cities.

AL00017-62

Comment:

Were the analysis expanded to include some options shifting some additional air service to outlying airports (as recommended above), continued use of the more localized health impact analysis method would cause the analysts to miss important benefits that would accrue from placing emissions downwind rather than upwind of the major population centers of the Los Angeles area. As pointed out by another commenter, restricting the environmental impact analyses to the immediate LAX area and the options considered only to expansion of LAX also prevents the Environmental Justice analysis from considering the relative burdens on minority communities of LAX expansion vs expansion of air service at other airports. The City of Inglewood appears to be substantially included in the existing boundaries of the air dispersion modeling study area. Still, so that Inglewood would be better able to negotiate either improved mitigation measures and/or compensation for residual unmitigated impacts, it is important to have impacts broken down by various political jurisdictions covering the most affected communities (e.g., Inglewood, El Segundo, etc.) in the LAX area and beyond.

Response:

Please refer to Response to Comment AL00017-35. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting aviation demand, Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-3 regarding environmental justice and regional context.

3. Comments and Responses

AL00017-63

Comment:

Another general deficiency of the analysis is that there is no apparent attempt to assess and communicate uncertainties in a quantitative way. Two basic levels of uncertainty analysis are possible. The first is called sensitivity analysis, in which reasonably plausible ranges of key assumptions or estimated parameters are varied and the reader is shown how much the important conclusions about impacts would change as a result. A second, more sophisticated level of analysis is to specify uncertainty and variability distributions in place of the fixed point parameters used in the analysis. Such analysis is becoming increasingly used in recent years,^{9,10} principals for stochastic analyses have been widely discussed in the field, and it is very surprising that such a large study of a major project with impacts projected many years into the future makes no apparent use of these techniques to fairly inform the audience of the uncertainties in key results.

Response:

Sensitivity analyses are common aspects of a risk assessment, but are not specifically required under standard guidance. Ideally, one would like to carry through the risk assessment the uncertainty associated with each parameter in order to characterize the uncertainty associated with final risk estimates. A highly quantitative statistical uncertainty analysis is usually not practical or necessary. A more practical approach for risk assessments is to describe qualitatively how uncertainties might be magnified or biased through the risk models used. Often available data are insufficient to fully describe parameter distributions, but are sufficient to describe the potential range of values the parameters might assume. In this situation, sensitivity analyses can be used to identify influential model input variables and to develop bounds on the distribution or risk. A sensitivity analysis can estimate the range of exposures or risk that can result from combinations of minimum and maximum values for some parameters and mid-range values for others. Using this semi-quantitative approach a range of exposure or risk could be generated.

A qualitative approach was used to describe uncertainties for parameters and to indicate the possible influence of these uncertainties on the final risk estimates in the human health risk assessment for the LAX Master Plan. Key parameter uncertainties are discussed in Chapter 7, Uncertainties, of Technical Report 14a, Human Health Risk Assessment. Additional uncertainties are presented in Chapter 7, Uncertainties, of Technical Report S-9a, Supplemental Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR.

To evaluate potential impacts resulting from the expansion of LAX, the health risk assessment assessed risk and hazards for maximally exposed individuals using upper bound predictions of exposure; i.e., receptors were assumed to be exposed to maximum predicted concentrations of TAPs at reasonable maximum exposure periods. The analysis treated outdoor concentration estimates as equivalent to actual personal exposure to the population. However, human exposures to air pollution depend on concentrations in both indoor and outdoor environments and the amount of time people spend in various locations, including their homes, schools workplaces and commuting. The methods used in the human health risk assessment were conservative, that is, methods used were more likely to overestimate than underestimate possible health risks.

AL00017-64

Comment:

One aspect of the modeling that is particularly in need of exploration via sensitivity/uncertainty analyses is the assumed behavioral responses of airlines to increasing delays as the intensity of usage of airport facilities increases. At present "capacity" calculations seem to be based on an assumption that 10-15 minute delays are the maximum that will be tolerated. However the operation of the model seems to have yielded somewhat different results for the "average" air side delay among options. These differences directly affect estimates of the emissions from idling aircraft and could also be an important factor in economic consequences resulting from differences in both airline and consumer behavior in response to different delays in flights scheduled at high vs low usage times and at LAX vs outlying airports. The basis for the existing assumptions needs to be more transparently documented, and

consequences of plausible alternative behavioral assumptions over the future years of the "No Action/No Project" and "build" options need to be assessed and disclosed.

Response:

A discussion of aircraft delay standards is provided in Chapter II, Section 2.1.3. of the Draft Master Plan. It should be noted that, subsequent to publication of the Draft EIS/EIR, a new alternative - Alternative D - was added to the range of alternatives being considered for the LAX Master Plan. As was described in the Supplement to the Draft EIS/EIR and the Draft Master Plan Addendum, Alternative D is designed to serve a future (2015) activity level comparable to that of the No Action/No Project Alternative, but at a much better level of service for passengers than would otherwise occur under the No Action/No Project Alternative.

AL00017-65

Comment:

Finally, there are some glaring omissions of important effects from the economic impact analysis. Economic impacts are assessed in terms of changes in employment, and overall economic activity, for the South Coast as a whole, Los Angeles County, and the City of Los Angeles. Changes in on-airport employment are also described, as are the expected capital costs of the various policy options. Unaccountably, there does not seem to be any readily locatable presentation of expected effects on operating revenues and costs for the major economic actors that are directly affected by the proposed project-LAWA itself, the City of Los Angeles as owner and taxing authority, and the air lines. Projections of these expected impacts must exist.

Response:

Pursuant to NEPA and CEQA, the purpose of the EIS/EIR is to fully disclose the environmental consequences of building and operating a major capital investment at LAX in advance of any decisions to commit substantial financial or other resources toward its implementation. NEPA and CEQA require a broad environmental impact statement disclosing the effects on the environment that could result from the proposed action. The EIS/EIR explores the extent to which study alternatives and options result in impacts. In Section 4.4, the Draft EIS/EIR and Supplement to the Draft EIS/EIR, addressed socio-economic impacts, but NEPA and CEQA do not require a detailed fiscal assessment of the impact of the proposed LAX Master Plan facilities on the internal finances of the sponsor or airline tenants at the facility.

AL00017-66

Comment:

Moreover, they are highly relevant to judgments of the equity (fairness) of the distribution of expected good and bad effects of the different policy options for different groups, including an expanded Environmental Justice analysis. Are residents of the City of Inglewood expected to receive incremental benefits from the project that bear a reasonable relationship to their incremental burdens, either in the form of further mitigation of the pre-existing "Environmental Baseline" impacts or other desirable projects? It seems that no judgment of this is possible unless the proponents of LAX expansion reveal the expected stream of net benefits that they expect to flow from their proposed \$10 billion or more of investments.

Response:

Please see Response to Comment AL00017-8.

AL00017-67

Comment:

Communicating the Results Clearly and Coherently

3. Comments and Responses

To say the least, the current massive document on 5 CD-ROM disks is not very user-friendly. There is a general need for a consolidated summary description of the major impact results for various options, the methods and assumptions used to derive those results, and the vulnerability of the findings to major types of uncertainties, including projections of future "demand" for air travel.

What is true of the general impact assessment summarization is also true at the level of at least some assessments of individual types of impacts in the Draft EIR/EIS. For example, the "Air Quality" assessment presents numerical estimates of expected changes in emissions and air concentrations of "criteria" air pollutants for construction, on-airport, and off-airport sources. However it does not quantitatively summarize the total emissions or expected exposures either before or after the application of proposed mitigation measures. Thus in order to obtain consolidated overall impacts, the reader would have to do their own analysis combining the results presented in several different tables.

Response:

The Draft EIS/EIR included an Executive Summary that presented the key findings of the more detailed analysis, and compared the impacts of each alternative. The Draft EIS/EIR, as well as the Supplement to the Draft EIS/EIR, provided quantitative discussions, where appropriate, of the effectiveness of mitigation measures, including for air quality impacts. Tables 4.6-16 through 4.6-23 of the Draft EIS/EIR and Table S4.6-18 through S4.6-26 of the Supplement to the Draft EIS/EIR quantify air pollutant emissions reductions associated with mitigation measures. Additional air quality analysis data was provided in the text and tables of Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

AL00017-68

Comment:

Survey of the Draft LAX Master Plan and EIR/EIS for Generic Types of Policy Analysis Problems

As mentioned in the introduction, this section reflects an earlier and somewhat more abstract stage of the author's assessment of the EIR/EIS documentation. The first subsection below provides some background on the different criteria for judging what is "good" information in basic science, vs. the analysis of policy options. Based on this, an overview is provided of generic types of policy analysis problems that have been observed in the author's prior experience, and this theoretical framework is briefly applied in a preliminary evaluation of the Draft Master Plan EIS/EIR.

3.1 Relevance and Comprehensiveness as Touchstones for Good Policy Analysis to Support Rational Decision-Making

One frequent source of confusion among technically trained people in preparing assessments for policy/decision-making purposes is that the basic rules for judging information are different in basic science from those that are appropriate in the analysis of public policy options. In basic science, one of the worst types of mistakes one can make is to make a premature conclusion of fact that later turns out to be wrong. The reason why this type of mistake is so damaging to the scientific process is that it misdirects research efforts-tending to send researchers down "blind alleys" based on incorrect premises.

Guarding against this type of error has led basic scientists to adopt "validity" and "reliability" as criteria of central importance for judging measurements and other information:

- A "valid" measurement is one that measures what it is claimed to measure. A classic example of an "invalid" measurement is a grocer weight meat with his thumb on the scale. In this case, the pressure of the grocer's thumb is being incorrectly included along with the weight of the meat in the assessment of how much meat the consumer is buying.

- A "reliable" measurement is one that achieves a reasonable standard of accuracy and reproducibility. Extending the previous example, we would say that a grocer would be making an "unreliable" measurement if he were to use a common bathroom scale to weigh the meat to be sold to the consumer. This is because bathroom scales are not generally equipped to measure the weight of meat for purchase to the degree of accuracy that we have become accustomed to in the supermarket.

Unfortunately, it is perfectly possible for technical specialists operating within the traditions of individual disciplines to produce valid and reliable results that are perfectly useless or even misleading for policy/decision-making purposes. Whereas the worst thing one can do in basic science (other than fudging data) is to come to a premature conclusion of fact, in policy analysis the worst thing one can do is to miss an effect that, if analyzed, would have a good chance to change the decision-makers' evaluation of the relative desirability of available policy options. Guarding against this type of error the main objective is to produce "relevant" and "comprehensive" information that is as "valid" and "reliable" as possible.

- "Relevant" information quantifies some difference that is valued by decision-makers among the consequences of various policy options.

- "Comprehensive" information includes quantification of all the differences in the consequences of various policy options that have a reasonable chance of influencing the choices that decision-makers would want to make among the various policy options.

Response:

Comment noted.

AL00017-69

Comment:

3.2 Overview of Generic Types of Policy Analysis Problems

3.2.1 Problems in Framing the Policy Options for Comparison

One of the easiest ways in which a policy analysis can be biased is in the construction of an inappropriate set of options for comparison. Choice of an unrealistically bad comparison case can makes the proposed project options look better than they should. And failure to include potentially better project options than the ones preferred by the proponents also can bias the results. The basic criterion for evaluation of an option set is, does it include all the possible policy choices that are or (by legislative action) could be reasonably available to the decision-making actor(s)?

For example, in the current case, one type of option component that might be considered would be a system of taxes and credits designed to shift some demand from LAX to outlying airports-particularly to the East--with an expectation of lesser population aggregate air pollutant impacts per passenger accommodated. Other types of options could be variants in which the ring road to provide better access to airport terminals was put in place before the new terminal is opened up.

Response:

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan - is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region.

Although the conclusion of the Draft EIS/EIR is that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region. Please note that Alternative D does not include a ring road. Please see Topical Response TR-RC-1 regarding the role of the LAX Master Plan in meeting regional aviation demand.

AL00017-70

Comment:

A related type of problem is potentially inappropriate bundling of mitigation measures with the project options to make the project options look better. In the current case one might well ask whether some of the air emission mitigation options might be considered as options in their own right, or joined with changes in user fees and perhaps a delayed schedule of roadway and terminal improvements to

3. Comments and Responses

achieve an even more desirable basket of net revenues and environmental improvements than is presented by any of the current plan options.

Response:

Comment noted. Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR for updated air quality mitigation measures.

AL00017-71

Comment:

Boundary Problems-Do the Boundaries of Space and Time Utilized in the Study Capture the Full Range of Project Impacts that are of Interest for the Choices Among Options?

The artificial limitation of the analysis of air emission impacts to a defined area east of the airport has already been discussed in Section 2 above. Quantitative impacts on health outcome can and should be assessed for the residents and workers in the entire South Coast Air Basin whose exposures to a variety of "criteria" pollutants and toxic air contaminants will be affected in ways that can be modeled, even if they may not be directly measurable. Accomplishing this improved basin-wide exposure modeling seems feasible on the basis of the results of the MATES-II study,¹¹ where results of basin-wide modeling of concentrations at several locations have been found to be reasonably comparable to observations for a large number of pollutants.

Response:

Please refer to Response to Comment AL00017-35.

AL00017-72

Comment:

3.2.3 Problems in the Dependent Variables Used to Quantify and Compare Impacts Among Policy Options

As indicated in Section 3.1, a good policy analysis should include all types of impacts that have an appreciable chance to affect the choices among options by relevant decision-makers or other affected parties.

Response:

Please see Response to Comment AL00017-73 below.

AL00017-73

Comment:

In particular the current analysis does not appear to show the reader the bottom line economic costs and benefits over time to the LAX owners and to the surrounding communities. Nor does it evaluate the impacts on the economics of supplementary economic measures (e.g. user charges per flight) that could make revenue available for additional mitigation steps.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed socio-economic impacts in Section 4.4, Social Impacts. Pursuant to NEPA and CEQA, the purpose of the EIS/EIR is to fully disclose the environmental consequences of building and operating a major capital investment at LAX in advance of any decisions to commit substantial financial or other resources toward its implementation. NEPA and CEQA require a broad environmental impact statement disclosing the effects on the environment that could result from the proposed action. The EIS/EIR explores the extent to which study alternatives and options result in environmental impacts. In Section 4.4, the Draft EIS/EIR and Supplement to the Draft EIS/EIR, addressed socio-economic impacts, but NEPA and CEQA do not require a detailed fiscal assessment of the impact of the proposed LAX Master Plan facilities on the internal finances of the local municipalities neighboring the airport.

AL00017-74**Comment:**

A second problem area discussed in Section 2 above is the lack of quantitative treatment of variability and uncertainty in the present analysis. Throughout, the current document presents results from one particular scenario of economic development, etc. At the very least several scenarios should explore the implications for the relative desirability of different technical options of different plausible possibilities for rate of growth in air transport demand; including possible effects of greater use of teleconferencing on growth in demand for business travel, different assumptions for the growth in population and personal income in Southern California, etc.

Response:

The Draft EIS/EIR provided comprehensive analyses of four (4) scenarios (alternatives), and the Supplement to the Draft EIS/EIR addressed a fifth alternative. Section 1.3, Meeting the Demand for Transportation in the Region, of the Draft EIS/EIR discussed different technical options related to meeting transportation demands in the region, including telecommuting. As was described in Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the Master Plan alternatives are based on reasonable forecasts of airport constraints and air traffic operations. Details regarding those forecasts are provided in Chapter III of the Draft Master Plan and Section 3 of the Draft Master Plan Addendum.

AL00017-75**Comment:**

Finally there is a need for presentation of impacts in more- and less-aggregated forms to show benefits, costs, and changes in health impacts for various policy options for various subgroups. In particular, it is important to assess cumulative impacts-integrated over time-over the project building period and at least a couple of decades thereafter, for residents of Inglewood, the City of Los Angeles, and the total residents of the South Coast Air Quality Management District

Response:

Comment noted. An extensive amount of data is presented throughout Chapter 4 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, providing information and analysis for each alternative, including cumulative impacts, to the horizon year of 2015. The analyses presented in these documents took into account long-term exposure, as appropriate (i.e., 70-year exposure for adult resident). Such information is appropriate for an EIS/EIR, and meets the requirements of NEPA and CEQA. Cost-benefit studies and long-term (20+ year) cumulative impacts health trend studies as suggested by the commentor are beyond the scope of, and requirements for, the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00017-76**Comment:**

3.2.4 Technical Problems in Assessing Impacts (e.g.-appropriate estimation of emissions, dispersion models, etc.)

The favorable comparison between the build options and the No Action/No Plan alternative may be very sensitive to the way that the analysts have modeled the responses of the airlines to increasing congestion on the air side and the responses of members of the public to increasing congestion on the terminal side. On the air side, the analysis appears to depend on assumptions that air lines will take severe steps to reduce traffic at the point when delays reach 10-15 minutes. The basis for this assumption and the basis for figuring the exact responses as a function of delay time do not appear to be fully articulated in the present report. There may well be other technical problems in the modeling of various other impacts, but these cannot be fully explored in the time frame available for this review.

3. Comments and Responses

Response:

Comment noted. Details regarding the basis and assumptions for airside operations including air traffic flows and delays are provided in Chapters II and III of the Draft Master Plan and Section 3 of the Draft Master Plan Addendum.

AL00017-77

Comment:

I. INTRODUCTION AND BACKGROUND INFORMATION

Background Setting

Los Angeles International Airport (LAX), the fourth largest airport in the world is planning to update its Master Plan to accommodate a continued increase in growth of passengers and cargo over the next fifteen years. Three major alternatives have been identified and a Draft Environmental Impact Report/Statement (DEIR/EIS) has been prepared for public comment. This paper reviews the DEIR/EIS, particularly the favored Alternative C by the Los Angeles World Airports (LAWA), for its consideration of air quality related impacts upon the City of Inglewood and its immediate vicinity.

LAX lies entirely within the City of Los Angeles. However, it is also immediately adjacent to the cities of Inglewood, Hawthorne, and El Segundo as well as the unincorporated town of Lennox. Within the City of Los Angeles, the community of Westchester is also directly impacted by LAX. Inglewood has a population of 121,000, up from 109,000 in 1990. Another 174,000 reside in the other communities adjacent to the airport and noted above, bringing to 295,000 the number of residents immediately adjacent to the LAX.

A larger, South Bay Subregion consists of fifteen cities (including Inglewood) having a population of about 764,000. In addition, the Subregion includes portions of the harbor area of the City of Los Angeles, which brings the total population of the area to slightly over one million persons. The area contains some of the most densely populated areas of the Los Angeles region as well as many manufacturing and industrial facilities that contribute greatly to the air pollution emission burden of the South Coast Air Basin. A major segment of California's interstate highway system, I-405 (the San Diego Freeway) runs the length of the Subregion, and I-110 (the Harbor Freeway) also transverses the southern portion and is a major heavy-duty transport corridor from the Port of Los Angeles to the downtown area. Finally, I-105 (the Century Freeway) terminates at the southern entrance to LAX and will play a major role in the proposed expansion of the highway network serving LAX in the Master Plan. The Master Plan proposal also includes a new, Los Angeles Airport Expressway to supplement the traffic circulation system.

Response:

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include the LAX Expressway.

AL00017-78

Comment:

Related Planning Requirements

There are several major planning efforts, mandated by Federal and State law that affect the expansion of LAX as described in the Master Plan. The following discussion highlights these requirements as a foundation for considering the recommended detailed analysis contained later in this report.

Air Quality Planning

The City of Inglewood lies wholly within the South Coast Air Basin and is thus directly affected by the Air Quality Management Plan (AQMP) for this basin. The South Coast Air Quality Management District (SCAQMD) has prime responsibility to develop and revise the AQMPs for the basin, with input from the

Southern California Association of Governments (SCAG) and its respective constituents such as Inglewood. The adopted AQMP is then forwarded to the California Air Resources Board and on to the US Environmental Protection Agency for approval under the Clean Air Act (CAA) as a State Implementation Plan (SIP). For Ozone, the currently approved State Implementation Plan (SIP) for the South Coast is the 1999 Amendments to the 1997 AQMP. Inglewood would be prudent to insure that airport mitigation measures are included in the current efforts to develop a 2001 AQMP by the end of this year. For Particulate Matter (PM10), the EPA has never approved any South Coast SIP. This was generally the result of problems with the Ozone portion of the submitted AQMPs, and the SCAQMD has requested that EPA now await the more comprehensive 2001 AQMP for taking action on PM10. For Carbon Monoxide (CO), the EPA gave Final Interim Approval to the South Coast CO SIP in 1998. In addition to the 2001 AQMP for the South Coast, the CARB is developing a Clean Air Plan to identify strategies that represent the State and federal contributions to the regional plans for ozone, particulates, and carbon monoxide (CO).

Response:

Comment noted. Please note that in April 2003 the USEPA approved the 1997 AQMP section addressing PM10. This update is reflected in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

AL00017-79

Comment:

Transportation Planning

The U.S. Department of Transportation (DOT), under the Transportation Equity Act for the 21st Century (TEA-21), requires that metropolitan planning organizations such as SCAG update every three years the Regional Transportation Plan (RTP) for the area. The RTP is a 20-year vision of the area's commitment to transportation improvements and must closely link to other related Federal mandates such as the Clean Air Act. The current update is scheduled to be adopted by the end of April 2001. One of the five major changes to the previous (1998) RTP is that of the Regional Aviation System. Several scenarios are evaluated in the draft 2001 RTP and one of these, Scenario 9, examines the impact of expanding LAX similarly to that proposed in the EIR. The key concern on the RTP from the 2001 air quality planning effort is its affect on the on-road mobile source emission budgets that will evolve from the AQMP. While the RTP update will be adopted in advance of the AQMP update, decisions made in both plans and the incorporation of various ground access mitigation strategies will be of great concern to the cities of the South Bay. If these plans cannot "conform" to the air quality emissions budget, potential loss of funding for all Federal transportation programs may occur.

Response:

Comment noted. Subsequent to publication of the Draft EIS/EIR, Alternative D-Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifts the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and included discussion of the 2001 RTP, and was circulated for public review and comment.

In conjunction with project approval, the selected alternative will undergo a Clean Air Act conformity determination pursuant to federal requirements to assess whether implementation of that alternative would conform with the State Implementation Plan for CO, NO₂, PM₁₀, and O₃. In accordance with federal requirements, the draft conformity determination will be made available for public review and comment. The project would not receive federal approval unless the necessary conformity occurs.

AL00017-80

Comment:

CEQA/NEPA Process

California Environmental Quality Act (CEQA)

3. Comments and Responses

The California Environmental Quality Act (CEQA) was adopted in 1970 and incorporated in the Public Resources Code §§21000-21177. Its basic purposes are to: inform governmental decision makers and the public about the potential significant environmental effects of proposed activities; identify ways that environmental damage can be avoided or significantly reduced; require changes in project through the use of alternatives or mitigation measures when feasible; and disclose to the public the reasons why a project was approved if significant environmental effects are involved. CEQA applies to projects undertaken, funded or requiring an issuance of a permit by a public agency. The analysis of a project required by CEQA usually takes the form of an Environmental Impact Report (EIR), Environmental Impact Statement (EIS), Negative Declaration (ND), or Environmental Assessment (EA).

National Environmental Policy Act (NEPA)

The National Environmental Policy Act (NEPA) of 1969 established national policies and goals for the protection of the environment. NEPA directs all federal agencies to give appropriate consideration to the environmental effects of their decision making and to prepare detailed environmental impact statements (EIS) on recommendations or reports on proposals for legislation and other major federal actions significantly affecting the quality of the environment. NEPA is divided into two titles. Title I outlines a basic national charter for protection of the environment. Title II establishes the Council of Environmental Quality (CEQ) which monitors the progress made toward achieving NEPA goals, advises the president on environmental issues and provides guidance to other federal agencies on compliance with NEPA.

It was determined that the LAX Master Plan expansion must meet the requirements of both the CEQA and the NEPA, and thus the document that this report reviews is the Draft EIR and EIS developed by LAWA and its consultants to address these requirements.

Response:

Comment noted.

AL00017-81

Comment:

Comment Process and Deadlines

The DEIR/EIS has a relatively long comment period of 180 days. Since it was released for public comment on January 18, the deadline to send formal comments to the LAWA will be July 25, 2001. The LAWA website has forms for making comments that can be downloaded. However, most agencies will probably submit the information in much more extensive fashion. Three, simultaneous, public hearings will occur on June 9 including one held at The Pavilion at Hollywood Park in Inglewood. This will provide an opportunity for the City to provide direct comments to LAWA; although it is not necessary to comment at this hearing in addition to providing written comments. Finally, there are several other reviews of the DEIR/EIS underway by other cities in the area, including a SCAG-assisted project with the 16-city South Bay Cities Council of Governments.

Following receipt of the public comments, a Final EIR/EIS will be prepared by LAWA. It should incorporate changes found acceptable to LAWA from the comment process as well as additional input on mitigation measures developed in partnership with the SCAQMD, CARB, U.S. EPA, and the Federal Aviation Administration (FAA). The resulting Action Plan will be a part of the Final EIR/EIS. The FAA, along with the Los Angeles City Council and Mayor, will make the ultimate decision on the Master Plan. U.S. DOT, represented by the FAA and the Federal Highway Administration, will then provide the Record of Decision (ROD) that reflects their final approval of the EIS/EIR and allows construction to commence.

An important process that must be satisfied prior to final approval is the conformity process under the 1990 Clean Air Act. The DEIR/EIS notes that the Master Plan expansion will be significant enough to require a conformity determination by the FAA with SCAQMD's latest, approved Air Quality Maintenance Plan (AQMP) for the pollutants of NO_x, CO, PM-10, and Ozone (1-hour). Although a revised AQMP is underway and expected to be completed by the end of this year, the latest approved AQMP (State Implementation Plan) is the 1999 amended version of the 1997 AQMP and will likely be the plan for use in the conformity determination. The airport expansion will fall under the General

Conformity provisions while the highway improvements (State Highway 1 and the LAX Expressway) will have to apply the Transportation Conformity provisions of the Act.

Response:

Comment noted. A separate document pertaining to the conformity of the Master Plan with the federal Clean Air Act has been prepared and circulated to the public, as required by federal law and regulations. The comment period on the Draft EIS/EIR closed on November 9, 2001, concluding a 295-day review period. The public hearing process for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR is described in Topical Response TR-PO-1.

AL00017-82

Comment:

II. OVERVIEW OF THE PHASE ONE REPORT

Cursory Review of Full Draft EIR/EIS for Air Pollution Issues

The initial step of the Phase 1 effort was to perform a cursory review the entire 12,000 page DEIR/EIS to identify all comments and statements regarding air quality. While this was a potentially very time-consuming process, the DEIR/EIS is organized in a manner that allows the reviewer to quickly skim large sections of the document that are unlikely to contain any reference to air pollution. This was especially true for Chapter 4, which contains 24 subparts organized by specific areas such as residential relocation, geology, schools, etc. In some cases, however, there was no mention of air pollution despite the topic seemingly quite related. A listing of those chapters, and sub-chapters of the DEIR/EIS that were found to contain little or no significant mention of air quality are listed as a part of Appendix A.

Response:

Comment noted. Air quality was addressed in Section 4.6 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. In addition, an Executive Summary was provided at the front of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR to provide the reader with an overview of the key issues and findings, including as related to air quality, that were addressed in detail within the full analyses of the subject documents.

AL00017-83

Comment:

In-Depth Review of Air Pollution Portions of DEIR/EIS, Appendices, and Related Studies

Upon completion of the cursory review of the document, those chapters and appendices found to contain some discussion of air quality or related issues were reviewed in much greater detail. The most extensive discussion of air issues, of course, were contained in Chapter 4.6 (Air Quality), Appendix G (Air Quality Impact Analysis), and Technical Report 4 (Air Quality Technical Report). The latter contains extensive listing of the 150 potential mitigation measures. Other sections of the document having considerable relationship to air quality included Chapter 4.24.1 (Human Health Risk Assessment) and Chapter 4.20 (Construction Impacts). Appendix K (Supplemental Environmental Evaluation for LAX Expressway and State Route 1) was also reviewed in-depth as it outlined the details of proposed roadway improvements that might have significant impacts on Inglewood's traffic circulation.

In addition to the DEIR/EIS document, the actual Draft Master Plan of November 2000 for LAX was examined as well as the LAWA Environmental Overview which highlights the airport's air quality programs. The Technical Workplan for LAWA's extensive new study on the air pollution levels (criteria pollutants and air toxics) and emissions in the vicinity of LAX was examined to see if additional input by the City would be useful during the study program. Finally, a series of other reports, memorandums, and related letters were examined in this review for possible relevance to the study objectives. The findings of each of these documents are briefly summarized in Chapter III of this report.

Identification of Key Air Pollution Issues for Further Consideration

3. Comments and Responses

Using the information found in the in-depth review of those portions of the DEIR/EIS containing air quality-relevant statements, the findings were listed under several basic topics. Examples of these topics are health-related impacts, air emissions determinations, mitigation measures, conformity to the AQMP, etc. This process allowed a better synthesis of the mass of air quality information scattered throughout the DEIR/EIS into key issue areas. For each category of information, a description of the potential issue for further consideration by the City of Inglewood was developed. These descriptions are contained in Chapter IV of this report.

Cites for the data categorized by specific location within the document are listed by category and page in Appendix A.

Recommended Four Significant Issues for Detailed Analysis

Finally, the consultant has selected four significant issues for the City of Inglewood to consider further analysis to determine the level of concern and necessity to include in the overall comments on the DEIR/EIS to the LAWA in June. The four issues are 1) mitigation measures, 2) conformance to 2001 RTP and AQMP, 3) analysis of the new LAWA air study for deficiencies and potential roles, and 4) impacts of road improvements identified in the DEIR/EIS. These four issues are analyzed in detail in Chapter V of this report.

III. SUMMARY OF THE FULL REVIEW FOR AIR QUALITY ISSUES

Organization of the Draft EIR/EIS Document

The Draft EIR/EIS is an extremely detailed and extensive analysis of the various Master Plan alternatives under consideration by the City of Los Angeles and the Los Angeles World Airports (LAWA). It is approximately 12,000 pages in length, containing seven chapters including a 1,233 page Chapter 4 which contains much of the technical analysis of the environmental consequences and mitigation measures for the various alternative plans. In addition to the main body of the document, there are eleven appendices that have specific documentation and additional technical analysis of the impacts of the alternatives. Finally, there are seventeen special technical reports, 251 tables and 183 figures in the main body of the report.

Briefly, the DEIR/EIS proposes three "build" alternatives for expanding LAX in addition to the mandated "No Action/No Project Alternative." Alternative A would add a new runway on the north field portion of LAX and could accommodate the full, projected aviation demand of 97.9 million annual passengers (MAP) and 4.2 million tons of air cargo by 2015. Alternative B would add, instead, a new runway on the south field portion of LAX and could accommodate the full demand as well. Finally, Alternative C (the preferred alternative by LAWA), would not add any new runways but move two of the existing runways, extend three of them, and widen one of them. This would accommodate the projected air cargo demand but "only" 86.9 MAP in 2015.

The reviewer can obtain a fairly detailed sense of the topics covered by reviewing the Table of Contents to the DEIR/EIS as each chapter is broken down into up to three additional sub-levels. In addition to the detailed Chapter 4 noted above, the other key chapters cover 1) Regional Context, 2) Purpose and Need for the Proposed Action, 3) Alternatives, 4) the Environmental Action Plan, 5) Other NEPA/CEQA Topics, and 6) Lists of Preparers, Persons/Agencies Consulted, Recipients of the DEIR/EIS, References, Glossary, Abbreviations and Acronyms, and an Index. The following section will discuss those portions that identified significant air quality issues.

Sections Identified for Potential Air Quality/Transportation Issues

In addition to the specific Air Quality sections (Chapter 4.6, Appendix G, and Technical Report 4), several other chapters were found informative on air pollution and related issues. Included in this list were portions of the Chapter 1 (Regional context), Chapter 2.3 (Consequences of Not Improving LAX), Chapter 3 (Alternatives), Chapter 4.2 (Land use), Chapter 4.3 (Surface Transportation), 4.4 (Social Impacts), Chapter 4.5 (Induced Socio-Economic Impacts), Chapter 4.17.1 (Energy Supply), Chapter 4.20 (Construction Impacts), Chapter 4.24.1 (Human Health Risk Assessment), Chapter 5 (Action Plan), Chapter 6 (Other NEPA/CEQA Topics), and Appendix K (Supplemental Environmental Evaluation for LAX Expressway and State Route 1).

Chapter 4.6, Air Quality, contains the "meatiest" compilation of findings on air quality in the entire document. It contains a description of the air basin and pollution sources context, the mitigation process, and describes how each alternative is analyzed. Key findings are grouped by On-Airport emissions, Off-Airport emissions, construction emissions, and an overall Environmental Action Plan. It does not cover health risks in any detail - those are covered in Chapter 4.24.1, Human Health Risk Assessment.

Appendix G, Air Quality Impact Analysis, is essentially a technical support document for Chapter 4.6. It includes detailed information on the methodology used for the emission estimates, dispersion modeling, and future background ambient air quality concentrations. Finally, it outlines the climatology, regulatory setting, and existing air quality for the LAX area. The report concludes with the modeling results conducted by the LAWA consultants. Thirty-four tables present findings on the air quality impact analysis.

Technical Report 4, Air Quality, provides even more technical details and data to support LAWA's air quality impact analysis of the DEIR/EIS. Included are an airport emission inventory, a regional traffic emissions inventory, roadway intersection analyses, a construction emissions and dispersion analysis, and a quantitative assessment of potential air quality mitigation measures. The latter, contained in Attachment X to the report, has about 150 potential air quality mitigation measures for consideration and will be a foundation for future analysis if a second phase to this study is requested.

Identification of Findings from the Cursory Review (Enumerated in Appendix A)

The categorization of the many references to air quality throughout the DEIR/EIS involved listing the key points of each comment under various topics related to air quality and/or related subject areas. The following summarizes the key findings from this review in each of these topics. Appendix A will provide specific page references to these and other findings, also organized by the key topics.

Response:

Comment noted. Please see Responses to Comments below. In addition, please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR for further discussion of air quality impacts associated with the LAX Master Plan, including the added Enhanced Safety and Security Plan alternative (Alternative D).

AL00017-84

Comment:

Air Pollution Impacts from the Various Alternatives Contained in the DEIR/EIS

The DEIR/EIS is up front regarding the fact that air quality will deteriorate with all four alternatives, including the No Action/No Project alternative. Appendix G begins with the following quote "With or without implementation of the proposed LAX Master Plan, the amount of air traffic, surface traffic, and airport activities would increase at LAX as compared to the environmental baseline. As a consequence of the increase in airport activities, emissions of criteria air pollutants from mobile, stationary, and area sources associated with LAX are expected to increase."

Response:

Comment noted. Please see Topical Response TR-AQ-3 regarding air pollution and the air quality benefits associated with Alternative D.

AL00017-85

Comment:

On-Airport emissions were found to increase in all three alternatives, though Alternative C (no added runway) has lowest increases for NOx that is perhaps the most important concern in the South Coast air basin. Interestingly, all three build alternatives had lower overall emissions than the No Action/No Project (NA/NP) alternative due to the proposed mitigation measures. Further analysis of this claim may be in order as many of the on-airport mitigation measures in the build alternatives may, in fact, eventually be mandated by other Federal and state pollution requirements in the AQMP and thus would

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have also reduced the NA/NP alternative emissions. Emissions of CO, PM-10, and VOCs were found "less than significant" in all three build alternatives, but emissions of NOx and SO2 were found "significant" under the definitions of CEQA/NEPA and thus must be mitigated to the extent possible.

Off-Airport emissions in 2015 are "significant" for all five criteria pollutants for all three build alternatives. VOC emissions would decrease in relation to the NA/NP alternative, but increased traffic in all three build scenarios would cause significant increases for each of the pollutants or their precursors. Alternative C, due to its lower passenger projection, would perform best among the three build alternatives.

Construction emissions, deemed "temporary" in nature, would peak in 2004 and exceed significance levels for all criteria pollutants under any build alternative. Peak emissions would be 2 to 10 times greater than the NA/NP alternative. NOx emissions from diesel-powered construction equipment would be the most significant construction pollutant unless mitigated. Alternative B would have highest construction emissions and Alternative A the lowest. It is not clear whether the full impact of the serious traffic congestion from construction activities was fully considered in the air quality analysis.

Response:

The level of significance following mitigation of air quality impacts was addressed in Sections 4.6.8 and 4.6.9 of the Supplement to the Draft EIS/EIR, and additional technical data and air analyses are provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR. Please see Response to Comment AR00004-8 regarding additional information on the analysis and inclusion of air quality mitigation measures.

Mitigated air quality impacts from off-airport, on-road sources and construction sources have been updated since publication of the Draft EIS/EIR and was addressed in subsection 4.6.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR.

AL00017-86

Comment:

Evaluation of the Health Risks and Air Toxic Impacts

CEQA requires that whenever a project emits toxic air pollutants during and/or after construction, an assessment on the impacts on human health must be conducted. The DEIR/EIS states that it "fulfills the requirements of CEQA" to make this assessment and the results of "part" of this assessment can be found in Chapter 24.1, Human Health Risk Assessment. While this chapter attempts to assess the cancer risks and non-cancer health impacts, it is clear that a major gap resulted from the lack of a comprehensive, air toxic baseline study in advance of the DEIR/EIS.

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00017-87

Comment:

The document states "The HHRA did not evaluate impacts of toxic air pollutants associated with the current airport operations." While a new study is now underway, the DEIR/EIS admits that the impact of toxic air pollutants associated with the current airport operations until 2002 and thus only the incremental changes can be projected in their document. This study, Air Quality and Source Apportionment Study of the Area Surrounding LAX, prepared a Technical Workplan on November 17, 2000 which contained a proposed schedule of tasks ending in a final study report in December 2002. Clearly, these findings will be available for public consumption long after the final decisions on the LAX Master Plan are made.

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please also see Topical Response TR-AQ-2 regarding the LAX Ambient Air Quality and Source Apportionment Study.

AL00017-88

Comment:

It is a somewhat difficult task to assess human health impacts of various alternative expansion proposals without having finalized the mitigation measures and not having a current airport operations database. Under CEQA, significant impacts occur if incremental increases greater than that of the regulatory thresholds over the established environmental baseline are predicted for the maximally exposed individual. The DEIR/EIS found that even without mitigation measures, cancer health risks were less than the CEQA threshold in 2015. However, "other health hazards" were found significant under CEQA for all three build alternatives. Implementation of potential mitigation options brought the health hazard level to less than significant. Some of the reasons for this finding are 1) Federal mandates for less polluting aircraft engines and ground service vehicles, 2) Runway additions or modifications will result in more efficient aircraft operations, 3) circulation system improvements will improve vehicle flow and reduce congestion, 4) new configurations of runways and the new West Terminal will place off and on-site residents further from the aircraft sources, and 5) the various mitigation proposals, if fully implemented, would reduce overall air emissions.

Response:

Please refer to Topical Response TR-HRA-1 regarding the updated environmental baseline and LAX ambient air quality and source apportionment study, Topical Response TR-HRA-4 regarding mitigation measures for toxic air pollutants, and Response to Comment AR00003-63 regarding finalizing mitigation measures.

Mitigation measures currently proposed differ from those under consideration during the preparation of the Draft EIS/EIR. Recommended mitigation measures were identified in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR to reduce impacts from airport operations and construction as well as from regional vehicular traffic under Alternatives A, B, C, and D. These recommended mitigation measures would also reduce impacts to human health associated with exposure to toxic air pollutants (TAPs). Results of the revised risk assessment based on reevaluation of the environmental baseline were presented in Section 4.24.1, Human Health Risk Assessment, of the Supplement EIS/EIR with supporting information in Technical Report S-9a.

AL00017-89

Comment:

It should be noted, however, that Chapter 4.24.1 has a small section (pg. 4-1000) that indicates areas immediately east of LAX, i.e., Inglewood, would experience a "slight increase in potential cancer risk and non-cancer hazard." This increase was still believed to be less than established thresholds of significance and that Alternative C would have the smallest amount of area experiencing these increases.

Response:

The content of this comment is essentially the same as comment AF00001-39; please refer to Response to Comment AF00001-39.

AL00017-90

Comment:

A map of the study area for the potential health risk impacts is shown in Figure 4.24.1-1. It notes the sensitive receptor locations, most of which are in Inglewood, Hawthorne, El Segundo, and Westchester.

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The findings of health risk assessment modeling are presented for the preferred alternative C on page 4-1034.

Response:

Comment noted.

AL00017-91

Comment:

Identification and Analysis of Potential Mitigation Measures

One of the most important aspects of the DEIR/EIS is the identification, analysis, and selection of measures to mitigate the impact of the increased air emissions from the expansion of LAX. While the document conducts a fairly extensive effort to identify potential measures, the specific impacts of implementing such measures upon the surrounding communities does not appear adequate. While most of Inglewood is within the Land Use Study Area noted in Figure 4.2-1, there was little or no analysis of the impacts on Inglewood from the mitigation measures and roadway improvements. In fact, the seventeen intersections modeled in connection to the LAX Expressway proposal, shown in Table 5.5-3 of Appendix K are all west of the San Diego Freeway. Furthermore, emission reductions from the select measures identified are somewhat questionable. At a minimum, LAWA should provide some analysis of the impacts of the mitigation measures and roadway re-configurations upon the City of Inglewood. As will be seen in the Chapter 5 recommendations in this report, analysis and selection of mitigation measures constitute a very important area for further study. Since LAWA has not made a final determination on which measures to adopt, input by cities such as Inglewood through the DEIR/EIS comment process could be quite successful in shaping the final set of measures.

Nearly 150 air quality mitigation measures were identified for potential inclusion in the final Environmental Action Plan and approximately thirty of those were analyzed (modeled) for their emission benefits. Although not listed as a "mitigation measure," the construction of the LAX Expressway, the "ring road," and the extension of I-105 and the Green Line to the new West Terminal is the basis for many of the Environmental Action Plan emission reductions. This assumption of increasing capacity to improve traffic flow to reduce air pollution is one of continuing controversy in the environmental community and should be examined further in light of other potential mitigation measures. Recent research by the University of California at Riverside and Georgia Tech has raised questions on the concept that freeway expansion relieves congestion and air pollution. Another paper by Hansen and Huang for the Transportation Research Association on road supply and traffic in California urban areas found that within four years of providing new road capacity 90% had been used up with new traffic.

The DEIR/EIS recommends a specific measure to reduce airport-related air quality impacts both inside, and adjacent to LAX. It is titled "MM-AQ-1. Implement Revised Air Quality Mitigation Programs." The following is quoted from page 4-512 of the report: "LAWA shall expand and revise the existing Air Quality Mitigation Programs at LAX in coordination with the FAA, USEPA, CARB and SCAQMD. The expanded programs shall reduce air quality impacts associated with implementation of the Draft LAX Master Plan. LAWA shall implement technologically/legally feasible and economically reasonable methods to reduce air pollutant emissions from aircraft, GSE, traffic, and construction equipment both on and off the airport. The overall effect of implementing the expanded programs should be substantial reductions in the South Coast Air Basin of NOx, VOC, and CO by 2015." It then lists fifteen mitigation measures that would be included, but not limited to, in MM-AQ-1. Caveats on LAWA's limited day-to-day management responsibility for many of these airport emissions are also added to the discussion.

A preliminary modeling analysis is presented for several of the mitigation measures included in MM-AQ-1. Mitigation measures are categorized under On-Airport (airside and landside mitigation), Off-Airport, and Construction mitigation. Table 4.6-17 provides the findings for each mitigation measure of the modeling effort, by pollutant and each of the three build alternatives, in 2005. Table 4.6-18 provides similar information for 2015. Another useful table provides an emission inventory for on-airport sources if all the operational mitigation measures were adopted. Similarly, a table provides the estimated operational concentrations by pollutant if all the measures were adopted. Adoption of all the off-airport traffic mitigation measures would result in 5% reduction in vehicle miles traveled (VMT) in 2005 and 10-11% VMT reduction in 2015.

Finally, the significance of mitigation measures for the preferred alternative C are as follows:

- On-airport emissions from operational sources would remain significant for NO_x and SO₂.
- Off-airport traffic emissions would remain significant for CO, VOC, NO_x, SO₂, and PM₁₀.
- Concentrations from on-airport operational sources would remain significant for NO₂ and PM₁₀.
- Construction emissions would remain significant for CO, VOC, NO_x, SO₂, and PM₁₀.
- Construction-related concentrations would remain significant for NO₂ and PM₁₀.

Response:

The impacts and benefits of these air quality mitigation measures on neighboring communities to LAX (including Inglewood) are discussed in subsection 4.6.8.1, Mitigated Airport Emissions Inventory, of the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00017-41 and Topical Response TR-ST-2 for a discussion of the study area definition and identification of facilities analyzed in the City of Inglewood.

The Draft EIS/EIR air quality analysis took into account the surface vehicle emission reductions associated with the proposed LAX Expressway and ring road based on the fact that these facilities are designed to primarily serve LAX and would provide a more efficient transportation route for vehicles traveling to and from LAX. This is substantially different from a freeway expansion where new road capacity may soon be consumed, as suggested in studies referenced in the comment.

AL00017-92

Comment:

Conformance of the Master Plan to 2001 Regional Transportation Plan and 2001 AQMP revisions

Major projects that receive Federal funding must comply with several aspects of national transportation and air quality legislation. Section 176 [c] of the 1990 Clean Air Act links the transportation and air quality planning efforts through the requirements that the activity must demonstrate conformity to the State Implementation Plan or AQMP. The approving agency for the LAX Master Plan, which in this case is the FAA, must make a general conformity finding that the expansion is consistent with the AQMP's strategy and emission budgets to achieve expeditious attainment of the National Ambient Air Quality Standards (NAAQS). Since several of the elements of the LAX Master Plan include transportation programs requiring federal funds, a similar conformity finding must be made for transportation conformity. The LAX Expressway, State Highway 1 improvements, extension of I-105 and the Green Line light rail transit all affect the air quality of the South Coast basin and thus must be incorporated into the AQMP analysis and strategies. The SCAG region's Regional Transportation Plan and Regional Transportation Improvement Program must be shown to conform to the air quality plan and thus the airport impacts must be included in their updated plans. Currently, the 2001 RTP is to be adopted in late April and the 2001 AQMP be completed by the end of the year.

Review of Chapter 4.6 found several inconsistencies in LAWA's reference to the conformity and SIP planning process. Selection of proper year for emission inventory updates and milestone/attainment years may not be fully consistent with the AQMP. In reviewing the DEIR/EIS text, it would appear that some of the most recent mobile source regulations of CARB and the SCAQMD may not have been included in accounting for airport emission reductions. A CARB regulation of September 2000 on reducing the risk from diesel-fueled engines and vehicles was noted but it was also indicated that this study did not have enough lead time to analyze what is expected to be a major impact. The Final EIR/EIS should examine these impacts. Use of latest conformity general guidance needs to be verified. LAWA does commit to the Master Plan's conformity requirements under the Clean Air Act. The most extensive commitment to working with SCAG and the SCAQMD on emission budgets is found on page 50 of Appendix G.

Response:

Please see Response to Comment AF00001-4 regarding general conformity and Topical Response TR-MP-2 regarding the relevance of the 2001 RTP to the LAX Master Plan. The Draft General Conformity

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Determination for Alternative D was issued on January 9, 2004, pursuant to federal law. The Final General Conformity Determination will be published prior to the publication of the Final EIS/EIR that will be approved by the FAA.

The Draft General Conformity Determination evaluated emissions for specific milestone/attainment years and appropriate emissions budgets in the applicable SIP per the general conformity regulations and guidance. The Final General Conformity Determination is summarized in the Final EIS/EIR. This air quality evaluation is not required under CEQA. It should also be noted that CARB's Risk Reduction Strategy enunciated in September 2000 is a policy statement without enforceable regulations. Therefore, no quantitative analysis could be performed for the Draft EIS/EIR to account for the effects of this policy until CARB issues specific implementing regulations. The updated air quality analyses presented in the Supplement to the Draft EIS/EIR did account for any applicable CARB regulations effective at the time of publication; see the Supplement to the Draft EIS/EIR, subsection 4.6.3.1 and Appendix S-E, Section 2.3.

AL00017-93

Comment:

Air Pollution Emission Inventories

A critical factor in determining the air quality impacts of a project is possessing an accurate and current air emission inventory. Chapter 4.6.2.1 describes the process that LAX utilized to obtain such an inventory. The report identified several adjacent, large stationary sources but chose not to quantify their emissions growth. Current emissions were assumed to be in the baseline, however. The inventory of aircraft emissions did not assume any fleet turnover. As noted earlier, the emission reductions from on-road vehicles also omitted consideration of CARB's September 2000 risk reduction plan for diesel-fueled engines and vehicles. It is also not clear how the No Action/No Project emissions were calculated. Since this is an information document, calculation of the No Action/No Project emissions and their assumptions should be clearly available to the public. Finally, the SCAQMD's CEQA Air Quality Handbook of 1993 is frequently cited in the DEIR/EIS as the basis for much of the emission inventory calculations. That document has been found to be greatly outdated and the District is in the process of updating many portions of the handbook. The revised version should be used in the Final EIR/EIS.

In addition to the description of the emission inventory methodology contained in Chapter 4.6, there is also considerable information and findings in both Appendix G and Technical Report 4. Page 10 of Appendix G references an effort by USEPA, CARB, SCAQMD, and the airlines and airports of the South Coast Basin to conduct a consultative process to convert Ground Support Equipment (GSE) to clean fuels. As this process is incomplete at the present, expected emission reductions were not included in the emission inventory of the DEIR/EIS.

Response:

The stationary sources included in the air quality analyses are presented in Table S17 of Appendix S-E to the Supplement to the Draft EIS/EIR. Growth is considered in the number of stationary sources included in the analyses for each alternative and year. Aircraft operations do include aircraft fleet turnover between the 1996 environmental baseline and future year scenarios. Please see Attachment I of Technical Report 4 for fleet operations. Please also see Appendix F-B, Attachment 4.

On-road vehicle emission inventories were calculated using the latest available and approved version of CARB's On-Road Emission Factor model (EMFAC2000). Since publication of the Draft EIS/EIR, a more recent version of EMFAC was approved (EMFAC2002) and was used for the analysis included in the Supplement to the Draft EIS/EIR. Please see Topical Response TR-GEN-2 and Section 4.6.6.1 of the Supplement to the Draft EIS/EIR regarding the No Action/No Project Alternative. The most current version of the SCAQMD CEQA Air Quality Handbook was appropriately used at the time of the analyses performed for the Draft EIS/EIR. Unconfirmed future emissions reductions from GSE fuel conversions were intentionally not included from the air quality analyses to produce conservative emissions estimates.

AL00017-94**Comment:**

Air Pollution Modeling

The modeling of future air pollution concentrations as a result of the Master Plan expansion was performed through a complex combination of three separate modeling processes. The On-Airport modeling used the basic Emissions and Dispersion Modeling System (EDMS 3.2) as required by the FAA. This was supplemented using the Industrial Source Complex - Short-Term (ISCST3) model, which is an USEPA-preferred dispersion model. It was primarily used to estimate PM-10 concentrations from aircraft engines as they cannot be modeled with EDMS 3.2. Finally, the Off-Airport motor vehicle emissions at intersections were modeled with the basic CAL3QHCR dispersion model. Results from all three of these models were refined by use of EPA's CALM Processor (CALMPRO) and the Tier 2 Ambient Ratio Method (ARM) using site-specific ratios.

The Technical Report 4, Air Quality, provides the results of this complex modeling program. The results are also summarized in Table 22 of Appendix G. A deficiency in the overall impact analysis is that of not including an analysis for the new 8-hour ozone standard. While the validity of that standard was in question at the time of the analysis (since, then, upheld by the U.S. Supreme Court), the data was available to perform analysis on the 8-hour basis. In fact, the nearby Hawthorne monitoring station of the South Coast AQMD has data on 8-hour ozone dating back to at least 1995 and shows 9 exceedance days in the 1995-98 period. This standard may be more crucial than 1-hour ozone standards since LAX operates on such a continuous basis. It would be useful if the new LAWA study of air emissions and concentrations in the vicinity of the LAX would include 8-hour ozone and PM-2.5 sampling and analysis.

Response:

In July 1997, USEPA promulgated a new 8-hour O₃ NAAQS and new 24-hour and annual PM_{2.5} NAAQS. While these standards were the subject of judicial challenges, they are currently in force and in the process of being implemented by USEPA, California Air Resources Board (CARB) and SCAQMD. USEPA has not designated non-attainment/attainment areas for these standards, but will do so starting in 2004, however SCAQMD staff expects that the South Coast Air Basin will be in non-attainment for these standards. Because ozone is a regional pollutant and can only be predicted using regional photochemical models that account for all sources of precursors in the South Coast Air Basin, it is beyond the scope of the Draft EIS/EIR or Supplement to the Draft EIS/EIR to address the future attainment of either the 1-hour or 8-hour ozone ambient air quality standards. Until USEPA issues guidance on the implementation of the PM_{2.5} ambient air quality standards, that agency has recommended that compliance with the PM₁₀ standards be considered a surrogate for compliance with the PM_{2.5} standards, and the analysis in this document follows that guidance.

AL00017-95**Comment:**

Impact of Roadway Improvements Identified in the DEIR/EIS upon Inglewood

As noted several times earlier, according to LAWA the proposed Ring road (LAX Expressway, I-105 extension, and connecting expressways) will play a major role in reducing traffic congestion and air quality emissions in the vicinity of LAX. Accordingly, this study reviewed Appendix K in-depth to learn more about those projects and their impact on air quality. Unfortunately, Appendix K focussed primarily on the "northside" roadway improvements - the LAX Expressway and the State Route 1 improvements with little mention or analysis of the extension of I-105 and the Green Line on the southside.

Response:

Comment noted. The main body of the Draft EIS/EIR provides a program level of analysis for the entire project, including all of the proposed surface transportation system improvements. Appendix K provides additional design specifications and more detailed environmental analysis for certain transportation system improvements, specifically the LAX Expressway and the SR-1 improvements, that were advanced to a project level of evaluation. Please see Topical Responses TR-ST-4 and TR-ST-5 for

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more information regarding airport area traffic concerns including the Green Line. It should be noted that Alternative D, added subsequent to the publication of the Draft EIS/EIR, does not include the ring road or LAX Expressway.

AL00017-96

Comment:

Chapter 5.5 of Appendix K focused on the air quality aspects of the LAX Expressway and State Route 1 Improvements. It notes that the projects were included in the 1998 SCAG Regional Transportation Plan, which "barely" passed the conformity determination of FHWA and EPA. Actual conformance with the SIP for these individual projects will occur at the time the projects proceed to the RTIP stage. The estimated construction emissions are examined in some detail in Appendix K. State Route 1 has two key alternatives focusing on the choice of diamond interchanges versus urban interchanges. It appears from Table 5.5-1 of Appendix K that construction emissions from both options are identical, which would be highly unusual. The LAX Expressway also has two options - a split viaduct on each side of I-405, or a single, four-lane viaduct along the western side of I-405. Emissions would be lesser on the split viaduct alternative. Mitigation measures all refer to reducing the construction impacts of these two projects. They include 1) use of low-NOx construction equipment, 2) use of reformulated (cleaner) diesel fuel, 3) equipment use phasing, 4) watering surface before grading, and 5) watering exposed surfaces at least twice daily to maintain surface crust.

Response:

As discussed in Section 3.2, State Route 1 Improvements and Alternatives, in Appendix K of the Draft EIS/EIR, State Route 1 improvement alternatives focus on the conceptual design for new interchanges at Westchester Parkway/Lincoln Boulevard and Westchester Parkway/Sepulveda Boulevard. Both conceptual improvement alternatives carried forward for analysis, including Alternative 2 (Diamond Interchange) and Alternative 3 (Urban Interchange), would encompass the same footprint (i.e., area of ground disturbance). Because the level of design for both of the alternatives is conceptual in nature and would encompass the same footprint, and also because the conceptual designs do not vary substantially, the analysis regarding potential construction-related impacts to air quality assumes that standard construction equipment usage [including construction scheduling and activity data (e.g., fuel consumption and manpower loading)] utilized for construction of the two alternatives would be equivalent. Therefore, the construction-related emissions associated with each respective alternative are assumed to be equivalent. Of course, changes in the footprint and/or final design elements of the alternatives could result in differences in construction-related emissions between the two alternatives. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality. Additional supporting technical data and analyses is provided in Appendix G and Technical Report 4 of the Draft EIS/EIR, and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

Please also refer to Topical Response TR-APPK-1 regarding the scope of analysis presented in Appendix K of the Draft EIS/EIR, and the next steps in the project planning and environmental review process.

Alternative D, the Enhanced Safety and Security Plan, evaluated in the Supplement to the Draft EIS/EIR published in July 2003, does not include the LAX Expressway.

AL00017-97

Comment:

The largest gap in the analysis of these two projects, and in several of the other mitigation analyses in the entire DEIR/EIS, were impacts on adjacent communities such as Inglewood and El Segundo. This lack of analysis on surrounding community impacts has been an unfortunately deficiency throughout the DEIR/EIS. Even Chapter 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, there was little discussion beyond the immediately adjacent neighborhood construction disruption on areas that would be affected by the LAX Master Plan alternatives.

Response:

The study area considered for each of the 27 environmental disciplines presented in Chapter 4 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR varies depending on the nature of the relevant issues and the potential for significant impacts to occur within a defined area. Section 4.4.4 focuses primarily on the area west of the San Diego Freeway because that area is most likely to be significantly affected by alteration of surface transportation patterns, changes in land use, or from other related activities or development. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR evaluated other potential impacts, such as traffic (Section 4.3.2), noise (Section 4.1), air quality (Section 4.6), human health and safety (Section 4.24), that are more relevant to areas in close proximity to LAX and areas that are more distant. See also Topical Response TR-ST-2 for a discussion of the surface transportation analysis methodology and the facilities selected for analysis.

AL00017-98

Comment:

Other Important Issues affecting Air Quality

The Phase I evaluation of the DEIR/EIS for air quality matters identified several other areas of related concerns in addition to those just mentioned above. A major question that those reviewing the overall decision on how and whether to expand LAX is the inter-relationship between LAX and the other major airports in Southern California. It would appear that much of the population growth of the past several decades, and certainly future population growth will result in other airports (Ontario, Orange County, Palmdale, March, Oxnard, etc.) being closer to the growing population and thus more accessible. Much of the discussion of alternative airport options occurs in Chapter 1, Regional Context.

Response:

Comment noted.

AL00017-99

Comment:

Another issue is that of population and economic projections for the South Coast Basin. Several recent reports have raised doubts over whether the past 60 years of growth in Southern California can possibly continue due to land availability, transportation, energy consumption, and changing attitudes about urban sprawl. A recent study by the Brookings Institute questioned the availability of developable land remaining in the Basin. If these concerns become trends in the next ten years, the passenger and cargo needs for the LAX may need revision.

Response:

Comment noted. Please also refer to Topical Response TR-RC-1 regarding the Master Plan's role in a regional approach to meeting demand.

AL00017-100

Comment:

A concern that has been raised in conversations with other cities in the South Bay Region is the incremental growth that has been occurring at LAX since the last major expansion (early 1980s), apparently without a major environmental impact report or assessment. This leads to questions on the proper baseline to consider for the current Master Plan assessment.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues and TR-GEN-3 regarding past growth at LAX.

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AL00017-101

Comment:

Another concern is whether the roadway improvements identified in Appendix K have a solid funding foundation or will they need to compete with other important highway projects and possibly be delayed beyond completion of the other direct airport expansion construction?

Response:

Project funding is not an environmental issue under the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA); therefore it is not addressed in the EIS/EIR. The proposed Master Plan improvements will be funded with a combination of monies from FAA Airport Improvement Fund grants, passenger facility charges, general airport revenue and airline fees. Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR provided a summary of Master Plan Commitments and mitigation measures related to off-airport surface transportation that LAWA is committed to implement if any of the proposed LAX Master Plan alternatives are adopted.

AL00017-102

Comment:

Considerable skepticism has also been made of the strong position that SCAG is taking regarding the construction of high-speed rail with the possible use of Maglev technology to connect airports and cities in the Region. The DEIR/EIS discusses these options on pages 27-28 of Chapter 1, Regional Context.

Response:

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AL00017-103

Comment:

Finally, in discussions about Alternative C it was noted on page 510 of Chapter 4.6 that it would have higher aircraft operations at night than the other alternatives. This raises concerns for noise and air quality.

Response:

Neither the national ambient air quality standards nor the California ambient air quality standards differentiate between day and night. The short-term standards are not to be exceeded more than once per year while the annual standards are never to be exceeded. While it is more probable that atmospheric conditions during nighttime are often less conducive to the dispersal of air pollutants (due to generally lighter winds and lower mixing heights) than during daytime, the number of aircraft operations during nighttime at LAX will be considerably lower than during daytime, yielding lower emissions during nighttime. The air quality dispersion modeling analyses evaluated all on-site meteorological conditions for a 12-month period, 24 hours per day for 365 days. Noise impacts in and around the airport are discussed in the Draft EIS/EIR and in the Supplement to the Draft EIS/EIR Section 4.1. Please see Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00017-104

Comment:

Other Related Reports Reviewed in this Effort

In addition to the Draft EIR/EIS, several other reports and position papers were deemed relevant to the Phase I evaluation effort. Due to the limited budget and timeframe, most of these documents could only be scanned for determining their usefulness if further analysis of all or some of the recommend

measures occur. The following are brief descriptions of each of the key air-related material in those reports found to contain useful information.

Response:

Please see Responses to Comments AL00017-105 through AL00017-110 below.

AL00017-105

Comment:

LAWA's Technical Workplan for the Air Quality and Source Apportionment Study of the Area Surrounding LAX, November 17, 2000

The Technical Workplan describes in great detail the study plan for this important analysis of air pollution in the communities surrounding LAX. The study was committed to by LAWA in late 2000 and has the cooperation of US EPA, the SCAQMD, and CARB. The purpose of the study is to collect comprehensive data on air quality around LAX and then examine the key criteria and toxic pollutants that are present. This will include both the concentrations in the air and the source of the emissions.

The objective of the study is to collect data and examine the key pollutants both in terms of exposure and source location. This study differs from the DEIR/EIS analysis of air quality in that it is designed to look at current operations instead of future impacts. The study area is much larger than that of the Master Plan DEIR/EIS. LAWA will collect at least one year of continuous and discrete air quality data from a large number of monitoring sites within and in the adjacent communities to LAX. A comprehensive characterization of emission sources and their associated mass emissions for chemical composition will identify marker compounds for subsequent study. More extensive modeling than that performed in the DEIR/EIS is planned, including chemical composition receptor modeling and air dispersion modeling will be conducted. Other techniques will include spatial gradient analysis, time series analysis, and emission inventory development.

The study will be overseen by a technical advisory group from the above mentioned agencies as well as two outside consultants. The same firm that oversaw the DEIR/EIS studies, Camp, Dresser, and McKee (CDM) will also oversee this project. Sub-contractors are Tracer, ES&T, and Dr. Henry of USC and Dr. John Watson of the Desert Research Institute.

Response:

Comment noted.

AL00017-106

Comment:

SCAQMD'S Draft Final Report, MATES-II, November 1999

This extensive effort by the South Coast AQMD might be characterized best as a predecessor to the upcoming LAWA Air Quality and Source Apportionment Study described previously. The Multiple Air Toxics Exposure Study known as MATES-II was a comprehensive expansion of a study conducted over ten years previously by the SCAQMD (MATES-I). MATES-II was initiated as part of the District's Environmental Justice Initiative of 1997. It focused on monitoring air toxic contaminants in two separate processes. First, there was a network of ten permanent sites that monitored every six days over the period lasting from April 1998 to March 1999. The sites were throughout the South Coast Air Basin, with Compton and Huntington Park being the closest areas affected by LAX activities. Second, a microscale study using three mobile platforms sampled in 14 additional communities. Sites in Torrance and Hawthorne were closest to LAX. However, there were no sites immediately adjacent to LAX and thus the LAWA study will provide much needed and more representative data. Over 30 pollutants were measured. The key findings were that the carcinogenic risk averaged about 1,400 per million persons, but ranged to about 1,740 per million in the ten permanent sites. Greatest risks were in the south-central and east-central portion of Los Angeles County. Risks were dominated by mobile sources, with 70% of all risk coming from diesel particulate emissions. The microscale sites generally had lower risks.

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Response:

Please refer to Topical Response TR-HRA-1 regarding baseline issues.

AL00017-107

Comment:

SCAQMD's CEQA Air Quality Handbook, 1993

This guidebook represents the recommended approach for lead agencies to provide CEQA air analyses for projects in the South Coast Air Basin. It was used extensively in the preparation of the LAX Master Plan DEIR/EIS. However, with the extensive revisions and improvements to the on-road mobile source emission factors as a result of EMFAC7G, the District recommends avoiding using the screening tables and on-road emission factors contained in the document. The District is currently revising the document and if it is available before the DEIR/EIS comments are due it might be useful to check several of the emission inventory values and mitigation measure calculations. A more accurate model to use in the interim is CARB's URBEMIS7G.

Response:

The EMFAC2000 model was used for the on-road mobile source emission analyses presented in the Draft EIS/EIR as it was the most recently available, EPA-approved mobile emissions model at the time of publication. The URBEMIS is used to estimate emissions from land development projects and is not appropriate for use specifically with the analysis of on-road sources, such as a regional traffic analysis.

Since publication of the Draft EIS/EIR, there have been several updates to this emission factor model. The Supplement to the Draft EIS/EIR addressed the use of EMFAC2002 to estimate on-road emissions for all alternatives in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E, and Technical Report S-4.

AL00017-108

Comment:

LAWA's Comments on SCAG's Draft Regional Transportation Plan, March 14, 2001

As noted earlier in this report, SCAG is in the process of completing a revised Regional Transportation Plan (RTP) for submittal to the US DOT by the end of April 2001. Affected agencies and cities were invited to provide comments on the draft RTP. The City of Los Angeles provided SCAG with comments from its various departments, and LAWA comments were sent to SCAG on March 12, 2001. The comments were quite critical of SCAG's technical approach to determining the impacts of the RTP. LAWA felt that the modeling and forecasting models lack sufficient technical data to allow sufficient analysis and comment. Assumptions on passenger levels and redistribution between airports were unrealistic, dates for reaching maximum capacity were in error, aircraft fleet mix forecasts seem questionable, and use of the RADAM model by SCAG for cargo demand redistribution was "unique." A major concern was SCAG's priority given to high-speed rail and the assumptions that passengers and cargo would change airport destinations as a result of such a system. LAWA believed that the draft RTP did not accurately portray the extensive ground transportation improvements committed to in the DEIR/EIS. LAWA questioned the aviation scenario that resulted from the high-speed rail system as well as the RTP use of EMFAC7G rather than the new EMFAC2000. Several specific comments focused on LAX capacity assumptions, air quality emission growth, noise, and Master Plan identified transportation projects that were apparently omitted from the RTP.

Response:

Comment noted. The comment provides background information and is not a comment on the contents of the Draft EIS/EIR.

AL00017-109**Comment:**

CARB's Comments on SCAG's Draft Regional Transportation Plan, March 15, 2001

CARB submitted comments on March 15, 2001 to SCAG on its Draft RTP. Their comments were relevant to the AQMP and conformity needs within the RTP but less relevant to the airport air quality concerns. The key concern related to SCAG's reduction of commitments to mobile source emission reductions (TCMs), lack of details on the schedule to implement the high-speed rail (Maglev) project, lessening of transit improvement programs, outdated modeling, and other mobile source programs.

Response:

This is not a comment on the contents of the Draft EIS/EIR.

AL00017-110**Comment:**

SCAQMD's Rule 1194 - Commercial Ground Access

In August of 2000, the SCAQMD adopted Rule 1194 that directly affects commercial airports in the South Coast Air Basin. It requires that all passenger car, light duty truck, medium duty transit vehicles, and heavy duty transit vehicle operators acquire cleaner burning or alternative-fueled vehicles when procuring or leasing such vehicles. The requirements are phased in during 2001. This regulation will stimulate and support programs such as identified as mitigating measures in the DEIR/EIS on cleaner fleets. However, analysis of projected emission reductions by LAWA must take care not to "double-count" emission reductions claimed for Rule 1194 in the 2001 AQMP.

Response:

Neither the Draft EIS/EIR nor the Supplement to the Draft EIS/EIR took mitigation credit for any legally-mandated regulation (including SCAQMD Rule 1194 - Commercial Airport Ground Access), Memorandum of Understanding, permit condition, etc., currently being imposed by another governmental agency.

AL00017-111**Comment:**

IV. AIR POLLUTION ISSUES FOR CONSIDERATION OF FURTHER ANALYSIS

In Chapter III of this report, seven distinct air pollution topics as well as several "other, related" topics were described in some detail based on the findings in the cursory review of the LAX Master Plan DEIR/EIS. This chapter discusses the potential to consider each of these air pollution issues for more detail evaluation in Phase II. The actual selection of any of these items for such detailed evaluation will be made by Inglewood city officials and staff. This consultant recommends four of these issues in Chapter V of this report.

Response:

Please see Responses to Comments AL00017-112 through AL00017-123.

AL00017-112**Comment:**

Air Pollution Impacts from the Various Alternatives Contained in the DEIR/EIS

The DEIR/EIS devoted over seventy pages to evaluating the air pollution consequences of the various alternatives in what appears to be a comprehensive manner. While more detailed analysis might show

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slightly different air pollution emissions or concentrations using more current models, it would unlikely change the findings that the project will cause increased levels of air pollution for all alternatives and pollutants. Therefore, I do not believe Inglewood's limited resources to evaluate the DEIR/EIS would be best spent conducting more technical analysis of the air quality calculations by LAWA's consultants.

Response:

Comment noted.

AL00017-113

Comment:

Evaluation of the Health Risks and Air Toxic Impacts

While the DEIR/EIS does assess the cancer risks and non-cancer health impacts, it is clear that a major gap resulted from the lack of a comprehensive, air toxic baseline study in advance of the LAWA analysis. The City of Inglewood has attempted to play a role in encouraging, and now participating in the LAWA Air Quality and Source Apportionment Study of the Area Surrounding LAX to remedy several gaps or deficiencies in the MATES-II study by the SCAQMD. This extensive study poses an immediate opportunity for Inglewood to secure accurate information on the status of air quality throughout the City since it is fully within the study area. To assure that it plays an active role over the next two years, it would be prudent to have a consultant independently examine the Technical Workplan of the LAWA study and identify specific inputs for the City.

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please also see Topical Response TR-AQ-2 regarding the LAX Ambient Air Quality and Source Apportionment Study.

AL00017-114

Comment:

Identification and Analysis of Potential Mitigation Measures

As noted in the Chapter III discussion, identification of potential mitigation measures is probably the air pollution issue that Inglewood can have its greatest impact on the Final EIR/EIS. The DEIR/EIS specifically asks for assistance by agencies at all levels on the potential for successfully implementing mitigation measures identified in the document. It also encourages new, innovative mitigation measures that it can consider in the final document. An important issue not addressed in the DEIR/EIS is whether the emission reductions secured by the mitigation measures would be "donated" to the AQMP or retained as credits by the implementing agency such as Inglewood. I would encourage the City to consider more detailed analysis of the 150 identified air quality mitigation measures and their affect upon Inglewood. They should be examined for implementation feasibility, costs, political acceptability, timing, enforceability, and, of course emission and congestion reduction characteristics.

Response:

Comment noted. The Supplement to the Draft EIS/EIR contains a much more extensive analysis of the 150 air quality mitigation measures. It is important to note, however, that emission reductions from mitigation measures are not the same thing as emission reduction credits. Mitigation measures are meant to lessen a project's detrimental environmental effects; the project will still have an adverse impact on the environment. Therefore, no emission reduction credits are generated through mitigation of the project's significant impacts.

AL00017-115

Comment:

Conformance of the Master Plan to 2001 Regional Transportation Plan and 2001 AQMP revisions

The potential expansion of LAX under the Master Plan must conform to areawide transportation and air quality plans. The cursory review of the DEIR/EIS identified several potential deficiencies in this process. Failure to conform could lead to potential funding sanctions and other Federal restrictions that would affect Inglewood and surrounding communities. Perhaps of great importance, though, is that such deficiencies be identified and corrected in future updates of these plans. While it is probably too late to seriously impact SCAG's 2001 RTP, this 20-year visionary document will be revised again in 2004 and deficiencies identified can be corrected at that time. The 2001 update of the South Coast AQMP, however, will be actively ongoing through the remainder of this year. Further evaluation of the air pollution impacts of the DEIR/EIS will likely provide valuable information for Inglewood to consider as it participates in the air quality planning process through the South Bay Cities COG, SCAG, and the SCAQMD. Therefore, I encourage consideration of this issue for Phase II detailed evaluation.

Response:

Please see Response to Comment AL000017-92 regarding the General Conformity Determination. Also, please see Response to Comment AF00001-4 regarding the general conformity determination and Topical Response TR-MP-2 regarding the relevance of the 2001 RTP to the LAX Master Plan.

AL00017-116

Comment:

Air Pollution Emission Inventories

Emission inventories are often considered the "weak link" in the analysis of air pollution problems in an area. This is particularly true for transportation-related control measures and others that require public involvement or are of a voluntary nature. Several deficiencies have been identified in the DEIR/EIS as noted in Chapter III. However, examination of the document's emission inventory process would be quite expensive, time-consuming, and likely not lead to any significant changes in the findings. Therefore, I would not recommend use of Inglewood's scarce resources to investigate the Master Plan's emission inventory work. The one exception might be as a part of evaluating the effectiveness of individual mitigation measures.

Response:

Comment noted.

AL00017-117

Comment:

Air Pollution Modeling

Similar to the previous discussion on emission inventories, detailed duplication of the various models used in the DEIR/EIS would not likely provide any substantial new material to use in the City's comments on the document. Furthermore, it is likely that other agencies with more substantial resources will examine the modeling approach used in the DEIR/EIS. Therefore, it is not recommended to pursue more detailed evaluation of the modeling.

Response:

Comment noted.

AL00017-118

Comment:

Impact of Roadway Improvements Identified in the DEIR/EIS upon Inglewood

This issue is not as directly related to air pollution as the ones previous identified. However, it may have equally important impacts on traffic circulation within Inglewood, both positive and negative. The proposed improvements to the Century Boulevard corridor through Inglewood, as part of the recent

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MOU, make better understanding of the impacts of the LAX Master Plan roadway improvements all the more important. I would propose that if this issue is selected for further analysis, it be performed in close coordination with Inglewood's City Transportation staff.

Response:

Comment noted.

AL00017-119

Comment:

Other Important Issues affecting Air Quality

Chapter III discussed several other air pollution and planning topic areas that were identified during the cursory evaluation of the DEIR/EIS. While it is not recommended that any of these issues be examined in greater detail by the consultant, they may well be areas that should be listed as concerns in the City's formal comments on the DEIR/EIS. Those issues are listed here for consideration:

Response:

Please see Responses to Comments AL00017-120 through AL00017-123 below.

AL00017-120

Comment:

- Choice of LAX versus other Southern California airports for increased capacity
- Validity of population and economic projections for the South Coast Basin

Response:

Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The comment does not indicate how or why the validity of population and economic projections for the South Coast [Air] Basin are in question, particularly as related to the Draft EIS/EIR. Population and economic factors within the region were taken into consideration in the evaluation of existing and future air transportation demands in the region, as reflected in Chapter I of the Draft Master Plan. Within the air quality analysis, future regional growth, as would reflect population and economic projections provided by SCAG for the South Coast Air Quality Management Plan, was accounted for in the future background concentrations of criteria air pollutants.

AL00017-121

Comment:

- Impacts of "growth creep" of LAX activity since last environmental review

Response:

LAX has been in operation since 1928 and, in conjunction with growth in the region, has experienced increases in passenger and cargo activity. LAWA has implemented certain off-airport programs, such as the residential soundproofing program, to reduce airport-related impacts on the local community. The ability of LAWA to use airport funds for other types of off-airport programs in the local community to address the impacts of past or present airport activities is limited by federal law. Off-airport improvements in the local community can, however, occur in conjunction with the development and implementation of a comprehensive improvement plan at LAX, as this constitutes a "project" under CEQA and an "action" under NEPA, through measures proposed as part of the project/action and through mitigation measures required to address the impacts of that project/action. The proposed LAX Master Plan provides a comprehensive long-term plan for accommodating continued growth in activity at LAX, as anticipated to occur through 2015. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR for the LAX Master Plan addressed the environmental impacts associated with various options for accommodating future growth. The impacts of each build alternative (Alternatives A through D) were measured against the 1996 environmental baseline, and mitigation measures were proposed if significant impacts were identified. The use of 1996 as the baseline year for the analysis of the Master

Plan alternatives is consistent with the requirements of the CEQA Guidelines. Under NEPA, the No Action/No Project Alternative is used as the basis from which to measure the impacts of each build alternative. See Topical Response TR-GEN-1 regarding baseline issues. The 1996 environmental baseline accounts for the incremental increases in activity at LAX that have occurred up to that point, including airport-related traffic, noise, air pollutant emissions, and other environmental factors that affect the surrounding community. The impacts analysis within the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the environmental effects projected to occur with ongoing increases in activity projected to occur by 2015. The mitigation measures presented in the subject documents provide for both on-airport and off-airport improvements to reduce LAX's impacts to the local community; improvements that would not otherwise occur outside of the Master Plan and EIS/EIR processes. It should be noted that mitigation measures adopted as part of project approval are subject to the monitoring and reporting requirements of CEQA. Similarly, mitigation measures set forth as part of the Record of Decision (ROD) must also be monitored under NEPA. Please see Topical Response TR-GEN-3 regarding LAWA's ability to mitigate environmental impacts associated with increased activity levels.

AL00017-122

Comment:

- Funding of road improvements associated with LAX Master Plan

Response:

The proposed Master Plan improvements, including improvements to roadways, will be funded with a combination of monies from FAA Airport Improvement Fund grants, passenger facility charges, general airport revenue bonds, and airline fees. No Los Angeles General Fund dollars will be used to pay for any of the proposed improvements.

AL00017-123

Comment:

- Increase in night operations under Alternative C

Response:

Nighttime operations were addressed in Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix D of the Draft EIS/EIR and Appendix S-C of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-N-5 regarding nighttime operations.

AL00017-124

Comment:

V. Recommendation of Four Major Air Issues for Potential Detailed Analysis in Phase II

The following four air issues are suggested for further evaluation in Phase II:

- Identification and Analysis of Potential Mitigation Measures
- Conformance of Master Plan to 2001 Regional Transportation Plan and the 2001 South Coast Air Quality Management Plan
- Evaluation of the Health Risks and Air Toxic Impacts
- Impact of Road Improvements Identified in the Draft EIR/EIS upon Inglewood and Immediately Adjacent Areas

Each of these issues are summarized in Chapter IV and discussed in greater detail in Chapter III.

Response:

Please see Responses to Comments AL00017-86, AL00017-91, AL00017-92, AL00017-95, AL00017-113, AL00017-114, AL00017-115 and AL00017-118.

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AL00017-125

Comment:

Appendix A

Complete listing of air quality issues and location within the Draft EIR/EIS

Appendix A is organized by the air pollution topics noted in Chapter IV. Within each issue, the page-reference and short description of "data" found at that site is noted.

Response:

Comment noted.

AL00017-126

Comment:

Air Pollution Impacts from the Various Alternatives Contained in the DEIR/EIS

4-460: Only NOx and SO2 "significant" for on-airport emissions; Off-airport increases are lowest for "C" (but, still less with NA/NP); Construction emissions - peak in 2004, and exceed CEQA thresholds for all NAAQS

4-461: Peak construction for all build scenarios have emissions 2-10 times greater than NA/NP alternative

4-503: Summary of overall exceedances and No action, no project alternatives

4-510: Summary of Alternative C

4-864: Air quality hot spot from construction on Aviation Blvd.

Response:

Comment noted.

AL00017-127

Comment:

Evaluation of the Health Risks and Air Toxic Impacts

4-999: Cancer risks <significant threshold in all scenarios for 2015. Other health hazards significant without mitigation

4-1002: The 3 stationary sources categories of Toxic Air Pollutants

4-1005: Figure 4.24.1-1, study area for HHRA

4-1007: Process for estimating future air quality impacts

4-1034: Conclusions on Alt. C impacts

Response:

Comment noted.

AL00017-128

Comment:

Identification and Analysis of Potential Mitigation Measures

4-224: Land use mitigation measures for Alternative C

4-273: Off-airport surface transportation - key conclusions, C has lowest traffic impacts

4-274: ITS and ATCS traffic mitigation measures

4-459: Final EIS/EIR will identify and be developed with the Federal agencies and the SCAQMD

4-460: Will limit increases through building LAX expressway, Ring Road, and extending the Green Line. All alternatives were better than No Action alternative.
4-461: 150 measures identified, with 30 potentially significant and modeled. Measures summarized here.
4-481: Environmental consequences of phased in, low-NOx construction equipment
4-513: List of mitigation measures
4-514: Quantifiable mitigation measures
4-521: All measures equal 5% VMTR in 2005 and 10-11% in 2015.
4-529: Alternative C - mitigation of emission inventory impacts
4-892: Air quality mitigation measures for construction impacts
4-894: Level of significance for air quality after implementation of construction mitigation measures
5-4: Construction truck mitigation routes
5-6: Air Quality specific construction equipment mitigation measure
5-16: Off-airport surface mitigation measures for air quality and congestion
5-17: MM-AQ-1 - LAWA commitment to revising the air quality mitigation program with 15 specific measures
App. K-85: Construction mitigation for LAX Expressway & State 1 construction

Tech.Report 4 - Attachment Z: Lists all 150 potential air mitigation measures

Response:

Comment noted.

AL00017-129

Comment:

Conformance of the Master Plan to 2001 Regional Transportation Plan and 2001 AQMP revisions

1-20: SCAG RTP forecasts
1-2: 28: Discussion of Maglev options
2-4: SCAG RTP forecasts
4-7: Environmental baseline and adjustments
4-460: Commitment to do conformity analysis
4-463: Only the preferred alternative need be analyzed under EPA rules
4-464: On-airport vs. off-airport conformity budgets
4-473: Appears to have used wrong milestone/attainment years (97 AQMP)
4-476: Note the 2000 E.I. Use of 1997 EI in AQMP.
4-477: CARB & SCAQMD - Recent regulations to reduce airport emissions - not used!
4-510: Are they using latest general conformity guidance?
4-511: Working with SCAQMD
G-50: Working with SC on 2001 AQMD and SCAG on 2001 RTP

Response:

Comment noted. Please see Response to Comment AF00001-4 regarding the general conformity determination.

AL00017-130

Comment:

Air Pollution Emission Inventories

4-460: Check why VOC emissions reduced (new vehicle mix
4-463: Did NOT quantify emissions from adjacent, non-LAX sources (in the baseline)
4-465: No fleet turnover assumed
4-466: Did not consider CARB's new (9-28-00) HD diesel particulate regulations
4-467: Used SCAQMD factors for construction emissions
4-480: Only on-airport emissions
4-481: How was No Action project emissions calculated?
4-857: Overview of construction impacts on air quality plan

3. Comments and Responses

G-1: Emission estimation procedures
G-11: MOU on GSE reductions
G-12: Emission forecasts are "conservative"
TR4-Attachment C: Baseline emissions

Response:

Comment noted. No Action/No Project Alternative emissions were calculated using the same methodology described in subsection 4.6.2.2 of Section 4.6, Air Quality, of the Draft EIS/EIR. Since publication of the Draft EIS/EIR, updates to the emission calculation methodology have been made and can be found subsection 4.6.2.2 of Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

AL00017-131

Comment:

Air Pollution Modeling
4-469: Integrated results of on, off, and construction (different models) into one new model.
Fig. 4.6-4: Why same value, location for all three alternatives in 2005?
G-4: Models used for mobile sources/aircraft engines
G-16: Used version 1.99 of EMFAC 2000
G-24: Dispersion modeling discussion
G-29: CAL3QHC discussion
G-45: Future background concentrations (no use of 8-hour data)
TR4-Attachment A: Air Quality Modeling Protocol.

Response:

Comment noted. Different models were used for different source types since each model individually would not have been the best model to handle the particular source. Dispersion models have been developed over time with specific applications in mind. Although it can model emissions from other sources, EDMS has been developed focusing on aircraft. CAL3QHC is specific for roadway intersections, while ISCST3 is best for stationary point, area, and volume sources. Maximum pollutant concentrations are driven by aircraft and GSE operations. Since the alternatives are identical in 2005, impacts from these alternatives would also be identical.

AL00017-132

Comment:

Impact of Roadway Improvements Identified in the DEIR/EIS upon Inglewood

3-55: Discusses traffic/parking/circulation facilities tied to roadway improvements under Alternative C
4-235: Overview of current congestion causes & management needs
4-295: Description of full "ring road" for all three build alternatives
5-2: Landside traffic congestion improvements under Environmental Action Plan

Response:

Comment noted.

AL00017-133

Comment:

K-30: Air quality discussion related to Roadway Improvements
K-76: Air quality and conformity requirements - State 1 and LAX Expressway were in the SCAG 1998 RTP. Will include in RTIP when individual projects are ready to build.
K-78: Table 5.5-1 shows identical before & after emissions for each of the two State Route 1 intersection design options.
K-85: Five construction air mitigation measures identified

Response:

Comment noted.

AL00017-134

Comment:

Choice of LAX versus other Southern California airports for increased capacity

1-25: Table 1-13 provides three scenarios for 2015 passenger activity for all Southern California airports. Scenarios do match three DEIR/EIS build alternatives.

1-30: SCAG 1998 sensitivity analysis on impact of reducing LAX international travel status

3-2: Discussion on alternative airport locations

4-10: Acknowledgement that LAX Master Plan meets EPA's General Conformity criteria requiring a finding.

Response:

Comment noted.

AL00017-135

Comment:

Validity of population and economic projections for the South Coast Basin

1-6: Population growth in Los Angeles Region, including REMI analysis

1-9: Nature of the demand for air transportation and passenger characteristics

1-13 to 1-21: Allocation of air service among the regional airports

Response:

Please see Draft LAX Master Plan document Chapter 3, Section 5.2.2, Projected Demographic and Socioeconomic Indicators. Figure III.5.3 presents the projected 2015 population by geographic zone. Alternative D - The Enhanced Safety and Security Plan Alternative - is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP. Please also see Topical Response TR-MP-2 regarding the compatibility between the LAX Master Plan and the SCAG's RTP.

AL00017-136

Comment:

4-445: Regional economic benefits from LAX under different alternatives

4-453: Discussion of growth-inducing impacts of LAX and finding that its impacts a small proportion of region's overall forecasted growth

4-457: Estimate of job creation by distance from LAX of Alternative C

Response:

Comment noted.

AL00017-137

Comment:

Increase in night operations under Alternative C

4-510: Alternative C has higher nighttime aircraft operations than other alternatives

Response:

Comment noted. Please see Response to Comment AL00017-103 regarding impacts from nighttime operations.

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AL00017-138

Comment:

Energy/Air Quality Impacts of LAX Master Plan

4-777: Air quality mitigation measures cause increased energy usage

4-780: Ground support system impacts on energy-usage

4-782: Basin air quality compliance requirements will result in cleaner and more efficient power generating equipment

4-794: Energy consumption table for all three alternatives (and NA/NP) for 2005 and 2015

4-806: Conclusion that none of the three build alternatives will significantly impact energy consumption and thus no mitigation measures needed for energy.

Response:

Comment noted.

AL00017-139

Comment:

II. CONFORMANCE TO THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS' (SCAG) 2001 REGIONAL TRANSPORTATION PLAN

Introduction

Federal law requires that metropolitan areas update, at least every three years, a Regional Transportation Plan (RTP) that establishes a roadmap for future transportation funding within the region. It should provide a balanced, multi-modal transportation system that reflects projected population and economic growth. Among the required components of the RTP is assurance that the funding and construction of transportation projects over the following 25 years will not interfere with current air pollution control programs to meet the National Ambient Air Quality Standards. Additionally, the relationship of the transportation program to environmental justice issues must be addressed.

In April 2001, SCAG adopted a new, updated RTP to replace the existing 1998 RTP. The major areas of change from the 1998 RTP were in growth forecasts (lower), financial assumptions (alternative funding strategy), regional aviation (aviation scenario that constrained LAX to lower passenger capacity than in the DEIR/EIS), transit services (increased per capita ridership and focus on new transit corridors), and air quality conformity (need for new conformity finding by June 9, 2001).

The consultant focused his efforts on examining the assumptions contained in the LAX Master Plan DEIR/EIS and the 2001 RTP adopted on April 12, 2001 by the SCAG Regional Council. Although this review was made somewhat difficult as the Final 2001 RTP has not been formally released pending the various changes to the earlier Draft RTP, several important differences between this document and DEIR/EIS were identified and discussed later in this section. The key implication of the lower passenger projection in the final RTP will be impacts on air quality around the LAX as well as throughout the Basin, assuming that the South Coast AQMD Board accepts SCAG's new growth mix into the revised AQMP that they are developing this year. While LAWA believes the SCAG decision will not affect any federal funding for the next three years (when a revised RTP will be needed), the Final EIS must make a conformity finding based on the most current AQMP.

The SCAG 2001 RTP, as noted earlier, must be determined by the US Department of Transportation (DOT) to fully conform to the "applicable SIPs" for the SCAG region by June 9, 2001. Applicable refers to a plan that has been approved by the US Environmental Protection Agency (EPA) with a mobile source emission budget found adequate for transportation conformity determinations. SCAG has five ozone non-attainment areas in its region (South Coast, Ventura County, Antelope Valley, Mojave Desert, and the Coachella Valley) as well as several smaller PM10 non-attainment areas. As the updated, 2001 AQMP will not be adopted before June 9, the applicable SIP for the South Coast air basin will be the 1997 Ozone SIP approved by EPA in early 2000. SCAG did include a conformity determination (Appendix H, pp. 14-97) in its Draft 2001 RTP. EPA conformity regulations require three

tests to pass conformity: (1) Regional emission analysis (consistency with motor vehicle emission budgets in the 1997 Ozone SIP); (2) Timely implementation of Transportation Control Measures (TCMs), which is a finding that TCM project categories in the 1997 Ozone SIP were given funding priority and on schedule for implementation; (3) Financially constraint test (all projects in the Regional Transportation Improvement Plan - RTIP - are identified for funding in all fiscal years. Finally, the conformity rule requires that construction activity-caused PM10 as a result of the transportation projects in the RTP be identified. SCAG's analysis of the 2001 RTP for meeting these tests concludes a positive finding. It will now require the DOT to confirm these findings prior to June 9.

The general conformity finding that will be made by LAWA for the Master Plan is not scheduled to occur until about the time of the Final EIR/EIS. This is of concern as it will not provide an opportunity for public review during the DEIR/EIS process (unlike SCAG's Program EIR for the Draft 2001 RTP) and will likely be controversial in terms of which AQMP version will be applicable at that time.

Finally, it should be noted that SCAG is designated under federal law as the Regional Clearinghouse to review all plans, plan changes, projects, and programs for consistency with adopted regional plans. Airport plans are included under this definition. SCAG also publishes an annual "State of the Region" report that tracks indicators on major issues in the region. This includes total passenger trips for the major transit operators and airport activity (passenger trips, cargo, and aircraft operations) for all the major airports.

General Description of Draft RTP

SCAG's 2001 RTP contains ten chapters and fourteen appendices, examining all aspects of transportation and environmental planning in the five county SCAG region. The two major portions examined for Phase II were the basis for transportation conformity findings (described previously) and the Aviation section (primarily covered in Technical Appendix B). That appendix contained considerable discussion regarding general aviation and a special aviation industry impact analysis for Southern California.

The existing 1998 RTP used a medium scenario for future growth which assumed that all the airports in the region were unconstrained and could expand to meet future demand. Future demand was estimated at 158 million annual passengers (MAP) in 2020 and 172 MAP in 2025. In developing the 2001 Draft RTP, SCAG used this scenario as a "placeholder" while numerous alternative scenarios were modeled and debated. An aviation task force was established and nine initial regional aviation scenarios were recommended for modeling using the Regional Airport Demand Allocation Model (RADAM) and results were compared with the 1998 Medium Scenario RTP Baseline. Scenarios focussed on different growth alternatives such as expanding Inland Empire airports, use of High Speed Rail connecting airports, limiting all capacity growth at LAX and extending "no fly" times over Inglewood from 11 p.m. to 7 a.m., adding large capacity airport at El Toro, and the LAWA preferred Alternative C Master Plan improvement. Four of the nine scenarios include various market enhancement strategies to focus growth to certain locations. After review of the results of the RADAM model, the task force narrowed the scenarios for consideration by the SCAG Regional Council committees to three. Scenario 2 constrained LAX at 70 MAP in 2020 and provided high speed rail (HSR) incentives to increase use of Palmdale and Ontario airports. Scenario 8 was similar to Scenario 2 except that LAX was constrained at its estimated physical capacity of 78 MAP. Finally, Scenario 9 allowed expansion of LAX to 86.4 MAP in 2020, similar to Alternative C in the Master Plan of 86.9 MAP in 2015. A table on page B-62 of the Draft RTP contains RADAM-modeled MAP data for each of the 9 scenarios and the 1998 RTP baseline for each major airport in the region as well as information on incentives and HSR assumptions.

Response:

Comment noted.

AL00017-140

Comment:

Finally, the 1998 RTP adopted twenty major transportation policies and objectives that continue to guide regional transportation decisions in the region. Three of these policies directly affect airport expansion and are relevant to Phase II:

3. Comments and Responses

Policy #18: Each county should provide environmentally acceptable airport capacity within its own market area to meet local and domestic air passenger demand

Policy #19: Airports shall be expanded and added to the system to reinforce regional growth patterns and to make regional communities more livable

Policy #20: International facilities should be developed at other commercial airports in the SCAG Region in addition to LAX

These policies and goals are important and in no small way led to the decision of the Regional Council in its selection of its preferred scenario as described in the next section.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements while being designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00017-141

Comment:

Current Status of 2001 RTP

The Draft 2001 RTP was made available for public review in December 2000. As required by CEQA, a companion Program Environmental Impact Report (PEIR) was published and comments were received for a 45-day period ending March 15, 2001. Eighty-four comment letters, including 21 from government agencies, were received and responded to by SCAG staff and contractors in April 2001. This consultant reviewed and identified significant concerns raised by the letters to help identify issues for consideration by the City of Inglewood in addressing the issues prioritized for Phase II. Issues relating to conformance with the LAX Master Plan DEIR/EIS will be discussed later in this chapter.

On March 1, the Transportation and Communications Committee of SCAG met and voted 23-9 to approve Scenario 8. This scenario constrains LAX to 78 MAP in 2020, and regional demand of 156 MAP in 2020 and 167 MAP in 2025. The full SCAG Regional Committee met in special session on April 12 and adopted the entire 2001 RTP, including Scenario 8, by a vote of 38-2. The final 2001 RTP, along with its conformity finding, will now be forwarded to the Federal Highway Administration (FHWA) in San Francisco for approval prior to the June 9 conformity deadline.

Response:

Comment noted. Please see Response to Comment AL00017-79 above.

AL00017-142

Comment:

Key findings and actions related to LAX Master Plan

The following is a discussion of several key findings and issues identified by the consultant and other reviewers of the Draft 2001 RTP and PEIR, and the Draft LAX Master Plan DEIR/EIS that raise concerns over the conformance of the latter document to the adopted final 2001 RTP. As the 2001 RTP was in the development stage during the creation of LAWA's DEIR/EIS, much of their efforts to conform were based on the 1998 RTP's Aviation Scenario. That scenario projected a 92.4 MAP in 2015 for LAX versus the 86.9 MAP in the recommended alternative C of the DEIR/EIS and the adopted 78.01 constrained MAP in the final 2001 RTP. Since the new RTP is now in effect, LAWA will now have to

examine this substantial inconsistency and re-look at the many conclusions reached in the DEIR/EIS. This will likely prove to be the most important plan conformance issue identified in the Phase II report.

Response:

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan - is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment.

Although the conclusion of the Draft EIS/EIR is that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region. Also see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan.

AL00017-143

Comment:

Numerous other issues have been identified and are briefly noted below. The cites are listed in parenthesis following each item. They include the page reference (where readily available) and the source "code." Codes are "R:" for items in the Draft RTP; "P:" for items in the Draft Program EIR; "C:" for comments and response to the Draft PEIR for the RTP; and "E:" for references in the Master Plan DEIR/EIS. These codes are used throughout the Phase II report references.

Response:

Comment noted.

AL00017-144

Comment:

- The 2001 RTP PEIR is a program EIR, and project specific analysis not required under CEQA. (C: 4-46). The PEIR doesn't perform detailed facility calculations such as individual airport analysis and surrounding area health impacts (P: C-49)

- The RTP uses EMFAC7G as it was based on the 1997 AQMP (C: 4-47). The 2001 AQMP Update by the SCAQMD will use EMFAC 2000 or 2001 and thus the 2004 RTP will also need to use those emission factors for conformity. However, the LAWA DEIR/EIS used EMFAC2000 for on-road vehicle emission calculations (E: 4-466). This inconsistency makes it quite difficult to compare the air quality impacts of the DEIR/EIS upon the 2001 (and 1998) RTP.

- TCMs and source controls were the basis for decreases in transportation-related emissions despite growth of population and VMT. (C: 4-47)

Response:

Please see Response to Comment AS00001-32.

AL00017-145

Comment:

- Scenario 8 (adopted by SCAG) contains High Speed Rail (HSR) as incentive to use alternate airports to LAX, and overall emissions in the SCAG region in 2025 are lower for each criteria pollutant than those for the 2001 RTP Update using the RTP Medium scenario (LAWA) without HSR (P: AQ-41). LAWA questioned use of HSR in any scenarios without more specification (C: 3-219)

3. Comments and Responses

Response:

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements while being designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00017-146

Comment:

- RTP used different market incentives for differing levels of use by non-LAX airports in their RADAM demand modeling. This is different than those used by LAWA (C: 4-76)

Response:

The fact that SCAG may have used different assumptions in their projections of future airport activity in the region was recognized in Chapter 1, Regional Context, of the Draft EIS/EIR. As indicated at the top of page 1-25 of the Draft EIS/EIR, the precise numbers vary among the different forecasts and scenarios; but the consistent conclusion of this analysis was that demand for service at LAX will increase regardless of the service available at the region's secondary airports. Such increase in demand at LAX is reflected by the fact that even under the No Action/No Project Alternative, activity at LAX is expected to grow to approximately 78.7 million annual passengers by 2015. Alternative D - Enhanced Safety and Security Plan was designed to serve a future (2015) activity at LAX to a level comparable to that of the No Action/No Project Alternative. Alternative D provides a build alternative that is consistent with the SCAG 2001 RTP policy framework that calls for no expansion of LAX and that future increases in regional aviation demands be accommodated at other airports in the region.

AL00017-147

Comment:

- RTP assumes LAX reaches capacity, in all scenarios, by 2015. The DEIR/EIS identifies considerable changes in passenger characteristics between 2015-2025 (C: 4-77)

Response:

Comment noted. Please see Topical Response TR-MP-2 regarding the SCAG RTP.

AL00017-148

Comment:

- RTP doesn't account for the extensive increase in larger capacity aircraft (stretch jets) as assumed in DEIR/EIS. Thus, SCAG's aircraft mix gives more conservative impact forecasts. (C: 4-77)

Response:

Comment noted. Section 1, Regional Context, of the Draft EIS/EIR acknowledges there are certain differences between SCAG aviation projections and the activity forecasts used in the LAX Master Plan analysis. The details of the LAX Master Plan activity forecasts, including fleet mix, are provided in Chapters II and III of the Draft Master Plan and Chapter 3 of the Draft Master Plan Addendum. Please see Topical Response TR-MP-2 regarding the SCAG RTP, including discussion of the pending 2004 RTP update.

AL00017-149**Comment:**

- The cargo projections in DEIR/EIS are considerably higher than SCAG projects for that airport (E:1-8,2-4). SCAG assumes use of HSR and truck lanes to move cargo about the region and thus allow other airports such as March or Ontario to assume part of the cargo load that is part of the LAWA DEIR/EIS. (C: 4-79 and P: B-46)

Response:

Comment noted. The new Enhanced Safety and Security Plan Alternative, Alternative D, analyzed in the Supplement to the Draft EIS/EIR, was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to the No Action/No Project Alternative. Chapter 3 of the Supplement to the Draft EIS/EIR, provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP. The City of Los Angeles owns and LAWA controls the operation and potential expansion of four airports: LAX, Ontario, Palmdale, and Van Nuys. It does not own or control March Air Force Base in Riverside County. The other regional airports are controlled by other jurisdictions that are responsible for their respective operation and expansion. Please see Topical Response TR-MP-1 regarding cargo handling and Topical Response TR-MP-2 regarding the role of SCAG in the LAX Master Planning process and the effect of SCAG's 2001 RTP on the Supplement to the Draft EIS/EIR.

AL00017-150**Comment:**

- DEIR/EIS doesn't consider HSR (Maglev) impacts upon LAX demands, while RTP bases its inclusion in the adopted scenario on the technical feasibility and support by public opinion polls. (C: 4-79, E: 1-28)

Response:

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AL00017-151**Comment:**

- RTP doesn't consider most of the LAWA ground access improvements since no funding has been identified by LAWA (C: 4-79, 82)

Response:

This comment is similar to comment AL00017-47. Please see Response to Comment AL00017-47. In addition, the RTP includes an action to mitigate the effects of expanding existing airports and consider the reuse of military air bases so that community impacts are minimized. This action supports the development of ground access improvements at LAX.

AL00017-152**Comment:**

- Comments raised on the PEIR question why SCAG is taking credit for "non-viable" projects in its air quality calculations C: 3-303). With the HSR (Maglev) project out of competition for the Federal seed money grant, and MTA not including truck lanes and the I-710 gap closure in its RTP input, there is valid questions on their inclusion into the air emission impacts of the various scenarios (may also provide support to LAWA concerns over HSR as well). SCAG defends use as it not being in the scope of the PEIR to determine which of the projects may not be completed - it just analyzes the impacts to air quality of the proposed RTP (C: 4-126).

3. Comments and Responses

- The air traffic distribution in adopted Scenario 8 is much different than LAX Master Plan Scenario 9. This will require airspace redesign, segregation of flows, or creation of an additional LAX departure scheme. (Presentation by MITRE to SCAG, March 14, 2001)

Response:

Comment noted.

AL00017-153

Comment:

- The RADAM model only considers maximum 280 seat aircraft, while the DEIR/EIS bases much of its reduced increase in aircraft operations by introduction of the new generation of large, 600-passenger wide-bodied aircraft (R: B-57, E: 2-11)

Response:

Page B-191 of the Southern California Association of Governments 2001 Regional Transportation Plan lists the equipment and seating capacity assumptions used for the analysis - the seating capacities range from 11 seats to 375-plus seats. The Draft LAX Master Plan assumes a number of New Large Aircraft (NLA) will serve LAX by 2015. Alternatives A, B, and C assume 30 NLA operations per day. NLA operations represent one percent of daily operations for each alternative. Design day activity for Alternative D in 2015 would include 27 NLA operations per day, which also represents one percent of the total daily operations for Alternative D.

AL00017-154

Comment:

- SCAG's Aviation chapter of 2001 RTP discusses various parking incentives through pricing, and discounted airfares for outlying airport flights. Various parking assumptions use cost as disincentive and at current value (R: B-57). It also assumes High Speed Rail runs every 30 minutes with unconstrained load factors (R: B-58)

Response:

Comment noted.

AL00017-155

Comment:

- The DEIR/EIS used three different scenarios as the basis of comparison of the off-airport surface transportation alternatives (E: 4-276, 4-7). These included the "environmental baseline as required by CEQA" which looks at 1996 traffic decisions, an "adjusted" environmental baseline assuming continued development of "non-airport" projects but current airport use, and a No Action/No Project alternative showing what would happen if the Master Plan was not adopted (appears to be the eventual 2001 RTP scenario constraining LAX to 78 MAP).

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues and Topical Response TR-ST-2 regarding the surface transportation analysis methodology.

AL00017-156

Comment:

Identification on Non-conformance to RTP by DEIR/EIS

The following are the most significant areas on non-conformance with SCAG's Regional Transportation Plan:

- DEIR/EIS based on scenario in 1998 RTP projecting approximately 92 MAP in 2015 for LAX, while the adopted 2001 RTP constrains LAX to 78 MAP

Response:

Comment noted. Please see Topical Response TR-MP-2 regarding the compatibility between the Draft EIS/EIR and Supplement to the Draft EIS/EIR and the SCAG Regional Transportation Plan (RTP).

AL00017-157

Comment:

- DEIR/EIS on-road vehicle emission factors based on EMFAC2000 while 2001 RTP based on EMFAC7G

Response:

Please see Response to Comment AS00001-32.

AL00017-158

Comment:

- DEIR/EIS modeled years 2005 and 2015, while 2001 RTP uses 2025 as horizon year as required by TEA21 rules.

Response:

Comment noted. Please see Topical Response TR-MP-2 regarding the compatibility between the Draft EIS/EIR and Supplement to the Draft EIS/EIR and the SCAG Regional Transportation Plan (RTP).

AL00017-159

Comment:

- Considerable differences in choice of market incentives between DEIR/EIS and 2001 RTP. This impacts choice and success of mitigation measures.

Response:

In response to the direction of Mayor Hahn, LAWA has developed a new alternative for consideration as part of the LAX Master Plan. Alternative D, The Enhanced Safety and Security Plan Alternative, is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. To ensure that the LAX Master Plan Alternative D has been fully analyzed to the level of the previous Master Plan alternatives, LAWA prepared a Supplement to the Draft EIS/EIR. Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP. It should be noted several of the key market assumptions of the 2001 RTP have substantially changed over the past few years, including the elimination of a new commercial airport at the former MCAS El Toro. Please see Topical Response TR-MP-2 regarding the SCAG RTP.

AL00017-160

Comment:

- Aircraft and passenger characteristics differ between RTP and DEIR/EIS assumptions, since latter assumes growth and changes through 2025 and RTP caps expansion at 2015. Projected aircraft types differ and thus affect emission estimates.

Response:

Comment noted. Please see Topical Response TR-MP-2 regarding the compatibility between the Draft EIS/EIR and Supplement to the Draft EIS/EIR and the SCAG Regional Transportation Plan (RTP).

3. Comments and Responses

AL00017-161

Comment:

- Cargo projections higher at LAX in DEIR/EIS than in adopted 2001 RTP.

Response:

Comment noted. The new Enhanced Safety and Security Plan Alternative, Alternative D, analyzed in the Supplement to the Draft EIS/EIR, was added to provide a build alternative designed to serve a level of future (2015) airport activity, including cargo activity, comparable to the No Action/No Project Alternative. Chapter 3 of the Supplement to the Draft EIS/EIR provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP. Please see Topical Response TR-MP-1 regarding cargo handling and Topical Response TR-MP-2 regarding the role of SCAG in the LAX Master Planning Process and the effect of SCAG's 2001 RTP on the Supplement to the Draft EIS/EIR.

AL00017-162

Comment:

- Projections of HSR not used in DEIR/EIS while a key component of the adopted RTP.

Response:

Comment noted. Also please refer to Topical Response TR-MP-2 regarding the relationship of the LAX Master Plan with SCAG's 2001 RTP and Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AL00017-163

Comment:

- RTP does NOT include funding for the Ring Road, I-105 westward extension, and I-405 (Connector) projects and thus not credited in emission reduction and other analysis. The DEIR/EIS includes them as an integral part of its calculations.

Response:

This comment is similar to comment AL00017-47. Please see Response to Comment AL00017-47. In addition, the RTP includes an action to mitigate the effects of expanding existing airports and consider the reuse of military air bases so that community impacts are minimized. This action supports the development of ground access improvements at LAX. Emission reductions resulting from the proposed ground access improvements will improve future regional air quality beyond the assumptions in the RTP.

AL00017-164

Comment:

- Use of the adjusted environmental baseline for off-airport traffic impacts (i.e., adjusted for non-airport growth in 2005 and 2015) does not allow for comparing the DEIR/EIS project alternatives with current conditions, and seems in conflict with CEQA requirements. It actually compares project alternatives to a future condition, and even concludes that the adjusted off-airport traffic baseline has greater impacts than the project alternatives (E: 4-281).

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-ST-2 regarding the Adjusted Environmental Baseline.

AL00017-165

Comment:

III. CONFORMANCE TO SOUTH COAST AQMD'S 2001 AIR QUALITY MAINTENANCE PLAN UPDATE

Introduction

The 1990 Clean Air Act (CAA) mandates that all areas the nation that have monitored air pollution levels in excess of the National Ambient Air Quality Standards (NAAQS) prepare a strategy, known as the State Implementation Plan (SIP) and termed Air Quality Maintenance Plan (AQMP) in Southern California, that provides a legal roadmap toward meeting the health standards by a deadline as set in the 1990 CAA. In California, a similar strategy under State law must be developed and revised every three years. The LAX is located in the South Coast Air Basin and, as a major generator of emissions, must be an active partner in all planning activities under the federal and state air quality laws. For Ozone, the currently approved State Implementation Plan (SIP) for the South Coast is the 1999 Amendments to the 1997 AQMP. The DEIR/EIS uses emissions projected at the time of the 1997 AQMP as part of the baseline for its alternative project analysis.

An important concept of the CAA is that all major projects in an area that is not attaining the NAAQS must assure EPA and DOT that their construction and operation will conform to the existing, approved strategies to clean up the air. This process is known as General Conformity and, for transportation aspects of the facility development, Transportation Conformity. The LAX Master Plan will require federal funding to fully construct and thus must be analyzed in terms of the "applicable" federal SIP, i.e., the 1999 AQMP. Furthermore, LAWA should be a major player in the on-going development of revisions to the AQMP as future conformity findings on its multi-year construction process will need to assure continuing conformity with the new AQMP emission budgets and strategies.

General Description of Currently Approved (1999) SIP

EPA took final action in early 2000 to approve revisions submitted in 1999 to the 1997 Ozone AQMP. The revised ozone plan consisted of the ozone portion of the 1997 South Coast Air Quality Management Plan (AQMP), as modified by an amendment adopted by the South Coast Air Quality Management District (SCAQMD) on December 10, 1999. The 1999 amendment adds in new control measures and successfully addresses EPA's concerns with the 1997 plan. On January 12, 1999, EPA proposed to disapprove key elements of the 1997 plan because the it represented backsliding from the federally approved 1994 ozone State Implementation Plan (SIP). Final approval of the revised ozone plan, as modified by the 1999 amendment, means that the 1999 plan becomes the federally enforceable ozone plan for the South Coast. The 1999 amendments did not substantially affect the treatment of LAX emissions and air quality programs from those contained in the 1997 AQMP. An Indirect Source measure affecting Ground Access vehicles in the 1994 AQMP, was not included in the 1997 AQMP and its reductions replaced in the 1999 amended plan by other measures. This measure would have reduced airport passenger vehicle trips and congestion in the vicinity of LAX and other major airports. Several of the suggested strategies are contained in some fashion in the DEIR/EIS and others have been implemented under other programs.

In August of 2000, the SCAQMD adopted Rule 1194 that directly affects commercial airports in the South Coast Air Basin. This was a rule included in the 1999 AQMP. It requires that all passenger car, light duty truck, medium duty transit vehicles, and heavy duty transit vehicle operators acquire cleaner burning or alternative-fueled vehicles when procuring or leasing such vehicles. The requirements are phased in during 2001. This regulation will stimulate and support programs such as identified as mitigating measures in the DEIR/EIS on cleaner fleets.

Measure M-15 in the 1997 AQMP is a federal measure to set nationwide aircraft emission standards.

The 1997 AQMP projected aircraft emissions from all airports in the South Coast Air Basin to be approximately 14.4 tons per day of VOCs and 93.1 tons per day of NOx in 2020 (Appendix III, Table A-33 of 1997 AQMP). The DEIR/EIS purportedly uses data from the SCAQMD in their baseline and projected impacts, though validation of these numbers was not a part of the Phase II study.

3. Comments and Responses

The 2001 AQMP will include updated growth projections, improved emissions inventories and air quality modeling, and revised control measures as appropriate.

Current Status of 2001 AQMP

The current processes to develop a new 2001 AQMP will be considering various strategies in early summer and provide a final, revised AQMP in October. Following adoption by the Board, it will be sent to the CARB and EPA for approval. While the DEIR/EIS could not during its drafting stage consider the 2001 AQMP, various measures will be evaluated over the next several months and certainly need to be addressed in the Final EIR/EIS. For example, in reviewing the DEIR/EIS text, it would appear that some of the most recent mobile source regulations of CARB and the SCAQMD may not have been included in accounting for airport emission reductions. A CARB regulation of September 2000 on reducing the risk from diesel-fueled engines and vehicles was noted but it was also indicated that this study did not have enough lead time to analyze what is expected to be a major impact. The Final EIR/EIS should examine these impacts. A major change could well occur should the SCAQMD Board accept the emissions inventory resulting from the revised SCAG 2001 RTP as it uses a much different growth scenario and input data than contained in the DEIR/EIS.

Currently, SCAQMD planning staff does not expect any new rules in the 2001 AQMP directed specifically at airports, though those related to transportation controls may still be submitted as part of SCAG's responsibility in the plan development.

Key relationships to LAX Master Plan

As noted earlier, the expansion of LAX under the Master Plan must be fully integrated into the AQMP planning process. The Draft EIR/EIS generally follows the currently the 1999 amended AQMP, which is the "applicable SIP." However, the Final EIR/EIS may well need to be adjusted to the emissions included in the 2001 AQMP including the different scenarios resulting from the adoption this April of a 2001 RTP. Accordingly, review of measures identified during the 2001 AQMP discussion period in respect to the DEIR/EIS would not be productive.

Identification on Non-conformance to AQMP by DEIR/EIS

- Since spatial projected emission inventory of applicable (1999) AQMP is currently used in the DEIR/EIS for growth distribution, changes in aviation scenarios in the 2001 AQMP will require revision to the emission inventory of the Final EIR/EIS. This could also require reorientation of 1999 AQMP emission control strategy to place more emphasis on new, higher-growth areas due to RTP changes (R: B-54)
- The failure to commit to specific mitigation measures in the DEIR/EIS is of concern since it delays the inclusion of such measures into the 2001 AQMP update process as well as prohibits reviewers of the DEIR/EIS to comment on such measures (E: 4-459). At the time of this report, LAWA's commitment to meet with EPA, CARB, and the SCAQMD to refine and select air mitigation measures has not occurred.
- The lack of a common baseline for comparing alternatives in the DEIR/EIS, discussed earlier in the RTP Conformance section, is of equal concern for AQMP conformance.
- The DEIR/EIS appears to assume that under all alternatives, including the No Action/No Project alternative, will have a similar aircraft mix with predominance of large, wide-bodied "jumbo jets" (E: G-6). This seems highly unlikely as consumer demand will depend on the type of facility and purpose. This lack of variation in the aircraft mix, particularly since it conflicts with the adopted 2001 RTP calculations, will likely cause problems in estimating the LAX emissions in the 2001 AQMP projections.
- The increase in nearby, off-airport stationary (commercial and industrial) source emissions do not appear to have been considered in the emission projections for the various alternatives (E: 4-463, 4-480, G-23). The DEIR/EIS asserts that they are included in the baseline emissions, but then refers to a table on "ambient" concentrations for future levels.
- DEIR/EIS assumed that there would be no future Ground Support Equipment air emission since all gates will be electrified, making GSE obsolete (E: G-6, 11). The GSE emission factors were derived from the EDMS instead of CARB's latest off-road emission model (E: 4-465).

- There does not appear to be mention of the requirement that the Governor issue "certification" that any new runway, or major extension of a runway receive CARB's blessing re. "insignificant" air impacts. This may need further investigation to determine if, and when this certification should occur.

In addition to the potential conformance problems documented above, other reviewers have found deficiencies in the DEIR/EIS air quality findings. These include the following issues:

- Assumption that there will be 100% compliance with 2005 off-road emission standards, highly unlikely compliance level for any regulation or standard
- Emissions, especially NOx, not considered from aircraft reverse thrust operations. These emissions, even for short periods, are generally quite high and occur nearby airports
- Aircraft delays, such as taxi delay, is not discussed or quantified
- Entrained road dust - it was included in the "baseline" for 1996, but may not be included in the 2005 and 2015 emission inventories based on preliminary EPA staff evaluations

Response:

Please see Response to Comment AL00017-19.

As noted in Section 3.5 of the Draft EIS/EIR, the Airport and Airway Improvement Act (AAIA) of 1982, as amended, is an applicable federal law. The AAIA has required, in pertinent part, that, as a necessary condition of approval by the Secretary of the Department of Transportation of an application for an airport development project involving the location of an airport or runway or a major runway extension, the governor of the state in which the project will be located must certify in writing that there is reasonable assurance that the project will be located, designed, constructed, and operated in compliance with applicable air and water quality standards. On December 12, 2003, President Bush signed into law the FAA reauthorization bill known as Flight 100--Century of Aviation Reauthorization Act. This Act eliminates the requirement for the governor's certificate previously required under the AAIA.

Since use of reverse thrust is, in many cases, a matter of pilot discretion, it may not be appropriate to assume its use in all cases of an environmental impact analysis. The methodology used to estimate emissions for the standard aircraft modes (approach, taxi/idle in, taxi/idle out, take off, and climbout) may be considered generally conservative enough to account for potential emissions from use of reverse thrust.

Aircraft delays on the airfield are accounted for in all analyses. Delay time is included in the taxi in and taxi out operational modes for aircraft when on the airfield. A detailed discussion of all aircraft operational modes and their effect on emissions is presented in Section 2.1.3.1 of Appendix G to the Draft EIS/EIR.

Entrained dust attributable to all mobile sources operating on paved and unpaved surfaces was included in the analyses for all scenarios; see the Draft EIS/EIR, Appendix G, Section 2.1.3.1, page 10 (regarding entrained dust from aircraft) and pages 14 and 15 (regarding entrained dust from on-airport ground access vehicles).

AL00017-166

Comment:

IV. IMPACTS OF LAX MASTER PLAN ON SURROUNDING COMMUNITIES

Note: This chapter limits its coverage to air quality and transportation impact upon the surrounding communities. Noise and Environmental Justice impacts are discussed elsewhere or by other consultant studies.

Identified impacts in DEIR/EIS by LAX expansion on "nearby" areas

3. Comments and Responses

The DEIR/EIS contains considerable discussion on the relationships between the demands of commercial air service in Southern California and the proposed expansion of LAX under the Master Plan. It also identifies the impacts on the immediate or "nearby" areas to the airport. Review of the DEIR/EIS indicated that LAWA used a number of different approaches to distinguish areas bordering or in close proximity to LAX. This reviewer adopted an approach that attempted to distinguish such areas in a clear, straightforward manner. To that end, I have defined "immediate areas" to LAX as bounded by Manchester Avenue to the north, I-405 to the east, Imperial Highway to the south, and the Pacific Ocean on the west. With one small exception, this area lies primarily within the City of Los Angeles.

The airport-related impacts on this immediate area are very briefly acknowledged in a two-paragraph section, Chapter 2.3.9. Positive impacts include tax revenue, increased employment, and air service. Negative impacts include congestion, noise, and air pollution. The major benefit suggested by the DEIR/EIS would be the creation of a commercial "village" development in Westchester, known as the "Southside Project." Ironically, the Southside Project is located on the northside of the LAX expansion.

Response:

Comment noted.

AL00017-167

Comment:

Chapter 4.3.2 evaluates the Off-Airport Surface Transportation impacts of the three build alternatives and the No Action/No Project alternative. The No Action/No Project alternative estimates traffic levels at intersections in 2005 and 2015 resulting from the growth of surrounding projects (see next section) and all the growth from airport projects that would normally occur without the Master Plan adoption. It then compares impact with that alternative on intersections under each of the three "build" alternatives. It is very important to note, however, that credit for the various mitigation measures and associated construction projects of the build alternatives are included when estimating their impacts. A serious inconsistency is the major credit claimed from the construction of the new LAX freeway off of I-405, the Ring Road around the north and western portions of LAX, State Highway 1 improvements, and the extension of I-105 and the Green Line to the new western terminal of LAX. None of these projects are constrained, i.e., expected to be funded, in the 2001 RTP and as such should not be credited with traffic (and emission) reductions.

The preferred Alternative C negatively impacts two intersections within the City of Inglewood in both 2005 and 2015: La Cienega at Arbor Vitae and La Cienega at Century. Similarly, in 2005 (only), La Cienega at Florence and La Cienega at Manchester are impacted by Alternative C. A mitigation plan, developed by the Los Angeles Department of Transportation, includes various street widening, turn lanes, and signal enhancement to offset Alternative C's impacts (Tables 4.3.2-27 and 28).

The DEIR/EIS describes in some detail the construction impacts on the "nearby" area and suggests a list of mitigation measures to enact during the expansion of LAX as part of its Environmental Action Plan (4-436 and 438). However, these are primarily limited to the nearby area as defined above and the impacts on the surrounding communities such as Inglewood are not detailed.

Response:

Construction impacts on most Inglewood streets are not expected to be substantial, since most construction traffic is expected to use the major freeways (I-405, I-105) and the arterial streets adjacent to LAX. Also, please see Topical Response TR-ST-3 regarding construction, and Response to Comment PC02220-6 regarding funding. The improvements identified by the commentor are either part of the project or mitigation measures. Those improvements would be included in a future RTP.

AL00017-168

Comment:

The DEIR/EIS appears to do an adequate job of conducting emission inventories, air quality monitoring, and dispersion modeling within the boundaries of LAX. Intersection modeling for CO hot spots was conducted for 17 intersections, 13 of which were within the defined "nearby" areas.

Response:

Comment noted.

AL00017-169

Comment:

Identified impacts in DEIR/EIS by LAX expansion on Inglewood and surrounding communities

The impact of the proposed Master Plan to expand LAX on Inglewood and the surrounding communities is not as well documented in the DEIR/EIS and appears to be a major deficiency in the report. The key chapter of the DEIR/EIS on surrounding community impact, Chapter 4.4.4 "Community Disruption and Alteration of Surface Transportation Patterns," only examines a study area west of the San Diego Freeway and limited to Westchester and El Segundo. For purposes of this section, I have defined "surrounding areas" to LAX as bounded by the Marina Freeway (State Route 90) and Slauson Avenue on the north, the Harbor Freeway (I-110) on the east, Artesia Blvd. (State Route 91) to the south, and the Pacific Ocean on the west. This is slightly larger than the LAX Master Plan Land Use Study Area as shown in Figure 4.2-1 of the DEIR/EIS.

Response:

Please see Responses to Comments AL00009-1 and AL00017-97 regarding the geographic extent of the analysis within the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00017-170

Comment:

In Chapter 2.6, the DEIR/EIS notes the NEPA and CEQA requirements that cumulative impacts be analyzed. The "non-airport" projects were derived from SCAG's regional and area-wide projections of major new projects through 2015. They also separately consulted with the various cities in the surrounding areas to identify projects for cumulative impact consideration. Two hundred projects, including 18,000 dwelling units, 5 million square feet of retail space, and 21 million square feet of office/commercial space were identified and included in the No Action/No Project Alternative as well as the three build alternatives. This growth, along with the associated traffic increases, was a major factor in the frequently cited deterioration of air quality without expanding the airport. Twelve major projects were highlight in the DEIR/EIS, but none of these were located in the City of Inglewood. However, several large projects noted that were relatively close and would affect the city included the Westchester Square, Lincoln Apartments, Hawthorne Gateway Center, Fox Hills Mall expansion, Howard Hughes Center, the El Segundo Media Center, and the 13,000 unit Playa Vista development.

Response:

Comment noted. The projects close to Inglewood referenced in this comment were evaluated against SCAG's regional projections and found to be fully accounted for in those projections.

AL00017-171

Comment:

The DEIR/EIS notes that the above developments, and Playa Vista in particular, will convert undeveloped land into intensified usage and thus impact the environment unless offset by mitigation measures. However, the increase in employment and household population growth from the Build alternatives were felt to be within the regional growth projections (representing less than 1% of the regional growth) and thus the cumulative effect on land use was considered less than significant (4.2.7.2).

Response:

The commentor correctly summarizes statements presented in Section 4.2.7.2 of the Draft EIS/EIR. While some impacts associated with Playa Vista and other related projects would require mitigation, in order to avoid physical land use incompatibility, the projected increase in employment and associated

3. Comments and Responses

population and households for cumulative development are well below SCAG's 1996-2015 forecasts locally. As stated in Section 4.5, Induced Socio-Economic Impacts, of the Draft EIS/EIR, population and household growth associated with Alternatives A, B, and C would represent less than 1 percent of forecast growth over the entire five county region. Cumulative impacts on land use are considered less than significant, in part, because SCAG's forecasts account for a variety of factors, including aviation related activities, and because the forecasts are developed with direct input from cities and counties regarding growth that can still be accommodated within their jurisdictional plans. Please see Section 4.5, Induced Socio-Economic Impacts, of the Supplement to the Draft EIS/EIR for an updated discussion of SCAG projections, 2000 census, and LAWA Staff's new preferred Alternative D. As concluded therein, Alternative D would not contribute meaningfully to SCAG's growth forecasts. See also Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR for a discussion of Alternative D, updated SCAG plans, and cumulative development. As described in Section 4.2.7.1 of the Supplement to the Draft EIS/EIR, cumulative impacts under Alternative D would be less than significant and less than identified for the other build alternatives. A discussion of SCAG's updated Regional Transportation Plan is also presented in Topical Response TR-MP-2.

AL00017-172

Comment:

Another analysis of the impacts upon the surrounding communities in the DEIR/EIS focused on off-airport surface transportation. The DEIR/EIS subdivides the area I defined above for Off-Airport Surface Transportation Study as Tier 1 (generally the area west of the San Diego Freeway) and Tier 2 (corridors radiating out from that area) (Figure 4.3.2-1). Once again, the emphasis was on the "nearby" areas even though the traffic impacts will be greatly seen throughout the surrounding communities. Approximately two-thirds of the 61 intersections examined for impact and mitigation were located what I defined in the first section as "nearby" areas. Indeed, only two of the 61 evaluated intersections were within Inglewood's "surrounding" area definition (east of the San Diego Freeway). These were the intersections of La Cienega Blvd. with La Tijera Blvd. and with Centinela Avenue. Three short corridor evaluations of about 1/4 mile each were performed on Century Blvd, Arbor Vitae St., and Manchester Avenue west of Hawthorne-La Brea. Finally, corridor analysis was performed on several blocks of Centinela east of La Brea Avenue. This limited evaluation of the impact of a major expansion of LAX upon the City of Inglewood would appear to be extremely deficient.

Other intersection analysis in the "surrounding" communities included nine intersections south of LAX, mainly in the City of El Segundo, and a large number of intersections in the northern Westchester, Playa Vista, and Marina Del Rey areas.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please refer to Topical Response TR-ST-2 for a discussion of the study area definition and identification of facilities analyzed. The Draft EIS/EIR analyzed four intersections that are entirely within the City of Inglewood boundaries, four additional intersections that are on the border of Inglewood, four roadway links in Inglewood, and thirteen freeway ramps within the boundaries of the City of Inglewood. Additional intersections were also evaluated in Inglewood for Alternative D, as summarized in the Supplement to the Draft EIS/EIR.

AL00017-173

Comment:

The growth inducing aspects of the LAX expansion are not identified for Inglewood or other specific communities in the surrounding area, thus making it difficult to plan for additional housing, schools, or other facilities. The DEIR/EIS estimates population and house growth in 10-mile radius tiers from the airport. In the first tier, which would encompass all of my defined "surrounding" community areas as well as cities such as Santa Monica, Beverly Hills, and Torrance, the preferred Alternate C would add 7,200 persons and 2,640 households. However, since the No Action/No Project alternative would result in declining population, the net impact would be 17,600 more people and 6,500 more households (4-457). Because the DEIR/EIS does not focus in detail beyond the immediate, adjacent area to LAX it is difficult for the surrounding communities to plan accordingly.

Response:

As was discussed within Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), of the Draft EIS/EIR, growth induced by LAX-related employment and associated population and housing from 1996 to 2015 was accounted for within the regional forecasts generated by SCAG. The SCAG projections reflect the level of growth anticipated by local jurisdictions, and serve, to a large degree, as the basis for long-range planning efforts by both local and regional agencies, particularly in addressing the forecasted need for increases in services and infrastructure. More specifically, regional transportation, utilities, schools, and other local and regional plans are based on this data.

In addition, subsequent to publication of the Draft EIS/EIR, a fourth Master Plan build alternative, Alternative D - Enhanced Safety and Security Plan, was proposed and evaluated in the Supplement to the Draft EIS/EIR. Implementation of Alternative D, LAWA's new staff-preferred alternative, would ultimately yield a net decrease of 57,113 jobs throughout the region compared to baseline (1996) conditions, similar to the No Action/No Project Alternative. This decrease would apply to all portions of the study area. Consequently, a total population of as much as 123,479 people in 43,153 households would be lost to the five-county region between 1996 and 2015, with proportionate losses projected for communities within a 10-mile radius and a 20-mile radius of LAX. The demand for public utilities and services associated with employee households and population would likewise decrease throughout the area over the course of the planning period. As under the other build alternatives, and independent of the forecasted decrease in population, housing demand, and employment, there is potential for growth-inducing effects in the immediate vicinity of LAX due to increases in cargo movement through the airport, relative to baseline cargo processing levels, associated with Alternative D. As was further described in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement) (subsection 4.5.6) of the Supplement to the Draft EIS/EIR, this increased cargo activity has the potential to induce demand for warehousing and industrial space in surrounding areas which could result in conversion or recycling of other land uses. It was further stated that discretionary approval by other jurisdictions and environmental review processes would ensure that any resulting demand for industrial development would be considered less than significant. Alternative D is not expected to remove obstacles to population growth.

AL00017-174

Comment:

While much of the air quality analysis focussed on the immediate LAX area, the study area for the Human Health Risk Assessment did much of the larger "surrounding area."

Response:

A major purpose of the air quality analyses was to identify the locations and magnitudes of criteria pollutant concentrations for comparison to the NAAQS/CAAQS, whereas a major purpose of Section 4.24.1, Human Health Risk Assessment, was to identify the extent of areas of potential human exposure to significant risk. The end points of the two analyses are quite different.

AL00017-175

Comment:

Projects in identified in the 2001 RTP as affecting Inglewood

The recently adopted SCAG 2001 RTP was reviewed to determine projects affecting Inglewood and surrounding communities. Projects are defined in the RTP as either constrained (high-performing, cost-effective funded projects) or unconstrained (no funding identified at present). Unconstrained projects are identified in RTP's to have a potential list of projects that, should funding suddenly develop, be ready to advance through the amendment process and be a part of the official RTP. A reason to identify both constrained and unconstrained projects in this analysis is to determine if certain transportation improvements might either be accelerated in their implementation or added to the constrained list through future mitigation funding as part of the Final EIR/EIS.

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Constrained Projects in the Surrounding Communities to LAX

Route	Type	Completion Year	Cost
Maglev: LAX to March	Maglev (HSR)	2010/2025	\$16,000,000,000
Green Line Extension (to Central LAX Terminal)	Light Rail	2010	\$10,000,000
Crenshaw Blvd. Corridor	Rapid Bus	2010	\$92,000,000
Florence Avenue Corridor	Rapid Bus	2010	\$108,000,000
Hawthorne Blvd. Corridor	Rapid Bus	2010	\$76,000,000
Vermont Avenue Corridor	Rapid Bus	2010	\$83,000,000
I-405 Corridor	Rapid Bus	2010	\$185,000,000
I-405 HOV, Rte. 90 to I-10	TCM	On-going	
I-405 HOV, Rte. 90 to I-105	TCM	On-going	
El Segundo Green Line Shuttle	TCM	On-going	
Green Line Shuttle, Crenshaw	MTA-Shuttle	2002	
Sepulveda & I-105	Offramp, widen	2002	
LAX	ITS for airport		
Westchester Tranp. Imprments.	Upg. Traffic Surv.	2004	
Sepulveda, Centinela-Lincoln	Bus/CP lane	2004	

Unconstrained Projects in the Surrounding Communities to LAX

Route	Description	Year
San Diego Fwy, I-605 to I-5	HOV lanes, with LAX connector	
Century Fwy, Sepulveda Blvd to new LAX West Terminal	Freeway, mixed-flow and HOV	
San Diego Fwy to Century Fwy	HOV Connector	
Arbor Vitae Ave., La Brea to Airport Blvd	Arterial	2015
Sepulveda Blvd, Howard Hughes Pkwy to Century Blvd.	Arterial	2010
Slauson Ave, Western to Jefferson	Arterial	2010
Culver Blvd, Route 90 to I-405	Arterial	
I-405 Airport Connector, HH Pkwy to Arbor Vitae St.	Arterial	
Rosecrans Ave., Sepulveda to Hawthorne	Arterial	
Sepulveda Blvd. & Centinela Ave	Intersection	
Century Fwy. & Western Ave.	Interchange and ramps	
Route 1/Lincoln Blvd., LAX to I-10	Corridor Development	

The two tables above are taken from information found in the 2001 RTP. They identify important transportation programs and projects that the cities surrounding LAX may wish to pursue as part of any negotiated mitigation of traffic congestion impacts resulting from the Master Plan.

Response:

LAWA and LADOT are already considering some of the referenced RTP improvements in the ground access plan for LAX. Further consideration will be given as the project moves closer to implementation. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3, Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00017-176

Comment:

Deficiencies in LAX Master Plan DEIR/EIS in evaluating impacts on Inglewood

- In general, much of Inglewood and the surrounding communities are not given adequate impact evaluation for the DEIR/EIS proposed expansion of LAX. This is especially true for air quality measurements and traffic impacts. The final EIR/EIS should include more information on the cumulative impact on the City of Inglewood

Response:

Please see Topical Response TR-ST-2 for a discussion of the study area definition and identification of facilities analyzed. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed direct and cumulative traffic impacts in Section 4.3, Surface Transportation, and direct and cumulative air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provide in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR.

AL00017-177

Comment:

- The comparison of the No Action/No Project alternative and "build" alternatives is seriously flawed as it fully assigns future growth impacts, including non-Master Plan expansions and growth of LAX, to the No Action/No Project alternative. Conversely, the build alternatives take credit for mitigation measures and the construction of five major arterials to ease traffic, which have no identified funding in the 2001 RTP.

Response:

The analysis was not flawed. It followed the requirements of CEQA for comparison to determine significant impacts. Impacts and mitigations used the Adjusted Environmental Baseline for comparison, not the No Action/No Project. The Adjusted Environmental Baseline did not include future growth of LAX. Please see Topical Response TR-ST-2 regarding the definition of baseline scenarios and incorporation of local/regional plans and programs.

AL00017-178

Comment:

- Growth-inducing impacts upon surrounding communities difficult to determine because of the broad nature of the socio-economic impact analysis of the DEIR/EIS.

Response:

Please see Response to Comment AL00017-173 regarding the geographic distribution of growth inducing impacts.

AL00017-179

Comment:

V. EVALUATION OF HEALTH RISKS AND AIR TOXICS IN THE DEIR/EIS

Summary of impacts identified for air quality in the DEIR/EIS

The health risks associated with the Master Plan are assessed in Chapter 4.24.1 of the DEIR/EIS. While this chapter attempts to assess the cancer risks and non-cancer health impacts, it is clear that a major gap resulted from the lack of a comprehensive, air toxic baseline study in advance of the DEIR/EIS. The document states "The HHRA did not evaluate impacts of toxic air pollutants associated with current airport operations." While a new study is now underway, the DEIR/EIS admits that the impact of toxic air pollutants associated with the current airport operations until 2002 and thus only the incremental changes can be projected in their document. The Workplan for the LAWA study that has just begun on air quality and source apportionment is summarized in the following section.

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please also see Topical Response TR-AQ-2 regarding the LAX Ambient Air Quality and Source Apportionment Study.

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AL00017-180

Comment:

A more in-depth review of the health risks approach taken in the DEIR/EIS is being conducted of the City of Inglewood separately by Dr. Dale Hattis of Clark University's Center for Environment, Technology and Development. He is looking at the LAX Master Plan for needed improvements in assessing available policy choices. The following is a brief summary highlighting major findings and mitigation measures identified in the DEIR/EIS that relate to air quality.

Under the No Action/No Project alternative, which assumes no new mitigation measures will occur, both cancer risks and non-cancer health hazards will increase from the 1996 environmental baseline. The risks will be greatest along the eastern boundary (I-405) of LAX and extending about 3-1/2 miles northeast over the center of Inglewood and into vicinity of Crenshaw and Slauson Avenue. Under the three "build" alternatives, taking advantage of the potential but yet-unselected mitigation measures, risk of cancer and non-cancer health hazards actually decline. The DEIR/EIS found the following reasons for this decline:

- Anticipated reduction in older, more polluting engines in aircraft and vehicles resulting from federal mandates to phase-in cleaner engines (all alternatives).
- Improved efficiencies in aircraft operations due to the addition of a new runway (Alternatives A and B) or runway modifications (Alternative C).
- Improved vehicle traffic flows associated with proposed transportation system improvements (all build alternatives).
- Changes in airport fence line and runway configurations that would place greater distances between emission sources and off-site residents (Alternatives A and C).
- Development of the West Terminal Area that would shift airport activities west and away from the population. This shift to the west helps spread emissions from east to west and reduces the impact of emissions on air quality in off-airport areas (mostly for Alternative A and, to a lesser degree, Alternatives B and C).
- Potential reduction in overall air pollutant emissions that could occur from implementation of preliminary air quality mitigation options proposed in Section 4.6, Air Quality (all build alternatives).

As part of the DEIR/EIS, a Human Health Risk Assessment (HHRA) was performed. It involved estimating future emission under the four alternatives, predicting incremental human health risks that might result from breathing toxic air pollutants (TAP) at various locations in the surrounding communities, and then evaluating the broader-scale, cumulative impacts of LAX emissions on air quality as part of the SCAQMD's Multiple Air Toxics Exposure Study (MATES-II). The HHRA included the following analysis:

- Identification of emissions sources for TAPs at LAX and quantification of TAP emissions for baseline conditions.
- Selection of TAPs of concern through evaluation of toxicity and release quantities.
- Analysis of exposure pathways of concern for TAPs emitted during LAX operations.
- Identification of an area (referred to as the health risk study area) and human populations around LAX likely to be affected by airport operations.
- Toxicity characterization for TAPs of concern.
- Estimation of future TAP emissions associated with the No Action/No Project Alternative and with implementation of the three build alternatives.
- Air dispersion modeling to predict air quality impacts on- and off-airport.
- Estimation of incremental impacts to air quality of the No Action/No Project Alternative and the three build alternatives through comparison with baseline emissions.
- Characterization of potential for incremental human health impacts based on changes in air concentrations for TAPs of concern within the health risk study area.

Response:

The comment summarizes information found in the Draft EIS/EIR. Comment noted.

AL00017-181

Comment:

Twenty-eight different toxic air pollutant substances were identified in the process. As mentioned earlier, a large study area was established to examine the potential impact of TAPs. Future air quality impacts were estimated but did not consider several proposed or recently adopted regulations of the SCAQMD, CARB, or the US EPA. As these rules most frequently deal with diesel-fueled vehicles, this appears to be a flaw that should be remedied in the Final EIR/EIS.

Response:

CARB, SCAQMD, and the City of Los Angeles have proposed and implemented programs and regulations that target air pollutant emissions from on-road mobile vehicles or ground access vehicles (GAV). As indicated in the Draft EIS/EIR, some of these programs and regulations were incorporated into the air quality analysis performed for the Draft EIS/EIR through the use of the CARB emission factor model, EMFAC 2000, used to calculate GAV emissions. The EMFAC 2000 model incorporates forecast clean fuel technologies and emission reductions for various pollutants resulting from recent state legislation and implementation goals. The state emission standards and programs incorporated into EMFAC 2000 include district inspection and maintenance programs, California Cleaner Burning Gasoline (reformulated gasoline), near-zero evaporative standards, on-road motorcycle standards, low-emission vehicle standards (LEV I and LEV II), and standards for heavy-duty engines. The standards for heavy-duty engines include off-cycle NO_x mitigation and exhaust emissions standards for urban transit buses. The EMFAC 2000 model does not incorporate the future changes in vehicle fleet composition resulting from proposed state legislation and proposed and recently adopted local legislation.

In the South Coast Air Basin, the SCAQMD and the City of Los Angeles have proposed or adopted additional rules and policies that govern cleaner fuel use and pollutant emission reductions in public vehicle fleets. The SCAQMD has adopted the following rules for clean on-road vehicles: 431.2 reduces the sulfur content of liquid fuels, 1186.1 for Less-Polluting Sweepers, 1191 for Light-and Medium-Duty Public Fleet Vehicles, 1192 for Clean On-Road Transit Buses, 1193 for Clean On-Road Residential and Commercial Refuse Collection Vehicles, 1194 for Commercial Airport Operations GAV, 1195 for Clean On-Road School Buses, 1196 for Clean On-Road Heavy-Duty Public Fleet Vehicles, and 2202 for On-Road Motor Vehicle Mitigation Options. In addition, the City of Los Angeles adopted Policy CF#00-0157 requiring that all city-owned or operated diesel-fueled vehicles be equipped with particulate traps and use low-sulfur diesel by the end of 2002. In addition, CARB adopted its Risk Reduction Plan for Diesel-Fueled Engines and Vehicles.

Not all proposed or adopted rules, plans, and policies were incorporated into the Draft EIS/EIR and Supplement to the Draft EIS/EIR air quality analyses. The SCAQMD has conducted a regional environmental assessment of the clean on-road vehicle rules. The air quality benefits from these rules have large regional implications, where public fleets make up roughly 25 percent of the vehicle universe. Within the LAX study area, however, the municipal government fleets represent a much smaller portion of the total vehicle miles traveled (VMT) than in the South Coast Air Basin as a whole. For the purposes of emission calculations and dispersion modeling, the adopted and proposed SCAQMD rules, City policies, and CARB plans will not substantially change the emission factors or the vehicle fleet mix used in the emissions calculation. The emission forecasts developed for the Draft EIS/EIR and Supplement to the Draft EIS/EIR did not assume reductions from these recently adopted rules, plans and policies and, therefore, provide conservative results. Air quality impacts and human health risks may be overstated as a result.

AL00017-182

Comment:

It is a somewhat difficult task to assess human health impacts of various alternative expansion proposals without having finalized the mitigation measures and not having a current airport operations database. Under CEQA, significant impacts occur if incremental increases greater than that of the regulatory thresholds over the established environmental baseline are predicted for the maximally exposed individual. The DEIR/EIS found that even without mitigation measures, cancer health risks

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were less than the CEQA threshold in 2015. However, "other health hazards" were found significant under CEQA for all three "build" alternatives. Implementation of potential mitigation options brought the health hazard level to less than significant. Some of the reasons for this finding are 1) Federal mandates for less polluting aircraft engines and ground service vehicles, 2) Runway additions or modifications will result in more efficient aircraft operations, 3) circulation system improvements will improve vehicle flow and reduce congestion, 4) new configurations of runways and the new West Terminal will place off and on-site residents further from the aircraft sources, and 5) the various mitigation proposals, if fully implemented, would reduce overall air emissions.

Response:

Please refer to Topical Response TR-HRA-1 regarding baseline conditions and TR-HRA-4 regarding mitigation strategies.

Mitigation measures currently proposed differ from those under consideration during the preparation of the Draft EIS/EIR. Recommended mitigation measures were identified in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, to reduce impacts from airport operations and construction as well as from regional vehicular traffic under Alternatives A, B, C, and D. These recommended mitigation measures would also reduce impacts to human health associated with exposure to TAPs. The following mitigation measures considered in the analysis include: continued conversion of GSE to alternative fuels, multiple construction-related measures including use of alternative fuels and add-on emission control devices on construction equipment, and expansion of flyaway bus service between LAX and other locations in the South Coast Air Basin using alternative-fueled buses. These measures, in combination with other proposed mitigation measures, would reduce emissions of TAPs during LAX operations and construction primarily by reducing exhaust emissions from mobile sources and reducing traffic congestion near the airport.

All post-mitigation analyses have been revised and were presented in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.9, Level of Significance After Mitigation), of the Supplement to the Draft EIS/EIR.

AL00017-183

Comment:

Summary of LAWA's Technical Workplan and Potential Roles for City of Inglewood

A major effort is now underway to examine the air quality in vicinity of LAX. The study was suggested early in the development of the LAWA Master Plan but only began to form in late 2000. There is considerable interest in getting a well-documented study by the US EPA, both in the San Francisco regional office and in the Office of Research and Development in EPA Headquarters. The Technical Workplan for this study, "Air Quality and Source Apportionment Study of the Area Surrounding Los Angeles International Airport," was released on November 17, 2000 and describes in great detail the study plan for this important analysis of air pollution in the communities surrounding LAX. The study was committed to by LAWA in late 2000 and has the cooperation of US EPA, the FAA, the SCAQMD, and CARB. The purpose of the study is to collect comprehensive data on air quality around LAX and then examine the key criteria and toxic pollutants that are present. This will include both the concentrations in the air and the source of the emissions. The study will build upon information gathered in the SCAQMD's MATES-II study that was completed in November 1999.

The objective of the study is to collect data and examine the key pollutants both in terms of exposure and source location. This study differs from the DEIR/EIS analysis of air quality in that it is designed to look at current operations instead of future impacts. The study area is much larger than that of the Master Plan DEIR/EIS. LAWA will collect at least one year of continuous and discrete air quality data from a large number of monitoring sites within and in the adjacent communities to LAX. A comprehensive characterization of emission sources and their associated mass emissions for chemical composition will identify marker compounds for subsequent study. More extensive modeling than that performed in the DEIR/EIS is planned, including chemical composition receptor modeling and air dispersion modeling will be conducted. Other techniques will include spatial gradient analysis, time series analysis, and emission inventory development.

The data from this study will be used to examine the various criteria and toxic pollutants, both in terms of concentration and sources. The difference in the scope of this study is that it extends to a much larger area around LAX and considers all sources of pollution. These include freeway, surface traffic, industrial facilities and a major refinery. LAWA believes that this will be the most exhaustive study undertaken by any airport authority in the nation.

The study will collect at least 12 months of continuous and discrete measurements of a variety of pollutants and toxic air compounds. The latter includes trace metals, semi-volatile and volatile organic compounds, and various inorganic compounds. Three monitoring stations will have a full complement of sampling equipment. Two of them will be within LAX property and the third at Jefferson School, 2 km. ENE of south runways of LAX. Seven satellite monitoring sites in the surrounding area will all measure a selected subset of compounds.

The study is currently in the pilot study phase and should begin the 12 month data collection and sampling by early summer. Analyzing the data results will be on going as the data is collected, and the final report should be finished by the end of 2002.

The source apportionment study will look at emissions data to determine what sources caused the emissions, based standard techniques of emissions scaling and dispersion modeling. The air quality measurements will then be combined with the source apportionment findings to evaluate time-series correlation, spatial gradients, and chemical markers. The results will allow researchers to determine the relative contributions at a site from the airport-caused activities versus other non-airport sources in the surrounding community.

The study will be overseen by a technical advisory group from the above mentioned agencies as well as two outside consultants. The same firm that oversaw the DEIR/EIS studies, Camp, Dresser, and McKee (CDM) will also oversee this project. Sub-contractors are Tracer, ES&T, and Dr. Henry of USC and Dr. John Watson of the Desert Research Institute. This consultant suggests that the City of Inglewood have representation and play a very active role in any policy and technical committees formed during the lifetime of this important health assessment.

Response:

Comment noted.

AL00017-184

Comment:

Deficiencies (only for air quality since Dr. Hattis performing more extensive analysis)

- The most obvious deficiency in LAWA's Health Risk and Air Toxics evaluation is the failure to organize and complete a study, such as the Air Quality and Source Apportionment Study described above, prior to the release of the DEIR/EIS. The findings of the study may prove very instrumental in determining the health impacts upon the surrounding community as well as identify mitigation priorities. The DEIR/EIS claims it "fulfills the requirements of CEQA" in assessing the health risks, yet without the Source Apportionment study it cannot assess the incremental impact of LAX operations on local air quality. This study will determine the contribution of various airport-related activities on selected air pollutant concentrations in relation to those pollutants caused by other, non-airport sources in the surrounding community. However, the current study will not be completed until at least the end of 2002.

Response:

Please see Topical Response TR-HRA-1 regarding the air quality and source apportionment study. A Source Apportionment Study was and is still contemplated for the area near LAX. The study was significantly delayed by the events of September 11, 2001, and still has not begun. Currently LAWA is working with the U.S. EPA in an attempt to secure funding for the Pilot Study portion of the LAX Ambient Air Quality and Source Apportionment Study. No date is available at this time as to when the study will start or when data will be available. As currently designed, the study will seek to assess the current contribution of airport-related emissions to total emissions from all sources in the area, and has no health risk assessment component. The LAX Ambient Air Quality and Source Apportionment study was never intended to be part of the LAX Master Plan documentation. LAWA agreed to support the

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study to the maximum extent possible, but stated several times that the study would not be tied to the Master Plan. Two important reasons were timing and methods of analysis.

The Draft EIS/EIR presented an analysis of cumulative health risks for cancer using results of the South Coast Air Quality Management District (SCAQMD) Multiple Air Toxics Exposure Study (MATES-II Study). This study provided estimates of cancer risks due to TAPs in ambient air for the entire South Coast Air Basin. Thirty TAPs were monitored and evaluated in the MATES-II Study for their contribution to excess lifetime cancer risk within the general population living in the South Coast Air Basin. Risks calculated in the study were based on data collected from April 1998 through March 1999. This study integrated impacts from freeway systems along with all other sources of toxic air pollutants in the region. The study concludes that the current excess population cancer risk resulting from exposure to TAPs is about 1,400 in one million (1.4×10^{-3}) in the South Coast Air Basin. Particulate matter from diesel-fueled engine exhaust (PM₁₀) was found to be the dominant pollutant, contributing approximately 70 percent of the total risk. The dominant source for diesel-related PM₁₀ within the Basin is mobile sources such as trucks, buses, automobiles and locomotives. The results of the MATES-II study were used as estimates of background cancer risk in the Draft EIS/EIR that would include current LAX operations. Estimated risks associated with LAX operations were compared to risks associated with those estimated in the MATES II study to determine the impact of LAX operations on cumulative risks (risks associated with LAX operations plus background risks) for people living in the South Coast Air Basin in Section 6.7, Cumulative Risks Associated with LAX Operations, of 14a Human Health Technical Report. The methods used in the analyses are expected to provide reasonable estimates of incremental impacts of the airport on surrounding communities.

Human health impacts associated with airport operations were reevaluated in the Supplement to the Draft EIS/EIR based upon the availability of new or updated information since publication of the Draft EIS/EIR in January 2001. Please refer to Section 4.24 of the Supplement to the Draft EIS/EIR for figures, which show changes in incremental risks, and hazards within communities to levels far below significance thresholds for several miles east of LAX.

An analysis of cumulative health hazards for impacts other than cancer was not provided in the Draft EIS/EIR, but was included in the Supplement to the Draft EIS/EIR. Cumulative impacts of the four build alternatives were evaluated for chronic and acute non-cancer health hazards using data from the U.S. Environmental Protection Agency (USEPA). These data can be used in a general way to illustrate the possible range of relative impacts among the build alternatives, but lack resolution to make predictions of impacts for specific locations around the airport. The USEPA provides estimates of non-cancer hazards for TAPs in air based on information from the Toxics Release Inventory and other sources, and air dispersion modeling. USEPA predictions were used as estimates of current total impacts from all sources in the vicinity of LAX and thus provided the baseline for assessment of cumulative impacts. Additional detail is provided in Technical Report S-9a of the Supplement to the Draft EIS/EIR.

AL00017-185

Comment:

- There appears to be no tables or data on cancer and non-cancer health risks for any year after 2015, yet the operation of the expanded airport during those latter years may well have continuing impacts on the residents of the surrounding communities. Health impacts are often seen in the resident population over a much longer time span than the 15 - 20 years assessed in the DEIR/EIS tables. Other major planning assessments, such as the RTP (2025) and the AQMP Maintenance Plan (2030), examine impacts of their action over a much longer time frame.

Response:

The content of this comment is essentially the same as comment AL00017-30; please refer to Response to Comment AL00017-30.

AL00017-186**Comment:**

- The criteria used to determine net change in chronic and acute hazard indices for LAX may not include the criteria pollutants. The results of the Source Apportionment study would have provided valuable input to assessing criteria (NAAQS) as well as various toxic air pollutant impacts on health.

Response:

Regarding criteria for determining the net change in chronic and acute hazard indices, please refer to Response to Comment AF00001-38 and Topical Response TR-HRA-1 regarding the use of the Source Apportionment study to assess criteria pollutants and toxic air pollutants.

AL00017-187**Comment:**

The DEIR/EIS may also ignore the incremental cancer and non-cancer risks to people whom do not "receive a certain hazard level criterion." (See the Dr. Hattis paper for further clarification)

Response:

The content of this comment is essentially the same as comment AL00017-32; please refer to Response to Comment AL00017-32.

AL00017-188**Comment:****VI. AIR MITIGATION MEASURES****Introduction**

One of the most important components of an Environmental Impact Statement or Report is the identification of ways to reduce or avoid the possible environmental impacts of the project. These are known as "mitigation measures" and are often a key element of an Environmental Action Plan for the project. The Master Plan DEIR/EIS has an exhaustive list of potential mitigation measures to address the significant impacts on air quality by the project. Several of these mitigation measures have specific implementation details including dates and estimated reductions in air emissions. Unfortunately, even a preliminary selection of mitigation measures did not occur in the DEIR/EIS and thus the public cannot comment on the impact of the mitigation measures as a package. LAWA merely commits to initiating discussions with EPA, FAA, CARB, and SCAQMD during the review period of the DEIR/EIS. At the time of writing this report, such meetings had not commenced. Furthermore, the affected cities should be a part of those discussions in addition to the formal comment process. To summarize, it would be helpful to have had LAWA's draft recommendations on the air mitigation measures in the DEIR/EIS but it also provides the commenting public and governmental agencies an opportunity to shape the final set of mitigation measures.

The DEIR/EIS groups the approximately 150 mitigation measures into three categories:

(1) On-airport includes "airside" mitigation such as conversion to electric GSE, reduced engine taxi, clean aircraft landing fees and, "Landside" mitigation includes traffic and parking options, clean motor vehicle fleets, and cargo vehicle options

(2) Off-Airport options include remote terminals, smart shuttles, traffic congestion controls, free parking at outlying terminals, parking pricing, etc,

(3) Construction include clean fueled vehicles for construction delivery and on-site rock crushing to minimize truck hauls

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Priority mitigation measures identified for air quality

The DEIR/EIS recommends a specific measure to reduce airport-related air quality impacts both inside, and adjacent to LAX. It is titled "MM-AQ-1. Implement Revised Air Quality Mitigation Programs. The measure commits LAWA to implement technologically and legally feasible and economically reasonable methods to reduce air pollutant emissions from aircraft, GSE, traffic, and construction equipment both on and off the airport. Finally, it lists 15 potential mitigation measures that can be divided between expansion and implementation of current measures, and development of new measures. The DEIR/EIS makes it very clear that this is a preliminary list that will serve as a discussion area with the FAA, regulatory agencies, and general public in determining the final list of committed mitigation measures in the Final EIR/EIS. It also notes the limited ability of LAWA to implement on a day-to-day basis many of the measures. Where possible, the DEIR/EIS also has estimated the range of emission reductions from each or a combination of measures, and the impact in 2005 and 2010 (Table 4.6-17).

The measures are listed as follows:

Currently implemented measures:

- Continued conversion of ground transportation vehicles to alternative fuels through LAWA's fleet purchasing program and installation of electric vehicle charging stations. Acceleration of the program by incorporating necessary infrastructure into the Master Plan.
- Continued use and encouragement of the LAWA carpool and rideshare program. Development of methods and incentives to promote ridesharing for all LAX tenant employees.
- Ongoing implementation of the traffic management programs, including door-to-door van conversions to alternative fuels, installation and operation of the LAX Intelligent Transportation System and Traffic Management Center, modifications to curbside operations, improvements to public parking and fee schedule, and improved roadway intersections, signage and pedestrian walkways.
- Ongoing expansion of the FlyAway Bus service between LAX and the Van Nuys Airport. Implementation of FlyAway Bus service to at least five other locations in the South Coast Air Basin. Use of alternative-fueled buses for transporting riders between LAX and the FlyAway stations.
- Continued addition of 400-Hertz electrical ground power and preconditioned air systems to existing aircraft passenger gates.
- Continued conversion of GSE to alternative-fuels. Acceleration of the program through incorporation of necessary infrastructure into the LAX Master Plan.

New measures:

- Incorporation of remote terminal services at the FlyAway stations allowing airline passengers to get tickets and check baggage before riding to LAX.
- Development of methods and/or incentives to encourage and promote alternative-fueled vehicles or SULEV/ZEV emission engines in commercial vehicles using the terminal areas, in cargo vehicles entering the airport, and in rental cars using on-airport RAC facilities.
- Development of methods and/or incentives to encourage and promote reduced-engine taxiing by aircraft moving between runways and terminal gates.
- Implementation of clean-fueled "smart shuttles" for trips between local businesses and LAX.
- Development of parking pricing policies to discourage single vehicle trips to the airport or minimizes idle time at the curb.
- Specification of clean-fueled construction equipment for use on LAX Master Plan construction projects.
- Development of methods and/or incentives to encourage and promote alternative-fueled vehicles or SULEV/ZEV emission engines in commercial/cargo vehicles delivering construction material and equipment to LAX Master Plan construction projects.
- Use of soil stabilization and/or water to reduce fugitive dust emissions from LAX Master Plan construction sites.
- Use of on-site rock crushing facility to reuse rock/concrete and minimize haul truck trips.

Other mitigation measures of value listed in DEIR/EIS

Attachment X of the DEIR/EIS contains an extensive listing of air quality mitigation measures that were identified by LAWA, the Master Plan Team, SCAQMD, AAA, LADOT, CARB, and various other cities and organizations during the planning stages. While those measures identified in the previous section probably represent most of the more feasible and quantifiable types of mitigation, there are several measures in Attachment X that may bear further consideration. Examples include the following:

- Minimize use of local streets to access LAX
- Use of larger aircraft, more seats, and scheduling of flights to avoid airport congestion and aircraft queuing
- Establish network of strategically located, off-airport intermodal check-in terminals serviced by LAX-dedicated clean fuel buses
- Promote "best engine" technology for rental cars
- Pricing incentives to replace older aircraft engines with cleaner ones such as emission fees
- Implement parking pricing mechanisms to reduce SOV use and encourage HOV (3+ passengers) or shuttle use
- Parking pricing policies to encourage single trips (use of long term lots by travelers) or minimize idle time at curb (by using short term lots)
- Reduce speed limit on Ring Road to maintain optimum NOx emissions levels (about 35 mph)
- Ban SOV access to Central Terminal Area (CTA) and West Terminal
- Installation of toll booths at entrances to CTA and West Terminal
- Include "airport-friendly" cars on the Long Beach-Los Angeles Blue Line to promote transfers of airport riders to use the Green Line to LAX
- Provide free Green Line entry from the LAX station to promote use of Green Line
- Do not allow private vehicles on the curb (handicap exemptions, of course)
- Charge fee for additional looping of terminal areas, or just don't allow looping to occur

Recommendations on additional or modified mitigation measures for consideration

In addition to the air mitigation measures identified in the DEIR/EIS and highlighted above, several other air mitigation measures are suggested for further consideration by the City of Inglewood in its comments on the Master Plan. They were the result of discussions with other agency staff such as EPA, review of the literature on aircraft mitigation measures, and knowledge of other airport programs by this consultant. Some of these measures include:

- Develop a Parking Cashout program for employees at LAX. Parking Cashout is a concept developed initially by Professor Donald Shoup of UCLA and later incorporated into the Clinton Administration's Global Warming strategy. Legislation in California also encourages parking cash out programs. Simply defined, the program requires employers (such as those at LAX) to offer cash to their employees equivalent to the fair price of parking at the employment site. Surveys have found that employees will often find alternative forms of transportation more cost-effective than driving their cars and paying high parking costs.
- Encourage the FAA to consider use of emission fees to help mitigate air pollution increases from expansion of LAX and other regional airports. Consider allowing only planes with lower emissions per passenger to land in severe and extreme ozone non-attainment areas such as the South Coast Air Basin.
- An incentive to encourage use of alternate airports was included in the Aviation Appendix B of the 2001 RTP. This measure suggested providing discount (10%) on airfare for using outlying airports. Also, HSR (Maglev) would be subsidized at 20% less than the assumed cost for use of Palmdale airport. Fare incentives might be examined as possible mitigation measures.
- Free transit access, rather than free parking, should be stressed in determining combinations of mitigation measures
- Construction mitigation measures should stress use of fees or other mechanisms to minimize the construction area and extend of soil disturbance, rather than just mitigating the impacts. Fees might work well here as well.
- For all unmitigated impacts, establish a fee or penalty system for air emissions over an acceptable limit. Use of fees could be for air monitoring or other environmentally supportive community improvements.

Response:

The Supplement to the Draft EIS/EIR contains an extensive list of potential mitigation measures and highlights those being carried forward and those still under review. The Supplement to the Draft EIS/EIR contains one concise set of mitigation measures that will be implemented in association with the proposed project. The FAA has made every effort through its public participation process to include local communities and community leaders in the CEQA/NEPA process for this document.

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The FAA has extensively evaluated the Parking Cash-Out concept for inclusion in the Supplement to the Draft EIS/EIR. The commentator may be aware that this concept was developed for employers with no on-site parking who were forced to pay an independent parking facility for use of their spaces. In addition, the environmental benefits of such a measure are difficult to quantify given there is no way of knowing what alternative mode of transportation was selected. Employees may opt to park on streets, may be driven to work by spouses who are then making this trip twice a day, rather than once a day. In addition, LAWA has implemented a Rideshare Plan pursuant to SCAQMD's Regulation 2202. In this rideshare plan, LAWA offers similar incentives for carpooling and finding alternative modes of transportation. Extensive analysis of this measure (i.e., Parking Cash-Out) finds that it is not cost-effective for the only potentially marginal air quality benefits that may result from it.

Many of the other mitigation measures suggested by the commentator are also related to fees and/or pricing incentives. These types of measures, while costly, are virtually impossible to quantify in terms of air quality benefits, if any. Please note FAA does not have the statutory authority to impose user fees at an airport it does not own; furthermore, FAA does not have the statutory authority to impose fees or prohibit access to a public-use airport based on potential exhaust emissions from aircraft.

There are approximately 150 construction-related air quality mitigation measures, including those which limit the area graded as well as require water, soil stabilizers, paving, etc., to minimize fugitive dust emissions. When all potential mitigation measures have been developed and implemented, as is the case with the proposed project, there is nothing environmental to be gained through the implementation of fees. It is important to note that the SCAQMD maintains an air monitoring station in close proximity to LAX in the City of Hawthorne.

AL00017-189

Comment:

VII. ENVIRONMENTAL JUSTICE

Summary of discussion in DEIR/EIS on the Environmental Justice air impacts

Chapter 4.4.3, and the accompanying Appendix F of the DEIR/EIS provide discussion of the Environmental Justice impacts and mitigation programs of the proposed LAX Master Plan. Understandably, noise is generally identified as the most serious Environmental Justice (EJ) issue resulting from the proposed build alternatives of the Master Plan. The air quality discussion has a focus upon increased emissions on the areas east of LAX if mitigation measures are not taken. It also discusses the potential levels of toxic air pollutants in the region. Construction impacts are covered in another section of the EJ sub-chapter of the DEIR/EIS. Finally, the DEIR/EIS discusses potential mitigation measures and the formation of an Environmental Justice Community Outreach Program. Review of Appendix F, Environmental Justice, and provided little new information on air quality not contained in Chapter 4.4.3.

Response:

The analysis in the Supplement to the Draft EIS/EIR addressed these issues. Specifically, Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR described the modifications made to the general approach and methodology for the analysis of environmental justice provided in the Draft EIS/EIR. The modifications of the approach serve to supplement the noise assessment, human health risk assessment, and assessment of off-airport traffic emissions to provide a more accurate and precise assessment of noise, human health risk, and traffic emissions. The modifications made to the approach are referenced on page 4-315 of the Supplement to the Draft EIS/EIR. This section of the Supplement to the Draft EIS/EIR also provides mitigation measures to reduce airport-related air quality impacts.

Please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

AL00017-190

Comment:

The EJ study area defined in the DEIR/EIS appears quite appropriate to determine the impacts on surrounding communities to LAX (Figure 4.4.3-1). While the report acknowledges that air pollutant levels in the study area exceed national health standards, it also strongly emphasizes that 60% of all the criteria pollutant emissions in the South Coast Air Basin come from on-road motor vehicles and that the study area has many major power plants and refineries that contribute to the pollution levels. Aircraft operating at LAX contribute under 1% of the basin-wide emissions of the NAAQS. Assessment of the impacts of the three build alternatives on the EJ study area are clouded, as are other air quality assessments in the DEIR/EIS, by the improper selection of the emission baselines. Even unmitigated on-airport emissions resulting from the Master Plan alternatives were found lower than No Action/No Project levels in 2005. However, unmitigated emissions on-airport in 2015 would increase for NO_x and SO_x as aircraft operations and passengers continued to increase. All of the off-airport emission scenarios would show increased unmitigated emissions in the study area in 2005 and 2015 as VMT increased. Construction emissions would add to those totals as well. Establishing the mitigation program (MM-AQ-1) discussed in the previous chapter of this report would decrease CO and VOC emissions by 25-30%, though both off and on airport emissions for most pollutants would remain significant.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental justice in Section 4.4.3, Environmental Justice, air quality impacts in Section 4.6, Air Quality, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix F, Appendix G, and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR, and Appendix S-C, Appendix S-D, Appendix S-E, and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR.

Please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities. Please also see Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits. Further, please see to Topical Response TR-HRA-1 regarding human health risk assessment baseline issues, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-HRA-4 regarding human health mitigation strategies. Finally, please see Topical Responses TR-AQ-2 regarding toxic air pollutants and TR-AQ-3 regarding air pollution increase.

AL00017-191

Comment:

More specific to the EJ issues and residents of the study area, the DEIR/EIS notes that ozone levels might increase as result of increased NO_x emissions from the aircraft operations. Studies show that minority and low-income populations are more severely affected by higher ozone levels, especially those suffering from asthma and other chronic respiratory illnesses. However, the DEIR/EIS then proceeds to note that studies to determine the health effects of the pollutants in the area around LAX are beyond the scope of the DEIR/EIS and requiring a long-term effort. The study that LAWA is only presently initiating, the Air Quality and Source Apportionment Study discussed in the previous chapter, is once again needed to adequately address the air impacts upon the residents of the EJ study area.

Response:

Please see Response to Comments AL00017-190 and AL00017-94.

AL00017-192

Comment:

The DEIR/EIS does note three census tracts just northeast of the LAX that will have cancer risk thresholds of significance in 2005. They are generally between Airport Blvd. and the San Diego

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Freeway but extend into downtown Inglewood as well. Nearly 60% of the 1,100 residents of that three-census tract area are minority and 14% low-income. Cancer risks would be reduced by 2015 due to the various mitigation measures such as GSE conversions, more aircraft activity in the West Terminal area, and the Ring Road.

Response:

Please Response to Comment AL00017-190.

AL00017-193

Comment:

Non-cancer health hazards for children would reach significance thresholds in 2005 and exceed thresholds in 2015 for all three-build alternatives. Employment of mitigation measures suggested in the Air Quality and Human Health and Safety chapters of the DEIR/EIS reduce these levels to less than significant.

Response:

Comment noted. Please see Response to Comment AL00017-90.

AL00017-194

Comment:

Construction noise is discussed in detail, and is generally a surrogate for air quality impacts and surface transportation disruptions. The Preliminary Findings (4.4.3.6) notes, again, that in the absence of background health data, "it is unknown whether air quality impacts associated with the LAX Mater plan could have a disproportionate severe human health effect on minority or low-income populations."

Response:

Please see Response to Comment AL00017-190. Also see Topical Response TR-HRA-2 regarding the data availability, applicable health studies, and the distinguished difference between the data that can be used to properly assess the project. Mitigation measures to alleviate air quality impacts for construction activities are provided in Topical Response TR-ST-3. Finally, please see Topical Response TR-ST-4 regarding airport area traffic concerns.

AL00017-195

Comment:

Finally, the DEIR/EIS discussed an Environmental Justice Community Outreach Process that will be developed and implemented in the study area. The nature and type of benefits from various mitigation measures will be the initial focus of the effort.

Response:

Comment noted.

AL00017-196

Comment:

SCAG RTP discussion on Environmental Justice air impacts of Aviation Scenarios

The SCAG 2001 RTP notes that since the 1998 RTP was adopted, it has become FHWA and Federal Transit Administration (FTP) policy to assure that EJ is in full compliance with the 1994 Executive Order on EJ. The RTP establishes a two-part program to assess the geographic distribution of environmental impacts and calculation of the net benefits of the RTP, including issues such as accessibility and mobility. SCAG established an Equity/Environmental Justice performance indicator of having the benefit of transportation investments equitably distributed among all ethnic, age, and income groups. Appendix B of the Draft 2001 RTP included a table analyzing the priority aviation scenarios on the number of

household affected by poverty levels. The SCAG Aviation Task Force concluded in March 2000 that EJ differences between its airport expansion scenarios were not large.

Response:

Please see Topical Response TR-EJ-3 regarding consistency of the Master Plan with the 2001 RTP.

AL00017-197

Comment:

Another examination of EJ and the expansion of LAX was conducted by Occidental College for the Communities for a Better Environment environmental group. This study, as are most of the other airport-related EJ studies, focused on noise impacts and assumes that air quality or transportation congestion would be proportional. The study calculated the percentage of the total regional burden faced by residents near LAX (and other airports) and adding up the number residents affected and the intensity of their impact to determined a "person-impact". This found that a very large expansion of LAX and/or a failure to convert El Toro Marine Base to commercial use greatly shifted burdens to minority populations in Southern California. Most equitable option for EJ is capping demand at LAX and shifting the traffic to Ontario.

Response:

Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-4 regarding Orange County air transportation demand. Subsequent to the publication of the 2001 Draft EIS/EIR, the voters of Orange County passed Measure W that designates non-aviation land uses for 4,700 acres of land at the former MCAS El Toro. Passage of Measure W changed the County's official land use designation for the property from that of a commercial airport to a mix of recreational, educational, cultural, and open-space uses. On April 23, 2002, the Department of Navy issued its Record of Decision (ROD) for the disposal of MCAS El Toro and determined that it would dispose of the base in a manner consistent with state and local land use plans (i.e., non-aviation reuse). The city of Los Angeles has no authority to develop a civilian airport at the former MCAS El Toro.

As previously indicated, the Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. Alternative D would also be consistent with the stated RTP desire to address disproportionately high and adverse aircraft noise impacts by distributing growth regionally and limiting growth at LAX.

AL00017-198

Comment:

Recommendations on additional considerations in Final EIR/EIS

- LAWA should make commitments in Final EIR/EIS to adjust/mitigate/offset the negative impacts on minority and low income residents identified in the DEIR/EIS through specific measures

Response:

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the Supplement to the Draft EIS/EIR. Furthermore, environmental justice outreach

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was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

AL00017-199

Comment:

- LAWA should strive to assure that the new Source Apportionment study is fully integrated, and has community input, from those residents in the EJ study area.

Response:

Please see Topical Response TR-AQ-2 regarding the integration of the Source Apportionment study as part of the LAX Master Plan documentation.

AL00017-200

Comment:

- LAX should consider initiating a model EJ program to address many of the impacts of air quality from airport operations that would occur in other areas of the South Coast air basin

Response:

Please see Response to Comment AL00017-190.

AL00017-201

Comment:

- Since LAX employs nearly 60,000 workers, it should try to use the proposed EJ Community Outreach Process to also include those workers who may also reside beyond the study area identified in the DEIR/EIS

Response:

Please see Topical Response TR-EJ-2 regarding a detailed description of the environmental justice program, economic benefits, and employment and business opportunities for low income and/or minority communities.

AL00017-202

Comment:

VIII. CONCLUSIONS

Procedural Relationships

This further evaluation of the LAX Master Plan Draft EIR/EIS, deemed the Phase II report, focused on several priority topic air quality areas to determine how adequate they were addressed in the subject document. An important CEQA/NEPA concept is that of "conformance to larger area plans." Accordingly, the current regional air quality and transportation planning efforts were examined against the DEIR/EIS. The impact of LAX upon not just the immediate areas outside the "fence line," but surrounding communities and impacted residents was studied. Finally, the report examined the various mitigation measures either strongly suggested or merely listed to determine which measures might warrant further pursuit in the Final EIR/EIS.

CEQA guidance on full disclosure, substantial evidence, and sufficiency of the EIR in light of what is reasonable feasible was applied throughout this investigation. Whether the EIR fully examined the

environmental effects of future expansion or whether the identified impacts were found too speculative to evaluate was investigated. The NEPA requires, under an Executive Order by the Council on Environmental Quality on July 28, 1999, that agencies must actively solicit participation of state, tribal, and local governments in the EIS process. It is under this guidance that the State and local air agencies are encouraged to meet with the FAA and EPA at the earliest convenience to begin identifying specific air mitigation commitments for the Final EIR/EIS. Similarly, at the State level under CEQA a lead agency must utilize the Caltrans' Airport Land use Planning Handbook for projects within the boundaries of a comprehensive airport land use plan.

Response:

Comment noted. The air quality analysis and air toxics analysis completed for the proposed LAX Master Plan, as presented in Sections 4.6 and 4.24.1, respectively, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, addressed potential impacts at both a local level, including impacts to surrounding communities, and on a regional level, relative to meeting state and federal ambient air quality standards as applicable to the South Coast Air Basin. The analyses were completed in accordance with federal, state, and local requirements and included direct consultation and coordination with the appropriate air resources agencies (i.e., U.S. Environmental Protection Agency, California Air Resources Board, and South Coast Air Quality Management District). Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR provided an analysis of the proposed Master Plan alternatives relative to the Caltrans Airport Land Use Planning Handbook.

AL00017-203

Comment:

Priority areas to consider commenting upon by the City

This report notes many areas that should be revised or strengthened in the Final EIR/EIS. The following listing highlights several of the more important concerns:

Response:

Please see Responses to Comments AL00017-204 through AL00017-215 below.

AL00017-204

Comment:

- Inconsistencies between the preferred alternative in the DEIR/EIS and SCAG's adopted 2001 RTP's Aviation Scenario. Projected size of LAX is much different.

Response:

Comment noted. Please see Topical Response TR-MP-2 regarding the compatibility between the Draft EIS/EIR and Supplement to the Draft EIS/EIR and the SCAG Regional Transportation Plan (RTP).

AL00017-205

Comment:

- Different emission factors and modeling year selection between RTP and DEIR/EIS

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed the selection of horizon years for air quality analyses in Section 4.6, Air Quality. Emission factors for stationary and number sources use the latest available emission factor models and information. On-road, mobile-source emission factors were calculated in the Draft EIS/EIR using EMFAC 2000. Calculations were revised in the Supplement to the Draft EIS/EIR using the latest available approved model, EMFAC model (EMFAC 2002). Please see Section 4.6, Air Quality, of the Draft EIS/EIR regarding on-road emission calculations.

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AL00017-206

Comment:

- Selection of different market incentives and rail scenarios between RTP and DEIR/EIS

Response:

In response to the direction of Mayor Hahn, LAWA has developed a new alternative for consideration as part of the LAX Master Plan. Alternative D, The Enhanced Safety and Security Plan Alternative is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. To ensure that the LAX Master Plan Alternative D has been fully analyzed to the level of the previous Master Plan alternatives, LAWA prepared a Supplement to the Draft EIS/EIR. Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP.

AL00017-207

Comment:

- Use of three different baseline scenarios in the DEIR/EIS makes it difficult to compare impacts on air quality both on and off airport.

Response:

The use of different baselines is necessary to conform to regulatory standards and the requirements of CEQA for both air emissions and ambient air concentrations. Under CEQA, incremental emission thresholds for operational and construction sources are separate. Operational and construction source emissions under future scenarios were compared against the 1996 environmental baseline, as described in Section 4.6.3, Affected Environment/Environmental Baseline, of the Supplement to the Draft EIS/EIR, to determine significance under CEQA. In addition, regional traffic analyses emissions were compared against regional adjusted interim year and 2015 environmental baselines as described in Section 4.6.2.6, Methods of Determining Significance, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

For the dispersion analysis, ambient air concentrations for on-airport operational sources and construction-related sources were re-analyzed and combined in the Supplement to the Draft EIS/EIR for comparison against the environmental baseline, and the National and California Ambient Air Quality Standards (AAQS). Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR regarding the methodologies used and the concentration results of the air dispersion modeling.

Please see Topical Response TR-GEN-1 for additional information regarding the environmental baseline.

AL00017-208

Comment:

- No commitment in DEIR/EIS to specific air mitigation measures

Response:

The Supplement to the Draft EIS/EIR contains a detailed Environmental Action Plan (Section 5). A Mitigation Monitoring and Reporting Program will be adopted as part of project approval, which will be designed to ensure compliance with the adopted measures during project implementation.

AL00017-209

Comment:

- Questionable assumptions of future aircraft operations mix

Response:

Please see Responses to Comments PC00599-7 and PC00593-1 for a discussion on the fleet mix assumptions used in the development of the alternatives.

AL00017-210

Comment:

- Optimistic assumptions on industry compliance and performance with future regulations.

Response:

Comment noted. Please see Topical Response TR-MP-2 regarding the compatibility between the Draft EIS/EIR and Supplement to the Draft EIS/EIR and the SCAG Regional Transportation Plan (RTP).

AL00017-211

Comment:

- Inadequate impact evaluation in the DEIR/EIS proposed expansion of LAX upon the surrounding communities

Response:

Please see Response to Comment AL00017-97.

AL00017-212

Comment:

- DEIR/EIS bases much of the mitigation on major highway and transit improvements which are not included in the 2001 RTP constrained (funds expected) project list

Response:

This comment is similar to comment AL00017-47. Please see Response to Comment AL00017-47. In addition, the RTP includes an action to mitigate the effects of expanding existing airports and consider the reuse of military air bases so that community impacts are minimized. This action supports the development of ground access improvements at LAX.

AL00017-213

Comment:

- Question whether Final EIR/EIS should be issued without some health impact results from the Air Quality and Source Apportionment Study

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please also see Topical Response TR-AQ-2 for additional information regarding the LAX Ambient Air Quality and Source Apportionment Study.

AL00017-214

Comment:

- Suggest further evaluation of selected additional air mitigation measures identified in Chapter VI of this report

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Response:

Comment noted. The Supplement to the Draft EIS/EIR provided more specific information as well as additional mitigation measures in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E.

AL00017-215

Comment:

- LAWA should make commitments to address Environmental Justice issues in areas affected by airport activities including specific air and traffic congestion mitigation projects.

Response:

Please see Response to Comment AL00017-198. As indicated in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, traffic impacts were not found to have a disproportionately high and adverse effect on minority and low-income communities. However, mitigation measures are proposed to address traffic impacts where they occur in all communities, as described in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Also see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities. The final set of mitigation measures and benefits relating to environmental justice are presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Final EIS/EIR.

AL00017-216

Comment:

Transportation Planning

The U.S. Department of Transportation (DOT) under the Transportation Equity Act for the 21st Century (TEA-21) requires that metropolitan planning organizations (MPO) such as SCAG update the Regional Transportation Plan (RTP) for the area every three years. The RTP is a 20-year vision of the area's commitment to transportation improvements. The current update was adopted in April, 2001. One of the major changes to the previously adopted RTP in 1998 should include the impacts of expanding operations at LAX. Decisions made on the RTP update and the incorporation of various transportation mitigation strategies is of great concern to the City of Inglewood and other South Bay cities.

Alternatives

The LAX Master Plan Draft EIR/EIS proposes three "build" alternatives in addition to the required "no build" alternative. Briefly, Alternative A would add a new runway on the north field portion of LAX and could accommodate the full projected demand of 97.9 million annual passengers and 4.2 million tons of air cargo by 2015. Alternative B would add a new runway on the south field portion of LAX and could also accommodate the full projected demand. Alternative C would not add any new runways but move two of the existing runways, extend three of them, and widen one of them. This would accommodate the projected air cargo demand but only 86.9 million air passengers in 2015. Alternative C is the preferred alternative by LAWA.

Because of time restrictions to complete this analysis and because it is the preferred alternative, the impacts of Alternative C are the subject of this report. Alternative C is identified as producing the smallest off-airport impact of all the alternatives.

II OVERVIEW OF THE DRAFT EIR/EIS

The Draft EIR/EIS is an extremely detailed and extensive analysis of the LAX Master Plan alternatives under consideration by LAWA. It is approximately 12,000 pages in length containing seven chapters and eleven appendices which have specific documentation and additional technical analysis of the impacts of the alternatives. Finally, there are seventeen special technical reports, 251 tables and 183 figures in the main report.

This analysis of the traffic and transportation issues required the review of Chapter 4.3, Surface Transportation and, specifically, Chapter 4.3.1, On-Airport Surface Transportation, Chapter 4.3.2, Off-Airport Transportation, and Chapter 4.20, Construction Impacts. Technical Report 3b, Off-Airport Ground Access Impacts and Mitigation Measures, completed by Barton-Aschman Associates, Inc in January, 2001, was the main focus of the potential long term impacts on the citizens of the City of Inglewood.

Approach and Methodology

The Barton-Aschman study used the standard approach and methodology including those required by the U.S. Department of Transportation for environmental documents to analyze the impacts of the various alternatives.

The basics are:

- Establishing existing conditions
- Forecasting LAX trips and assigning them to the area road system
- Adding future traffic demand for background (non-airport) trips and assign them to the road system
- Adding trips that will be generated by future non-airport projects in the region
- Comparing significant impacts
- Developing preliminary mitigation measures

Because the base year for analysis purposes is 2005, assumptions were made that future transportation system improvements with programmed funding were added to the model networks. Improvements are assumed to the freeways, high-occupancy (HOV) lanes, surface streets, and to the transit system. The roadway improvements are shown in the attached Table 2.3. (Please see original letter for table.) The validity of the model depends on these improvements being in place.

Six intersections in the City of Inglewood were analyzed. They are:

- Aviation at Arbor Vitae, Intersection No. 7
- La Cienega at Arbor Vitae, Intersection No. 8
- La Cienega at Century, Intersection No. 26
- La Cienega at Florence, Intersection No. 40
- La Cienega at Manchester, Intersection No. 72
- La Cienega at I-405 SB ramp n/o Century, Intersection No. 111

Roadway links identified as being analyzed in the City of Inglewood are:

- Manchester Avenue west of La Brea
- Arbor Vitae Street west of La Brea
- Century Boulevard west of La Brea

Significant Issues

Four significant issues were identified for the City of Inglewood to consider including in the overall comments on the Draft EIR/EIS and to consider for further analysis. These issues are: 1) impacts of the proposed "congestion relief package"; 2) impacts on level of services (LOS) changes caused by the project (Alternative C); 3) mitigation measures; and 4) conformance to the 2001 RTP.

Construction traffic would cause main roads around the airport to be intermittently subject to temporary detours and congestion during construction of airport related improvements. This, in turn, would temporarily impact access to businesses, residences, community facilities and services. Implementation of numerous mitigation measures to reduce construction impacts would serve to minimize significant community disruption impacts. It is felt that construction traffic will not be a significant issue for the City of Inglewood.

III DISCUSSION OF SIGNIFICANT ISSUES

This section will discuss the four significant issues affecting the City of Inglewood.

Impact of the Proposed Congestion Relief Package

The proposed "congestion relief package" consists of three major transportation improvement projects as follows:

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- On the north, an expressway would provide direct freeway access to LAX for motorists traveling south on the 405 Freeway and for exiting the airport heading north.
- From the east, the 105 Freeway would be extended approximately 1.5 miles so that it terminates directly onto the airport.
- A ring road would be constructed that provides direct access to all parts of the airport and to the above freeway connections.

Response:

Comment noted.

AL00017-217

Comment:

According to LAWA, these highly touted improvements will play a major role in reducing traffic congestion in the vicinity of LAX. Unfortunately, the gap in the analysis of these projects were impacts on adjacent communities including the City of Inglewood. This lack of analysis on surrounding communities has been a deficiency throughout the DEIR/EIS. Even Chapter 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, there was little discussion past the immediate neighborhoods surrounding LAX.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please refer to Topical Response TR-ST-4 for a discussion of traffic impacts in the neighborhoods surrounding LAX. In addition, please see Subtopical Response TR-ST-2.2 for a discussion of the study area definition and identification of the facilities analyzed. The Draft EIS/EIR analyzes four intersections that are entirely within the City of Inglewood boundaries, four additional intersections that are on the border of Inglewood, four roadway links in Inglewood, and thirteen freeway ramps within the boundaries of the City of Inglewood. An additional five intersections were evaluated in the analysis of Alternative D. This alternative shifts more airport activity eastward, closer to I-405. Because of this shift, additional intersections east of I-405 were analyzed for Alternative D.

AL00017-218

Comment:

Another concern is whether the roadways improvements described above have a solid funding base or will they have to compete with other vitally needed projects in the region. For example, SCAG is vying with six other states for a \$950 million federal grant to construct a high-speed rail demonstration project that would connect LAX to downtown Los Angeles and other communities and air facilities. If the "congestion relief" projects are not constructed in conjunction with the expansion of LAX, surrounding cities could be impacted significantly.

Response:

Please see Response to Comment AL00008-6 regarding funding.

AL00017-219

Comment:

SCAG has adopted a new Regional Transportation Plan (RTP) for 2001. Affected cities were invited to provide comments on the draft RTP. LAWA comments through the City of Los Angeles were quite critical of SCAG's technical approach to determining the impacts of the RTP. A major concern was SCAG's priority given to high-speed rail and the assumptions that passengers and cargo would change airport destinations as a result of a high-speed rail system. LAWA believed that the draft RTP did not accurately portray the extensive ground transportation committed to the LAX DEIR/EIS.

Impacts on Levels of Service (LOS) Caused by the Project (Alternative C)

Level of Service (LOS) measures the effectiveness of an intersection or roadway segment in terms of delay, which is a measure of driver discomfort and frustration, fuel consumption, and lost travel time. The attached Table 4.3.1-2 describes and depicts various levels of service from LOS A to LOS F. (Please see original letter for table.)

Of the six intersections in the City of Inglewood analyzed by Barton-Aschman, all were adversely impacted by the project in the Year 2005 and five in the Year 2015 as shown on the attached Tables 4.3.2-15 and 4.3.2-16. (Please see original letter for table.)

The attached Table 4.3.2-23 shows the LADOT Levels of Service for Alternative C for 2005 under existing conditions, base conditions (2005), 2005 with Alternative C, and 2005 with Alternative C with mitigation in place. Table 4.3.2-24 shows the same for 2015 conditions under Alternative C. (Please see original letter for table.)

Response:

Comment noted.

AL00017-220

Comment:

Mitigation Measures

One of the most important aspects of the Draft EIR/EIS is the identification, analysis and selection of measures to mitigate the impacts of increased traffic volumes resulting from the expansion of LAX. While the document conducts an extensive effort to identify potential mitigation measures, the specific impacts of implementing these measures upon the City of Inglewood does not appear adequate. While most of the City of Inglewood is within the Land Use Study Area as shown in the attached Figure 4.2-1, the analysis on the impacts of the project on intersections and roadway segments east of the 405 freeway are minimal.

Mitigation measures at intersections include addition of through and/or turning lanes. They also include two Intelligent Transportation System (ITS) Mitigation Measures which make it possible to adjust the flow of traffic. An Adaptive Traffic Control System (ATCS) would continuously electronically adjust traffic signal timing based on real-time conditions. Automated Traffic Surveillance and Control (ATSAC) makes it possible for manual remote control of traffic signals.

Analysis of additional intersections and roadway segments east of the 405 freeway is appropriate and necessary to determine the need for additional mitigation measures other than those already included in the DEIR/EIS. Since LAWA has not made a final determination on which measures to adopt, input by the City of Inglewood through the DEIR/EIS comment process could be helpful in settling on the final set of mitigation measures.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-ST-2 regarding the traffic analysis study area.

AL00017-221

Comment:

Conformance to the 2001 RTP

The potential expansion of LAX must conform to areawide transportation plans. A review of the Draft EIR/EIS showed potential deficiencies in this area. Failure to conform could lead to potential funding sanctions and other Federal restrictions that could affect the City of Inglewood. It is important that such deficiencies be identified and corrected.

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Response:

Please see Response to Comments AL00018-58 and PC01835-65 regarding conformity to local plans.

AL00017-222

Comment:

IV EVALUATION OF ISSUES AND RECOMMENDATIONS

Impact of the Proposed Congestion Relief Package

The proposed "congestion relief package" consists of three major transportation improvement projects as described in the previous section. On preliminary review, it appears that the South Bay cities are excluded from the congestion relief package. Also, it is unclear whether these roadway improvements have a solid funding base. If not, there will be fierce competition for these funds with other regional projects and even the funding of mitigation measures for the LAX expansion.

It is recommended that the City of Inglewood include these concerns in their DEIR/EIS comments.

Response:

The congestion relief package addresses the facilities significantly impacted by the proposed project, as discussed in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR. Also, please see Response to Comment AL00008-6 regarding funding.

AL00017-223

Comment:

While the LAX Expressway borders areas in the City of Inglewood, Chapter 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, of the DEIR/EIS states that "this facility is proposed within existing rights of way and would not intrude into Inglewood or interfere with access to community services". The plans for the LAX Expressway and a more detailed discussion of its potential effects on communities are provided in Appendix K, Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements.

It is recommended that an independent consultant funded by LAWA conduct an extensive evaluation of the impacts of the LAX Expressway upon the citizens of the City of Inglewood.

Response:

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR are program-level environmental documents intended to analyze the impacts of a Master Plan. It is acknowledged that further documentation may be required to address certain environmental issue in a more specific manner, as necessary and appropriate. However, the level of detail provided in the Draft EIS/EIR is sufficient to identify environmental impacts and appropriate mitigation, per CEQA and NEPA. For the LAX Expressway, this information is provided in Appendix K. Please note that Alternative D does not include the LAX Expressway or ring road, as detailed in the Supplement to the Draft EIS/EIR.

AL00017-224

Comment:

Impacts on Levels of Service (LOS) Caused by the Project (Alternative C)

Of the six intersections in the City of Inglewood analyzed by Barton-Aschman, all were adversely impacted by the project in the Year 2005 and five in the Year 2015 as shown on the attached Tables 4.3.2-15 and 4.3.2-16. (Please see original letter for tables.)

The attached Table 4.3.2-23 shows the LADOT Levels of Service for Alternative C for 2005 under existing conditions, base conditions (2005), 2005 with Alternative C, and 2005 with Alternative C with

mitigation in place. Table 4.3.2-24 shows the same for 2015 conditions under Alternative C. (Please see original letter for tables.)

There are serious concerns regarding the validity of the model with regard to the following:

Baseline Conditions - There is a question of the legitimacy of the baseline for evaluating the levels of service. Two baseline scenarios were used to determine the effect of the proposed Master Plan improvements on off-airport roadways. First, the environmental baseline is the surface condition existing in 1996. Second, the adjusted environmental baseline uses the current airport use, but assumes future roadways and land uses. Two issues are raised when using this approach:

1. It does not provide for a comparison of project alternatives with existing conditions. CEQA requires that the existing condition of an EIR be established at the time the Notice of Preparation (NOP) is issued. The use of so-called existing condition for the years 2005 and 2015 does not meet this requirement.

2. It minimizes the extent of change on area roads between the existing conditions and the future conditions associated with the project. It is clear that not all future roadway adverse conditions will be a result of the LAX Master Plan. However, comparing the project to a future condition seems to limit the evaluation of cumulative effects and the project's contribution to their mitigation.

Modeled Years - The DEIR/EIS modeled future conditions for the years 2005 and 2015. The current SCAG RTP uses 2025 as the horizon year. The 2025 year would seem to be the appropriate year to use since the project will take at least 16 years to complete. The proposed Master Plan improvements may well not be complete by 2015. A discussion of a longer planning horizon would be appropriate.

Assumptions - Because the base year for analysis purposes is 2005, assumptions were made that future transportation system improvements with programmed funding were added to the model networks. Improvements are assumed to the freeways, high-occupancy (HOV) lanes, surface streets, and to the transit system. The roadway improvements are shown in the attached Table 2.3. (Please see original letter for table.) The validity of the model depends on these improvements being in place. However, there is no guarantee that these facilities will all be built in a timely manner.

It is recommended that the City of Inglewood include these concerns in their DEIR/EIS comments.

Response:

Please see Topical Response TR-ST-2 regarding the surface transportation analysis methodology and results, including definition of baseline scenarios and incorporation of local/regional plans and programs.

AL00017-225

Comment:

Mitigation Measures

One of the most important aspects of the Draft EIR/EIS is the identification, analysis and selection of measures to mitigate the impacts of increased traffic volumes resulting from the expansion of LAX. While the document conducts an extensive effort to identify potential mitigation measures, the specific impacts of implementing these measures upon the City of Inglewood does not appear adequate.

The mitigation measures currently in the report for intersections in Inglewood are shown the attached Phase 3F: 2005 Alternative C Final Transportation Improvements and Phase 3F: 2015 Alternative C Final Transportation Improvements. (Please see original letter for tables.) The 2005 improvements include five intersections in Inglewood and the 2015 improvements include two intersections in Inglewood. No roadway links in Inglewood were included for improvements nor is there a discussion regarding them.

Analysis of additional intersections and roadway segments east of the 405 freeway is appropriate and necessary to determine the need for additional mitigation measures other than those already included in the DEIR/EIS. Since LAWA has not made a final determination on which measures to adopt, input by

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the City of Inglewood through the DEIR/EIS comment process could be helpful in settling on the final set of mitigation measures.

It is recommended that the city of Inglewood include these concerns in their DEIR/EIS comments.

It is further recommended that an independent consultant funded by LAWA conduct an extensive evaluation of the impacts of the project on the intersections that were analyzed and an evaluation of intersections and roadway links east of I-405 that were not analyzed within the City of Inglewood.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The level of detail in the Draft EIS/EIR and Supplement to the Draft EIS/EIR was appropriate to satisfy both NEPA and CEQA requirements. Significant impacts were determined and appropriate mitigation measures were developed where necessary, as summarized in Section 4.3.2, Off-Airport Surface Transportation. Also, please see Topical Response TR-ST-2 regarding the traffic analysis study area.

AL00017-226

Comment:

Conformance to the 2001 RTP

The potential expansion of LAX must conform to areawide transportation plans. Apparently, there is substantial inconsistency between the Draft EIR/EIS and the SCAG adopted RTP. The DEIR/EIS refers to the 1998 SCAG RTP and its data. However, the SCAG RTP 2001 has been adopted and includes more up-to-date figures. In addition, the LAX project designated in the RTP is for 78 million air passengers not the 86 million used in the DEIR/EIS preferred Alternative C. Failure to conform could lead to potential funding sanctions and other Federal restrictions that could affect the City of Inglewood.

It is recommended that the City of Inglewood include these concerns in their DEIR/EIS comments urging that these deficiencies be corrected.

Response:

This comment is similar to comment AL00017-47. Please see Response to Comment AL00017-47. The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00017-227

Comment:

Following are my overall conclusions resulting from the EIS/EIR review.

- The 1996 baseline year, five years ago, is an unacceptable baseline from which to evaluate future noise impacts, and misleads the reader into believing comparisons are made with respect to current conditions. The current airport noise impact is substantially less than that described for the baseline condition, resulting in an understatement of the increased noise impacts for future year assessments.

Response:

Please see Response to Comment AL00033-87.

AL00017-228

Comment:

- All noise exposure contours are understated because discreet single-line flight tracks were input to the Integrated Noise Model (the INM is the FAA standard noise modeling computer program) rather than

actual dispersed flight tracks observed from the ARTS radar information. This was probably done to simplify computer input for noise modeling.

Response:

Comment noted. For more information please see Topical Response TR-N-1, regarding noise modeling approach, particularly TR-N-1.4.

AL00017-229

Comment:

- All noise impacts are given solely in terms of the CNEL noise descriptor.

Response:

Table A5-4 through Table A5-8 show noise impacts using DNL, Lmax and Time Above metrics in the Draft EIS/EIR. The Supplement to the Draft EIS/EIR included a comprehensive analysis of single event noise.

AL00017-230

Comment:

While the report states that at least a "Time Above" (TA) analysis was also conducted using the INM, I find no TA results within the report, nor any impact assessment made with respect to this metric.

Response:

Extensive Time Above information is provided in Tables A5-6 through A5-9 of Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. The introduction to the Supplemental Metrics section of the appendix describes in general terms the use of Time Above results as indicators of noise effect. Nighttime single event noise impacts and mitigation for LAX Master Plan alternatives were presented in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, with supporting information in Appendix SC and Technical Report S-1.

AL00017-231

Comment:

- The technical report on economic impacts does not address the effects of noise on property values.

Response:

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

AL00017-232

Comment:

- Appendix 14b, "Health Effects of Noise Technical Report," is a good discussion of physiological and psychological effects of airport noise at LAX, but the EIS/EIR fails to make any assessment with respect to the criteria set forth.

Response:

Please see Response to Comment AL00017-52.

AL00017-233

Comment:

The Baseline Year

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The 1996 five-year-old baseline year represents a noise environment substantially greater than that realized around LAX today. The Airport Noise and Capacity Act (ANCA) required the graduated phase-out of the older and noisier Stage 2 aircraft by the year 2000. The year 1996 was midway through this phase-out when the noise environment at LAX continued to be dominated by noisier Stage 2 aircraft, all of which have subsequently been retired. Thus the current noise exposure at LAX is substantially below the 1996 baseline. This is readily evident by reviewing the latest Quarterly Report to the State Department of Transportation provided in compliance with static noise standards.

There was no need to adopt a baseline year five years old. Certainly there was substantial preparation time required for this document, but reliable forecasts had been available for some time before the current year 2001 when this EIS/EIR has been submitted for review. It is a simple, straight forward and responsible act to revise the EIS/EIR using the latest INM model submitted to the State for review. This is an accurate model which is verified by noise monitoring stations around LAX.

Response:

Please see Response to Comment AL00033-87.

AL00017-234

Comment:

Specific Comments

Following are individual observations of details down throughout the EIS/EIR:

- The noise overview, page 4-12, shows a bar graph "Population Newly Exposed to 65 CNEL compared to environment baseline (2015)." At the risk of dwelling on this issue, the term "newly" should be understood to be with respect to the baseline year 1996. Thus the population actually "newly" exposed to 65 CNEL using today's baseline would be substantially greater for each of the alternatives that is shown in this misleading bar chart.

Response:

Please see Response to Comment AL00033-87. It should be noted that there are certain differences in using a 1996 versus 2000 baseline for measuring noise impacts. For example, more acres and dwellings are within the 1996 65 CNEL contour than the 2000 contour; in this sense, the 1996 baseline underestimates the noise impacts from the Master Plan improvements. See Table S4.1-1 of the Supplement to the Draft EIS/EIR. On the other hand, there are less people and non-residential noise sensitive parcels within the 1996 65 CNEL contour than the 2000 contour. Using a 2000 baseline would underestimate the potential noise impacts. Also, it should be noted that, although the area significantly impacted by noise has been reduced since 1992, all incompatible land uses within the 1992 fourth quarter 65 CNEL noise contour or within the 65 CNEL area extending beyond the 1992 contour are eligible for participation in the ANMP.

AL00017-235

Comment:

- Table 4.1-6, "Combined Daily Aircraft and Roadway Noise at Receptor Site by Alternative (Leq)," attempts to compare peak-hour equivalent noise levels for aircraft and roadway noise. It is unclear how this was done. Was the aircraft activity that occurs during the peak hour road traffic used to compute this level? Was the road traffic that occurs during the peak aircraft hour used for the assessment? Were different peak hours used for the assessment?

Response:

Daily average noise levels (24 hour Leq) was computed for aircraft noise at each of the roadway noise locations as input information to combine with roadway noise for a description of the combined effects of both noise sources on 21 noise-sensitive locations near roadways. Peak hour Leq data was developed for roadway noise and converted to estimated 24-hour Leq levels by relating the proportion of the noise energy from surface transportation during the peak hour to the 24-hour day. The roadway and aircraft 24-hour Leq levels were then logarithmically added and reported as combined noise levels.

Information about these locations and the combined noise levels is reported in Section 4.1, Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, with supporting information in Appendix D of the Draft EIS/EIR and Appendix SC of the Supplement to the Draft EIS/EIR.

AL00017-236

Comment:

Or is the comparison being made between two different metrics, CNEL for aircraft noise and peak-hour equivalent noise level for traffic noise? I believe that this section is important because it appears to be the only section of the EIS/EIR that attempts to describe the total noise environment in the areas around LAX, that is, the noise environment from both LAX aircraft activity and from local roadway activity. The information and computations made for Table 4.1-6 should be provided.

Response:

CNEL data was developed for the measurement sites for comparison with measured noise levels of the environmental baseline condition. Daily average noise levels (24 hour Leq) were computed for aircraft noise at each of the roadway noise locations as input information to combine with roadway noise for a description of the combined effects of both noise sources on 21 noise-sensitive locations near roadways. Information about these locations is reported in Section 4.1, Noise (subsection 4.1.2.2), of the Draft EIS/EIR and Section 4.1 of the Supplement to the Draft EIS/EIR.

AL00017-237

Comment:

- Table 4.1-7, 'Forecast Daily Aircraft Operations,' reflects only moderate transition from propeller aircraft to light jets between the years 2005 and 2015. One might expect a greater increase during this period due to the emerging popularity of regionally jets which may be well suited for central valley and Palm Springs locations.

Response:

Comment noted. The commentor accurately describes a portion of the forecasts provided in the Draft EIS/EIR. For information regarding accuracy of the forecast fleet mix please see Subtopical Response TR-N-1.5.

AL00017-238

Comment:

- Table 4.1-18, "Significant NEPA/FICON Noise Impacts," is an important table and an example of the understated impacts due to selection of a five-year-old baseline year. Again the "newly exposed to 65 CNEL" is misleading.

Response:

Please see Response to Comment AL00033-87. For more information, please see Topical Response TR-GEN-1 and Topical Response TR-N-1, particularly Subtopical Response TR-N-1.3, regarding use of 1996 baseline noise levels from which to measure increases associated with proposed alternatives, and Subtopical Response TR-N-6.2 regarding relationship between traffic levels and noise levels.

AL00017-239

Comment:

- Section 4.2 on land use is fairly comprehensive but, unfortunately, understates the noise impacts through use of a five-year-old baseline year. Actual numbers of churches, schools, residences, etc. newly impacted are substantially greater in the future prediction years.

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Response:

Please see Sections 4.1 and 4.2, Noise and Land Use, respectively, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information on and comparisons of noise and noise-related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives including new Alternative D. Please see Response to Comment AL00017-233 regarding the 1996 baseline and Topical Response TR-N-6 regarding noise increases.

AL00017-240

Comment:

Flight Track Dispersion

The flight tracks use for the current condition and all alternatives are simplified single-line tracks such as those shown in Exhibit 2 in Section 2.1.3, Flight Tracks, of Appendix D, "Aircraft Noise Technical Report." These flight tracks were likely generalized to single-lines after reviewing actual flight track histories recorded on the FAA control tower's ARTS radar. It appears that flight tracks were developed by observing the concentration and dispersion of aircraft along a general route, and then placing all aircraft on a single flight track generally centered in the middle of the dispersed route. This facilitates modeling because it eliminates the need to create multiple routes along a single published flight track. However, the effect of this centralization is to understate the resulting CNEL contour. For instance, the noise contour for two identical aircraft departing on routes five degrees apart would be larger than for the identical two aircraft departing on a single route.

Each flight track should be broken into three or five discreet flight tracks with one or two flight tracks a few degrees each side of the single centerline flight track. The aircraft then assumed to fly the single flight track should be dispersed somewhat equally among the three or five independent flight tracks before the INM is run. The accuracy of the model may be checked by comparing the model results at noise monitor locations with the recorded noise exposure at those locations. This may readily and easily be done in conjunction with the preparation of the Quarterly Reports for the State Department of Transportation.

Response:

Flight track dispersion is addressed by Subtopical Response TR-N-1.4. According to FAA's policy guidance for the preparation of NEPA documents (FAA Orders 5050.4A and 1050.1D, change 4) noise exposure patterns are to be presented without modification by noise levels measured in the field. This guidance is provided to assure the direct comparability between current noise exposure conditions and noise exposure conditions at some future time that cannot be measured while evaluations are underway, e.g., the comparison of current to future build alternatives or the comparison of future no action to build conditions. A comparison of the measured and modeled noise levels for the environmental baseline is presented in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. For additional information on this topic, please see Subtopical Response TR-N-1.2.

AL00017-241

Comment:

Economic Impacts

The technical report on the economic impacts of the Master Plan alternatives, listed as Appendix 5, discusses many of the economic benefits from the commerce associated with operation of LAX. However, it fails to discuss the economic impact on housing, commercial structures, schools and other land uses adversely affected by airport noise from LAX. Further, the economic impact would certainly be expected to vary with the variations in noise exposure among the various alternatives.

Response:

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

AL00017-242**Comment:**

Of particular concern to local residents is the economic impact on their housing values from increasing noise exposure on their property. This is a particular concern for those areas which will be newly exposed to noise exposure at or above 65 CNEL. In addition to the decreased desirability of these residences, California requires disclosure of airport noise environments, essentially requiring the property sellers to advise all potential buyers of the new adverse noise environment. Several studies have been conducted on the effects of airport noise on residential properties, and these may serve as the basis for this required economic assessment. Likewise, small business owners are concerned about the effects of airport noise on their commercial property.

Response:

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

AL00017-243**Comment:**

The cost to cure the interior noise environment through a potential noise insulation program must also be addressed in this economic assessment. LAX has considerable experience with these programs, and a great deal of data exist on the expenditures for residential noise insulation. Certainly, new residential noise insulation must be included as a noise mitigation measure and an economic assessment of this mitigation is required in the overall scheme of this EIS/EIR.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR do not specifically identify costs associated with the Aircraft Noise Mitigation Program (ANMP). However, LAWA forecasts costs related to acoustical treatment of homes and land recycling on an annual basis. The latest forecast for the year 2001, estimates that the total costs will be \$710 million with sound insulation accounting for \$357 million and land recycling \$353 million. For additional information on the ANMP please see Topical Response TR-LU-3.

AL00017-244**Comment:**

Finally, lost productivity by workers residing in the airport noise environment, from sleep disturbance, should also be addressed. Likewise, the effects of disturbance on learning in schools should be economically quantified.

Response:

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. The studies suggested by the commentor are beyond the scope of, and requirements for, the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00017-245**Comment:**

Health Effects of Noise

Appendix 14b, "Health Effects of Noise Technical Report," is a good summary of several key noise impacts which have not been evaluated in the LAX Master Plan EIS/EIR. The physiological health issues are hearing loss and other physiological effects; the psychological effects are speech communication, sleep disturbance, learning effects and work performance effects. Each of these is

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discussed generally, some specific criteria is presented in this appendix, and excellent references are provided to obtain the necessary information and procedures to conduct these important analyses. However, these important analyses, recommended by the FAA in their "Aviation Noise Abatement Policy 2000," are not a part to this EIS/EIR and constitute a major deficiency.

Response:

Please see Response to Comment AL00017-52. Section 4 of the Aviation Noise Abatement Policy 2000 discusses various approaches to assessing aviation noise. The noise analysis completed for the LAX Master Plan Draft EIS/EIR is consistent with the Abatement Policy's recognition of yearly day-night average sound levels (DNL) as the primary measure of noise impacts on people and land uses. Section 4 of the Abatement Policy also describes supplemental metrics that can be considered on a case by case basis. Such metrics include Leq, Lmax, Sound Exposure Level (SEL), Time Above (TA), and single event noise including as related to sleep disturbance and speech interference. While not required, the Draft EIS/EIR included consideration of such supplemental metrics. Additionally, the noise analysis completed for the Supplement to the Draft EIS/EIR provided a more comprehensive evaluation of single event noise impacts.

AL00017-246

Comment:

The discussion of hearing loss states, in the first paragraph, "Baseline noise exposure analysis shows that the peak Sound Exposure Level (SEL) affecting residents closest to LAX is 109 dB along Imperial Avenue in El Segundo." This noise exposure, unfortunately, is not given in terms of any other metric, although that may be easily determined using TA analyses from the INM. Specifically, the time-above analysis should be conducted at these critical areas where the potential for hearing loss may exist. The TA analysis may be summed for the aircraft operations at specific locations, and the resultant noise exposure duration per day at various sound levels may be related to Table 1, "OSHA and CalOSHA Permissible Noise Exposure Standards," in this section. This would enable direct computation of the noise dose. The SEL value of 109 dB cited in this section indicates a potential for hearing damage, since a number of these events may be expected and sound levels above 105 dB are permitted for less than one hour per day according to the OSHA criteria. Children in outdoor areas may be particularly vulnerable to hearing damage risk.

Response:

As a clarification to the discussion of single-event noise levels on page 4-1044 of the Draft EIS/EIR, it is important to note that a more accurate indication of the nature and duration of high noise levels around LAX is provided in the Time Above (TA) tables that are presented in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR, and that are revised and updated in Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR. The subject tables indicate, in number of minutes, the TA 65 decibels (dB), TA 75 dB, TA 85 dB, and TA 95 dB for several hundred specific locations at and around LAX for existing conditions (1996 and 2000) and for future conditions (2015) under each of the alternatives. As indicated in Tables S19 of Appendix S-C1, the maximum duration for TA 95 dB for all scenarios described above would be 2.8 minutes at Dockweiler Beach (Grid Point Location PRK67) under Alternative A in 2015. Although not modeled, the duration of time above 109 dB at that (worst-case) location would certainly be substantially less, possibly a fraction of a minute. The OSHA and CalOSHA standards presented in Table 4.24.2-1 of the Draft EIS/EIR specify the following maximum exposure duration per day for noise levels of 95 dB and above: 95 dB-4 hours; 97 dB-3 hours; 100 dB-2 hours; 102 dB-1.5 hours; 105 dB-1 hour; 110 dB-0.5 hour; and 115 dB-0.5 hour (OSHA)-0.25 hour (CalOSHA). Based on these standards, aimed at hearing protection, and the TA values presented in the technical appendices of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, no significant impacts related to hearing loss are expected to occur under any of the proposed alternatives. Also, please see Response to Comment AL00038-11 regarding the impact of high noise levels on children.

AL00017-247

Comment:

Likewise, other physiological effects such as release of adrenalin, rise in blood pressure and muscle tension should be addressed, particularly for children in the highest noise areas. Additionally, the issues

of effects on cardio-vascular system, well-documented in the literature, need to be discussed and applied to this particular EIS/EIR.

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

AL00017-248

Comment:

Speech interference is a key impact not adequately addressed in this EIS/EIR. As noted in this section, normal conversational speech is in the range of 60 dB to 65 dB. Where normal open-window construction providing approximately 15 dB of attenuation and closed-window construction providing 20 dB to 25 dB of attenuation, aircraft events with levels above 80 dB may be expected to interfere with speech communication. This occurs not only in residential areas, but also in commercial areas where they materially affect the productivity and consequent economic productivity of the area.

Response:

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to speech interference within the classroom setting in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Outside the classroom, numerous studies of human perception and annoyance have indicated that the 65-decibel (dB) level of Community Noise Equivalent Level (CNEL) is a reliable standard for determining when the community will become "highly annoyed" by aircraft noise. The Federal Aviation Administration has developed criteria, which describe what land uses are acceptable within a certain noise level contour. These compatibility criteria and an analysis of the build alternatives were described in Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00017-249

Comment:

Perhaps most important is the impact of speech interference upon classroom activities. An assessment is required for each school within the study area to determine the degree of speech interference caused by operation of LAX, for the current baseline year and for each of the alternatives. Again, there is considerable literature on the learning problems associated with airport noise environments. In addition to an adequate assessment of speech interference in schools, a noise mitigation program must also be developed to minimize this impact.

Response:

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Included in the assessment of single event aircraft noise impacts is the identification of schools exposed to significant interior single event noise levels for 1996 baseline and Year 2000 conditions. Also please refer to Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program (ANMP) and how the existing and proposed ANMP relates to schools.

AL00017-250

Comment:

Sleep disturbance is another important issue cited in this technical appendix and not fully addressed within the EIS/EIR. The technical appendix includes, in Figure 1, "Recommended Sleep Disturbance Dose Response Relationship," which relates the percent of people awakened with the indoor SEL value. In addition to the percent awakened, an assessment is required of the changes in stage of sleep with single-event noise exposure levels. An assessment of sleep stage change is important because it directly relates to fatigue and worker productivity. As with the other psychological and physiological effects, an economic impact assessment is required for these adverse effects of noise from LAX.

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Response:

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. The analysis of sleep disturbance from single event aircraft noise contained in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR is consistent with the California Court of Appeal ruling in the Berkeley Jets case (*Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344) that, to provide a more accurate and complete picture of a project's noise impacts, and to provide more comprehensive mitigation, a single event noise analysis must supplement an EIR's cumulative (i.e., CNEL) noise analysis, including use of appropriate thresholds of significance and mitigation of significant events. As indicated in Section 4.24.2, Health Effects of Noise, of the Draft EIS/EIR, the extent to which environmental noise affects human sleep patterns varies from individual to individual. An assessment of changes in stage of sleep due to single event noise exposure, and an economic impact assessment for adverse effects associated with sleep disturbance is beyond the scope of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In *Berkeley Jets*, the Court of Appeal left it to the lead agency's discretion to establish appropriate thresholds of significance to identify significant single event noise impacts. Thus, in the Supplement to the Draft EIS/EIR, LAWA determined that new exposure to the 94 dBA SEL contour for residential uses was an appropriate threshold of significance to identify significant single event noise impacts on nighttime awakenings. Beyond this, there are no "standard" thresholds of significance under CEQA that would require an assessment of the changes in stage of sleep due to single event noise.

AL00017-251

Comment:

AIRCRAFT NOISE AND ITS EFFECTS

The environment is getting noisier everyday and a significant contribution to this increasing noise is the growth in passenger and air cargo aircraft activity.¹ This increase in noise significantly impacts the quality of American life. According to the United States Congress, nearly 20 million citizens are exposed to noise levels that can lead to psychological and physiological damage, and another 40 million people are exposed to noise levels that cause sleep or work disruption.² Over 25 years ago, in 1974, the U.S. Environmental Protection Agency (EPA) estimated that nearly 100 million Americans lived in areas where the daily average noise levels exceeded 55 dBA. The total number of citizens exposed has presumably increased; however, since then, both the EPA Office of Noise Abatement and funding sources for gathering these statistics have been eliminated.³

A considerable amount of study and research has been conducted over the last 25 years to understand the effects of high noise levels on communities. For those who live near airports, noise from departing and arriving aircraft has been shown to be a constant source of distress, interfering with normal speech, interrupting sleep, and disrupting a wide range of activities. Studies also show that in addition to lifestyle disruption, there is a relationship between noise and the health of community residents, with high noise levels as a potential factor in hypertension, cardiovascular disorders, and gastrointestinal disturbances.⁴

A significant contribution to this increasing noise problem near airports has been the growth of passenger and air cargo aircraft activity.⁵ The increase in aircraft activity, and particularly the increase in the amount of cargo that is shipped via air, has resulted in more and more people being exposed to excessive aircraft noise. Nowhere is the cause for concern more apparent than in the communities underneath the flight corridors of the Los Angeles International Airport (LAX).

LAX is a significant source of noise for the communities surrounding the Airport. Residents, employees and students in the LAX environs suffer daily from the barrage of aircraft overflights. Residents living within the LAX air corridor have long complained about intrusive aircraft noises. In testifying at workshops on noise issues in the City of Los Angeles, members of the public were unanimous in their desire for relief from the aircraft noise burden that is increasingly disrupting their lives.⁶

Members of the public have reported that they suffer from severe sleep disruption, inability to carry on conversations in their homes and inability to enjoy their homes due to the intensity and constant noise from aircraft operations at LAX. Others reported that it is unpleasant and uncomfortable to walk outside, unpleasant for their children to play out of doors, and unpleasant to use bike paths along the beach due to the noise from aircraft.⁷ The City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the City.⁸

In this paper, discussions of the effects of high noise levels on the quality of life and health of a community are followed by a presentation of specific noise problems in the communities surrounding LAX due to aircraft overflights.

1 NRDC Report 1996.

2 Quiet Communities Act of 1997, Proposed Senate Bill 951.

3 Suter, 1992.

4 Bronzaft et al., 1998.

5 NRDC Report, 1996.

6 See Los Angeles City Planning Department Staff report to the Planning Commission, prepared for the 11/12/1998 Planning Commission hearing - hereinafter "Staff Report."

7 Staff Report.

8 City of Los Angeles Noise Element, 2-11.

Response:

Please see Response to Comment AL00017-52. In addition, please see Topical Response TR-LU-4 regarding outdoor noise levels. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Please see Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00017-252

Comment:

The Effects of Noise on the Quality of Life and Health of Communities

Noise has a significant impact on the quality of life, and in that sense, it is a health problem in accordance with the World Health Organization's definition of health, which includes total physical and mental well being, as well as the absence of disease. Along these lines, the World Health Organization has determined that "[n]oise must be recognized as a major threat to human well-being."⁹

Some of the effects of noise, such as sleep disruption, the masking of speech, and the inability to enjoy one's property or leisure time, limit or impair the quality of life. In addition, high noise levels interfere with the teaching and learning process, disrupt the performance of certain tasks, and increase the incidence of anti-social behavior. There is also evidence that noise can adversely affect general health and well being in the same manner as chronic stress.¹⁰ Documentation now exists that noise is harmful to the human body and is capable of altering the body's physiological processes. Another serious and quite alarming effect is the reduction of the ability of children to focus and learn when in a high noise environment. Below we discuss some of the harmful effects of a high noise environment on health and well-being.

9 Suter, 1992, citing Suess, 1973.

10 Suter, 1992

3. Comments and Responses

Response:

Please see Response to Comments AL00017-52 and AL00017-53. Also please refer to Topical Response TR-LU-1 regarding impacts on quality of life.

AL00017-253

Comment:

1. Annoyance and Feelings of Helplessness

Over 70 million Americans live in neighborhoods with noise levels that interfere with communication and cause annoyance and dissatisfaction.¹¹ Aircraft are the leading offender of noise producing community annoyance. Annoyance can connote more than a slight irritation; it can mean a significant degradation in the quality of life.¹²

A prime effect of chronic noise exposure is the feeling of helplessness. Studies show that chronic exposure to noise appears to be associated with feelings of helplessness among adults living near airports.¹³ Community surveys of noise annoyance frequently note that, while annoyance is common, complaints or other actions to intervene are rare.¹⁴ Most people who are annoyed by noise report feeling unable or helpless to alter the situation.¹⁵

¹¹ Cohen, Krantz et al., 1981.

¹² Suter, 1992.

¹³ Evans and Lepore, 1993.

¹⁴ Evans and Lepore, 1993, citing Evans and Tafalla, 1987.

¹⁵ Evans and Lepore, 1993, citing Jue et al., 1984.

Response:

Please see Response to Comment AL00017-52.

AL00017-254

Comment:

2. Sleep Disturbance

Noise is more annoying when it occurs at times when people expect to rest or sleep. Noise has been found to be one of the most common causes of sleep disturbance, and sleep disturbance is a critical component of noise-related annoyance. Noise-induced sleep interference can produce short-term adverse effects, such as mood changes and poor performance at work the next day. The possibility also exists for more serious effects on health and well being when sleep interference continues over long periods of time.¹⁶

High noise levels can cause people to awaken repeatedly and to report poor sleep quality the next day, but noise can also produce reactions of which the individual is unaware. These reactions include changes from heavier to lighter stages of sleep, reductions in "rapid eye movement" sleep, increases in body movements during the night, and changes in cardiovascular responses. Thus, even if people are not actually awakened by noise during the night, they still may be subject to sleeplessness, mood changes, irritability and poor performance the next day.¹⁷

Intermittent and impulsive noises, such as aircraft overflights, have been found to be more disturbing to sleep than continuous noise sources.¹⁸ Furthermore, as one might expect, studies have determined that the quality of sleep and sleep disturbance are directly related to aircraft noise exposure.¹⁹ In one study of 1,500 residents living near JFK Airport in New York, almost 60% of the residents living about a mile from the airport reported some sleep disturbance, compared to about 30% of the residents located five miles away, and less than 10% living 12 miles away. About half of residents living 2.5 miles or

closer to the airport say that aircraft-induced sleep interruption is serious and unacceptable, compared to only 2% in the 15-mile distant areas.²⁰

16 Suter, 1992.

17 Suter, 1992.

18 Suter, 1992.

19 Borsky, 1976.

20 Borsky, 1976.

Response:

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

AL00017-255

Comment:

3. Interference with Speech

Interference with communication has proved to be one of the most important components of noise related annoyance.²¹ Noise can mask important sounds and disrupt communication between individuals. It can also disrupt effective communication between teachers and students in schools, and can cause fatigue and vocal strain in those who need to communicate in spite of the noise.

21 Suter, 1992.

Response:

Please see Responses to Comments AL00017-52 and AL00017-248.

AL00017-256

Comment:

4. Physiological Effects

Noise has been implicated in the development or exacerbation of a variety of health problems.²² The research on the physiological effects of noise appears to indicate that noise is harmful to the human body.

a. Cardiovascular and Behavioral Effects on the General Population

Much of the research on the health effects of aircraft noise has been directed toward cardiovascular effects, especially potential elevations in blood pressure.²³ Accumulating evidence suggests that prolonged exposure to high-intensity noise can produce long-term changes in cardiovascular function in animal and human subjects. A study sponsored by the EPA, constituting one of the most notable studies of animal noise exposure, examined cardiovascular effects of noise on monkeys.²⁴ This research demonstrated that monkeys subjected to industrial noise at levels between 85 to 90 dBA for several months developed significant elevations of systolic and diastolic blood pressure.²⁵ It is particularly notable that these changes persisted long after exposure ceased, demonstrating that noise has a chronic effect on blood pressure.²⁶

Human studies have shown similar results to those on animal subjects. One study investigating how low-flying aircraft affected elderly human subjects, showed significant increases in both systolic and diastolic blood pressure after exposure to chronic aircraft noise.²⁷ In another series of studies, it was found that residents in neighborhoods adjacent to an airport in Amsterdam with high levels of aircraft

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noise were more likely to be taking drugs for cardiovascular problems. These residents were more likely to have high blood pressure and other cardiac abnormalities than an unexposed population.²⁸ While the increase in cardiovascular drug use could not be explained by age, sex, smoking habits, or obesity, the noisy and quiet areas in this study did differ in socioeconomic status. Another study conducted by the same researchers, which included controls for socioeconomic status, indicated that increases in the purchase of cardiovascular drugs were positively correlated with the number of aircraft overflights at night.²⁹

2. Depression and Feelings of Helplessness

One effect of exposure to noise, at least to unpredictable or uncontrollable noise, such as aircraft overflights, is a reduction in perception of control over the environment. This loss of control is often accompanied by a depressed mood and decreased motivation to initiate new responses.³⁰ If people have perceived control over noise, it appears to decrease the adverse effects on their subsequent performance of certain tasks.³¹

22 Suter, 1992.

23 Suter, 1992.

24 Suter, 1992, citing Peterson et al., 1978, 1981 and 1983.

25 Suter, 1992.

26 Cohen, Krantz et al., 1981.

27 Suter, 1992, citing Michalek et al., 1990.

28 Cohen et al., 1981.

29 Cohen et al., 1981.

30 Cohen et al., 1981.

31 Suter, 1992.

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

AL00017-257

Comment:

5. Effects of Aircraft Noise on Children and Their Ability to Learn

One particularly disturbing result of noise research are studies that show the effect of high noise levels on young children. Research confirms that children exposed to persistently high noise levels suffer from modest elevations of resting blood pressure, attention deficiencies, and decreased reading ability. Other effects suspected to be a result of exposure to chronic high noise levels include diminished task motivation and deficits in auditory discrimination.³² In fact, noise can disrupt communication in the classroom to the extent that the instructional method used in schools close to airports is sometimes nicknamed "jet pause" teaching.³³

a. Reduced Academic Performance

Children in schools assailed by frequent aircraft noise do not learn to read as well as children in quiet schools. This finding is the conclusion of a Cornell University study that compared a total of 116 first and second graders from two elementary schools. One of the two schools in the study had low-flying planes passing overhead from a major New York metropolitan airport. These overflights produced maximum noise levels of up to 90 dBA at the school every 6.6 minutes. The other school, closely matched for ethnicity and percentage of children receiving subsidized school lunches and speaking

English as a second language, was in the same urban area but in a quiet neighborhood not affected by aircraft noise. The results of this study showed a correlation between lack of speech recognition skills and lower reading scores with chronic noise exposure. Thus, this study seems to provide a link between chronic aircraft noise exposure at school and a child's lack of speech recognition skills and lower reading scores.³⁴

The major reason for the reduction in reading level appears to be due to children tuning out speech when continuously exposed to high levels of aircraft noise. Gary Evans, an international expert on environmental stress, such as noise, crowding and air pollution, indicates that "we've known for a long time that chronic noise is having a devastating effect on the academic performance of children in noisy homes and schools." His study shows that children do not tune out sound per se, rather they have difficulty hearing in high noise environments and thus have a limited ability to acquire speech recognition skills.³⁵

Another study, this one conducted with elementary school children near LAX, confirms that academic performance is hindered when children are exposed to excessive aircraft noise. In this study the impact of aircraft noise on children initially in the third and fourth grades living and attending schools in the air corridor of LAX was assessed. The children were compared with children of similar socioeconomic status, age, and race living and attending schools in quiet Los Angeles neighborhoods.³⁶ Again, the results of this study demonstrated that chronic exposure to the noise resulting from aircraft overflights affects a variety of cognitive, motivational, and physiological processes. Blood pressure was relatively higher in noise-affected children, and they did less well with puzzle solving and math. These findings could not be attributed to economic or social variables or to hearing loss. The study also looked at the effect of school noise abatement programs and found that, in general, sound insulation in the classroom may not be sufficient to repair the harm done to children from a noisy environment. "The longitudinal data provide little evidence that children who had been enrolled in a noisy school improve in their performance and/or health after a school year in a noise-abated classroom, even though interior sound levels were substantially reduced."³⁷ Confirmation of this conclusion has come in another research study which showed that students in the noisiest schools read at least one year below grade level.³⁸

Perhaps the most persuasive data of reduced motivation related to high noise levels is Cohen et al.'s (1980) findings on "giving up." Not only are children from noisy schools less likely to solve a challenging puzzle within a four-minute time period, a substantially greater proportion of them (15%) simply gave up before the allotted time had elapsed, often remarking that they could not do the task in comparison to 2% of their quiet school counterparts who gave up.³⁹

Further evidence of the problem of aircraft noise and children's learning comes from a 1981 research study by Cohen and Weinstein which showed that skills such as auditory discrimination and reading achievement can be adversely affected when children live in noisy circumstances, even though their schools may be no noisier than average. These studies also indicate that interference with communication in the classroom is not the only process at work. Possible additional explanations include adverse effects on children's information processing strategies and their feelings of personal control.⁴⁰

b. Children's Psychological Stress

Not surprisingly, excessive noise levels have also been shown to increase children's stress levels and to result in elevated blood pressure levels. Children may be psychologically less able to deal with the continuous nature of noise because of a limited range of coping strategies or because they lack the opportunity to control or manipulate their environment.⁴¹

A study was undertaken of children in third and fourth grades living either near the newly constructed Munich International Airport or in nearby communities outside the noise impact zone of the airport. This research determined that chronic exposure to ambient aircraft noise elevates psychological stress in human beings. Children living proximate to the new Munich Airport experienced significant elevations in resting blood pressure after the airport opened. During the same time period, well-matched children in nearby, similar communities unaffected by aircraft noise experienced stable levels of resting blood pressure.⁴²

In conclusion, it is no surprise that, after controlling for socioeconomic factors, studies indicate that the academic performance of children in quiet schools is better than that of children in noisy schools.⁴³

3. Comments and Responses

32 Evans and Lepore, 1993.

33 Suter, 1992.

34 Evans and Maxwell, 1997.

35 Lang, 1997.

36 Cohen, Evans, et al., 1980.

37 Cohen et al., 1981.

38 Green, Pasternack, Shore, 1982.

39 Evans and Lepore, 1993.

40 Suter, 1992.

41 Evans and Lepore, 1993.

42 Evans, Hygge, Bullinger, 1995.

43 Suter, 1992.

Response:

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Based on careful review of numerous studies and research related to school disruption from single event noise, LAWA developed thresholds of significance to be used in the CEQA analysis of the four build alternatives for the LAX Master Plan. The development and application of these thresholds relative to the four build alternatives was presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR. Also please refer to the Response to Comment AL00038-11 regarding the impact of high noise levels on children.

AL00017-258

Comment:

6. Problems with Noise Regulations and Standards

The aviation industry's regulation of noise and use of noise descriptors present some obstacles in understanding the true impact of noise on people. The aviation industry typically reports aircraft noise in terms of the average noise level produced by aircraft operations for an annually averaged day. The average noise descriptor used in California, known as the Community Noise Equivalent Level (CNEL), fails not only to account for days and weeks when air traffic is heavier, but it also, and more importantly, ignores the impact of single aircraft events. In this way, the CNEL understates the true impact of aircraft noise.

Response:

The commentor is correct in identifying that the CNEL metric provides for an annual average day and does not identify specific single events that may be annoying to the community. Please see Topical Response TR-N-2, and in particular, Subtopical Response TR-N-2.1. Additionally, in response to a recent California Appellate Court ruling and public comment received during the review process, single event noise effects on nighttime awakenings and on speech disruption in schools are presented in Section 4.1, Noise, Section 4.2, Land Use, Appendix S-C1, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report of the Supplement to the Draft EIS/EIR.

AL00017-259

Comment:

The Federal Aviation Administration (FAA) has established a CNEL of less than 65 dBA as being "normally acceptable" with residential land uses, despite research and public testimony that a CNEL threshold of 65 dBA is not sufficient to protect the public's health and welfare. Research confirms that annoyance is often generated at average sound levels well below 65 dBA.⁴⁴ Specifically, studies of the Burbank and Orange County airports showed that, at an average day/night noise level of 60 dBA, the percentage of the population who described themselves as highly annoyed ranged from 70% near the Burbank Airport to some 40% near the Orange County Airport.⁴⁵ Thus, people exposed to a CNEL of 60 dBA may be disturbed by aircraft noise, sometimes for many hours a day. Yet, because the FAA has set a CNEL of 65 dBA as the threshold for compatibility with residential uses, these people are ignored in government reports on aircraft noise because noise levels in their communities fall below a CNEL of 65 dBA.

44 Suter, 1992, citing Fidell et al., 1985, 1991; Hall et al., 1981.

45 Suter, 1992.

Response:

Comment noted. Annoyance by aircraft noise may vary from individual to individual, and among population groups. The data cited for Burbank is drawn from a study prepared by Fidell et. al. in 1991 and an evaluation of the Schultz curve of annoyance, and indicates that the populations highly annoyed ranged widely. At the worst case, one group included 70 percent of the population as highly annoyed with CNEL levels of 60 dB, ranging down to a best case of 10 percent of the population highly annoyed at 69 CNEL. At Orange County, the data more consistently indicates high annoyance at 40 to 50 percent between 58 and 68 CNEL. The commentor is accurate in stating that persons may be highly annoyed by aircraft noise below 65 CNEL, but the adopted threshold of significance is based on nationally accepted averages which have been generally accepted in the scientific community. For additional information related to this topic, please see Topical Response TR-N-1 regarding the noise modeling approach.

AL00017-260

Comment:

The U.S. EPA confirms these studies that demonstrate community annoyance is triggered at noise levels lower than a CNEL of 65 dBA. In the 1970s, the EPA identified a noise level that it deemed necessary to protect the public health and welfare (with an adequate margin of safety) of 55 dBA, which constitutes a noise level with half as much average loudness (or an order of magnitude less sound energy) as the 65 dBA level established by the FAA.⁴⁶ Unquestionably, the government is under-reporting the numbers of people affected by aircraft noise.⁴⁷

46 NRDC Report, 1996.

47 Bronzaft et al., 1998.

Response:

The commentor misinterprets the findings of the 1974 EPA study. That study indicates that there is no IMPACT below a level of 55 dB. The report states explicitly at page 3 "These levels are not to be construed as standards as they do not take into account cost or feasibility". And further at page 11 "There was a great deal of concern during preparation of this document that the levels identified would be mistakenly interpreted as Federal noise standards. The information in this document should not be so interpreted." The use of CNEL 65 which is a Federal noise standard is accepted throughout the Federal government including the U.S. E.P.A. For additional information on noise analysis based single event noise related significance thresholds please see Section 4.1 Noise, Appendix S-C1, Supplemental Aircraft Noise Technical Report, Section 4.2, Land Use, and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR.

3. Comments and Responses

AL00017-261

Comment:

When used as the only measure of noise, the CNEL does not provide a true or complete picture of what people actually hear as aircraft fly overhead. Indeed, since the CNEL is an average noise measurement, it tends to mask the tremendous effect that a single aircraft overflight has on individuals. It is single-event and maximum noise levels, after all, and not average noise levels, that result in adverse impacts such as sleep disturbance, speech interference and inability to concentrate in school.

Response:

Overflight noise is addressed through the use of the CNEL metric. CNEL takes into account every single event to which an area is exposed on a daily basis. The commentor can find maximum Single Event Levels in Table A5-5 of Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR and Table S15 of Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR. Additionally, Tables A5-6 through A5-9 of Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR and Table S16 through S19 of Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR provide information related to the duration of time that each noise sensitive facility in the airport environs would be exposed to single event noise above 65, 75, 85, and 95 decibels on an average annual day. For further information about the relationship between CNEL and single events, please see Topical Response TR-N-2 regarding single event noise and CNEL differences. Single event impacts on sleep disturbance and school speech interference were addressed in Section 4.1, Noise, Appendix S-C1, Supplemental Aircraft Noise Technical Report, Section 4.2, Land Use, and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR.

AL00017-262

Comment:

LAX NOISE IN THE SURROUNDING COMMUNITIES

Aviation is the fastest growing mode of transportation in the United States.⁴⁸ Noise pollution is likely to become an even greater public health threat as air traffic continues to increase. In 1980, U.S. scheduled airlines flew approximately 255.2 billion passenger miles and 5.7 billion cargo ton-miles. By 1990, these figures were 457.9 billion passenger miles and 10.6 billion cargo ton-miles. This represents an increase of 79% in passenger mileage, and 86% in airfreight mileage in the 10-year period between 1980 and 1990.⁴⁹ Air cargo traffic appears to be growing at an exceptionally rapid pace, and according to the FAA, there will be 36% more flights in 2007 than there are today.⁵⁰ LAX, the fourth busiest airport in the United States and the world, with 58 million passengers and 1.89 million tons of air cargo freight passing through it in 1996, has also experienced tremendous increases in traffic; and the Los Angeles World Airports, the agency which oversees LAX, contemplates a tremendous increase in aircraft activity over the next 20 years.⁵¹

⁴⁸ NRDC Report, 1996.

⁴⁹ Suter, 1992

⁵⁰ NRDC Report, 1996.

⁵¹ City of Los Angeles Noise Element, 2-23.

Response:

Comment noted.

AL00017-263**Comment:**

There is a growing concern that, with the increase in aircraft activity projected for the next decade, communities will not be able to withstand the constant bombardment of aircraft noise. Some relief is at hand in that quieter Stage III aircraft are being phased in. By the end of this year, 2000, all of the noisier Stage II aircraft are to be phased out pursuant to the Airport Noise and Capacity Act of 1990. While this requirement should promote a quieter environment around airports, the growth of air transportation and increased use of larger jets threatens to offset the benefits of the quieter aircraft. Furthermore, though Stage III aircraft are quieter than Stage II, they are nevertheless noisy. In general, Stage III aircraft are 10 dBA quieter than Stage II aircraft, which represents a halving of perceived noise. However, actual noise reduction varies by aircraft. For example, maximum noise levels produced by retrofitted Boeing 747s that meet Stage III standards are only 4 to 5 dBA quieter than non-retrofitted 747s. In addition, according to Airport Noise: A Guide to the FAA Regulations Under the Airport Noise and Capacity Act, Stage III aircraft actually can be noisier on landing than Stage II aircraft.⁵²

52 NRDC Report, 1996, p. 85, citing The Cutler Stanfield series, in conjunction with Harris Miller, Miller & Hanson, Inc.

Response:

This is not a comment on the contents of the Draft EIS/EIR. Please see Topical Response TR-N-6 for additional information related to this topic.

AL00017-264**Comment:**

LAX is a tremendous source of noise in the surrounding communities. A review of LAX's quarterly noise reports shows that in the eight years between 1990 and 1998 the total land area within the 65 dBA CNEL contour increased by over 35% with the number of homes within this contour increasing by 26%. In the fourth quarter of 1998, the 65 dBA CNEL noise contour encompassed over 10,000 acres (more than 15 square miles), with over 95,000 people living in over 34,000 dwellings within the 65 dBA CNEL noise contour. During this same period the total number of flights at LAX increased by nearly 17 % to a total of over 760,000 flights.

Response:

This is not a comment on the contents of the Draft EIS/EIR. However, as shown on Figure S4.2-5 of the Draft EIS/EIR and Figure S4.2-2 of the Supplement to the Draft EIS/EIR, the overall land area exposed to the 65 CNEL contour has progressively decreased from the 1992 fourth quarter 65 CNEL contour. See also Topical Response TR-LU-4, regarding exposure of land area and residential area to outdoor noise levels of 65 CNEL or greater.

AL00017-265**Comment:**

The greater percentage increase in the total land area and number of homes officially impacted by aircraft noise than the percentage increase in air traffic (35 and 26% vs. 17%) between 1998 and 1990 may be explained in a number of ways; the most logical appearing to be that, (1) more planes flew during evening and nighttime hours in 1998 than in 1990, (2) more planes used approach or departure paths over residences, or (3) on average, planes flying into and out of LAX produced more noise in 1998 than in 1990. If the aircraft using LAX were somewhat louder in 1998 than in 1990, the increase in noise is most likely due to an increase in the number of passengers and/or weight of cargo loads on the planes, since the percentage of Stage III aircraft at LAX increased from below 70% in 1990 to about 93% in 1998.

If one were to assume that the over 760,000 flights which took place in 1998 occurred 7 days per week, 24 hours per day, 365 days per year, which they do not, LAX would have handled almost 2,100 flights

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per day or 87 flights per hour. Considering that late night and early morning hours operations at LAX have historically decreased, but not ceased with about 5 to 20 flights per hour between 11 p.m. and 7 a.m., during the daytime hours (7 a.m. to 10 p.m.) a takeoff or landing would occur every one or two minutes. Because some days, weeks and months have much greater air traffic, during busy periods one could expect more than this number of LAX operations per hour.

Response:

Please see Topical Responses TR-N-6 regarding aircraft noise increase and Subtopical Response TR-N-7.1 regarding current noise rules during nighttime hours. It should be noted that that noisier (Stage 2) aircraft were phased out as of December 31, 1999.

AL00017-266

Comment:

Prior to 1973, aircraft operations into and out of LAX were almost entirely conducted in an east-to-west direction. However, after 1973, in an effort to reduce noise exposure during sleeping hours for the people living east of LAX, aircraft have been required to approach the airport from over the ocean between 11 :00 p.m. and 6:00 a.m., except when tailwinds exceed ten (10) knots. In a subsequent action, the hours of over-ocean operations were adjusted to between midnight and 6:30 a.m.⁵³ Though this curfew on eastward operations may have somewhat reduced nighttime operational noise levels, the bulk of operations out of and into LAX continue to produce high noise levels during the early morning, daytime and late evening hours in the communities east of the runways.

53 LAX 2000 Draft EIR, 1988, p. 16.

Response:

Please see Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00017-267

Comment:

The majority of the aircraft operations that produce high noise levels in the community are passenger jet and air cargo jet flights. Though the jet fleet operating out of the airport is to have achieved full Stage III compatibility by the end of the year 2000, it will continue to produce high maximum noise levels when overflying schools, residences and other sensitive land uses surrounding the Airport. The communities of Playa del Rey, Westchester, Inglewood, Lennox, Hawthorne and El Segundo are adjacent to the Airport, with residences and schools in Inglewood and Lennox directly under the flight paths as close as 4,500 feet from the eastern end of the nearest runways.

When jets either depart or arrive over these communities, maximum noise levels can be quite high. To determine the noise levels produced by aircraft flying over the schools and residences nearest LAX during the early morning, daytime and late evening hours, maximum aircraft noise levels were modeled using the latest version of the FAA's Integrated Noise Model (INM version 6.0A). The results of this modeling are shown in the following table:

Aircraft Type	Maximum Noise Levels at Schools and Homes Approximately 4,500 Feet East of LAX Runways	
	Standard Approach	Standard Departure
350+ seat Passenger Jet (typical: B747, Stage III)	104 dBA	95 dBA
250-349 seat Passenger Jet (typical: B777, Stage III)	98 dBA	90 dBA
150-249 seat Passenger Jet (typical: B767, Stage III)	95 dBA	88 dBA
100-149 seat Passenger Jet (typical: B737, Stage III)	95 dBA	80 dBA
Air Cargo Jet (typical: DC8, Stage III)	95 dBA	88 dBA

Based on the results of this modeling it is clear that, even with Stage III aircraft, homes and schools are, and will continue to be, exposed to excessive maximum noise levels when passenger and air cargo jets approach and depart LAX directly overhead.

From these average maximum noise levels, it may also be seen that smaller passenger jets produce maximum noise levels during approach and departure of between of 6 to 9 dBA and 5 to 15 dBA, respectively, less than a wide-body B747 jet. However, even these "smaller" aircraft still expose the community to excessive noise.

Response:

The commentor is correct in identifying that jets create the largest amount of noise at LAX. The noise levels created by all aircraft, whether large or small, were incorporated into noise modeling. Please see Topical Response TR-1 and Topical Response TR-N-6 for more information. Furthermore, single event noise levels are provided in detail in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. Nighttime single event noise impacts and mitigation for LAX Master Plan alternatives were presented in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, with supporting information in Appendix S-C and Technical Report S-1.

AL00017-268

Comment:

Another important observation is that maximum noise levels produced by arriving aircraft are 7 to 15 dBA greater than departing aircraft. This is especially important when one considers that the preferred morning, daytime and evening arrival paths at LAX are from the east over the schools and residences of the surrounding communities. Additionally, though the 1973 curfew order required nighttime approaches and departures over the ocean, planes confronting adverse wind conditions still approach and depart over these communities during the nighttime hours.

Response:

Noise generated by arriving aircraft is typically less than that produced by departing aircraft when measured at the same distance between the aircraft and the receiver. The amount of noise produced is related directly to the thrust level applied to the engines. During arrival, the level of thrust necessary to maintain control and forward momentum for an aircraft that is losing altitude is considerably less than that necessary to lift an aircraft during departure. The commentor may be confused by comparing certificated takeoff and arrival noise levels that are measured at different locations. Arrivals are measured at locations approximately one mile from the landing threshold when the aircraft is approximately 300 feet above the measurement device. Takeoffs are measured at a location approximately three miles from the start of takeoff roll, when the aircraft has typically reached an altitude in excess of 1,000 feet. Because of the differences in distance between the arrival and departing aircraft at the Part 36 certification points, one might state that arrivals are louder than takeoffs, but such a statement would be misleading and generally incorrect. There is no curfew in effect at LAX. However, LAWA has a policy of preferred operating procedures that call for over-ocean procedures to be used at night when practicable. As noted by the noise abatement procedures delineated in Subtopical Response TR-N-7.1, exceptions to the over-ocean procedures are available when weather or wind conditions require east traffic flow. Additionally, for information on easterly operations at night, please see Topical Response TR-N-5 regarding nighttime aircraft operations, and particularly Subtopical Response TR-N-5.2 regarding east flow operations at night. Furthermore, as part of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, a mitigation measure (MM-N-5. Conduct Part 161 Study to Make Over-Ocean Procedures Mandatory) is incorporated for each build alternative to provide for a Part 161 study in an attempt to restrict easterly departures when over-ocean procedures are in effect.

AL00017-269

Comment:

The preceding table also shows that wide-body four-engine passenger jets, such as 747s, operating out of LAX, generate the highest maximum noise levels in the communities surrounding the Airport. According to noise reports from LAX, the total number of this aircraft type at LAX increased by almost 15% between 1990 and 1998. Based on the number of 1998 operations at LAX, one could expect that,

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on the average, one 747 would either depart or arrive at LAX every eight to nine minutes during the daytime and evening hours.

Response:

Depending on build alternative, daytime 747 operations (7:00 a.m. to 7:00 p.m.) would approximately range from one every 4.9 minutes under Alternative A & B to one every 5.7 minutes under Alternative D. Evening 747 operations (7:00 p.m. to 10:00 p.m.) would approximately range from one every 6.0 minutes under Alternative C to one every 6.7 minutes under Alternative A. Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information on and comparisons of noise and noise-related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives including new Alternative D. Additionally, supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-N-6 regarding noise increase.

AL00017-270

Comment:

The rest of the air fleet operating out of LAX operates on a similarly busy schedule. From a review of LAX's existing design day operations hourly usage charts, one may see that aircraft at LAX operate at all hours of the day and night. Following is a brief review of some of these operations and their frequency.⁵⁴

International flights to and from LAX occur primarily between the hours of 7 a.m. and 11 p.m., with between three and 20 operations per hour.

54 Project Description, LAX Master Plan Phase IIIF, October 29, 1999.

Response:

The commentor is correct in stating that flights are scheduled during daytime and nighttime hours. However, the commentor is incorrect with the number of identified operations. Chapter IV, Facility Requirements (May 1996), of the Draft LAX Master Plan identifies the following hourly design day criteria for international operations. Table IV-A.1 (3 of 3) shows that the Year 2000 design day shows between 5 and 31 hourly international operations, Table IV-A.2 (3 of 3) of the Appendix A, Flight to Gate Assignments, shows that the year 2010 design day shows between 9 and 46 hourly international operations, Table IV-A.3 (3 of 3) shows that the year 2015 design day shows between 10 and 59 hourly international operations. Table F-9 (3 of 3) Hourly Forecast Design Day - Total Operations by User 2015 Alternative D of the LAX Draft Master Plan Addendum forecasts between 10 and 41 hourly international operations.

AL00017-271

Comment:

International flights continue after 11 p.m. to about 2 a.m. with between one and five flights per hour.

Response:

The commentor accurately states that international operations occur between 11:00 p.m. and 2:00 a.m. However the commentor is incorrect with regard to the number of identified operations. Chapter IV, Facility Requirements (May 1996), of the Draft LAX Master Plan identifies the following numbers of international operations for between the hours of 11: 00 p.m. to 2:00 a.m. for the design day. Table IV-A.1 (3 of 3) of the Appendix A, Flight to Gate Assignments, shows that the Year 2000 design day shows between 2 and 12 hourly international operations, Table IV-A.2 (3 of 3) shows that the year 2010 design day shows between 3 and 21 hourly international operations, Table IV-A.3 (3 of 3) shows that the year 2015 design day shows between 3 and 23 hourly international operations. Table F-9 (3 of 3) Hourly Forecast Design Day - Total Operations by User 2015 Alternative D of the LAX Draft Master Plan Addendum forecasts during the 11:00 p.m. to 2:00 a.m. period between 3 and 20 hourly international operations.

AL00017-272**Comment:**

Domestic passenger flights typically begin at about 6 a.m. and continue to 11 p.m., with between 30 and 40 flights per hour for Central/Eastern/Hawaii flights, and between 30 and 50 flights per hour for Pacific Coast flights. Domestic passenger flights continue after 11 p.m. to about 2 a.m., with between one and seven flights per hour.

Response:

The commentor is correct in identifying the blocks of time where aircraft operations occur. However, the hourly domestic operation numbers are incorrect. Please see Chapter IV, Facility Requirements (May 1996), of the Draft LAX Master Plan and in particular, Appendix A, Flight to Gate Assignments, Table IV-A.1 (3 of 3) in the Year 2000 identifies 7-43 hourly domestic flights for Central/Eastern/Hawaii and 30-43 hourly Pacific flights between the hours of 6:00 a.m. and 11:00 p.m. This chart also identifies 8-31 domestic hourly operations between the hours of 11:00 p.m. and 2:00. Table IV-A.2 (3 of 3) in the year 2010 identifies 6-48 hourly domestic flights for Central/Eastern/Hawaii and 16-47 hourly Pacific flights between the hours of 6:00 a.m. and 11:00 p.m. This chart also identifies 9-33 domestic hourly operations between the hours of 11:00 p.m. and 2:00 a.m. Table IV-A.3 (3 of 3) in the year 2015 identifies 7-49 hourly domestic flights for Central/Eastern/Hawaii and 16-48 hourly Pacific flights between the hours of 6:00 a.m. and 11:00 p.m. This chart also identifies 10-35 hourly operations between the hours of 11:00 p.m. and 2:00 for specific design day operation. Table F-9 (3 of 3) Hourly Forecast Design Day - Total Operations by User 2015 Alternative D of the LAX Draft Master Plan Addendum in the year 2015 identifies 7-35 hourly domestic flights for Central/Eastern/Hawaii and 22-40 hourly Pacific flights between the hours of 6:00 a.m. and 11:00 p.m. This chart also identifies 5-30 hourly operations between the hours of 11:00 p.m. and 2:00 for specific design day operation.

AL00017-273**Comment:**

Air cargo flights operate at all hours of the day and night with peak activity occurring at 3 a.m., 7 a.m., and 7 p.m., with between eight and 16 flights per hour. During other hours of the day and night, cargo flights tend to occur at between one and five flights per hour.

Response:

The commentor is correct in identifying that cargo flights operate throughout the day and night. Tables IV-A.1 through IV-A.3 located in Chapter IV, Facility Requirements, Appendix A of the LAX Master Plan provides hourly breakdowns for forecast cargo operations. Table F-9 in Vol. 2, Appendix F of the LAX Master Plan Addendum provides hourly breakdowns for forecast cargo operations in Alternative D. Also please see Subtopical Response TR-N-5.4 regarding relationship of air cargo flights and night noise impacts.

AL00017-274**Comment:**

Future Airport Noise (Assuming Greater Proportion of Wide-Body, B747, Planes)

The Los Angeles World Airports is contemplating the expansion of LAX. Preliminary expansion plans call for the introduction of a greater percentage of wide-body aircraft, such as the B747, to handle the expected service demand and minimize the need for increases in the total number of operations.⁵⁵ This change will increase B747 or similar large-capacity air traffic by over 180% so that, on the average, one B747 can be expected to depart or arrive at LAX about every five to six minutes during daytime and evening hours.

55 Project Description, LAX Master Plan Phase IIIF.

3. Comments and Responses

Response:

Based on the forecasts, a larger percentage of wide body jets will be operating at LAX and Boeing 747 aircraft are anticipated to operate every five to six minutes in 2015. The Average Annual Day Operations and Fleet Mix for all alternatives can be found in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR and in Appendix S-C, Supplemental Aircraft Noise Technical Reports, of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-N-6, particularly Subtopical Responses TR-N-6.2 and TR-N-6.3 regarding noise increase.

AL00017-275

Comment:

Though in this scenario, the overall percentage of passenger jets with seating capacities under 350 persons is projected to decrease, the number of jets that can carry between 250 and 349 passengers, such as B777s, and which can produce maximum noise level of 90 to 98 dBA in the community, are expected to increase by 80% over existing usage levels. The number of jets that can carry between 150 and 249 passengers, such as B767s, which can produce maximum noise level of 88 to 95 dBA in the community, are expected to increase by 50% over existing usage levels.

Response:

Comment noted. Please see Subtopical Response TR-N-1.5 regarding the accuracy of the forecast fleet mix.

AL00017-276

Comment:

Because larger aircraft produce higher noise levels, increasing the percentage of the largest aircraft, while maintaining the overall activity levels, will not only expose residents to more extremely noisy events, but is also estimated to result in a 1 to 2 dBA increase in the existing CNEL noise exposure due to aircraft operations. To characterize the significance of this CNEL increase, we note that in 1999 CNELs at homes and schools in El Segundo, Lennox, Inglewood, Westchester, and Playa del Rey were reported to range from a low of 64.9 to a high of 73.5 dBA.⁵⁶ In the future these levels can be expected to range from 65.9 to 75.5 CNEL.

⁵⁶ Florida West International Airways Negative Declaration Filing, December 2, 1999, Table II.

Response:

Noise levels have been modeled for existing conditions in 1996 and projected for 2005 and 2015 in the Draft EIS/EIR. Similarly, they have been modeled for existing conditions in 2000 and for projected conditions in 2015 in the Supplement to the Draft EIS/EIR. They are presented in detail in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR and Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR. While the percentage of large aircraft in the fleet are projected to increase, the size of an aircraft is not necessarily related to its noise level. Subtopical Response TR-N-6.3 also addresses this issue. The noise levels reported in the Aircraft Noise Technical Reports of either document indicate the anticipated changes between existing conditions and forecast noise levels, but much of the variation is related to the configuration of the airfield or the number of operations forecast to use a particular runway, rather than the change of aircraft type. In these cases, the variation is location specific, rather than generally applicable to the entire contour area. Maps are provided in Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR that indicate the areas expected to be exposed to increases in noise level of 1.5 decibels of CNEL or more.

AL00017-277

Comment:

The FAA typically uses a 1.5 dBA increase to determine whether a significant noise impact has occurred. Therefore, perhaps the projected 1 to 2 dBA increase in future CNEL noise exposure due to

the aircraft operations called for in the proposed airport expansion plan will be seen as significant by FAA regulators.

Response:

The standard for significance for aircraft noise exposure is stated in FAA Order 1050.1D Change 4 as a 1.5 dB or greater increase occurring within the established 65 CNEL contour. New exposure to the 1.5 CNEL or greater increase within the 65 CNEL or greater contour for residential, school, churches, hospitals, and select outdoor recreational use is a threshold used to determine significant aircraft noise impact in Section 4.1, Noise, and Section 4.2, Land Use, of the EIS/EIR. See also Topical Response TR-LU-5.3 regarding the thresholds used identify significant aircraft noise impacts.

AL00017-278

Comment:

Ultimately the proposed airport expansion plan, with its call for a greater percentage of wide-body aircraft, and the phase in of Stage III aircraft, will not solve the noise problem at LAX. Though there are many reasons for this failure, the primary problems are that noise levels at residences under landing aircraft would likely increase since (1) as previously noted, Stage III aircraft can be noisier upon landing than Stage II aircraft, (2) the total number of aircraft operations over the next decade will continue to increase, and (3) the use of larger aircraft to limit overall increase in aircraft operations will burden residents with higher single event noise levels.

Response:

The commentor is correct in identifying that: 1) Some Stage 3 aircraft are noisier on arrival, and 2) there will be an increase in future total operations. Please see Topical Response TR-N-6, in particular TR-N-6.3, regarding relationship between aircraft size and noise levels.

AL00017-279

Comment:

As discussed earlier in this paper, noise at the levels currently experienced by the members of the communities near LAX have been shown to cause serious adverse effects on not only the quality of life but also potentially health threatening effects in the community.

Response:

Please see Response to Comment AL00017-52.

AL00018 Wolkowitz, Edward City of Culver City 7/18/2001

AL00018-1

Comment:

The City of Culver City has reviewed the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) and submits this letter containing our comments. We are deeply concerned about the negative and unmitigated impacts the proposed LAX expansion will have on Culver City. Accordingly, the City of Culver City has adopted the attached City Council Resolution No. 2001-R068 that formally transmits our comment on the Draft EIS/EIR.

Response:

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

3. Comments and Responses

AL00018-2

Comment:

Overall, we believe the Draft EIS/EIR fails to adequately address potential significant impacts to Culver City caused by the proposed expansion of LAX including the proposed LAX Expressway along the I-405 Freeway. The Draft EIS/EIR and associated documents primarily focus on an analysis of impacts and proposed mitigation measures for the area immediately adjacent to the airport.

Due to the failure of the Draft EIS/EIR to adequately address impacts and propose mitigation measures for Culver City, despite our close proximity, we believe that the Los Angeles World Airports should find the Draft EIS/EIR inadequate for certification and require that it be revised and re-circulated to respond to the deficiencies we have identified in Resolution No. 2001-R068 and the extensive technical comments that is attached thereto as Exhibit A.

Response:

Comment noted. Please see responses to comment letter AL00018 below (i.e., individual responses to each of the concerns raised in the City's letter, Resolution No. 2001-R068, and Exhibit A).

AL00018-3

Comment:

The City of Culver City will use all means necessary to insure that the environmental documents are adequate in their analysis of, and proposed mitigation of, potential impacts on our city. We will work to insure that our city is fully protected from any inappropriate impacts of the project itself.

Response:

Comment noted.

AL00018-4

Comment:

As part of this letter, a copy of Culver City City Council Resolution No. 98-R087, referenced in Resolution No. 2001-R068, calling for a regional airport for Southern California is attached.

Response:

Please see Response to Comment AL00018-114 below which addresses Culver City Council Resolution No. 98-R087.

AL00018-5

Comment:

Further, we are also forwarding a copy of a letter dated June 11, 2001, from the Hillside Memorial Park and Mortuary located in Culver City containing their comments on the LAX Master Plan Draft EIS/EIR.

Response:

Please see Responses to Comments AL00018-115 through AL00018-130 below.

AL00018-6

Comment:

WHEREAS, the City of Los Angeles Department of Airports has developed a draft Master Plan for Los Angeles International Airport (LAX) which incorporates capacity enhancements to enable the expansion of passenger activity from a current 60 million passengers per year up to an expected 98 million

passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year through the year 2015; and,

WHEREAS, LAX is located in close proximity, approximately two miles from the boundaries of the City of Culver City, and the impacts of its operation are of critical interest to the citizens of Culver City; and,

WHEREAS, on July 31, 1997, Culver City provided written comments to the City of Los Angeles Department of Airports and the Federal Aviation Administration (FAA) on the June 11, 1997, Notice of Preparation/Notice of Intent of a Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR), which in addition to other comments, requested that issues related to traffic, air quality, overflight operations, and regional context be analyzed in the environmental review document; and,

WHEREAS, on September 14, 1998, the City Council of the City of Culver City approved and adopted Resolution No. 98-R087 and for the development of a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and promotes development of additional capacity at the many other commercial airports in Southern California to serve the expanding air commerce market place, As established in City Council Resolution No. 98-R087, the City's official position regarding the proposed expansion is one of opposition to the LAX capacity expansion beyond that which can be accommodated by existing LAX facilities, and support for developing the capacity of other commercial airports within Southern California; and,

WHEREAS, the Los Angeles World Airports (LAWA) and the FAA prepared a joint Draft EIS/EIR to address the potential environmental impacts caused by the proposed LAX expansion, which was released for public review and comment on January 18, 2001; and,

WHEREAS, the Draft EIS/EIR analyzes four project alternatives: 1) No Action/No Project; 2) Alternative A, Additional runway to the north airfield, 3) Alternative B, an additional runway to the south airfield, and 4) Alternative C, no additional runways but reconfiguration of existing runways including either lengthening, widening, and relocating; and,

WHEREAS, a City Staff Team, consisting of various City Departments as well as a noise consultant and a traffic consultant hired by the City of Culver City, was established to evaluate and comment on the adequacy of the Draft EIS/EIR in addressing potential impacts to Culver City; and,

WHEREAS, the City Council of the City of Culver City, accepted public comments and considered the Draft EIS/EIR at public meetings on May 29, 2001, and June 25, 2001.

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE as follows:

SECTION 1. The following key findings are hereby made by the City Council of the City of Culver City. These findings are described more fully and augmented in greater detail in "Exhibit A", which is attached to this Resolution.

Response:

Comment noted. Please see Responses to Comments AL00018-25 through AL00018-114 below.

AL00018-7

Comment:

1. The Draft EIS/EIR inadequately and inaccurately addresses the substantial adverse environmental impacts potentially affecting the City of Culver City. The Draft EIS/EIR is inadequate and inaccurate as an informational document based on but not limited to the following issues:

Response:

Please see Responses to Comments AL00018-8 through AL00018-23 regarding the specific concerns raised in the City's Resolution.

3. Comments and Responses

AL00018-8

Comment:

a. Aircraft Overflight Noise: There are potential aircraft overflight noise impacts from two new arrival paths and a new departure path. A major problem with the Draft EIS/EIR regarding aircraft noise is the lack of key data and detailed analysis of the overflight noise impact to Culver City and other communities in close proximity. The degree of impact cannot be determined because noise levels and flight frequency information for aircraft overflights is not provided in the Draft EIS/EIR.

Response:

The commentor is correct in identifying that no over-flight noise levels are identified for the Culver City area. They were not addressed because projected noise levels in Culver City would be below the levels of significance defined by the Federal and State regulations. Federal Aviation Regulations define compatible land use impacts based on noise from aviation activities, using the 65 dB Community Noise Equivalent Level (CNEL), or a 1.5 CNEL increase in existing areas of 65 CNEL, as the impact thresholds for noise sensitive uses. For California evaluations, the Caltrans Airport Land Use Planning Handbook, provides noise and safety compatibility criteria for review of development near airports. The suggested noise compatibility criteria calls for no new residential development to be located within the 65 CNEL contour. Culver City is not located in the 65 CNEL contour for existing conditions, or any of the identified future build or No Action/No Project alternatives. Noise levels at locations outside the 65 CNEL contours were further addressed in Section 5.1, Locations of Significant Impact, in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. Nighttime single event noise impacts and mitigation for LAX Master Plan alternatives were presented in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, with supporting information in Appendix S-C1 and Technical Report S-1. Therefore, no further noise impacts analysis was necessary. Also please see Subtopical Response TR-N-2.3.

AL00018-9

Comment:

b. Traffic: The Draft EIS/EIR is totally inadequate in evaluating traffic impacts in the City of Culver City. Only one intersection in Culver City was analyzed. The analysis should have included other intersections within the radius of influence of the Airport Expansion, to determine at which point in Culver City, impacts can be mitigated to a to a level of insignificance, if possible. Assessment of additional significant intersections should have been included, all of which currently are operating at unacceptable levels of service. Not only is there a lack of acceptable analysis, the failure to address these issues results in a failure to address potential mitigation measures which might have the effect of reducing the levels of adverse impacts.

Response:

Please see Topical Response TR-ST-2, Section 1.0, regarding the definition of study areas used in the surface transportation analysis. As discussed in that topical response, LAX is an Intermodal transfer facility. It is not a true traffic generator, such as a regional shopping mall. Therefore, it was not necessary in the Draft EIS/EIR or Supplement to the Draft EIS/EIR to identify and analyze every intersection that may be impacted by the project.

AL00018-10

Comment:

c. Air Pollution: The Draft EIS/EIR totally fails to evaluate localized air pollution impacts on Culver City.

Response:

Pollutant concentrations produced from airport sources were predicted at sufficient publicly accessible receptor locations to identify the maximum ambient air quality impacts from the airport sources. Up to 300 receptors were used in each initial EDMS dispersion modeling scenario and approximately 1000 receptors were used in each ISCST3 modeling scenario. Receptors were located along the property

line defined for Alternative D, and spaced a maximum of 300 meters and a minimum of 100 meters from the next property line receptor. An overlaying receptor grid (with receptors spaced a maximum of 500 meters and a minimum of 100 meters apart in EDMS and a maximum of 250 meters and a minimum of 100 meters apart in ISCST3) were also included in each modeling scenario. The grid was centered approximately on the Theme Building and extended 4.5 km to both the east and west and 5 km to both the north and south. Grid receptors falling within the property line but not in areas accessible to the public were removed from the analyses. The height of all receptors was 1.8 m (EDMS default), the approximate breathing height of persons standing on the ground. These receptor locations were identified in the modeling protocol which was reviewed by SCAQMD prior to conducting the air quality analyses presented in the Draft EIS/EIR, and comments and suggestions from SCAQMD were incorporated into the protocol. No significant impacts were anticipated beyond these receptors.

Receptors were also placed at locations sensitive to the public interest. These locations included schools, hospitals, nursing homes, and day-care facilities. Pollutant concentrations were predicted at all readily identifiable sensitive locations within a radius of at least 3 km from the LAX Theme Building. Locations in Culver City are beyond the outermost extent of modeling receptors used in the air quality analyses, so no impacts in Culver City were quantified. Due to the nature of the dispersion models used in the air quality analyses, predicted concentrations tend to decrease with increasing distance from the source. Therefore, any impacts in Culver City from emissions at LAX are expected to be less than those modeled at the outermost receptors; these impacts were well below the maximum predicted impacts reported in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00018-11

Comment:

No mitigation measures are proposed for Culver City from increased air and mobile sources from auto traffic, aircraft operations, construction, and in particular from freight and cargo operations.

Response:

Please see the Final EIS/EIR subsection 4.6.8 and the Supplement to the Draft EIS/EIR Appendix S-E subsection 2.3 for detailed discussions of air quality mitigation measures. The selected mitigation measures will provide substantial reductions of emissions associated with both the construction and the operation of the selected Master Plan alternative. The regional environment-areas off airport, including Culver City-will benefit from the reduced emissions and ambient pollutant concentrations attributable to these mitigation measures, particularly from the transportation-related measure and its components.

Please see Section 4.3, Surface Transportation, of the Supplement to the Draft EIS/EIR regarding traffic-related impacts. Please also see Topical Response TR-MP-1 regarding air cargo activity and demand.

AL00018-12

Comment:

Without this critical analysis, the Draft EIS/EIR fails to comply with the minimum requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

Response:

Please see Responses to Comments AL00018-10 and AL00018-11 above regarding air quality impacts on Culver City. The Draft EIS/EIR and Supplement to the Draft EIS/EIR air quality analyses meet the analytical requirements of CEQA and NEPA.

AL00018-13

Comment:

d. LAX Expressway Traffic: It is anticipated that there will be more congestion on Culver City arterial streets and creation of "congestion nodes" on the I-405 resulting from anticipated traffic friction as well

3. Comments and Responses

as weaving impacts on the I-405 immediately north of SR-90 freeway as a result of the proposed Expressway. However, an assessment of these impacts is completely absent from the Draft EIS/EIR.

Response:

Comment noted. Please see Topical Response TR-APPK-1. If an alternative to the LAX Master Plan is adopted that includes the proposed LAX Expressway as a project component, then a project-specific traffic analysis that details the existing and future (no build condition) traffic demands along the proposed LAX Expressway corridor would be conducted. The traffic study would be based upon the specific adopted alignment of the proposed LAX Expressway and incorporate operational assumptions that would become available when more detailed design plans are developed.

Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

Please see Topical Response TR-ST-2 for a description of the surface transportation analysis methodology used for the Draft EIS/EIR, which includes a discussion of the methodology used to determine a geographic distribution of airport trips. It also includes a description of the goals of the LAX Master Plan to minimize impacts to local streets and to project neighborhoods.

Please also see Topical Response TR-ST-4 for a discussion of airport area traffic concerns and Topical Response TR-ST-6 for a discussion of neighborhood traffic impacts.

AL00018-14

Comment:

e. LAX Expressway Traffic Noise: There are potential adverse impacts due to increased noise from vehicular traffic within residential, park, and school properties located near Coolidge Avenue and Culver Park Place. These noise-sensitive sites are located abutting or adjacent to the alignment of the proposed Expressway. However, no noise analysis, no noise measurements, and no mitigation measures or sound barriers are proposed for these noise-sensitive uses in Culver City.

Response:

The segment exclusive to Alternative 3 of the proposed LAX Expressway, located north of Bristol Parkway along the east side of I-405, was analyzed for noise impacts using a screening method. It was determined (as stated in Section 5.6.1, LAX Expressway, of Appendix K of the Draft EIS/EIR) that existing and future No Action/No Project traffic noise levels are likely to approach or exceed FHWA Noise Abatement Criteria due to the existing major highway facilities in the vicinity. Construction of LAX Expressway Alternative 3 could incrementally increase traffic noise levels in the area. Section 5.6.1, LAX Expressway, of Appendix K of the Draft EIS/EIR states that a detailed noise abatement evaluation would be carried out as part of the Caltrans project development process.

Please refer to Response to Comment AL00018-89 for detailed information about construction mitigation measures and LAX Master Plan Commitments specified in the Draft EIS/EIR and Supplement to the Draft EIS/EIR that apply to the proposed LAX Expressway improvements.

In addition, please refer to Topical Response TR-APPK-1 for additional information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR. Subsequent to the publication of the 2001 Draft EIS/EIR, Alternative D, the subject of the Supplement to the Draft EIS/EIR, was prepared and does not include the LAX Expressway or the proposed ring road. Alternative D is LAWA staff's preferred alternative.

AL00018-15

Comment:

f. LAX Expressway Construction Activities: Construction of the Expressway is anticipated in Phase II of the Master Plan. The document fails to analyze any cumulative construction impact on Culver City from both the I-405 widening project and the proposed LAX Expressway. The duration of the construction will be 10 years, from 2005 to 2015. Despite the long duration of the construction period, there is

inadequate analysis and no construction mitigation measures proposed for the affected areas in Culver City.

Response:

As noted on page 6 in Section 2.2.1, Freeway Network, of Appendix K of the Draft EIS/EIR, 2005 is the target year for completion of the Caltrans I-405 High Occupancy Vehicle (HOV) lane installations between Century and Wilshire Boulevards. If the proposed LAX Expressway is adopted and carried forward as a Master Plan project component, construction would occur during Phase 2 of the LAX Master Plan, scheduled for implementation between 2006 and 2015. As such, construction of the LAX Expressway and the Caltrans I-405 HOV improvements are not expected to occur simultaneously.

Construction mitigation measures and Master Plan Commitments that would apply to areas in Culver City are identified in the Supplement to the Draft EIS/EIR as follows:

- Subsection 4.3.2.8.3, Cumulative Impacts - A, B, C, and D, of the Supplement to the Draft EIS/EIR (page 4-289) specified the mitigation measure MM-ST-14 to limit the cumulative impact of construction on area roads. It reads as follows: MM-ST-9. Expand The Traffic Coordination Office: Expand the traffic coordination office proposed in Master Plan Commitment C-1 to include representatives of any other area development projects (such as Playa Vista), as appropriate, to ensure that the cumulative impacts of construction are coordinated and minimized.

- Section 4.3.2.5, Master Plan Commitments, of the Supplement to the Draft EIS/EIR (beginning on page 4-248) identified Off-Airport Surface Transportation Master Plan Commitments to be included in construction specifications and contracts.

- Appendix K of the Draft EIS/EIR lists mitigation measures for the proposed LAX Expressway in Section 6.0, Inventory of Mitigation Measures. Construction mitigation measures that would apply to areas of Culver City include measures listed under the headings of: Land Use (reference to MM-DA-1 identified in subsection 4.21.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR); Air Quality; Wildlife, Fisheries, and Vegetation; and Archaeological Resources.

If the proposed LAX Expressway is adopted and carried forward, a more focused analysis of environmental impacts of the proposed LAX Expressway and identification of additional construction mitigation measures would be conducted in compliance with CEQA requirements. Please refer to Topical Response TR-APPK-1. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

Finally, please see Responses to Comment AL00018-89.

AL00018-16

Comment:

g. LAX Expressway Land Use: Based on evaluation of the proposed LAX Expressway, there are potential land use impacts to residential, business, school, and park uses. The Draft EIS/EIR fails to demonstrate that the proposed Expressway will be compatible with certain sensitive receptor uses due to the lack of analysis and noise mitigations proposed for areas in Culver City.

Response:

Land use and sensitive use impacts from the proposed LAX Expressway are addressed in Section 5.1 of Appendix K of the Draft EIS/EIR. This section specifically identifies properties that would be potentially affected by construction of the proposed LAX Expressway. A Section 4(f) evaluation was also conducted to identify any parks potentially affected by the LAX Expressway. This report is included as an attachment to Appendix K of the Draft EIS/EIR.

Please also see Responses to Comments AL00018-13, AL00018-68, AL00018-116, AL00018-123, and AL-00018-89.

3. Comments and Responses

AL00018-17

Comment:

Also, it is apparent from Figure 3.1-7 of Appendix K, that some areas in Culver City will require property acquisition with Expressway Alternative No. 3, particularly on the east side of the I-405 Freeway, north of the SR-90/I405 freeway interchange. However, the Draft EIS/EIR fails to provide adequate information, analysis, and mitigation measures regarding this matter.

Response:

Properties potentially impacted by the proposed LAX Expressway (Alternative 3) are identified in Section 5.1, Land Use, of Appendix K of the Draft EIS/EIR. Refer to Topical Response TR-APPK-1 for an explanation of the programmatic level of analysis provided in Appendix K of the Draft EIS/EIR and a description of the more detailed analysis that would be undertaken in the future if the LAX Expressway is adopted as a component of the LAX Master Plan. Please note that Alternative D, Enhanced Safety and Security Plan, does not include the proposed LAX Expressway as a project component. Also refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues. LAX Master Plan Commitments and Mitigation Measures related to the LAX Master Plan are summarized in Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR.

AL00018-18

Comment:

Furthermore, there is also potential visual/shade and shadow/aesthetics impacts from the placement of the elevated Expressway and column supports in Culver City but no analysis or mitigation measures are provided in the document.

Response:

Appendix K does not specifically mention the potential for shade and shadow effects associated with the support columns of the proposed Expressway. The exact placement of the columns is not known at this time, however, it is anticipated that there would be some visual/shade and shadow/aesthetics impact under both Expressway alternatives. However, the degree of impact can only be determined at the specific project level analysis stage which would occur during the Caltrans Project Development process and CEQA review stage. At that time, more detailed engineering plans will be available upon which such analysis can be conducted to determine significance and any appropriate mitigation measures to reduce such effects. Please see Topical Response TR-APPK-1 with respect to additional project specific CEQA analysis.

AL00018-19

Comment:

h. Cumulative Impacts: The Draft EIS/EIR fails to adequately analyze the cumulative impacts of other projects, which will be under construction during the same time period as the proposed expansion of LAX such as Playa Vista.

Response:

As stated on page 4-2 in Chapter 4 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, cumulative impacts are the impacts of the project in conjunction with past, present, and probable future projects in the area. The project's contribution to cumulative impacts for each environmental discipline (e.g., noise, land use, surface transportation (traffic), air quality, etc.) were evaluated in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. As discussed in Section 2.6 of the Draft EIS/EIR, the cumulative impacts analysis was based on applicable planning documents designed to evaluate regional and area-wide conditions, as well as an assessment of some 200 separate projects, including the Playa Vista project, Howard Hughes Center, and Marina del Rey development, expected to occur in the LAX vicinity through 2015. Please see Section 2.6 of the Draft EIS/EIR for further information on the approach to the cumulative impacts analysis and identification of projects closest (within 3 miles) to

LAX. In addition to the 200 projects considered in the Draft EIS/EIR, the following projects were also considered in the Supplement to the Draft EIS/EIR: 1) the El Segundo Corporate Campus/Media Center; 2) a 2,200 unit residential development near Long Beach Airport; 3) a new hotel in Marina del Rey; and 4) the revised Playa Vista project (on November 14, 2002, the City of Los Angeles Planning Department published a Notice of Preparation for the Villages at Playa Vista Project, a development proposal that supersedes and replaces the previously proposed Playa Vista Second Phase Project. The development proposal for the Villages at Playa Vista project is substantially less than the previously proposed Playa Vista Second Phase Project, (i.e., reduced to less than one-third of the earlier proposal)). A discussion of cumulative impacts associated with each Master Plan alternative is included in each section in Chapter 4 under the heading "Cumulative Impacts," (for example, Section 4.1 for information regarding cumulative noise impacts, Section 4.3 regarding cumulative traffic impacts, and Section 4.6 regarding cumulative air quality effects).

AL00018-20

Comment:

For example, the cumulative impacts of the LAX expansion along with the Playa Vista project, including their cumulative construction impacts, would result in significant adverse impacts to the I-405, Sepulveda Boulevard, and other arterials, resulting in adverse impacts to local circulation and air emissions.

Response:

Cumulative transportation impacts were analyzed following the requirements of NEPA and CEQA. They are discussed in subsection 4.3.2.8 of the Draft EIS/EIR and subsection 4.3.2.7 of the Supplement to the Draft EIS/EIR. Cumulative construction impacts were analyzed following the requirements of NEPA and CEQA, and are discussed in Section 4.20.7. These sections include the identification of adverse impacts and mitigation measures. Please also see Topical Response TR-ST-2 regarding cumulative impacts.

AL00018-21

Comment:

i. Regional Context: The Draft EIS/EIR presumes that a vast majority of the region's growth in air passenger and air cargo demand will be directed to LAX. A number of commercially viable airports in the Southern California area currently exist and are underutilized relative to their capacity. A fully regional solution to this air passenger and air cargo capacity has not been adequately addressed in the Draft EIS/EIR.

Response:

The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale, and Van Nuys Airports. The decision to develop any airport is the responsibility of local government. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

3. Comments and Responses

AL00018-22

Comment:

j. NOP/NOI Comment Letter: In response to the NOP/NOI to prepare the Draft EIS/EIR issued in June 1997, Culver City requested in a letter dated July 31, 1997, that major issues and concerns related to traffic, air quality, overflight operations, regional context, and other subject areas impacting Culver City be analyzed in the preparation of the Draft EIS/EIR. None or minimal analysis of the issues the City requested to be analyzed are contained in the Draft EIS/EIR. Further, Culver City's NOP/NOI comment letter is not contained in Appendix A of the Draft EIS/EIR, where copies of written comments from affected agencies are contained.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; air quality in Section 4.6, Air Quality; and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. The air quality and noise analyses were conducted in accordance with established regulations and practices. The air quality analysis focused on emissions and peak concentrations, irrespective of jurisdictional boundaries. Regional emissions were also evaluated. The noise study area encompassed land uses within certain noise contours, also irrespective of jurisdictional boundaries. For a discussion of the traffic study area relative to Culver City, please see Response to Comment AL00018-25. For a discussion of the LAX Master Plan role in the regional approach to meeting demand, please see Topical Response TR-RC-1.

Regarding the City's indication that their comment letter on the NOI/NOP is not included in Appendix A of the Draft EIS/EIR, both FAA and LAWA made best attempts to retain all comment letters received on the NOP/NOI and the Supplemental NOP, and provide copies of those letters in Appendix A. The City did not provide a copy of the subject letter in their comments on the Draft EIS/EIR and has not indicated what, if any, issues raised in the July 31, 1997 letter are not adequately addressed in the Draft EIS/EIR. It should be noted that Appendix A of the Draft EIS/EIR does contain a copy of hand-written comments provided by Theodore Smith III, Planning Commissioner, City of Culver City, during the scoping process.

AL00018-23

Comment:

2. The magnitude of omissions in the Draft EIS/EIR is so extensive that attached hereto as "Exhibit A" of this Resolution, are significant additional comments which detail the failure of the lead agencies to adequately address the complete array of adverse environmental impacts this project is anticipated to have on Culver City.

Response:

Please see Responses to Comments AL00018-25 through AL00018-114 below.

AL00018-24

Comment:

SECTION 2. Pursuant to the foregoing recitation and findings, the City Council of the City of Culver City, California, hereby:

1. Determines that the Draft EIS/EIR is substantially inadequate and inaccurate for certification by the Lead Agencies and that a complete and proper level of environmental data and analysis must be incorporated into the Draft EIS/EIR to address the identified deficiencies.

2. Establishes that this Resolution, including attached Exhibit "A," constitutes the City of Culver City's formal position and comments on the Draft EIS/EIR that was prepared for the proposed LAX Master Plan,

3. Directs and authorizes Staff to transmit the position and comments of the City of Culver City on the Draft EIS/EIR to LAWA and FAA.

Response:

Comment noted.

AL00018-25

Comment:

EXHIBIT A
CITY OF CULVER CITY RESOLUTION NO. 2001-R068
Culver City Comments on the LAX Master Plan Draft EIS/EIR
June 25, 2001

SURFACE TRANSPORTATION

Intersection and Street Segment Traffic Impact Analysis

1. The impacts of LAX expansion traffic within Culver City were not given sufficient analysis. The most thorough method of analyzing the traffic flow quality and impacts on a street network is the evaluation of the operations at the critical intersections. They are the locations that act as valves for the flows on the intersecting streets. The flow along the street segments between the important intersections does not yield a true picture, because the interruptions to flow at the critical intersections are not properly accounted for in that type of analysis. Only one intersection in Culver City was included in the Draft EIS/EIR impact analysis - Sepulveda Boulevard / Centinela Avenue, at the southern edge of the City [Figure 2-1, following page 2-4]. We feel additional and critical Culver City intersections listed in the table below should be analyzed in the Draft EIS/EIR.

1. Braddock Drive @ Overland Avenue
2. Braddock Drive @ Sepulveda Boulevard
3. Bristol Parkway @ Centinela Avenue
4. Bristol Parkway @ Slauson Avenue
5. Buckingham Parkway @ Slauson Avenue
6. Centinela Avenue @ Green Valley Circle
7. Centinela Avenue @ Washington Boulevard
8. Centinela Avenue @ Washington Place
9. Culver Boulevard @ Main Street/Washington Boulevard
10. Culver Boulevard @ Overland Avenue
11. Culver Boulevard @ Sawtelle Boulevard
12. Culver Boulevard @ Sepulveda Boulevard
13. Duquesne Avenue @ Jefferson Boulevard
14. Glencoe Avenue @ Washington Boulevard
15. Green Valley Circle @ Sepulveda Boulevard
16. Hannum Avenue @ Playa Street
17. Hannum Avenue @ Slauson Avenue
18. I-405 NB Ramps s/o Venice Boulevard @ Sepulveda Boulevard
19. I-405 SB Ramp n/o Culver Boulevard @ Sawtelle Boulevard
20. Inglewood Boulevard @ Washington Boulevard
21. Jefferson Boulevard @ Overland Avenue
22. Jefferson Boulevard @ Sepulveda Boulevard (N)
23. Jefferson Boulevard @ Slauson Avenue
24. La Cienega Boulevard @ Washington Boulevard
25. Marina Freeway @ Slauson Avenue
26. Matteson Avenue/I-405 SR Ramps @ Sawtelle Boulevard
27. Motor Avenue @ Washington Boulevard
28. Overland Avenue @ Washington Boulevard

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29. Playa Street/Jefferson Boulevard @ Sepulveda Boulevard
30. Redwood Avenue @ Washington Boulevard
31. Sawtelle Boulevard @ Sepulveda Boulevard
32. Sawtelle Boulevard @ Venice Boulevard
33. Sawtelle Boulevard @ Washington Boulevard
34. Sawtelle Boulevard @ Washington Place
35. Sepulveda Boulevard @ Slauson Avenue
36. Sepulveda Boulevard @ Washington Boulevard
37. Sepulveda Boulevard @ Venice Boulevard
38. Sepulveda Boulevard @ Washington Place
39. Walgrove Avenue @ Washington Boulevard

2. Only six street segments in Culver City were included in the analysis - 1) Sawtelle Boulevard, south of Venice Boulevard; 2) Sepulveda Boulevard, south of Venice Boulevard; 3) Overland Avenue, south of Venice Boulevard; 4) Sepulveda Boulevard, south of Sawtelle Boulevard; 5) Centinela Avenue, west of Sepulveda Boulevard; and 6) Washington Boulevard, east of Lincoln Boulevard. [Figure 2-1].

a. Other streets that are components of routes to/from the airport, such as Jefferson Boulevard (west of Sepulveda Boulevard and east of Overland Avenue), Culver Boulevard, and Centinela Avenue (toward the east), are not included, although they are likely to carry meaningful volumes of airport traffic. These streets should also be studied.

b. Of the streets that are included, some of the segments are not the most critical in evaluating impacts of airport traffic. For example, Overland Avenue, south of Jefferson Boulevard would have far higher impacts of airport traffic than the segment of Overland Avenue that was chosen for analysis. The same could be said about Sawtelle Boulevard, south of Culver Boulevard, and about Washington Boulevard, east and west of Sepulveda Boulevard.

c. There is only one study segment along the entire length of La Cienega Boulevard, although that is one of the most attractive routes to/from LAX carrying 15% of LAX traffic, as shown in Draft EIS/EIR Table II-7.13.

d. According to Table 11-7.4 on page 11-7.13, the "existing" (1996) operations in the afternoon peak hour were at:

- Level of Service (LOS) A or B along Sepulveda Blvd., south of Venice Boulevard.
- LOS A and B along Overland Avenue, south of Venice Boulevard.
- LOS A along La Cienega Boulevard, south of Slauson Avenue.
- LOS A and B along Washington Boulevard, east of Lincoln Boulevard.
- LOS B and C along Sepulveda Boulevard, south of Slauson Avenue.

Those calculated levels do not conform to actual experience on the streets. The actual, observable operations are at lower levels, even though traffic signal enhancing equipment (ATSAC) has been installed. The street segment analysis has not taken account sufficiently of the interruptions to flow that occur at the critical intersections along the segments.

e. Many of the findings of current and future Levels of Service on street segments [Table 11-7.4, page 11-7.13; Attachment C, unnumbered pages] are not credible and should be re-evaluated in light of current experience.

- La Cienega Boulevard, south of Slauson Avenue is shown at LOS A or B during all peak hours to the year 2015, although the road is observably congested during peak hours and many non-peak hours now.

- Washington Boulevard, east of Lincoln Boulevard, is shown at LOS A during all peak hours to 2015, although that high level of operations has not been the experience since the opening of the Costco store in that street segment. Apparently, the calculations, which are based on pre-Costco counts, did not take the new retail traffic into account, despite Costco being highlighted in the report text as a related project.

- Sepulveda Boulevard, south of Slauson Avenue is shown at Loss's A and C in the afternoon peak hour of 2015 with the Alternative C traffic included. The street is already operating at LOS's below those levels, and the additional traffic with no mitigation will not improve operations.

Again, those findings demonstrate the weakness of analysis using street segments instead of intersections. The interruptions of flow at the critical intersections are not fully accounted for in the segment methodology.

Response:

Please refer to Topical Response TR-ST-2, Section 1, for a discussion on the definition of the study area and identification of facilities analyzed.

2a. Please refer to Topical Response TR-ST-2, Section 1, for a discussion on the definition of the study area and identification of facilities analyzed.

2b. The street segments selected for the analysis form a screenline that forms a circle surrounding the Tier 1 Study area, consistent with the two-tiered approach outlined in the Memorandum of Understanding between LAWA and LADOT.

2c. Comment 2c incorrectly asserts that La Cienega carries 15 percent of airport trips based on Table II-7.13 of Technical Report 2b. The table actually indicates that between 12 and 19 percent of the trips on La Cienega Boulevard south of Slauson Avenue, depending upon time of day and direction, are airport-related trips.

2d. Table II-7.4 in Technical Report 2b, a table describing existing levels of service, was a preliminary table that was later refined. The refined information is included in Technical Report 3b, Attachment C. The refined report reflects the assumption of three lanes in each direction on Sepulveda south of Venice (the correct assumption is two lanes per direction), and the assumptions of two lanes per direction on Overland south of Venice (the correct assumption is one lane per direction). When these refinements were made, the LOS for northbound Sepulveda changed from B to E in the AM peak hour and both directions changed from A to E in the PM peak hour. The LOS for northbound Overland changed from A to F in the AM peak hour, and southbound Overland changed from A to E. During the PM peak hour, the LOS changed from A to E northbound and from B to F southbound. As shown in Attachment C in Technical Report 3b, future year conditions on these streets are shown to be severely congested with LOS F in the Adjusted Environmental Baseline. La Cienega south of Slauson is assumed to operate much like a freeway, with the equivalent of a freeway interchange at the junction of Sepulveda and Slauson and no local access along La Cienega in this segment. It is our experience that congestion on La Cienega Boulevard typically occurs south of La Tijera and north of Stocker Street. Other than possible long queues at the intersections, including the intersection of the ramps from La Cienega to Slauson Avenue, traffic tends to flow much more quickly in the section between La Tijera and Stocker than anywhere else along La Cienega Boulevard. Therefore the LOS estimates in Table II-7.4 seem reasonable for this specific section. The comment indicates that the segment of Washington Boulevard east of Lincoln was experiencing high (good) levels of service as indicated in Table II-7.4 until a new retail development project was opened recently. The comment incorrectly identifies the LOS for Sepulveda south of Slauson as B and C. Table II-7.4 shows the LOS ranging from A to E, depending upon the time of day and direction. The overall assessment of the existing level of service analysis conducted in Technical Report 2b is that it provides reasonable results once the errors in capacity assumptions are corrected. Since these errors were corrected prior to the analysis of future year conditions in Technical Report 3b, the credibility of the future year results is not jeopardized.

2e. See response #2d above for comments regarding La Cienega Boulevard south of Slauson Avenue. While the Costco project was included as a related project in the analysis (see Table 2.2 in Technical Report 3b) and trips from Costco were included in all future year model runs, it is beyond the scope of this program-level EIS/EIR process to analyze the specific impacts of that one related project on a single intersection and/or street segment miles away from LAX. The analysis was conducted using the best information available. Technical Report 2b shows existing LOS at Sepulveda south of Slauson to be A and D in the AM peak hour and B and C in the PM peak hour. Technical Report 3b, Attachments C, D, and E show the 2015 LOS for Alternative C (unmitigated) to be A and E in the AM peak hour and C and D in the PM peak hour. The same LOS are shown for Alternative C with other mitigation measures described on page 5-6 of Technical Report 3b being implemented. These clearly indicate traffic growth and increased congestion when compared to existing conditions. In addition, a significant

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impact was identified on this street segment. Implementation of other mitigation measures for Alternative C, as described on page 5-6 of Technical Report 3b, cause sufficient diversion of traffic away from this street segment and fully mitigates the impact. The overall assessment of the future level of service analysis conducted in Technical Report 2b is that it provides reasonable results given the information available.

AL00018-26

Comment:

3. The "No Action/No Project" (NA/NP) alternative includes large volumes of traffic that would have been generated by LAX Northside and Continental City [page 4-293], assuming these developments were going to be built. However, they have not been built and are not part of the background or base conditions against which the proposed expansion traffic should be measured. Therefore, no credit should be allowed for those non-existent trips. As shown on page 3-10, the Draft EIS/EIR trip generation estimates for Alternative C of the LAX expansion were 22% to 26% lower than the NA/NP trip generation estimates. With such assumptions of base conditions, the LAX expansion is being treated as if it were a traffic mitigation project, rather than a traffic generating development.

Response:

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic and Topical Response TR-ST-2, Section 2.0, regarding baseline assumptions used in the traffic analysis.

AL00018-27

Comment:

4. According to the Draft EIS/EIR, LAX Alternative C will result in a significant impact at the Sepulveda Boulevard/Centinela Avenue intersection in the year 2015. Two distinct and conflicting mitigation measures are proposed in different parts of the document.

a. In Table 4.3.2-28 on page 4-350, pavement widening, etc. is recommended to provide a third left-turn lane for northbound Sepulveda Boulevard. That measure would not be available, because it has already been assigned to the Playa Vista Phase II development.

b. In Attachment F [pages are unnumbered], ATSAC traffic signal enhancement equipment is recommended. That equipment is already in place and has been for several years. Therefore, it cannot be considered as a mitigation measure for Alternative C traffic.

Since both of the conflicting mitigation measures that are recommended in different parts of the Draft EIS/EIR are invalid, the impacts at the Sepulveda Boulevard/ Centinela Avenue intersection must be considered unmitigated.

5. There is no recommendation or offering of mitigation measures for the Alternative C traffic impacts on the street segments, although such measures are presented for the street segments that would be impacted by Alternatives A and B.

a. In 2005, Alternative C traffic will have significant impacts at Sepulveda Boulevard, south of Venice Boulevard, and on Overland Avenue, south of Venice Boulevard (with final mitigation). [Attachment C, pages are unnumbered]

b. In 2015, Alternative C traffic will have significant impacts at three segments: 1) Sepulveda Boulevard, south of Venice Boulevard; 2) Overland Avenue, south of Venice Boulevard; and 3) Sepulveda Boulevard, south of Slauson Avenue. Even with the "final mitigation" in place, the second and third segments would have significant impacts residual [Attachment C, pages are unnumbered]. These impacts need to be addressed.

6. For Alternative A, street segment mitigation measures include ATSAC traffic signal enhancement at the Sepulveda Boulevard/Slauson Avenue intersection and at the Sepulveda Boulevard/Centinela Avenue intersection [Table 4.3.2-20, page 4-325]. The ATSAC equipment at those two locations, and

at all other intersections along Sepulveda Boulevard, has been in place for several years. Therefore, the mitigation measures are invalid, and the impacts would remain un-mitigated.

7. One of the stated accomplishments of the "congestion relief package" would be to increase the average arterial speed by 3% [Page ES-24]. That would be trivial and of no real value to individual drivers. For example, at 30 miles per hour, a 3% increase would lead to an average of 30.9 miles per hour, which would not be noticeable to individual drivers.

Response:

There is no regulation that restricts a transportation improvement from mitigating more than one significant environmental impact or impacts from more than one proposed project. As an example, transportation improvement fee programs (such as the one in the Coastal Transportation Corridor Specific Plan) are developed specifically to mitigate a large number of impacts with a small number of improvements, and to allow multiple development projects to share in the benefits of the improvements. Therefore, the recommended improvements for the intersection of Centinela Avenue and Sepulveda Boulevard remain valid as a mitigation measure. The proposed mitigation plan in Attachment F of Technical Report 3b was subsequently refined, as described in Section 4.3.2.9.3 of the Draft EIS/EIR. Upgrading this signal to ATSAC is no longer a proposed mitigation measure. The proposed list of mitigations for Alternative C in 2015 is provided in Table F4.3.2-27. This table includes recommended mitigation measures for Alternative C link impacts.

Given the update on ATSAC on Sepulveda Boulevard, the mitigation measures for impacts at both Sepulveda south of Slauson and Centinela west of Sepulveda would be redefined to upgrade from ATSAC to ATCS on Sepulveda Boulevard between Centinela and Slauson. This will reduce the V/C of Sepulveda south of Slauson by 0.03 and reduce the V/C of Centinela west of Sepulveda by 0.015. These reductions will bring the impacts at these links to a level below the significance thresholds and fully mitigate the impacts. This updated information is useful for maintaining the most recent data available, but does not render the Draft EIS/EIR incorrect for this issue, as the analysis represented a snapshot in time based on the best available at that time. As the status of related projects and roadway network improvements continues to evolve over the upcoming years, the project's mitigation plans will continue to be refined.

The fact that the Master Plan alternatives will increase travel speeds on arterial streets in addition to reducing vehicle hours of travel and overall levels of congestion throughout the surrounding areas is an important finding of the analysis and not at all trivial. If the analysis had shown that average arterial speeds were to be increased three percent by the Master Plan alternatives, it would have not been considered trivial. Impacts as little as one percent are significant under the significance criteria used in the Draft EIS/EIR.

AL00018-28

Comment:

8. Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements, Paragraph 2.2.3 on Page 8. This section describes Pershing Drive as a six-lane arterial. While that statement is true immediately adjacent to the airport, the section of Pershing Drive that connects to Culver Boulevard is a narrow two-lane winding road that will feed the six-lane arterial. This has been left out of the report or ignored.

Response:

Comment noted. Traffic impacts along Pershing Drive were investigated and included in the traffic model completed for the Draft EIS/EIR. As noted in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR (and depicted on Figure 4.3.2-1), the referenced segment of Pershing Drive is included in the Tier 1 off-airport surface transportation study area. Traffic along Pershing Drive was specifically studied at its intersections with Imperial Highway, Westchester Parkway, and Manchester Avenue. The segment of Culver Boulevard (including the intersection with Pershing Avenue) that connects all traffic to and from Pershing Avenue was specifically studied in the traffic analysis. As such, all future impacts to Pershing Drive that may result from implementation of the LAX Master Plan have been fully evaluated.

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Please refer to Topical Response TR-ST-2 for a description of the surface transportation analysis methodology used for the Draft EIS/EIR. This topical response includes a discussion of the methodology used to determine a geographic distribution of airport trips.

AL00018-29

Comment:

It will be Culver Boulevard and probably Manchester that drivers will use to access the proposed terminals adjacent to Pershing Drive. Culver Boulevard itself is a two-lane road from the 90 Marina Freeway to the Jefferson intersection, and that two-lane road creates congestion in the morning all the way through Playa del Rey and along Vista del Mar all the way back up to Imperial Boulevard. The Playa Vista Traffic Mitigation will address some of this congestion, but Playa Vista is not mitigating anticipated traffic that will be generated by the LAX exchange. This situation needs to be addressed in the Draft EIS/EIR.

Response:

Please refer to Topical Response TR-ST-2 for a description of the surface transportation analysis methodology used for the Draft EIS/EIR. This topical response includes a discussion of the methodology used to determine a geographic distribution of airport trips, including a discussion about assumptions made regarding the Playa Vista project in the traffic analysis completed for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The topical response also includes a description of the goals of the LAX Master Plan to minimize impacts to local streets and to project neighborhoods.

Please also refer to Topical Response TR-ST-4 for a discussion of airport area traffic concerns and Topical Response TR-ST-6 for a discussion of neighborhood traffic impacts.

AL00018-30

Comment:

9. 4.4.4 Overview, "Community Disruption", also 5.1 Technical Report 3b, page 43, last bullet, 1st paragraph. Closing Pershing Drive to through traffic places additional morning and evening rush-hour traffic onto Vista Del Mar. The LAX Master Plan shows no connection from eastbound Imperial to Pershing Drive northbound, or a connection from Pershing Drive southbound to the Ring Road (it diverts the traffic over the dunes at Sandpiper) onto Vista Del Mar. How does someone driving from Vista Del Mar turn onto the Ring Road to use the new West Terminal? How does someone driving south on Pershing Drive gain access to the Ring Road to use the new West Terminal? What happens to all the am/pm commuter traffic using Pershing Drive between Imperial and Manchester?

Response:

The intersection of Pershing Drive and Westchester Parkway is not removed in any project alternative. In Alternative D, Pershing Drive would be unaffected. In Alternatives A, B, and C, most of the turning movements would still be allowed, but a few movements would be eliminated. It would still be possible to turn right or left from southbound Pershing Drive onto Westchester Parkway. It would also be possible to turn right or left from Westchester Parkway or onto northbound Pershing Drive.

The turning movements that would be eliminated would be the north/south through trips on Pershing Drive and all U-turns. These movements would be eliminated in order to avoid the potential for large increases in trips on Pershing Drive and other arterial streets in Playa del Rey and El Segundo, as well as to improve operations of the access road system to the West Terminal. Elimination of these movements would mean that the following connections would not be possible to/from Pershing Drive in Playa del Rey: Access to/from the LAX West Terminal (access to streets connected to the East Terminal is allowed from Pershing Drive, but connections to/from the West Terminal from Playa del Rey must be made via another street); and through trips along Pershing to/from Imperial Highway.

The modified connection would allow full access between the Westchester and Playa del Rey communities via Westchester Parkway and Pershing Drive. Access between Playa del Rey and El Segundo would be affected. Vehicles wishing to travel along Pershing Drive from Imperial Highway into Playa del Rey would be required to use either Vista del Mar or Sepulveda Boulevard between Imperial Highway and Westchester Parkway.

At the intersection of Pershing Drive and Imperial Highway, all turning movements would be allowed except the eastbound left turn from Imperial Highway to Pershing Drive, the southbound right turn from southbound Pershing Drive to Imperial Highway, and all U-turns. It should be noted that Pershing Drive is not a through street today, and does not continue into El Segundo south of Imperial Highway. Vehicles wishing to access Pershing Drive to/from El Segundo today must use other streets in El Segundo such as Vista del Mar, Main Street, and Sepulveda Boulevard. In Alternatives A, B, and C, there would be two alternative paths to use to get from Imperial Highway to Pershing Drive. One alternative is to use Vista del Mar, which is only about 1,700 feet away. The other alternative path, which uses Sepulveda Boulevard, Lincoln Boulevard and Westchester Parkway to travel between El Segundo and Playa del Rey, includes many intersection and roadway improvements that would improve the attractiveness of this alternative and mitigate this impact.

AL00018-31

Comment:

10. Overview Sections 4.14 & 4.4.4 "Community Disruption", page 4-20. There is no mention of increased traffic volume on Vista del Mar under the Coastal Zone Management and Coastal Barriers. Section 4.4.4 says "...but adjacent Vista del Mar would provide suitable north/south alternative access." This information needs to be provided in the document.

Response:

Page 4-435 in Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, of the Draft EIS/EIR indicated that Vista del Mar would provide suitable north/south alternative access. Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR discussed anticipated traffic impacts on Vista del Mar. In general, traffic volumes on Vista del Mar under Alternatives A, B, and C would decrease, compared to baseline conditions, once the ring road is operational. As discussed in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, no significant impacts to coastal access would occur under any of the Master Plan build alternatives.

AL00018-32

Comment:

11. Overview, Section 4.21 "Design, art...", page 4-47, Key Conclusions, Views and Vistas. The document says that aesthetic quality along Vista de Mar would not be affected and that the popular ocean and airport views from Sandpiper St. within the dunes area would also be retained. If the traffic southbound on Pershing Drive is not allowed to travel to Imperial and is diverted over Sandpiper to Vista del Mar, Sandpiper will become a well-used and dangerous street. It should be noted that it would be dangerous for vehicles to slow down or stop on Sandpiper to catch the view.

Response:

Following publication of the Draft EIS/EIR and the events of September 11, 2001, Sandpiper Street, which offers expansive ocean and airport views, was closed to the public for security purposes. Any view impacts relating to Sandpiper Street that were discussed in Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Draft EIS/EIR would no longer be applicable. Similarly, any roadway improvements or traffic impacts relating to the use of Sandpiper Street that were addressed in the Draft EIS/EIR have since been reassessed in the Supplement to the Draft EIS/EIR. Regardless of the Master Plan alternative that is ultimately approved and implemented, signage and roadway improvements would be required to ensure safe operations of all new facilities to the satisfaction of the Los Angeles Department of Transportation.

AL00018-33

Comment:

LAX Expressway

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12. The reason drivers seek alternative routes to/from LAX, instead of using the San Diego Freeway, is not the lack of a direct connection between the freeway and the airport. It is because the freeway, itself, north of the airport and through Culver City and West Los Angeles, is congested during much of the day, both on weekdays and on weekends. Sepulveda Boulevard and other north-south streets are attractive alternative routes for distances far north of Centinela Avenue. When Playa Vista is developed, the freeway congestion will increase and extend into more hours of the day, as well as further north.

Response:

The purpose of the proposed LAX Expressway is to preempt this condition from occurring by providing a better separation of airport-related traffic from non-airport traffic on I-405 and by providing a more direct and streamlined and/or exclusive access to the airport, thereby minimizing the potential for congestion on both the freeway and local surface streets.

Please see Response to Comment AL00018-13. Please also see Topical Response TR-ST-2 regarding a discussion of the assumptions made about the Playa Vista project in the traffic analysis completed for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00018-34

Comment:

13. The LAX Expressway will not add to the capacity of the freeway. The expressway will essentially be a long off and on-ramp between the airport and the San Diego Freeway. The expressway will not reduce freeway congestion north of the expressway. It may actually add to the congestion by giving airport-oriented drivers the false expectation of a convenient, fast route between the freeway and the airport. The expressway should not be considered a mitigation measure for traffic flows on the surface streets that would serve traffic to/from the airport. Most drivers who currently use the surface streets will continue to do so to avoid freeway traffic congestion, and many new drivers will be attracted to the surface streets because of significantly increased freeway congestion.

14. The first San Diego Freeway ramps north of the juncture of the LAX Expressway and the freeway will be in Culver City. Drivers leaving the airport heading north on the expressway and encountering congestion as they enter the northbound freeway will want to leave the freeway at the first convenient off-ramps, that is, within Culver City. The problem of airport traffic using surface arterial and local streets will have been moved north from Los Angeles into Culver City; the problem will not be eliminated. This issue needs to be addressed in the Draft EIS/EIR.

Response:

Please see Response to Comment AL00018-13 and Topical Response TR-APPK-1 regarding the future project-specific traffic analysis that would be completed for the LAX Expressway if it is ultimately adopted and carried forward in the planning process. The assumptions and conclusions made about the proposed LAX Expressway within the scope of the programmatic level of analysis depicted in the Draft EIS/EIR are described below.

The proposed LAX Expressway is intended to accommodate a projected increase in air-passenger and air-cargo demand at LAX if any of the proposed Alternatives A-C of the LAX Master Plan are adopted. As described in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR, the I-405 is already at or above its capacity to accommodate existing travelers, evidenced by weekday and weekend traffic congestion. Without the proposed LAX Expressway, traffic congestion would be worse under the No Project/No Build scenario. The proposed LAX Expressway would increase the carrying capacity along mainly that portion of I-405 between SR-90 to the north and Arbor Vitae Street to the south. Existing and future airport users potentially utilizing the I-405 would be displaced onto the proposed LAX Expressway, thereby relieving, to some extent, congestion on the I-405. The proposed LAX Expressway would rather serve as an attractant and deter drivers from utilizing surface streets. Finally, please note that Alternative D, Enhanced Safety and Security Plan, is LAWA staff's preferred alternative and does not include construction of an expressway.

AL00018-35**Comment:**

15. Impacts to Culver City's major intersections should be analyzed under the assumption that the LAX Expressway may not go forward. The analysis should then correlate how the proposed Expressway will mitigate the identified impacts to a level of insignificance.

Response:

This analysis and corresponding mitigation measures are provided in the Supplement to the Draft EIS/EIR in Section 4.3, Surface Transportation. The proposed Alternative D, Enhanced Safety and Security Plan, of the LAX Master Plan does not include the LAX Expressway as a project component.

AL00018-36**Comment:**

Freeway Impacts

16. There has been no consideration or analysis of the traffic friction and weaving impacts that will result from the addition of the expressway ramps to the already poorly operating freeway-to-freeway interchange of the San Diego and Marina Freeways. When future Playa Vista traffic is added by way of the San Diego Freeway's Jefferson Boulevard ramps, which are part of that entire interchange, the impacts will be significant.

Response:

Please see Response to Comments AL00018-13, AL00018-33, and AL00018-34. Also, please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, Topical Response TR-ST-4 regarding airport area traffic concerns, and Topical Response TR-ST-6 regarding neighborhood traffic impacts.

AL00018-37**Comment:**

17. The analysis of the impacts of airport expansion traffic on the freeways is cursory and difficult to ascertain. Although Figure II-7.3 shows study links along two of the freeways, the results of the impact analyses are not covered in the report text. The results must be found in tables in Attachment C, as follows:

a. On the San Diego Freeway, the impacts of LAX expansion traffic will be significant both north or south of the airport, even "with final mitigation" in place.

b. On the Glenn Anderson Freeway (I-105), the impacts east of the airport will be significant.

In neither case are mitigation measures for those impacts presented.

Response:

Project impacts to the freeways are shown in the Congestion Management Program (CMP) analysis in Section 6 of Technical Reports 3b (Alternatives A, B and C) and S-2b (Alternative D). Also, please see Topical Response TR-ST-4, and in particular TR-ST-4.6 regarding impacts to the I-405 Freeway.

AL00018-38**Comment:**

18. There is no analysis of the impacts of LAX expansion traffic on the Santa Monica Freeway (I-10). Although the I-10 is somewhat north of the airport, it serves airport traffic from throughout the region to

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the northeast and northwest. Analysis of the impacts on the I-10 Freeway should be included in the Draft EIS/EIR.

Response:

Impacts on the Santa Monica Freeway and other regional transportation facilities outside the Tier I and Tier II study area are addressed in Technical Reports 3b (Alternatives A, B, and C) and S-2b (Alternative D), Section 6.

AL00018-39

Comment:

Construction Traffic Impacts

19. The analysis of construction related impacts is perfunctory, particularly when it is expected that the airport expansion construction will be spread over at least 14 years. The following points need to be addressed:

a. Although "The general construction concept is to have many of the transportation improvements completed within the first five years after construction begins ..." [page 4-318], the important LAX Expressway and the northeastern portion of the ring road from the San Diego Freeway to Sepulveda Boulevard would not be available to traffic until well after the first five years [Table 4.3.2-18, page 4-318].

b. The Draft EIS/EIR admits to a flow of 2.8 trucks per minute for 10 hours per day in a six-day work schedule or 1.2 trips per minute for 20 hours per day in a seven-day work schedule [Page 4-319]. That is a large number of trucks to be imposed on the current traffic flows on the streets and freeways,

Response:

This comment is similar to comment AR00003-33. Please see Response to Comment AR00003-33

AL00018-40

Comment:

particularly when Playa Vista truck trips are also added.

Response:

Cumulative construction impacts were analyzed in Section 4.20.7 of the Draft EIS/EIR. This section includes the identification of adverse impacts and mitigation measures. Please also see Topical Response TR-ST-2 regarding Playa Vista.

AL00018-41

Comment:

The mitigation recommended is to divide the truck trips among four locations at the construction site. But, that does not address the impacts of the trucks on the streets and freeways that are even a short distance away from the construction site. Those impacts are ignored.

c. Scheduling truck deliveries to not occur during four peak hours of the day [page 7-3] does not address the truck traffic problem. Many truck drivers will travel from remote supply depots to the airport vicinity during the peak periods in order to enter the airport boundaries during the allowable periods. When leaving, they will exit before the starts of the peak periods, but they will still be traveling on the freeway/street network to the remote locations during the peak periods. Additionally, the freeways and streets serving the airport area are congested during periods far longer than four peak hours per day.

Response:

The Supplement to the Draft EIS/EIR provides additional detail on construction-related traffic impacts of all alternatives, including specific haul route impacts, and the cumulative impacts of the Master Plan and

Playa Vista projects. That analysis incorporates construction truck traffic into the interim year traffic modeling analysis, so that the impact of all airport-related traffic, both normal operational traffic and construction traffic, is fully analyzed and mitigated for the three peak hours (8:00 to 9:00 a.m.; 11:00 a.m. to 12:00 noon; and 5:00 to 6:00 p.m.). That analysis shows that the total traffic could be mitigated during the peak hours, except for at six intersections. Please see Topical Response TR-ST-3 regarding construction traffic.

AL00018-42

Comment:

d. The construction employees will work in three shifts. The workers for the second shift will arrive before the first shift ends [Page 4-319]. Therefore, there would have to be employee parking for, perhaps, 8,000 workers during the period each day when the two shifts overlap. Will that magnitude of employee parking be feasible?

e. Remote parking areas are recommended for construction employees in Palmdale, Van Nuys, and Ontario [Page 4-319]. Aside from the improbability of those remote areas being attractive to and extensively used by employees, there is no analysis of the impacts of the added traffic at those remote locations, nor is there analysis of the impacts of the shuttle traffic between those locations and the airport.

Response:

The plan includes adequate parking, even accounting for overlapping shifts. It is anticipated that the secondary evening and night shifts will be much smaller than the primary day shift; therefore the impact would not be as large as it would be if there were the same number of worker on each shift. The Supplement to the Draft EIS/EIR and Section 7 of the Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface Transportation Technical Report, provide additional detail on construction-related traffic impacts of all alternatives, including specific haul route impacts, and the cumulative impacts of the Master Plan and Playa Vista projects. The construction trips in that analysis accounted for employee shuttles. Please also see Topical Response TR-ST-3 regarding construction traffic.

AL00018-43

Comment:

f. There is no analysis of the impacts of the construction worker traffic on the entire street/freeway network. Those traffic flows, which will extend through most of the 14-year construction period, will be substantial six or seven days each week.

g. There is no definition of the work shift schedules upon which to evaluate the potential overlap with the network peak periods, which currently extend for much longer durations than the typical 7 to 9 a.m. and 4 to 6 p.m. Therefore, the impacts of employee traffic cannot be evaluated with any assurance of accuracy or high probability.

Response:

The Supplement to the Draft EIS/EIR and Section 7 of the Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface Transportation Technical Report, provide additional detail on construction-related traffic impacts of all alternatives, including work shift changes. It should be noted that while the shifts would overlap, this would minimize the impact on the surface transportation network because the inbound employees would be on-airport before the outgoing employees would leave. Please see Topical Response TR-ST-3 regarding work shifts.

3. Comments and Responses

AL00018-44

Comment:

h. The assurances that "Construction traffic during all other times can be managed ..." [page 4-320] and "Traffic patterns around the airport for the general public would be largely maintained ..." [Page 4-320] are weak substitutes for actual measures that should be described and analyzed.

Response:

The level of detail in the Draft EIS/EIR and Supplement to the Draft EIS/EIR is sufficient for this program-level analysis. In fact, additional detail is provided in the Supplement to the Draft EIS/EIR. However, an even more detailed construction traffic maintenance plan would be prepared prior to construction that would address the specific issues the commentor mentions.

AL00018-45

Comment:

i. "However, even with these commitments in place, the project would still cause sufficient construction-related traffic to cause noticeable disruption of normal traffic flows near the airport." [Page 4-320]. That will last over most of the construction period of 14 years, and will result in delays to air passengers, cargo deliveries, and the general public bound for other destinations within the sub-region or just passing through.

Response:

Sections 4.3.1.6.2 and 4.3.2.6.2 of the Supplement to the Draft EIS/EIR and Section 7 of the Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface Transportation Technical Report, and Topical Response TR-ST-3, Construction Traffic, address the concern raised in this comment. While delays will inevitably occur from time to time during construction, a plan would be in place to mitigate the impacts as much as possible.

AL00018-46

Comment:

j. The construction of the LAX expansion will coincide with the construction of Playa Vista, approximately two miles north of the airport [4-320]. Both construction contractors will use Sepulveda Boulevard and the San Diego Freeway for major haul routes. The LAX Draft EIS/EIR mitigation measure is to expand the "... traffic coordination office ..." to minimize the impacts of construction traffic [4-320]. That is likely to be an ineffective measure, as construction companies schedule operations for their own convenience and efficiency without regard to the real impacts on the general public.

Response:

Much of the Playa Vista project is already completed or under construction. The remainder of the Playa Vista project has been substantially reduced in size in recent months. These facts effectively reduce the potential cumulative construction impacts of the two projects, although they may not eliminate all potential cumulative construction impacts. LAWA will have the ability to specify precisely when truck deliveries will be allowed. The recommended traffic coordination office will be monitoring conditions continually, and will be able to modify the delivery times as needed throughout the construction process.

AL00018-47

Comment:

k. The Draft EIS/EIR authors admit "... significant and temporarily unavoidable ..." impacts [page 4-320]. The construction periods during which the two projects (airport expansion and Playa Vista) will overlap will be a minimum of 10 years. That is a long period to be labeled "temporarily".

Response:

Sections 4.3.1.6.2 and 4.3.2.6.2 of the Supplement to the Draft EIS/EIR and Section 7 of the Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface Transportation Technical Report, and Topical Response TR-ST-3, Construction Traffic, address the concern raised in this comment. While delays will inevitably occur from time to time during construction, a plan would be place to mitigate the impacts as much as possible.

AL00018-48**Comment:**

I. Depending upon scheduling, the impact of closing all or part of Sepulveda Boulevard could be a major disruption to traffic flow in Culver City especially if Playa Vista and LAX Northside are being constructed simultaneously.

Response:

The LAX Master Plan does not propose any construction activity in Culver City. Specific policies are proposed to minimize the impacts of construction. These policies are described in Technical Reports S-2b (Alternative D) and 3b (Alternatives A, B, and C), Section 7.3, pages 7.3 and 7.4. Included in these policies is the statement that other than very short time periods during nighttime periods, no current roadways will be closed until they are no longer needed for regular traffic or construction traffic, unless a temporary detour route is available to serve the same function. Another suggested policy is the creation of a Ground Transportation Construction Coordination Office specifically designed to monitor traffic and to take corrective actions as needed to ensure that major disruptions in traffic do not occur.

AL00018-49**Comment:**

Airport Expansion Phasing

20. The anticipated phasing schedule for the airport expansion should be more realistic, because the analyses of expansion traffic are for certain specific study years, and if the study years are not realistic, the analyses are not correct. The Draft EIS/EIR analysis is divided into two airport expansion development phases [Page 2-12]. The traffic impact study and report should be revised extensively to coincide with realistic study years.

a. Phase I would be 5 to 6 years long and would end in 2005, according to the document. That is now impossible. The EIS/EIR will not be approved before late 2001, and Phase I of the actual construction could not begin before 2002. Therefore, Phase I would end in 2007 or 2008, not 2005.

b. Phase II, which would end 10 years after the completion of Phase I, according to the document, would extend to 2017 or 2018, not 2015, as stated throughout the Draft EIS/EIR.

Response:

Please see Response to Comment AL00033-26 regarding the construction phasing and schedule.

AL00018-50**Comment:**

Related Projects Analysis

21 .The accuracy of the related projects analysis is questionable when the following mistakes about several of the highlighted entries [page 2-16] are considered:

- a. Sony Pictures Studio - "2 miles north of LAX" [It is 5 miles north of LAX.]
- b. Costco Center - "City of Los Angeles" [It is in Culver City.]
- c. Marina del Rey - "City of Los Angeles" [It is in unincorporated County area.]

3. Comments and Responses

If the report authors made mistakes with significant information regarding large and well-known projects near their study site, about which there is substantial public information, what is the potential for accuracy of the remainder of the list that includes many smaller projects and many more remote projects?

Response:

Comment noted. The subject typographical errors are hereby acknowledged and have been corrected in Chapter 2, Purpose and Need for the Proposed Action, of this Final EIS/EIR; however, the validity and accuracy of the Draft EIS/EIR is not affected based on the fact that the correct location of each project, based on addresses shown in Table 2.2 of Technical Report 3b (Off-Airport Traffic Analysis) of the Draft EIS/EIR, were used for the technical analyses.

AL00018-51

Comment:

Transit Systems

22. Page 4-241, Transit Systems. The date used for this analysis is based on 1993 data. This data is old and thus inaccurate. Culver CityBus Line 6 serving this corridor had grown over 20% in ridership since 1993 to over 2 million passengers annually. We recommend that the LAX study use current municipal / regional transit data in the study to best reflect the true impact of transit service in and around the airport.

23. Page 4-254, 4.3.1.6.2 Alternate A- Added Runway North: Relocation and expansion of the LAX Transit Center. The City would like to be involved in the decision making process for its proposed relocation of the transit center. .

24. Page 4-274 Environmental Action Plan (Proposed) Last Paragraph. This paragraph and globally throughout the document, should propose the use of signal transponders for all Municipal and Regional transit services in and around the airport. LADOT is currently using its Intelligent Transportation System (ITS) infrastructure and the ATCS system for the Rapid Bus along Wilshire and Ventura Boulevards. This technology used with transponders on transit buses serving the airport area could improve mobility.

Response:

Comment noted. The future year trip tables that were used in the analysis of alternatives do reflect the latest transit information in the SCAG RTP. Please see Subtopical Response TR-ST-5.3 for more information. The transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00018-52

Comment:

25. Tables 4.3.2-8, 4.3.2-9, 4.3.2-12, 4.3.2-13 and 4.3.2-15. These tables reflect the circulation / LOS impact at major intersections in and around the LAWA project. As the tables note, a LOS of "F" is predicted along Sepulveda Blvd. and surrounding Culver City arterials and streets. In fact, the vehicle to capacity ratio (V/C) is significantly higher than the 1.00 used to define intersections as LOS "F". In some cases the V/C exceeds 1.5 on arterials in proximity to Culver City and along Culver CityBus routes.

Response:

Please see Topical Response TR-ST-2, Section 3.0, regarding LOS and significant impacts.

AL00018-53**Comment:**

26. Page 4-320 Section 4.3.2.9 Mitigation Measures. All Alternatives (A, B and C) should propose to install transponders for all transit operations serving the airport area. This should be coordinated with the proposal to mitigate impacts on mobility and LOS at surrounding intersections as identified in Tier 1 and 2 with the installation of LADOT's ATCS or priority control system.

Response:

LAWA will be participating in the MTA Metro Rapid Bus program to improve transit in the airport area. Please see Subtopical Response TR-ST-5.3 for more information. The transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00018-54**Comment:**

Additionally, if a negative impact is determined at an intersection creating a LOS of .85 or greater as a result of the implementation of either Alternative A, B, or C a mitigation should be required to improve that intersection to an acceptable LOS; or its previous LOS.

Response:

Please see Topical Response TR-ST-2, Section 3.0, regarding LOS and significant impacts.

AL00018-55**Comment:**

27. Page 4-236, Environmental Action Plan and Page 4-252, Phase I Construction Commitments (2000 - 2005): ST-4 Limited Short Term Lane Closures. Master Plan Commitment ST-4 states that the lane closures at key Century Blvd. / Sepulveda Blvd. intersections would be limited to 12 hours and would be scheduled for less congested non-summer and non-holiday periods. This expected closure would severely hurt the on-time performance of Culver CityBus Line 6. We recommend work to commence during non-peak traffic periods as well, such as nights and weekends. This impact was addressed in the Draft EIS/EIR.

28. Page 4-269, 4.3.1.7.2 Alternatives A, B, and C: Phase I (Year 2004). The Culver City Transportation Department has concern with the proposal's mention to divert traffic off Sepulveda Blvd. onto Century Blvd. during the construction of the Sepulveda tunnel. With the assumption of LOS F, this would greatly affect the service of Culver CityBus Line 6 serving the Metro Green Line Station at Aviation and Imperial via Sepulveda Blvd.

Response:

This comment expresses concern with the proposed construction phasing plan in terms of possible disruption to Culver City Bus Routes. As further detail is developed on construction phasing, attention will be given to developing approaches to further minimize traffic disruption, including bus transit routes. Please see Subtopical Response TR-ST-5.3 for more information.

AL00018-56**Comment:**

29. Page 4-270, 4.3.1.9.3 Alternative C- No Additional Runway. The Culver City Transportation Department has concern that no mitigation measures are identified for the construction impacts on inbound upper level ramp to the CTA from south Sepulveda Blvd. This will have a significant impact of bus services and general mobility along Sepulveda Blvd.

3. Comments and Responses

Response:

Regarding bus transit impacts, LAWA will work with transit operators to ensure that impacts of airport construction are minimized. Please see Subtopical Response TR-ST-5.3 for more information. The transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00018-57

Comment:

30. Page 4-320, Section 4.3.2.8 Cumulative Impacts. As noted in this section, other projects might be under development concurrently, such as Playa Vista. If both projects use the same truck routes, such as the I-405, Sepulveda Blvd. or other arterials a significant adverse impact to local circulation will result. If at all possible the LAWA Traffic Coordination Office should plan for truck trips during non-peak periods or at night.

Response:

Please see Response to Comment AR00003-21 regarding cumulative traffic impacts. Also, it is possible that construction trips from Playa Vista and LAX could use the same routes at the same time. Mitigation Measure MM-ST-14, Expand the Traffic Coordination Office, is intended to specifically address this issue, ensuring that that cumulative impacts of construction are coordinated and minimized.

AL00018-58

Comment:

31. Page 4-263, Consistency with other Adopted Plans. Alternatives A, B, and C do not mention or include information contained in the plans of Culver City (General Plan or Short Range Transit Plan) or information contained in the MTA Long Range Plan.

Response:

Officials at Culver City were coordinated with on the Master Plan in 1995 and again in 1999. Culver City's planned improvements were obtained in both meetings and were incorporated into the analysis. In fact, all jurisdictions in the 50-square-mile area were coordinated with for consistency. The 1999 update included incorporation of the most up-to-date MTA Long Range Plan information as well.

AL00018-59

Comment:

AIR QUALITY

32. Page 4-496, Table 4.6-9. The table represents unmitigated off-airport emission inventories. Should we assume the significant increase in PM10 is a result of increased cargo operations and additional trips over the base?

33. Page 4-509, Overall Significance of Alternative C. Under Alternative C, conformity requirements are met. However, there is concern with the amount of emissions brought to the eastside of the airport under this Alternative. Under Alternative C mobile source emissions from cargo carriers, additional passenger trips, and increased flights cannot be mitigated.

Response:

Increases or decreases in any off-airport pollutant emissions, including PM10, are due to a number of factors for each year analyzed, including (but not limited to) changes in cargo operations, vehicle-miles-traveled (VMT) and vehicle-hours-traveled (VHT), differences in fleet mix, and differences in trip lengths. Air quality impacts were addressed in Section 4.6 of the Draft EIS/EIR and Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR. Since publication of the Draft EIS/EIR, Table 4.6-9 has

been updated to include the off-airport emission inventory for Alternative D, as well as recalculate the emission inventory for the Adjusted Environmental Baseline, No Action/No Project Alternative, and Alternatives A, B, and C using the most recent available emissions factors (EMFAC 2002). The updated results can be found in Table S4.6-10, in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

The Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality. The level of significance following mitigation of these impacts for Alternative D, the LAWA Staff-preferred alternative, was addressed in subsection 4.6.9 of the Supplement to the Draft EIS/EIR. FAA is required by Section 176(c) of the Clean Air Act Amendments to prepare and circulate the Draft and Final General Conformity Determination on Alternative D.

AL00018-60

Comment:

33. Page 4-511, 4.6.7 Cumulative Impacts. This expansion of LAX should take into consideration other planned developments such as Playa Vista. During the initial construction year (2004), Playa Vista Phase II will likely be under construction. This would increase truck traffic as well as emissions relating to construction duties.

Response:

Cumulative impacts associated with air quality and water quality, are discussed respectively in subsections 4.6.7 and 4.7.7, Cumulative Impacts, in the Draft EIS/EIR and in the Supplement to the Draft EIS/EIR. These discussions concluded that several air and water quality impacts for each alternative analyzed under the Master Plan (including the No Action/No Project Alternative), when considered in conjunction with impacts from other past, present, and probable future development projects in the vicinity, would be significant.

Further, as indicated in the Executive Summary of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, air quality emissions during construction and operation of the airport as well as concentrations of several pollutants under the Master Plan alternatives are significant and unavoidable after mitigation. The effect of combining the Master Plan impacts with past, present, and probable future development projects in the vicinity of LAX would be to conclude that cumulative impacts would be significant, as already stated in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. No additional analysis of air quality cumulative impacts is needed under CEQA and NEPA.

AL00018-61

Comment:

34. Section 4.6, Draft EIS/EIR. The plan provides mitigations only for the immediate area around LAX and not for the surrounding areas which could have impacts from increased congestion and air quality from increased air and mobile sources. We can only assume from the magnitude of this project that both air pollution and traffic congestion will increase. Whether the proposed mitigation measures will ease both (air pollution & congestion) is hard to say since the mitigation measures need to be approved by other entities (i.e. shuttle services, airlines, LAX employees, hotels, etc.).

Response:

Mitigation measures have been proposed to reduce environmental impacts for the immediate and surrounding areas of LAX. Mitigation measures such as the extension of the Green Line, roadway infrastructure improvements, the addition of up to five new FlyAways, the consolidation of on-airport rental car companies into one center, etc., all seek to alleviate congestion problems for both the immediate and surrounding areas of LAX.

The Supplement to the Draft EIS/EIR addressed further measures to reduce traffic-related air quality impacts in Section 4.3, Surface Transportation, and Section 4.6, Air Quality.

3. Comments and Responses

AL00018-62

Comment:

NOISE

Overflight Noise

35. Reviewing the "Current Standard and projected Assumed Flight Tracks" for No Action and Alternatives A, B and C, Appendix D of the Draft EIS/EIR indicates a change in flight tracks over Culver City. Currently, there are two departure flight tracks (airplanes headed east) and no arrival flight tracks passing over Culver City. The current aircraft over-flight noise level impact and flight frequency within Culver City from the two departure flights paths is not addressed in the Draft EIS/EIR documents.

36. For each build alternatives, the Draft EIS/EIR proposes two arrival and one departure flight tracks passing over portions of Culver City. There is no data in the Draft EIS/EIR indicating projected aircraft over-flight noise levels or flight frequency within Culver City from these flight tracks. Existing and proposed aircraft over-flight noise data is needed to evaluate the noise impact of the flight track route changes over Culver City.

Response:

Tracks Z1 and Z2 that are identified in Figure 2 Current Standard Flight Tracks are not identified in Table 3 Flight Track Utilization Percentages - Environmental Baseline. There was a typographical error during flight track identification. Some of the tracks identified with the Letter "T" should in fact be the letter "Z." In this case, under the column labeled Departures (East Flow) Tracks T1 and T2 adjacent to Rwy 06R should be identified as Z1 and Z2. Both sets of tracks identify a less than 0.05 percentage of usage. This error has been corrected. Please see Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR. No over-flight noise levels are identified for the Culver City area. They were not addressed because projected noise levels in Culver City would be below the levels of significance defined by the Federal and State regulations. Federal Aviation Regulations define compatible land use impacts based on noise from aviation activities, using the 65 dB Community Noise Equivalent Level (CNEL), or a 1.5 CNEL increase in existing areas of 65 CNEL, as the impact thresholds for noise sensitive uses. For California evaluations, the Caltrans Airport Land Use Planning Handbook, provides noise and safety compatibility criteria for review of development near airports. The suggested noise compatibility criteria calls for no new residential development to be located within the 65 CNEL contour. Culver City is not located in the 65 CNEL contour for existing conditions, or any of the identified future build or No Action/No Project alternatives. Noise levels at locations outside the 65 CNEL contours were further addressed in Section 5.1, Locations of Significant Impact, in Appendix D, of the Draft EIS/EIR. Therefore, no further noise impacts analysis was necessary.

AL00018-63

Comment:

37. The documents indicate that aircraft taking off in a westerly direction for an eventual destination in the east will follow what is referred to, as Loop 1 Departure Procedure, which may potentially impact Culver City. All aircraft flying the Loop 1 Departure Procedure routes climb immediately to 5,000 feet west of the airport over the Pacific Ocean and cross the shoreline. The aircrafts will then make a sharp loop resulting in an eastbound route directly above LAX. The aircraft will then follow an easterly departure route crossing directly over Culver City. This procedure is expected to be put in place during the next decade, regardless of the disposition of the LAX Master Plan Alternatives. The degree of negative impact to Culver City is uncertain at this time, as over flight noise levels or frequency of flights within Culver City were not addressed in the Draft EIS/EIR. Therefore inadequate information was given to effectively evaluate the noise impacts of the Loop I Departure route over Culver City. A complete analysis is needed to quantify the potential for overflight noise impacts on Culver City.

Response:

The described air traffic actions are not a part of the Master Plan project actions, but are being evaluated independent of this project. They will be the subject of a NEPA evaluation at that time. For

further information, see Topical Response TR-N-3, regarding aircraft flight procedures, in particular Subtopical Response TR-3.1.

AL00018-64

Comment:

38. The Draft EIS/EIR noise sections needs to expand its discussion on the effect of aircraft noise on the quality of life and health, including the effects of sleep disturbance and education, on persons within the areas impacted primarily by CNEL 65 levels. There are no CNEL 65 areas within Culver City but the discussions of sleep disturbances from aircraft over flights of Culver City should be considered as a potential impact on the health and well being of some Culver City residents.

Response:

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

AL00018-65

Comment:

39. The critical point concerning noise and Culver City is that the 65 CNEL noise measurement customarily used in assessing noise from airports does not fully capture the noise exposure likely to be experienced by the population. It represents a weighted average, and therefore discounts single noise events, that can be much higher in sound level. This is of significant concern relative to aircraft overflights over Culver City where short term, high level noise events add little to average sound levels but can impact a large population with intrusive noise impacts. The Draft EIS/EIR fails to adequately address this issue.

Response:

Please see Topical Response TR-N-2 regarding single event noise and CNEL differences, in particular Subtopical Response TR-N-2.1 and Subtopical Response TR-N-2.3. Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information on and comparisons of noise and noise-related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives including new Alternative D.

AL00018-66

Comment:

Lax Expressway Traffic Noise

40. LAX Expressway Alternative No. 3 has the potential to increase the traffic noise impact on a larger and more noise sensitive area within Culver City than LAX Expressway Alternative No. 2. The Draft EIS/EIR reports the traffic noise from Alternative No. 3 will potentially impact numerous properties within Culver City from Port Road at the I-405 freeway south to Green Valley Circle. Sensitive areas anticipated to have an increase in traffic noise impact with this Alternative are residential or school properties located adjacent to the freeway, north of Segrell Way.

Response:

The segment exclusive to Alternative 3 of the proposed LAX Expressway, located north of Bristol Parkway along the east side of I-405, was analyzed for noise impacts using a screening method. It was determined (as stated in Section 5.6.1 of Appendix K of the Draft EIS/EIR) that existing and future No Action/No Project traffic noise levels are likely to approach or exceed FHWA Noise Abatement Criteria due to the existing major highway facilities in the vicinity. Construction of LAX Expressway Alternative 3 could incrementally increase traffic noise levels in the area. Section 5.6.1 of Appendix K of the Draft EIS/EIR states that a detailed noise abatement evaluation would be carried out as part of the Caltrans project development process.

3. Comments and Responses

Please also see to Responses to Comments AL00018-13, AL00018-68, AL00018-116, AL00018-123, and AL00018-89.

In addition, please refer to Topical Response TR-APPK-1 for additional information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR.

AL00018-67

Comment:

41. The Draft EIS/EIR report indicates a potential residential zone impact on the west side of Coolidge Avenue between Diller Avenue and Port Road. After reviewing the reports and completing an inspection of the neighborhood, there are additional residential parcels on Culver Park Place/Culver Park Drive between Segrell Way and Diller, which could be impacted by an increase in traffic noise. It is also believed that the El Marino School and Park will be affected by an increase in traffic noise with the completion of the Alternative 3 Expressway Viaduct. These additional "affected" areas should be analyzed and included in Figures 3.1-1 to 3.1-10 of Appendix K.

Response:

The segment exclusive to Alternative 3 of the proposed LAX Expressway, located north of Bristol Parkway along the east side of I-405, was analyzed for noise impacts using a screening method. It was determined (as stated in Section 5.6.1, LAX Expressway, of Appendix K of the Draft EIS/EIR) that existing and future No Action/No Project traffic noise levels are likely to approach or exceed FHWA Noise Abatement Criteria due to the existing major highway facilities in the vicinity. Construction of LAX Expressway Alternative 3 could incrementally increase traffic noise levels in the area. Section 5.6.1, LAX Expressway, of Appendix K of the Draft EIS/EIR further states that a detailed noise abatement evaluation would be carried out as part of the Caltrans project development process.

Please also see Responses to Comments AL00018-13, AL00018-68, AL00018-116, AL00018-123, and AL00018-89.

In addition, please refer to Topical Response TR-APPK-1 for additional information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR.

AL00018-68

Comment:

42. The LAX Expressway Noise Abatement section states that the implementation of the Alternative 3 project could increase traffic noise by a small increment at several residences located along Coolidge Avenue and that a screening analysis was conducted. The report also states that the existing and future-without-project traffic noise level is likely to approach or exceed the FHWA Noise Abatement Criteria (NAC) due to the major highway facilities and interchange/on ramps in the vicinity of these residential uses. The report suggests that any noise abatement in the form of sound walls in this area would be deferred and evaluated as part of the Caltrans project development process for sound walls.

It is understood that this statement means that although LAWA predicts an increase in traffic noise from the Expressway Alternative No. 3 to residential properties, noise mitigation in the form of sound walls would not be included in the Expressway design, but included in the Caltrans sound wall project development list. Any noise mitigation measures such as the construction sound walls should be independent of Caltrans sound wall project development process and included as a separate mitigation measure in the Draft EIS/EIR and Appendix K documents.

Response:

If found to be warranted based upon Caltrans and Federal Highway Administration (FHWA) Noise Abatement Criteria, soundwalls would be considered as abatement measures as design elements of the LAX Expressway build components are further refined. In order to be constructed, soundwalls must be both feasible and reasonable. The details of what constitutes "feasible" and "reasonable" under

Caltrans and FHWA guidelines is explained in Section 5.6.1.1 of Appendix K of the Draft EIS/EIR. Further, as stated in Section 5.6.2.1 of Appendix K of the Draft EIS/EIR, final determination of suitability for noise abatement is dependent upon a number of factors including the eventual final design of the Expressway (if implemented) and the public involvement process. If soundwalls are found to be warranted, feasible, and reasonable, they would be implemented and dependent upon the final design of the LAX Expressway itself. That being said, any noise mitigation measures required under the LAX Expressway would not be deferred to Caltrans' sound wall project development process, but rather dependent upon final design of the applicable elements associated with this project component.

Please see Response to Comment AL00018-89 for detailed information regarding construction mitigation measures and LAX Master Plan Commitments that apply to the proposed LAX Expressway.

AL00018-69

Comment:

Lax Expressway Construction Noise

43. Construction noise and vibration impacts are likely when a construction site is located within 300 feet of residences or schools. Based on the preliminary construction plan indicated in the Appendix K of the Draft EIS/EIR, there is the potential for short-term impact from construction noise within Culver City. Also, it indicates that construction crews, on occasion, will be scheduled to work during the evening hours utilizing high-powered lights for illumination.

A complete and thorough analysis of construction impacts and required mitigation measures associated with the LAX Expressway is needed in Appendix K. During the preliminary engineering, a detailed analysis of construction noise impacts and mitigation measures must be developed and provided to the City of Culver City for inclusion in the construction contract documents. The mitigations should include, but not be limited to, the following:

- Requiring the contractor to construct temporary construction sound walls.
- Placing restrictions on construction during nighttime hours.
- Limiting the use of particularly noisy activities such as impact pile driving and jack hammering.
- Requiring the construction to be performed in compliance with specific equipment and property line noise limits.

Approaches to ensure that construction is performed in compliance with specified requirements include:

- Construction noise monitoring by the construction management firm.
- Requiring contractors to retain acoustical engineers to perform noise control plans.
- Limiting specific noisy construction activities, particularly during early morning and nighttime hours.
- Requiring contractor to have temporary noise barriers stockpiled.
- Performance of all construction in a manner to minimize noise.
- Use of equipment with high performance mufflers.
- Minimization of the need for the use of back-up alarms.
- Selections of haul routes and schedules to minimize impact to residential neighborhoods.
- Positioning of staging areas away from noise sensitive areas.

Response:

Please refer to Topical Response TR-APPK-1 for information about the current and future environmental impact analysis (to include refined noise impacts analysis) of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR. As indicated on page 94 of Appendix K, Section 5.6.4, Construction Noise, the potential noise from construction was found to be a substantial and unavoidable impact. Mitigation measures proposed for construction noise (subsection 4.1.8.3, Construction Equipment Noise, of the Supplement to the Draft EIS/EIR) include MM-N-7, Noise Control Devices (including barriers), MN-N-9, Program Maintenance, MN-N-10, Equipment Replacement, and MN-N-11, Construction Scheduling. If an alternative to the LAX Master Plan is adopted that includes the proposed LAX Expressway as a project component, then project-specific analyses would be conducted as design elements are refined to ensure that appropriate mitigation is implemented, where necessary. Please note that Alternative D, Enhanced Safety and Security Plan, LAWA's preferred alternative, does not include the LAX Expressway or ring road.

3. Comments and Responses

Please also see Responses to Comments AL00018-15 and AL00018-89.

AL00018-70

Comment:

LAND USE

44. Draft EIS/EIR, Section 4.2, Page 4-76 to 4-234. The land use study area discussed in the Draft EIS/EIR is limited to those communities immediately surrounding LAX (i.e. Cities of LA, Inglewood, El Segundo, and Hawthorne). The City of Culver City is not included in the land use study area. Therefore, the evaluation and land use mitigation measures regarding land use impacts is limited to the Cities listed above. The land use study area and discussion should however, be expanded to include communities such as Culver City, which although is not directly adjacent to the LAX boundary, are close enough where potential significant noise, traffic, air quality and more impacts from the proposed LAX Master Plan could occur. There is inadequate information in the Draft EIS/EIR to effectively determine whether individual or combined impacts associated with the Master Plan alternatives could render land uses in Culver City incompatible.

Response:

As stated in the Draft EIS/EIR, Section 4.2, Land Use (subsection 4.2.2), the study area included all proposed acquisition areas and other areas that were determined to have the potential for land use incompatibility due to implementation of the LAX Master Plan build alternatives. This area of potential land use incompatibility is generally defined by noise sensitive uses located within the 65 CNEL contour under 1996 baseline conditions and under the 1992 conditions established for the ANMP. The extent of these contours was shown on Figure 4.2-5 of the Draft EIS/EIR. Due to the distance of Culver City from the airport boundaries, 65 CNEL contours, and affected transportation facilities, impacts on Culver City were not evaluated in the Land Use section of the Draft EIS/EIR. However, potential noise, traffic, air quality, and other impacts on Culver City associated with development of the LAX Expressway and State Route 1 improvements under Alternatives A, B, and C are addressed in Appendix K of the Draft EIS/EIR. See also Topical Response TR-APPK-1 regarding a refined analysis of environmental impacts of the LAX Expressway and State Route 1 improvements. Note that the LAX Expressway and State Route 1 improvements are not proposed under LAWA Staff's new preferred Alternative D.

AL00018-71

Comment:

45. Draft EIS/EIR, Section 4.0, Figure 4-1, Page 4-3. The Expressway is shown in this figure to be part of the "Master Plan Boundaries". However, the Expressway is only drawn up to the area near the Howard Hughes Parkway on and off ramps. As Appendix K states, the LAWA preferred Expressway extends all the way up to areas north of the SR-90/I-405 Interchange. Include and expand this Master Plan Boundary figure to show the entire length of the proposed Expressway roadway, in particular the neighborhoods of Culver City.

Response:

The LAX Expressway is explained and analyzed in detail in the Draft EIS/EIR, Appendix K. Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

AL00018-72

Comment:

46. Appendix K, 4.1 Land Use, Page 19-24 and Appendix K, 5.1 Land Use, Pages 64-68. Adequate analysis of land use impacts is lacking and required mitigation measures for the proposed LAX Expressway on Culver City is not addressed in Appendix K. LAX's primary mitigation measure is the Expressway. The Expressway could cause significant impacts to Culver City and therefore the analysis of the Expressway on Culver City is essential and critical. Figure 3.1-1 and 3.1-7, highlights only some

of the potentially affected parcels which may require partial or full acquisition for right-of-way purposes. For instance, the affected parcel labeled as "P" for Public Facility Parcels on the east side of the I-405 Freeway between Bristol Parkway and Green Valley Circle is NOT entirely a flood control channel. Portions of this highlighted area are private property. The figures need to be revised and include all affected land uses in Culver City.

Response:

Refer to Topical Response TR-APPK-1 for an explanation of the programmatic level of analysis provided in Appendix K of the Draft EIS/EIR and a description of the more detailed project-level analysis that would be undertaken in the future if the LAX Expressway is adopted as a component of the LAX Master Plan. Please note that the proposed Alternative D of the LAX Master Plan does not include the proposed LAX Expressway as a project component. LAX Master Plan commitments and Mitigation Measures related to the LAX Master Plan are summarized in Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR.

In the event that the LAX Expressway is selected for implementation as a component of the LAX Master Plan, the residences, businesses and various facilities impacted by the proposed LAX Expressway would qualify for compensation and relocation assistance under the Preliminary Relocation Plan described in Chapter 5, Appendix P of the LAX Master Plan. The final relocation plan will be developed during the Master Plan implementation phase and will conform to applicable statutes such as the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 as amended in 1987, and the regulations implementing the Act (49 CFR Part 24). This plan would ensure that impacted property owners by the proposed LAX Expressway would be properly compensated either through acquisition of the property or through assistance in relocation as a means to maintain economic benefits for the City and the property owner. Because this relocation plan is an integral part of the LAX Master Plan, specific land use impact mitigation measures are not provided. Refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues.

AL00018-73

Comment:

a. There should be specific mention and analysis of land use impacts to the single-family homes on Coolidge Avenue, Culver Park Place, and Culver Park Drive, as well as the El Marino School and the El Marino Park. Also, there is no mention of potential property acquisition at this location, despite the closeness of this proposed roadway.

Response:

Comment noted. Specific analysis of the noted land uses would occur with future project-specific analysis if the LAX Expressway is ultimately adopted as a component of the LAX Master Plan. Refer to Topical Response TR-APPK-1 for an explanation of the programmatic level of analysis provided in Appendix K of the Draft EIS/EIR and a description of the more detailed project-level analysis that would be undertaken in the future if the LAX Expressway is adopted as a component of the LAX Master Plan. Also refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

At this time, the following information can be inferred from the existing analysis provided in Appendix K of the Draft EIS/EIR:

Two public facilities parcels in the City of Culver City would be impacted by the proposed LAX Expressway under Alternative 2. Seven residential properties along Coolidge Avenue, 17 business parcels and two public facility parcels in the City of Culver City would be impacted by the proposed LAX Expressway under Alternative 3. These properties are accounted for in the overall total number of affected parcels presented in Table 4.3-3 of Appendix K of the Draft EIS/EIR for the proposed LAX Expressway alternatives. Residences and/or businesses along Culver Park Place would not be directly impacted, however, they may experience increases in vibration, traffic noise, shade and shadow effects during the day under Alternative 3 and light/glare spill over effects during the nighttime hours. New vibration and noise impacts are not a result of a new vibration or noise source generated by the

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proposed LAX Expressway, rather, these impacts are a result of bringing existing effects closer to a sensitive receptor.

El Marino High School is located at the corner of Port Road and Coolidge Avenue - right at the terminus of the proposed expressway under Alternative 3. El Marino Park is located adjacent to the school to the southeast. The proposed expressway under Alternative 3 is not expected to cross directly over or on either sensitive land use and therefore acquisition of the property is avoided. However, the high school may experience increases in vibration and traffic noise during the daytime hours from the proposed off-ramp design feature in that a percentage of the passing vehicles traveling along the I-405 would be closer to the school. Currently, the nearest school structure is approximately 75 feet from the structural limits of the I-405 and approximately 50 feet from perceived Caltrans ROW which would be used to construct the proposed expressway consistent with Alternative 3. As such, traffic noise would be 25 feet closer to the school.

AL00018-74

Comment:

b. Under both the Single Viaduct and Split Viaduct Alignment for the LAX Expressway, additional areas in Culver City along the I-405 could be subject to land use impacts. Impacts to Culver City will start slightly north of the SR-90 interchange down to the City limits at Green Valley Circle, with elevated crossovers at Centinela, Sepulveda, Bristol Parkway, and Jefferson Boulevards. Due to the need for placing column structures, there could also be significant impact to the industrial properties along Bankfield Avenue as well as to some industrial/commercial properties that are on Jefferson Boulevard.

Response:

Properties along the roadways noted have been accounted for in Section 5.1, Land Use, of Appendix K of the Draft EIS/EIR. As stated in the conclusions reached in the land use impact analysis, it is not known whether support columns for the proposed LAX Expressway would be located within the CHP parking lot or along Bankfield Avenue or Selmarine Drive. The analysis did, however, disclose which facilities may be potentially impacted (directly or indirectly) in whole or in part by the proposed LAX Expressway. These properties are represented as hatched polygons in Figure 3.1-8 of Appendix K, and clearly address properties identified by the commentor.

The analysis presented in Appendix K of the Draft EIS/EIR does not detail exact land use and property impacts relating to column support structures of the proposed LAX Expressway. Refer to Topical Response TR-APPK-1 for an explanation of the programmatic level of analysis provided in Appendix K of the Draft EIS/EIR and a description of the more detailed project-level analysis that would be undertaken in the future if the LAX Expressway is adopted as a component of the LAX Master Plan. Also refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

AL00018-75

Comment:

There could also be column placements in the parking lots that are in the vicinity of Bristol Parkway and Centinela Avenue. Supports for the elevated structure will, most likely, be located in the CHP parking lot, in the area of Bankfield Avenue-Selmarine Drive, and the west side of Slauson Avenue north of Jefferson Boulevard.

There are multiple environmental impacts to Culver City that must be addressed along the east side of the I-405 right-of-way in the vicinity of Bristol Parkway and Green Valley Circle. There are commercial, light manufacturing, and office uses along the east edge of the I-405 that would be subject to land use impacts from the LAX Expressway. Hotels located within the City of Culver City such as the Radisson, the Sheraton Four Points, and the Ramada Plaza Hotel located on Centinela and Sepulveda Boulevard could also be impacted. An application for a new car dealership (Airport Marina Ford) has been submitted to the City of Culver City for initial review. This new facility is proposed to be located on private property and partially in the current LA County Flood Control easement area as well as some

portion of the existing Centinela Avenue right of way. This proposed development would be in conflict with the proposed alignment of both the build alternatives of the LAX Expressway.

Response:

Impacts to properties along the east side of the I-405 right-of-way in the vicinity of Bristol Parkway and Green Valley Circle are addressed in Section 5.1, Land Use, of Appendix K of the Draft EIS/EIR. Potentially affected parcels in this vicinity are represented in Figure 3.1-8 of Appendix K as hatched polygons. The nearby hotels identified by the commentor are not expected to be directly impacted by the proposed LAX Expressway. However, the parking lot of the Ramada Hotel located at the corner of Bristol Parkway and Centinela Avenue is identified in Appendix K as being in the direct path of the proposed expressway under Alternative 3.

In regards to the new proposed car dealership along Centinela Avenue, land use impacts would likely occur to this establishment should the City of Culver City approve the development application. As depicted in Photo 13 of Section 4.17, Visual, of Appendix K, there currently exists a dealership (the very same Airport Marino Ford) along Centinela Avenue parallel to the proposed LAX Expressway. According to an investigation of assessor parcel information, the property is a public facility belonging to the LA County Flood Control District. As such, the analysis identifies land use impacts to public facilities and not a business. Land use impacts would include impacts to the existing car dealership, bringing the total number of businesses affected by the proposed LAX Expressway to 24 (Alternative 2) and 35 (Alternative 3).

Specific analysis of the exact impacts to noted land uses would occur with future project-specific analysis if the LAX Expressway is ultimately adopted as a component of the LAX Master Plan. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

AL00018-76

Comment:

47. Appendix K, 4.1 Land Use, Page 19-24 and Appendix K, 5.1 Land Use, Pages 64-68. In Appendix K, there is a limited amount of discussion and analysis of adopted Culver City land use, circulation, and noise policies.

Response:

Section 4.1.1 of Appendix K provides a summary of land use, noise and circulation policies adopted by the City of Culver City that were deemed to be applicable to the evaluation of land use impacts resulting from the proposed expressway. The analysis discussion focused primarily on those policies that were in conflict with the proposed expressway, and therefore, an exhaustive discussion of each individual policy identified was not provided. Alternative D, the Enhanced Safety and Security Plan, does not include the LAX Expressway.

AL00018-77

Comment:

48. Appendix K, Section 5.5.1.2, Page 65, 1st paragraph, Alternative 2 (Split Viaduct). Under Lax Expressway Alternative 2, the report states "Although this alternative would likely require the acquisition of additional Right-of-Way along both the east and west side of the 405 FWY would not be considered a high priority roadway improvement under Culver City's General Plan Circulation Element. Irrespective of the emphasis the city places on the priority of the LAX Expressway project Alternative 2, no specific conflict with Culver City's Circulation Element have been identified." This statement is confusing, misleading, and needs to be clarified. It should be noted that the City's Circulation Element was updated in 1996. At this time, any off airport roadway improvements such as the LAX Expressway was not analyzed or included in our Circulation Element. Therefore, to state there is no specific conflict with the Circulation is not correct.

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Response:

Comment noted. Please see Response to Comment AL00018-76. A more detailed and updated investigation of the policies of the Circulation Element of the City of Culver City General Plan would occur with future project-specific analysis if the proposed LAX Expressway is ultimately adopted as a component of the LAX Master Plan. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

AL00018-78

Comment:

49. Appendix K, Page 66, Section 5.1.1.3, Second Paragraph, Last Sentence. Correct and revise the last sentence to include the language in bold brackets. "However the reduction to noise levels to 66 dBA would not be consistent with the City Inglewood and [City of Culver City] General Plan Noise Element." Also, nowhere in the document does it discuss or explain or provide mitigations as to how noise generated from the proposed Expressway will be reduced to 66 dBA or lower in those areas in Culver City.

Response:

FHWA Noise Abatement Criteria is in the form of the peak-noise-hour (i.e., 1-hour Leq), while the City of Culver City General Plan Noise Element criteria uses a weighted 24-hour, Community Noise Equivalent Level (CNEL) noise metric. Thus any comparison of the two noise metrics is not correct without accounting for the relationship between them. Under either noise metric, the existing and future traffic noise levels in the project area are sufficiently high to qualify for noise abatement evaluation. Please see Topical Response TR-APPK-1 regarding the refined analysis of the LAX Expressway and SR-1.

AL00018-79

Comment:

50. Appendix K, Figure 4.1-6 on page 4-65. Any figure(s) illustrating the location/map of the proposed LAX expressway should include and highlight those communities or uses that would be impacted by the ENTIRE length of the proposed expressway.

Response:

The commentor identifies Figure 4.1-6 of Appendix K as depicting land uses and communities along the proposed Expressway. However, Figure 4.1-6 in Appendix K actually depicts land uses along the proposed SR-1 realignment project. The commentor is referred to Figure 4.1-1 in Section 4.1.2.1 LAX Expressway in Appendix K which clearly depicts land uses along the entire length of the proposed Expressway.

AL00018-80

Comment:

51 Appendix K, Page 23, Section 4.1.2.1. - Correct language on this page to state that the City of Culver City, not "community of Fox Hills" bounds the northeast portion of the LAX Expressway.

Response:

The error is noted. In response, page 23 of Appendix K of the Draft EIS/EIR has been revised and is included in this Final EIS/EIR.

AL00018-81

Comment:

52. Preliminary Section 4F of the Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements. On Page 6, Table B, it lists Fox Hills Park as a part of the City of Fox Hills. This should be corrected to show that Fox Hills Park is in the City of Culver City. Again, on Page 6, Table B, El Marino Park should be added to the list, as should El Marino School.

Response:

The error is noted. In response, Table B on page 6 of Attachment 4, Preliminary Section 4(f) Evaluation, has been revised and is included in Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR. El Marino School is addressed in Response to Comment AL00018-73.

AL00018-82

Comment:

53. Draft EIS/EIR Page 3-44, Master Plan Chapter V Page V-3.111, Appendix K page 2. The referenced documents contain no or minimal discussions on the proposed Expressway under Alternative B (Additional runway to the South). Under Master Plan Alternative B, will the Expressway also extend up to the Howard Hughes Parkway ramps or to the SR-90/I405 interchange? Where is the terminus of the Expressway under Alternative B?

Response:

As discussed in Appendix K, there are two primary alternative designs for the proposed Expressway, the 'split' and 'single' viaduct. The terminus for Alternative 2 - the 'split' viaduct is Howard Hughes Parkway. The terminus for Alternative 3 - the 'single' viaduct is at the SR-90/I-405 interchange. The proposed Expressway under Alternative B was not analyzed in Appendix K because it was determined during the preparation of the Project Study Report that it would result in the greatest impact to historic resources and thus considered not viable. Nonetheless, in response to the comment, the northern terminus of the proposed Expressway for Alternative B would be at the Sepulveda Boulevard overpass at the I-405. It would extend south along the I-405 to Florence Avenue where it would then follow the railroad right-of-way south to Arbor Vitae Street, the northeastern corner of the proposed ring-road under Alternatives A, B, and C.

AL00018-83

Comment:

Parks and Schools

54. Volume 3, Section 4.26.3 Parks and Recreation Section in Paragraph 4.26.3.3 Affected Environmental/Environmental Baseline. Culver City is not included in the list of analysis. An expressway on the east side of the 405 would be adjacent to the El Marino Elementary School, and would be adjacent to El Marino Park. This is of concern for environmental and noise related issues and needs to be further analyzed in the EIR as to what impacts the expressway would create and how it would affect both the school and the park.

Response:

Sections 4.1, Land Use, 4.1.1, General Approach, and 5.1, Land Use, in Appendix K of the Draft EIS/EIR include the City of Culver City in the land use impact analysis for the proposed LAX Expressway project. The potential environmental issues associated with this proposed project are assessed at a programmatic scope of analysis in Appendix K of the Draft EIS/EIR under Section 5.1, Land Use, Section 5.3, Social and Economic, Section 5.5, Air Quality, Section 5.6 Noise, and Section 5.17, Visual. The degree of impacts are not determined in the programmatic level of analysis specified in Appendix K of the Draft EIS/EIR, given the absence of detailed engineering and design plans for the proposed LAX Expressway. However, these sections in Appendix K do conclude that there would be some level of impacts on sensitive receptors such as the El Marino Elementary School and Park. Please refer to TR-APPK-1, TR-N-1 and TR-C-1 for a discussion of project level analysis and mitigation requirements. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component.

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AL00018-84

Comment:

55. Section 4.27, Schools. The analysis of this section includes distant schools in San Pedro and Banning, but does not mention Culver City at all. How can a major report such as this can ignore a city close to LAX while including schools in San Pedro, Carson, etc.? There is no consideration of El Marino School, which is literally within 100 feet of the existing freeway and the proposed Expressway would be built very close to the school. This issue needs to be addressed as a part of the Draft EIS/EIR.

Response:

Please see Response to Comment AL00018-73.

AL00018-85

Comment:

56. Preliminary Section 4F of the Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements. The Figure A diagram of the Expressway on the east side of the freeway shows that there will be impacts to El Marino School and the adjacent El Marino Park; yet it is not mentioned elsewhere in the report.

Since the impacts to El Marino School and El Marino Park are not addressed and in fact are ignored in the document, there is no way to comment on the adequacy of the impact analysis without seeing this specific analysis that should have been done as part of the Draft EIS/EIR document. The document needs to provide an analysis to be able to comment on.

Response:

Please see Response to Comment AL00018-73.

AL00018-86

Comment:

4.4 Social Impacts

57. Section 4.4.2 Relocation of Residences or Businesses. Under the build alternatives, the LAX expressway would impact residences and businesses in Culver City (i.e. Marina Ford, etc.). How will these impacts be mitigated? What would be the tax impacts for these uses if relocated, acquired, etc.?

Response:

Please see Response to Comment AL00018-72.

Adherence to the final Relocation Plan under the proposed LAX Master Plan would ensure that the City of Culver City would continue to benefit from taxes generated by affected businesses. The final Relocation Plan would attempt to relocate affected businesses to comparable locations within the City so as not to significantly disrupt the tax base. The details of the plan will adhere to the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 as amended in 1987, and the regulations implementing the Act (49 CFR Part 24). Please refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues.

AL00018-87

Comment:

58. Section 4.4.4 Community Disruption and Alteration of Surface Transportation Patterns, Page 4-20. It should be acknowledged under "The Transportation System Improvements Under Build Alternatives"

section, that certain northern portions of the LAX Expressway are proposed to extend out of the I-405 and MTA right of way onto non-ROW land in Culver City boundaries.

Response:

Under Alternative 3, Single Viaduct, of the proposed Expressway, the northern terminus would extend beyond the I-405 and MTA ROW and into Culver City boundaries. Should this alternative be selected, coordination and negotiations with the City of Culver City would be necessary to establish some sort of lease agreement between Caltrans and the City. At the project level design and environmental review analysis stage, the extent of ROW infringement will be determined. Please refer to Topical Response TR-APPK-1 for project level analysis and mitigation requirements. Alternative D does not include the proposed LAX Expressway.

AL00018-88

Comment:

59. Section 4.18 Light Emissions, Page 4-824. There is no mention or analysis in the Draft EIS/EIR or Appendix K of potential light spill (light that shines beyond the area intended for illumination, can be a source of annoyance particularly for residences where light spill might disturb sleep or privacy) from the proposed LAX Expressway onto adjoining properties in the City of Culver City (i.e. residential properties on Coolidge Avenue and near Culver Park Place). Also, there are no mitigation measures required for potential light emission impacts from the LAX Expressway in the City of Culver City.

Response:

On page 111 of Section 5.17.1.2, Alternative 2 - Split Viaduct, of Appendix K states that a new light source would be introduced upon implementation of the proposed Expressway and that it "would constitute an adverse visual impact to adjacent residents in the evening." Adjacent residents include those residential properties on Coolidge Avenue, near Culver Park Place, Diller Avenue, Patom, Culver Park Drive and Segrell Way as well as residents in the City of Inglewood along Ash Avenue. The proposed mitigation measure for addressing such a light/glare impact involves restricting the lighting intensity by no more than two foot-candles above existing conditions as indicated in Mitigation Measure 3 on page 114, Section 5.17.4, Mitigation Measures, of Appendix K of the Draft EIS/EIR. Implementation of this mitigation measure would ensure that light/glare effects experienced indoors would be avoided, if not minimized to the maximum extent feasible. Additional mitigation measures may be recommended upon completion of the CEQA level project specific analysis in coordination with the Caltrans Project Development process. Please refer to Topical Response TR-APPK-1 for clarification on supplemental project level analysis.

AL00018-89

Comment:

4.20 Construction Impacts

60. Significant negative impacts to Culver City are anticipated with the construction of the LAX Master Plan and in particular the LAX Expressway. There will be construction impacts within Culver City related to noise, land use, surface transportation, air quality, schools, aesthetics, lighting, public safety, and other environmental subject areas.

Response:

It is noted that impacts to Culver City will occur as a result of the construction of the proposed LAX Expressway improvements. Appendix K of the Draft EIS/EIR describes the existing environmental setting, as well as potential direct and indirect environmental impacts to properties adjacent to the proposed LAX Expressway improvements. Please refer to Topical Response TR-APPK-1 for information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR. As noted, a future project level analysis of LAX Expressway potential impacts will include refined analysis of all environmental subject areas and mitigation measures to reduce construction impacts.

3. Comments and Responses

Please also refer to Section 4.3.2.5, Off Airport Surface Transportation Master Plan Commitments, of the Supplement to the Draft EIS/EIR. This section summarized measures that will be taken during construction of off-airport transportation improvements (i.e., the LAX Expressway) to minimize impacts to adjacent communities and land uses. The Off-Airport Surface Transportation Master Plan Commitments specified in the Supplement to the Draft EIS/EIR are listed below:

In addition to the on-airport Master Plan commitments summarized in Section 4.3.1.5, Master Plan Commitments, the following off-airport commitments are to be included in the construction specifications and contracts:

ST-9. Construction Delivery Permits. Construction deliveries requiring lane closures will be required to obtain delivery permits 30 days prior to delivery, allowing traffic maintenance plans to be modified and implemented.

ST-10. Designated Truck Routes. For dirt and aggregate and all other materials and equipment, truck deliveries will be on designated routes only (freeways and non-residential streets). Every effort will be made for routes to avoid residential frontages and may include, but will not be limited to:

- Florence Avenue (I-405 to Aviation Boulevard)
- Manchester Avenue, east of Aviation Boulevard
- Aviation Boulevard, south of Manchester Avenue and north of Imperial Highway
- Arbor Vitae (from I-405 to Sepulveda Boulevard)
- Westchester Parkway
- Imperial Highway, east of Sepulveda Boulevard
- La Cienega Boulevard, south of Manchester Avenue and south of Imperial Highway
- Airport Boulevard, south of Arbor Vitae
- Sepulveda Boulevard, south La Tijera Boulevard and north of Imperial Highway
- I-405
- I-105 east of Sepulveda Boulevard
- Pershing Drive south of Westchester, but not connecting to Imperial Highway

ST-11. Stockpile Locations. Stockpile locations will be confined to the eastern area of the airport vicinity. Multiple stockpile locations will be provided.

ST-12. Designated Truck Delivery Hours. Truck deliveries will be concentrated during night hours, and will avoid the peak periods (7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m.).

ST-13. Construction Employee Parking Locations. Employee parking will be provided along the east end of the airport, to the extent possible. Shuttle buses will transport employees to construction sites. In addition, remote parking locations (1 to 50 miles away) will be established for construction employees with shuttle service to the airport. An emergency return system will be established for employees that must to leave early.

ST-14. Construction Employee Shift Hours. Shift hours that do not coincide with the heaviest commuter traffic periods (7:00 a.m. to 9:00 a.m., 4:30 p.m. to 6:30 p.m.) will be established. Work periods will be extended to include weekends and multiple work shifts, to the extent possible and necessary.

ST-15. Separation of Construction Traffic. Construction traffic will be separated from regular airport traffic by various means, including keeping in service as haul routes any existing roads that would be replaced and detour routes (where appropriate), even after the parallel new roadway is open to traffic.

ST-16. Designated Haul Routes. Every effort will be made to ensure that haul routes are located away from sensitive noise receptors.

ST-17. Maintenance of Haul Routes. Haul routes will be maintained periodically and will comply with City of Los Angeles or other appropriate jurisdictional requirement for maintenance. Minor striping, lane configurations, and signal phasing modifications will be provided as needed.

ST-18. Detour Plan. A complete detour plan will be developed to designate routes, variable message sign locations, and communication methods with airport passengers, delivery trucks, etc. Detour routes will be periodically maintained.

ST-19. Closure Restrictions of Existing Roadways. Other than very short time periods during nighttime construction, no existing roadways will be closed until they are no longer needed for regular traffic or construction traffic, unless a temporary detour route is available to serve the same function. This will recognize that there are three functions taking place concurrently: (1) airport traffic, (2) construction haul routes, and (3) construction of new facilities.

Please also see Responses to Comments AL00018-15 and AL00018-69.

AL00018-90

Comment:

However, the Draft EIS/EIR and associated appendices and technical reports neither address nor mention these impacts onto Culver City. From review of the documents, the evaluation and discussion of construction related impacts and mitigation is geared toward the immediate area surrounding the LAX boundary (i.e. Westchester, El Segundo, Inglewood, etc.). Therefore, it is uncertain whether the mitigation measures and master plan commitments related to construction of LAX apply to affected areas in Culver City. Clarify and specify in the Draft EIS/EIR and associated documents any construction impacts and mitigation measures applicable to affected areas in Culver City.

Response:

As indicated above in Response to Comment AL00018-89, construction-related impacts to Culver City were addressed in the Draft EIS/EIR where appropriate. As described therein, such impacts are primarily associated with the proposed construction of the LAX Expressway under Alternatives A, B, and C. Aside from those, construction-related impacts associated with other the components of the proposed Master Plan, particularly the on-airport improvements, are anticipated to have less than significant impacts on Culver City due to the relative distance. Such would be the case under Alternative D, added subsequent to the publication of the Draft EIS/EIR, which does not include the proposed LAX Expressway and focuses the majority of improvements to on-airport facilities and areas immediately nearby.

AL00018-91

Comment:

61. Construction Schedule, page 4-859, 4-860. Include a discussion under Alternative A and Alternative B, explaining under which phase the LAX Expressway will be constructed.

Response:

Construction of the LAX Expressway would be started in Phase I of all alternatives, although it may not be completed until Phase II. Note that Alternative D does not include the LAX Expressway.

AL00018-92

Comment:

62. Appendix K. There is minimal and inadequate discussion of construction impacts and mitigation measures of the LAX Expressway.

3. Comments and Responses

Response:

Please see Responses to Comments AL00018-15, AL00018-69, and AL00018-89.

AL00018-93

Comment:

4.21 Design, Art and Architecture

63. Page 4-921, Lax Expressway. This section should discuss visual/aesthetic impacts to land uses in Culver City. The Single Viaduct alignment (Alternative 3) for the LAX Expressway would parallel the I-405 right-of-way from approximately Arbor Vitae Street to areas slightly north of the SR-90. Figure 3.1-7 in Appendix K only highlights some and not all the affected areas in Culver City. In the area particularly northeast of the I-405/I-90 freeway interchange, the LAX Expressway would be visible from sensitive receptors such as single-family homes on Coolidge Avenue, Culver Park Place, Culver Park Drive, as well as the El Marino School and El Marino Park. At present, there is a densely landscaped area, which provide a visual buffer between the I-405 freeway and the homes on Coolidge Avenue. The proposed LAX Expressway would be closer than the existing freeway, if not on top of some of the homes and yards, and will eliminate the landscape buffer. Notwithstanding potential property acquisition at this location, the closeness of this proposed roadway will impact views from the residential area as well as the El Marino School and Park. Therefore significant aesthetic and view impacts from the LAX Expressway are expected.

Response:

Comment noted. However, Figure 3.1-7 of Appendix K depicts those properties within the City of Culver City that would be directly impacted by the proposed Expressway (Alternative 3) - that is, those properties that would abut the proposed Expressway or are partially intersected by the proposed Expressway alignment. With respect to the commentor's comment regarding visual impacts to residences just northeast of the I-405/SR-90 interchange, to park users, and students at El Marino School, it is anticipated that the proposed Expressway under Alternative 3 would result in some visual effects. However, because detailed design plans are not known at this time (i.e., whether the exit/connector ramp from the proposed Expressway northbound to the I-405 at the SR-90 interchange would be at, below or above grade) it is not possible to assess the degree of visual effect on these sensitive receptors. In addition, the landscape buffer between the I-405 and Coolidge Avenue would potentially be removed resulting in an adverse visual impact should the landscaping not be replaced. However, without more detailed design plans for Alternative 3, the extent and magnitude of impact, and thus appropriate mitigation, cannot be determined at this time. Most likely, the landscaping would be replaced with comparable vegetation thereby reducing the visual impact to sensitive receptors along Coolidge Avenue, Culver Park Place, Culver Park Drive and El Marino School. Please see Response to Comment AL00018-118 for additional discussion regarding visual impacts along the Expressway corridor within the City of Culver.

As indicated in Section 4.21.8, Mitigation Measure, of the Draft EIS/EIR (page 4-926), a complete visual analysis would be done when the LAX Expressway project reaches the design stage. As a performance standard for mitigation of visual impacts, project design features or conditions of approval shall ensure that the LAX Expressway is attractively screened from the view of significantly impacted properties to an equivalent or greater level than provided by existing landscaping or other intervening structures that screen views of the I-405.

AL00018-94

Comment:

Additional areas in Culver City along the I-405 would be subject to visual impacts under both the Single Viaduct and Split Viaduct Alignment for the LAX Expressway. The light manufacturing, commercial, office, research and development uses would be subject to visual impacts and shade and shadow effects from the LAX Expressway. Hotels located within the City of Culver City such as the Radisson, Four Points Sheraton Hotel, and the Ramada Plaza Hotel on Centinela and Sepulveda Boulevard would also view the proposed LAX Expressway.

Impacts to Culver City will start from slightly north of the SR-90 and I-405 freeway interchange down to the City limits at Green Valley Circle, with elevated crossovers at Centinela, Sepulveda, Bristol Parkway, and Jefferson Boulevards. Due to the need for placing column structures, there could also be significant impact to the industrial properties along Bankfield Avenue as well as to some industrial/commercial properties that are on Jefferson Boulevard. There would also be visual impacts, including shade and shadow effects and column placements in the parking lots that are in the vicinity of Bristol Parkway and Centinela Avenue. Supports for the elevated structure will, most likely, be located in the CHP parking lot, in the area of Bankfield Avenue-Selmarine Drive, and the west side of Slauson Avenue north of Jefferson Boulevard.

These impacts to Culver City are not mentioned in the Draft EIS/EIR or in Appendix K. Conduct a view analysis within Culver City areas, provide adequate mitigation measures, and include discussion within the Draft EIS/EIR of the visual/aesthetic/shade and shadow impacts to these sensitive receptors as well as other commercial and other types of uses in Culver City impacted by the LAX Expressway.

Response:

Comment noted. The degree of visual impact can not be determined at this time because detailed design plans have not been completed. Similarly, impacts related to the placement of the support columns for the proposed Expressway can not be determined to project specificity. Such impacts will be evaluated at the Caltrans Project Development process and CEQA project-level review stage. At that time, it will be known to a greater level of accuracy where the support columns will be placed and which industrial/commercial/business properties will be directly affected. Furthermore, mitigation measure will specifically be developed to reduce impacts on these properties.

Please see Topical Response TR-APPK-1 regarding future detailed analysis and mitigation measures to address shade and shadow impacts from the placement of support columns.

Finally, please see Response to Comment AL00018-118 regarding follow-up reconnaissance conducted to assess visual impacts in the area in Culver City.

AL00018-95

Comment:

64. Page 4-898, Environmental Action Plan and Page, 4-926 MM-DA-1 & MM-DA-2. The two proposed mitigation measures (MM-DA-1 & MM-DA-2) designed to address aesthetic and visual impacts from the construction of the LAX Expressway should include areas and roadways in Culver City such as Coolidge Avenue, Culver Park Drive, Culver Park Place, Slauson Avenue, Selmarine Avenue, Bankfield Avenue, Jefferson Boulevard, Bristol Parkway, Green Valley Circle, and Centinela Parkway. Ensure in the language of the proposed mitigation measures that any construction fencing, pedestrian canopies, and view analysis be provided for these roadways listed above as they will be directly and significantly impacted by the proposed LAX Expressway.

Response:

A preliminary visual analysis is contained in Sections 4.17 and 5.17 of Appendix K which includes sensitive view locations south of the SR-90 within the City of Culver City as depicted in Figure 4.17-1. These include areas near Bristol Parkway, Green Valley Circle, and Centinela Parkway. Please see Response to Comment AL00018-118 regarding additional discussion of views 'from' and 'of' the proposed Expressway that include Coolidge Avenue, Culver Park Drive, Culver Park Place, and Slauson Avenue.

More project specific view analysis will be conducted at the project-level design phase and CEQA review (see Topical Response TR-APPK-1). At that time, Selmarine Avenue and Bankfield Avenue will also be considered as well as other sensitive view properties included in the programmatic level analysis. This level of analysis will include mitigation measures that ensure the protection of pedestrians along the affected roadways listed during construction activities. These mitigation measures may include but not be limited to the erection of construction fencing, pedestrian canopies and other visual barriers.

3. Comments and Responses

AL00018-96

Comment:

65. Appendix K, Page 60 and 110, Visual. The visual analysis section does not analyze or evaluate view impacts or shade and shadow effects of the LAX Expressway to those areas in Culver City northeast of the I-405/I-90 freeways.

Response:

In response to shade and shadow effects, please refer to Response to Comment AL00018-18 and Topical Response TR-APPK-1 for clarification on additional studies and impact assessment at the project level design process and CEQA review stage.

AL00018-97

Comment:

66. Appendix K, Figure 4.17-1, Photo Locations. Figure 4.17-1, stops short of depicting the entire northern length of the Expressway adjacent to Culver City. As such, the photo analysis conducted did not analyze those areas north of the freeway interchange in Culver City. Modify this figure to show additional photo locations and show the proposed Expressway extending slightly north the I-405/I-90 interchange, consistent with Figure 3.1-7, Segment A.

Response:

Figure 4.17-1 has been revised to reflect locations north of SR-90 with "views of the roadway;" this revision is included in this Final EIS/EIR. These properties would likely experience 'moderate' view impacts of the proposed roadway. A more detailed view analysis to determine the significance of the view effect will be conducted at the project level NEPA/CEQA review stage once initiated. Studies in support of this environmental document will address view impacts from properties just north of the I-405 and SR-90 interchange as well as provide more specific design mitigation measures. Please refer to Topical Response TR-APPK-1 for clarification of additional studies and environmental review of visual impacts. Please also see Response to Comment AL00018-118.

AL00018-98

Comment:

4.24 Human Health and Safety (CEQA)

67.4.24.2.6, Environmental Consequences, Page 4-1046. Provide an explanation or time frame in the phasing out of older, noisier aircraft. How long will this take?

Response:

All civil sub-sonic turbojet aircraft weighing more than 75,000 pounds were required to meet Stage III noise requirements by December 31, 1999. The phase out of the noisier Stage II turbojet aircraft has been completed. Aircraft that weigh less than 75,000 pounds are not required to be converted from current noise levels. Please see Subtopical Response TR-N-7.6 regarding ANCA phase-out of stage 2 aircraft.

AL00018-99

Comment:

PUBLIC SAFETY

Police:

68. The primary concern of the Police Department with the LAX Expansion Project proposals is traffic congestion. Traffic Congestion impacts the response time of Police vehicles to emergency calls, which

impacts the quality of life in Culver City. The only two routes for response to the Fox Hills area from the East Portion of Culver City are La Cienega Avenue and Sepulveda Boulevard. Both of those streets are congested during peak traffic hours and impact the response time of emergency vehicles to or from the above-described areas.

Response:

The potential for cumulative impacts related to off-airport police response times was addressed in Section 4.26.2, Law Enforcement, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. More specific data on traffic impacts is provided in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. As discussed in subsection 4.26.2, Law Enforcement (subsection 4.26.2.7.2), of the Supplement to the Draft EIS/EIR, although Alternatives A, B, and C, would in combination with Playa Vista and other independent projects, result in intersection level of service deficiencies, these alternatives would mitigate almost all project impacts and, in some cases, improve traffic flow compared to conditions that would exist if the Master Plan were not developed. The discussion notes that even with existing intersection deficiencies under 1996 baseline conditions, adequate emergency access is maintained. The use of emergency vehicle sirens, alternate response routes during peak periods or congested conditions (such as Playa Street or Slauson Avenue), and multiple station/jurisdiction responses when necessary, may partially account for the adequacy of current emergency access. As such measures would continue to be employed in the future, adequate emergency access, despite intersection deficiencies in some areas, would continue to be expected. Therefore, cumulative impacts after project and independent project mitigation on law enforcement are considered to be less than significant.

As discussed in Section 4.26.2, Law Enforcement (subsection 4.26.2.7.3), of the Supplement to the Draft EIS/EIR, Alternative D would also result in fewer significantly-affected surface transportation facilities (i.e., intersections, street links, freeway segments and freeway ramps) in 2015 than the No Action/No Project Alternative, and after mitigation would have the least number of significantly-affected facilities of any build alternative. Similar to the other alternatives, with mitigation of almost all project-related traffic impacts, Alternative D would serve, in some cases, to improve regional traffic flow compared to conditions that would exist if the Master Plan were not developed. Furthermore, the continued use of emergency vehicle sirens, alternate response routes during peak periods or congested conditions, and multiple station/jurisdiction responses when necessary, would be expected to facilitate adequate emergency access and response, as occurs under existing, albeit deficient, roadway conditions.

Regarding emergency response in the Fox Hills area of Culver City, in contrast to the other build alternatives, Alternative D does not involve the LAX Expressway and associated alterations to transportation facilities in this area. Furthermore, as indicated in Section 4.3, Surface Transportation (subsection 4.3.2.10.2), of the Supplement to the Draft EIS/EIR, the three intersections that would not be fully mitigated under Alternative D are proximate to the airport and are not located in or adjacent to Culver City.

AL00018-100

Comment:

69. Executive Summary IV-8.28 and IV-8.31. The document describes traffic conditions, during peak hours of certain road segments. The segment of Sepulveda between Venice and Centinela is described in the report as follows. "Low volumes; primarily free-flow operations. Density is low, and vehicles can freely maneuver within the traffic stream. Drivers can maintain their desired speeds with little or no delay." That Report is not accurate. In fact, the actual traffic conditions during peak hours fit the description of the Impact Report's worst conditions, as follows. "Forced-flow operations with high approach delays at critical signalized intersections. Speeds are reduced substantially, and stoppages may occur for short or long periods of time because of downstream congestion."

Response:

Conditions on each road differ depending on the hour analyzed. Three peak hours were analyzed for each road segment in the study areas. The actual conditions, in terms of actual volume to capacity ratios, of each segment during each hour were used in the analysis. This is explained further in Technical Reports 3b, Surface Transportation Technical Report, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report.

3. Comments and Responses

AL00018-101

Comment:

70. All of our major roads lead to LAX. The LAX Expressway is proposed to accommodate traffic flow in and out of LAX. It directly feeds outbound LAX traffic to the San Diego Freeway, connecting N/B traffic to the 405 Freeway between the Jefferson Blvd and Culver Blvd ramps. There are no proposals for modifying that portion of the freeway for the added volume. The overflow traffic will exit into Culver City from the next two northbound ramps (Culver and Venice). That volume of traffic will add to the already congested Sepulveda Blvd, Washington Blvd, Washington Place, Culver Blvd and Venice Boulevards during peak traffic hours. It will also cause increased traffic congestion and delays on all of Culver City's North/South through streets. As the LAX grows, added traffic congestion will result in slower response times to emergency police calls.

Response:

The analysis did not show an exodus of traffic on the two northbound ramps identified by the commentor. Further, mitigation measures have been identified for all traffic impacts identified in the analysis, as presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Analysis of emergency response times is presented in Section 4.26.1, Fire Protection. Please note that Alternative D does not include the LAX Expressway or Ring Road.

AL00018-102

Comment:

Fire:

71. Both LAX Expressway proposals have southbound lanes beginning north of SR 90 freeway and continuing south to Arbor Vitae Street. There are no on- or off-ramps to provide emergency access along the way. Arriving at the emergency scene may prove difficult as traffic backs up with no way to divert vehicles. Culver City will be responsible for providing coverage on the southbound expressway unless farther distanced Los Angeles City Fire Department units are expected to handle all calls. The draft EIS/EIR needs to adequately address how emergency vehicles (fire trucks) can access/respond in a timely manner along the entire length of the proposed Expressway under non-peak and peak travel times.

Response:

Both alternatives for the proposed expressway incorporate a 3.0 meter (approximately 10 feet) shoulder space for the north and southbound viaducts. This space would be able to accommodate the passage of an emergency vehicle in the event of a collision or accident on the proposed Expressway requiring immediate response and access. The 3.0 meter width is the acceptable design standard for the state of California according to the California Highway Design Manual.

AL00018-103

Comment:

72. The Report does not address additional traffic congestion on Sepulveda Boulevard through Culver City or the merging Expressway onto northbound San Diego Freeway. Any new traffic will have a significant impact on the Culver City Fire Department's response into the Fox Hills neighborhood, Centinela Avenue, I-405 Freeway north, etc. from the current location of Culver City Fire Station 3 located at 11304 Segrell Way.

Response:

Please see Topical Response TR-ST-1, Section 1, for a discussion of the study area and identification of facilities analyzed. Specific operations analysis of the merge of the LAX Expressway and I-405 would likely be conducted in a subsequent project-level study of the facility.

AL00018-104**Comment:**

73. Overviews 4.24.3 Safety, page 4-58, under LNG/CNG Facility, last paragraph, last sentence. Under all three Alternatives, the existing LNG Facility would be relocated to a site in the southeast portion of the airport near the East Imperial Cargo Complex. CNG storage would be constructed in conjunction with the LNG facility. The hazard radius for the LNG/CNG Facility would remain at a maximum of approximately 1,300 feet. As the location shown is in close proximity to the I-105 Freeway, the document does not mention the freeway as a possible exposure.

Response:

As indicated in Section 4.24.3, Safety, of the Draft EIS/EIR, the hazard radius for the LNG/CNG Facility would remain at a maximum of approximately 1,300 feet. Occupied areas/uses potentially affected under Alternatives A and C would include individuals along a portion of Imperial Highway (east of where the I-105 Freeway connects with Imperial Highway). Please refer to Figures 4.24.3-13 and 4.24.3-19 of the Draft EIS/EIR. Occupied areas/uses potentially affected under Alternative B would include individuals along a portion of Imperial Highway, as well as portions of the I-105 Freeway, Aviation Boulevard, and the Green Line. Please refer to Figure 4.24.3-16 of the Draft EIS/EIR. Page 4-1115 of the Draft EIS/EIR has been revised to note the additional transportation facilities that would be potentially affected under Alternative B. Please refer to Section 4.24.3, Safety, of this Final EIS/EIR.

AL00018-105**Comment:**

ENERGY

74. 4.17 Energy Supply and Natural Resources. The projections are all based on 1997, 1998 figures, before deregulation set in. What are the environmental impacts on electricity and natural gas usage based on current generation and transport capacity projections?

Response:

Please see Response to Comment AL00033-188 regarding energy supply/transmission capacity.

AL00018-106**Comment:**

75. 4.17.1.8 Mitigation Measures. There is repeated reference to a Master Plan Commitment E-I, Energy Conservation and Efficiency Plan that would be implemented by LAWA which therefore eliminates the need for any mitigation measures. Has any portion of the plan been implemented to date, and if so what has the effectiveness been in energy reduction? Is it feasible to indicate that LAWA is capable of reducing energy consumption?

Response:

Master Plan Commitment E-1 is intended to reduce energy consumption associated with implementation of the Master Plan and would be implemented upon approval and construction of the Master Plan. However, LAWA has taken a number of steps over the years to reduce energy consumption at LAX, including a Central Utility Plant, which provides heating and air conditioning to the CTA, provision of electric vehicle charging stations for employees and members of the public, and purchase of alternative fuel fleet vehicles, among other measures.

AL00018-107**Comment:**

REGIONAL CONTEXT

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76. The Draft EIS/EIR presumes that a vast majority of the region's growth in air passenger and air cargo demand will be directed to LAX. A number of commercially viable airports in the Southern California area currently exist and are underutilized relative to their capacity. A fully regional solution to this air passenger and air cargo capacity has not been adequately addressed in the Draft EIS/EIR.

Response:

Please see Response to Comment AL00018-21.

AL00018-108

Comment:

77. 1.13.3 Future Demand for Air Passenger and Cargo Transportation. What is the impact the Alameda Corridor and the East Alameda Corridor projects on shifting the transport of cargo to other airports from manufacturing centers?

Response:

The Alameda Corridor and the East Alameda Corridor projects deal with heavy freight that is transported between the seaports and rail lines, such as automobiles. The heavy freight that is transported on ships and by rail is not the same cargo that is shipped by air. Aircraft are used to ship cargo that is either perishable or valuable. Thus, the impact of the Alameda Corridor and the East Alameda Corridor projects on airport cargo is negligible. Please see also Topical Response TR-ST-5 regarding the rail/transit plan.

AL00018-109

Comment:

78. 1.2.4 Forecast Distribution of Demand. Where is the scenario that LAX is constrained to its current MAP and the demand has to be distributed to other airports? Only discussion is that air traffic will decrease overall, not about distribution.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00018-110

Comment:

79. 1.3 Meeting the Demand for Transportation. The length of the driving time to various cities is unrealistic. Assumes less than 50 mph speed on open freeways.

Response:

The 60 minute accessibility diagram, Figure 1-3, is based upon average travel times. During peak travel times, actual driving times will be higher. During off-peak hours, actual driving times will be lower.

AL00018-111**Comment:**

80. 1.4 The Need to Expand LAX. Statements do not indicate the benefit to the region with a freeze on LAX expansion - reduced traffic, pollution, noise, etc.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; air quality in Section 4.6, Air Quality; and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

AL00018-112**Comment:**

81.2.6 Non-LAX Development. Costco Center is located in Culver City not City of Los Angeles.

Response:

Correction noted.

AL00018-113**Comment:**

OTHER

82. In response to the NOP/NOI to prepare the Draft EIS/EIR issued in June 1997, Culver City requested in a letter dated July 31, 1997, that major issues and concerns related to traffic, air quality, overflight operations, regional context, and other subject areas impacting Culver City be analyzed in the preparation of the Draft EIS/EIR. None or minimal analysis of the issues the City requested to be analyzed are contained in the Draft EIS/EIR. Further, Culver City's NOP/NOI comment letter is not contained in Appendix A of the Draft EIS/EIR, where copies of written comments from affected agencies are contained.

Response:

The content of this comment is essentially the same as comment AL00018-22; please refer to Response to Comment AL00018-22.

AL00018-114**Comment:**

RESOLUTION NO. 98- R087

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, CALLING FOR A REGIONAL AIRPORT PLAN FOR SOUTHERN CALIFORNIA.

WHEREAS, the Los Angeles Department of Airports has initiated a revision of the Master Plan for Los Angeles International Airport (LAX) which anticipates expanding its passenger activity from a current 60 million passengers per year to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year; and

WHEREAS, expanding the passenger and cargo activity as proposed will greatly increase the number of flights and nearly double ground traffic going to and from LAX; and

WHEREAS, communities in the vicinity of LAX which already experience enormous adverse environmental impacts from operations of the Airport can expect greatly increased noise and air

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pollution from overhead aircraft, greatly increased congestion and air pollution from ground traffic, especially from dramatic increases in the activity of diesel trucks around the Airport; and

WHEREAS, airport officials estimate LAX improvements will cost as much as \$12 billion dollars, not including the costs of transportation improvements required to facilitate access to LAX which will be paid for by regional taxpayers; and

WHEREAS, there are many other commercial airports in Southern California; some with significant histories as commercial airports, some recently converted to commercial or joint military and commercial airports; and

WHEREAS, several of these airports are located in areas of Southern California expected to experience the greatest growth in population and employment over the next twenty years, while LAX is near the communities expected to experience the least growth in the same period; and

WHEREAS, developing airport capacity near high growth communities rather than concentrating airport development at LAX may be an environmentally superior, lower-cost and more equitable strategy for serving future growth in air commerce in Southern California; and

WHEREAS, the development of these regional airport resources will help spread jobs and economic development opportunities more equitably throughout the region, and reduce the public health and environmental burdens on communities near LAX.

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE, as follows:

SECTION 1. The City of Culver City calls upon the communities of Southern California, including the City of Los Angeles; the Counties of Los Angeles, Orange, San Bernardino, Riverside, and Ventura; the State of California; and our congressional representatives to join together in developing the Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and develops the capacity of the many other commercial airports in Southern California to serve the expanding air commerce marketplace.

APPROVED and ADOPTED this 14th day of September, 1998.

Response:

Comment noted. The types of environmental impacts mentioned in the recitals of the resolution were addressed in Sections 4.1, Noise, 4.2, Land Use, 4.3, Surface Transportation, and 4.6, Air Quality, of the Draft EIS/EIR. As indicated previously, subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00018-115

Comment:

Attached you will find our letter to the Lax Master Plan Office in response to the EIS/EIR. In it, we elaborate on our concerns regarding the proposed LAX Expressway. For the Council's convenience we are providing the following summary. We hope that our concerns mirror yours and will be reflected in the response that the City makes to the LAWA.

Response:

Comment noted. Please see Responses to Comments AL00018-116 through AL00018-130 below.

AL00018-116

Comment:

1) Noise

In spite of the fact that Culver City requires noise barriers to be part of any new development or improvement, the EIR/EIS only proposes noise barriers along the 405 between La Tijera and La Cienega, not all the way to Sepulveda.

The Noise Study did not include a portion of the area in Culver City that will be dramatically affected by the Expressway. The study's Northern boundary was Howard Hughes Parkway. The noise impact will extend further North to either Bristol Parkway (Alternative 2) or even beyond Jefferson (Alternative 3). Both of these alternatives include Hillside Memorial Park, where any increase in noise will have a dramatic effect on funeral services.

Response:

The segment exclusive to Alternative 3 of the proposed LAX Expressway, located north of Bristol Parkway along the east side of I-405, was analyzed for noise impacts using a screening method. As stated in Section 5.6.1 of Appendix K of the Draft EIS/EIR, it was determined that existing and future No Action/No Project traffic noise levels are likely to approach or exceed Caltrans and Federal Highway Administration (FHWA) noise abatement criteria due to the existing major highway facilities in the vicinity. Construction of the LAX Expressway Alternative 3 could incrementally increase traffic noise levels in the area. Section 5.6.1 of Appendix K states that a detailed noise abatement evaluation would be carried out as part of the Caltrans project development process.

If an alternative to the LAX Master Plan is adopted that includes the proposed LAX Expressway as a project component, then a project-specific noise analysis would be conducted that details the existing and future noise levels along the proposed LAX Expressway corridor. The noise study would be based upon the specific adopted alignment of the proposed LAX Expressway and incorporate design features that would be dependent on refined design elements determined as the project progresses. Noise mitigation (e.g., soundwalls) would be implemented, if found to be warranted, feasible, and reasonable, at appropriate locations (including those areas referenced by the commentor) based upon the final design of the LAX Expressway. Please note that Alternative D, Enhanced Safety and Security Plan, LAWA's preferred alignment, does not include the proposed LAX Expressway as a project component.

Please see Response to Comment AL00018-68 for additional information regarding the LAX Expressway and noise mitigation. Also, please see Response to Comment AL00018-89 for detailed information regarding construction mitigation measures and LAX Master Plan Commitments that apply to the proposed LAX Expressway.

Finally, please refer to Topical Response TR-APPK-1 for additional information regarding impacts associated with the LAX Expressway.

AL00018-117

Comment:

2) Cultural Resources

The Study did not include Hillside Memorial Park as a possible Historical, Architectural Resource in the affected area. The Hillside Memorial Park Waterfall and Jolson Memorial were designed by Paul Williams (the same architect responsible for the Theme Building at the Airport) in 1950. We have been operating as a cemetery in this location since 1941. We are an important part of the history of the Jewish culture in Los Angeles. In addition, for over 50 years the waterfall and Jolson Memorial have been highly visible landmarks from either Sepulveda or the 405 Freeway. We feel we deserve at least as much consideration as Randy's Donut, which has been considered a historic property.

3. Comments and Responses

Response:

A search was conducted of listed and eligible properties to the National and California Register of Historic Places as well as the Los Angeles Historic-Cultural Movement. The Hillside Memorial Park was not listed in either of these data searches nor does the City of Culver City list this property as historic. However, it is acknowledged that the property may be a potentially significant resource given its duration of operation and the architect (Paul William) known to have designed the waterfall and Jolson Memorial features at the park. At the Caltrans Project Development process and CEQA review stage, it will be determined whether or not the park or any of its structures or features will be directly or indirectly affected by the proposed Expressway alignment. The significance of impact to the park cannot be determined at this time given the absence of detailed site engineering plans for the project. However, if the project level of analysis suggests that this potentially significant resource would be directly or indirectly affected, a qualified architectural historian will be retained to evaluate the park. The Hillside Memorial Park and all of its ancillary features will be formally evaluated for eligibility for inclusion on the National Register of Historic Places and the California Register of Historical Resources. Please refer to Topical Response TR-APPK-1 for clarification on supplemental CEQA analysis.

AL00018-118

Comment:

3) Visual Impact

The EIS/EIR stated that "views of the road" were more important than "views from the road" for purposes of assessing the impact of the expressway. Our rolling hillsides and majestic buildings are very impressive when viewed from the 405. The loss or disruption of this view is a significant factor to be considered; at least as much as the item deemed most visually dominant by the EIS/EIR (the multi-story office building on the west side of the I-90 junction).

We are very concerned that given the proposed height of the expressway and its location (particularly in Alternative 3) we will be dramatically impacted by shade, shadow and aesthetically at the entrance area and Southwest corner of our Park.

Response:

As stated in Appendix K (p. 60), "views of the road" were the more dominant factor in assessing visual impacts given the presence of sensitive view receptors, such as the Hillside Memorial Park & Mortuary, school, church and residences. Upon implementation, the proposed LAX Expressway would not physically alter the park or its ancillary features, hence, "views of the road" was determined to be the more appropriate application for the analysis. Construction of the proposed LAX Expressway would not physically change the aesthetic appeal of the park. It should also be noted that Alternative D, Enhanced Safety and Security Plan, does not include the proposed LAX Expressway or ring road. Alternative D is LAWA staff's preferred alternative. Based on this comment, a follow-up reconnaissance visit to the proposed LAX Expressway alignment under Alternative 3 was conducted on August 2, 2002 to determine with greater certainty whether or not "views of the road" (i.e., of the park waterfall and memorial) would be obstructed. This reconnaissance focused primarily on the northern most terminus of the proposed Expressway under Alternative 3 as well as the Memorial Park. Views of the Memorial Park heading northbound and southbound would be obstructed. The impact is not considered adverse in that the proposed Expressway would reach heights that would allow for commuters to see past or below the proposed expressway structure. In addition, the Park is oriented towards the northwest which would require northbound travelers to avert their line of sight directly to the east. On the other hand, views of the Park are more apparent and direct to southbound commuters on I-405. The significance and magnitude of this impact would be determined by subsequent analysis at the project design phase when sufficient details of the proposed Expressway would be available. Results, including photographs, of the follow-up reconnaissance conducted on August 2, 2002 are included as Attachment 3, LAX Expressway Photographs, of this Final EIS/EIR.

AL00018-119

Comment:

4) Traffic

The EIS/EIR states that during construction "inconvenience (delays, etc) may occur particularly at intersections where the expressway crosses or connects to Florence, La Cienega, La Tijera, Bristol Parkway & the 405". The EIS/EIR also states that the intersection at Centinela & Sepulveda is already the lowest level of service rating for peak periods, With the exception of the Florence intersection, all of this is taking place in a small section of surface streets that are major arteries used to access our location.

Response:

As discussed in Section 4.3.2, Off-Airport Surface Transportation, of the Supplement to the Draft EIS/EIR, Master Plan Commitments ST-9 through ST-19 are proposed to reduce construction-related traffic impacts associated with the build alternatives; however, the Draft EIS/EIR and Supplement to the Draft EIS/EIR concluded that construction-related traffic will, at times, result in significant and unavoidable impacts. Please also see Topical Response TR-APPK-1 regarding refined analysis of LAX Expressway and State Route 1 (SR-1) impacts.

AL00018-120

Comment:

5) Social & Economic

Although all of the above concerns have the potential to severely affect us financially, we have one additional concern. The visibility of the waterfall, Jolson Memorial and our signage from the 405 is tremendously important to us in maintaining our place in a highly competitive market. We use the Jolson Memorial as our corporate logo on all of our advertising and it has become a landmark and a symbol we refer to with pride. Compromising the view of this historical feature would be a tremendous blow for us economically.

Response:

Please see Response to Comment AL00018-118 regarding views of the Hillside Memorial Park and Mortuary waterfall and Jolson Memorial.

AL00018-121

Comment:

Hillside Memorial Park & Mortuary is located on the North side of Centinela, between Bristol Parkway and Green Valley Circle in Culver City. We were established in 1941 and purchased by Temple Israel of Hollywood in 1956. We are a religious, not for profit organization, which employs 65 people, and provides approximately 950 burials and 850 mortuary services per year. We are very concerned about the potential impact of the LAX expansion on the quality of service and the environment we provide to families who come to us to mourn and remember their loved ones who have died.

Response:

Potential impacts to the immediate vicinity of the proposed LAX Expressway, which includes the area encompassing the Hillside Memorial Park & Mortuary, are addressed in Appendix K of the Draft EIS/EIR in Sections 5.5, Air Quality, 5.6, Noise, and 5.17, Visual. Please note that the proposed Alternative D, Enhanced Safety and Security Plan, of the LAX Master Plan does not include the proposed LAX Expressway as a project component. Also, please see Topical Response TR-APPK-1 regarding refined analysis of LAX Expressway and State Route 1 (SR-1) impacts.

AL00018-122

Comment:

The Draft EIS/EIR states that LAWA prefers Expressway Alternative 3, which transitions traffic to and from the 405 at the junction with the 90 freeway, rather than Expressway Alternative 2, which transitions traffic to and from the 405 at Howard Hughes Parkway (Appendix K, page 2). The remainder of Appendix K presents the analysis of Alternative 3 in much more detail than the "less desirable" Alternative 2. This makes it more difficult for anyone adversely impacted by Alternative 3 to respond to

3. Comments and Responses

the Draft EIS/EIR. However, after careful study, we at Hillside Memorial Park and Mortuary have the following concerns regarding the methods and conclusions reached by the EIR/EIS.

Response:

Upon examination, the analysis presented in Appendix K of the Draft EIS/EIR presents equal discussion of impacts of both Alternatives 2 and 3 of the proposed LAX Expressway. Because both Alternatives 2 and 3 of the proposed LAX Expressway follow the same general alignment (although they differ in design), in many cases, the impacts associated with Alternative 2 are identical to those identified for Alternative 3. This is stated in various citations throughout the text of Appendix K of the Draft EIS/EIR. As such, impacts associated with both Alternatives 2 and 3 of the proposed LAX Expressway are given equal documentation in Appendix K of the Draft EIS/EIR.

Please refer to Topical Response TR-APPK-1 for additional information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR.

AL00018-123

Comment:

1) Noise

The Culver City General Plans Land Use Element requires noise barriers to be part of any new development or improvement (Appendix K, page 23). The EIR/EIS proposes noise barriers along the 405 between La Tijera and La Cienega (Appendix K, page 71). The EIS/EIR clearly shows that the areas of Culver City to be affected by the Expressway stretch from Green Valley Circle North to either Bristol Parkway (Appendix K, Figure 3.1-2) or beyond that to a point North of Jefferson (Appendix K, Figure 3.1-7). Therefore, we believe that the proposed noise barriers are not in compliance with the requirements of Culver City

Response:

The segment exclusive to Alternative 3 of the proposed LAX Expressway, located north of Bristol Parkway along the east side of I-405, was analyzed for noise impacts using a screening method. As stated in Section 5.6.1 of Appendix K of the Draft EIS/EIR, it was determined that existing and future No Action/No Project traffic noise levels are likely to approach or exceed Caltrans and Federal Highway Administration (FHWA) noise abatement criteria due to the existing major highway facilities in the vicinity. Construction of the LAX Expressway Alternative 3 could incrementally increase traffic noise levels in the area. Section 5.6.1 of Appendix K states that a detailed noise abatement evaluation would be carried out as part of the Caltrans project development process.

If an alternative to the LAX Master Plan is adopted that includes the proposed LAX Expressway as a project component, then a project-specific noise analysis would be conducted that details the existing and future noise levels along the proposed LAX Expressway corridor. The analysis would identify specific impacts to known sensitive receptors and provide recommendations for mitigation that would be consistent with Culver City requirements for noise abatement. Further, the noise study would be based upon the specific adopted alignment of the proposed LAX Expressway and incorporate design features that would be dependent on refined design elements determined as the project progresses. Noise mitigation (e.g., soundwalls) would be implemented, where found to be warranted, feasible, and reasonable, based upon the final design of the LAX Expressway. Please note that Alternative D, Enhanced Safety and Security Plan, LAWA's preferred alignment, does not include the proposed LAX Expressway as a project component.

Please see Response to Comment AL00018-68 for additional information regarding the LAX Expressway and noise mitigation. Also, please see Response to Comment AL00018-89 for detailed information regarding construction mitigation measures and LAX Master Plan Commitments that apply to the proposed LAX Expressway.

Finally, please refer to Topical Response TR-APPK-1 for additional information regarding impacts associated with the LAX Expressway.

AL00018-124

Comment:

A category "A" land use or activity level is defined as "Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose" (Appendix K, page 39). According to the EIR/EIS there are no category "A" uses identified in the project area (appendix K, page 39). Having conducted funeral services at this location since before there was a 405 Freeway, we assure you that the need for serenity and quiet are of extraordinary significance here. As a matter of fact, we can not imagine what land use could fit more completely and clearly into Category A than that of a Memorial Park.

Response:

Only a very few places in the United States have a designation of Activity Category A - these include the Grand Canyon and Arlington National Cemetery. Activity Category B land uses are listed as "Picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries and hospitals. Activity Category C land uses are described as "Developed lands, properties, or activities not included in Categories A or B above." There is some controversy among Federal transportation agencies and state transportation departments whether cemeteries belong in Activity Category B or C. Serenity and quiet are important elements to a cemetery for outdoor services and personal reflection. For that reason, it would appear that cemeteries would meet the same requirements as the land uses listed for Category B. On the other hand, some Federal and state transportation agencies do not feel that cemeteries receive enough use to warrant the level of noise protection received by Category B land uses. If the LAX Expressway becomes a specific project, further analysis of noise would be done for the specific project design. That analysis would include assessment of noise impacts at the Memorial Park. Specific recommendations for noise abatement would be made following that impact assessment. It should be noted that Alternative D does not include the proposed LAX Expressway or ring road. Alternative D is the LAWA staffs' preferred alternative.

AL00018-125

Comment:

The area included in the Noise Study extended from just South of the 105 to Howard Hughes Parkway. Since the area affected by the expressway extends North to either Bristol Parkway (Appendix K, Figure 3.1-2) or beyond that to a point North of Jefferson (Appendix K, Figure 3.1-7), we feel a second study needs to be done to include the areas that will actually be adjacent to all of the Expressway.

Response:

The segment exclusive to Alternative 3 of the proposed LAX Expressway, located north of Bristol Parkway along the east side of I-405, was analyzed for noise impacts using a screening method. It was determined (as stated in Section 5.6.1 of Appendix K of the Draft EIS/EIR) that existing and future No Action/No Project traffic noise levels are likely to approach or exceed FHWA Noise Abatement Criteria due to the existing major highway facilities in the vicinity. Construction of LAX Expressway Alternative 3 could incrementally increase traffic noise levels in the area. Section 5.6.1 of Appendix K of the Draft EIS/EIR states that a detailed noise abatement evaluation would be carried out as part of the Caltrans project development process.

Please also see Responses to Comments AL00018-13, AL00018-68, AL00018-116, AL00018-123, and AL00018-89.

In addition, please refer to Topical Response TR-APPK-1 for additional information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR.

3. Comments and Responses

AL00018-126

Comment:

2) Cultural Resources

The Area of Potential Effects (APE) shown in Appendix K includes all of Hillside Memorial Park & Mortuary (Appendix K, figure 4.15-1). However, the Section 106 report does not include Hillside Memorial Park & Mortuary; only the area of Centinela that runs along the front of our Park (Appendix I, map 7). The EIR/EIS did not list Hillside Memorial Park as a possible Historical, Architectural Resource in the affected area. The Hillside Memorial Park Waterfall and Jolson Memorial were designed by Paul Williams (the same architect responsible for the Theme Building at the Airport -Appendix K, page 57) in 1950. We have been operating as a cemetery in this location since 1941. We are an important part of the history of the Jewish culture and community in Los Angeles. In addition, for over 50 years the waterfall and Jolson Memorial have been highly visible landmarks from both Sepulveda and the 405 Freeway.

One of the stated reasons that the LAWA prefers Alternative 2 is that it "minimizes the disruption to Historic Resources". We feel Hillside deserves at least as much consideration as Randy's Donut, which has been considered a historic property by the EIR/EIS.

Alternative 3 would be more disruptive to Hillside Memorial Park & Mortuary than Alternative 2. (Appendix K, figures 3.1-2 and 3.1-7) It overhangs our property, it impacts traffic, it impairs lines of sight, it increases the noise level in the Park, and it will cause additional vibration, glare and all of the other detrimental effects listed in the EIR/EIS.

Response:

The Hillside Memorial Park & Mortuary has been identified as a sensitive land use receptor potentially affected in Table 5.1-1 in Section 5.1, Land Use, of Appendix K (see page 64). It is classified in the Community Facility category under the Land Use heading as cemetery for both Alternative 2 and 3. In Appendix K, it is not considered a historic resource because it was not listed on either the state or national register. Please refer to Response to Comment AL00018-117 for clarification regarding the exclusion of Hillside Memorial Park & Mortuary as a potential historic resource. Sections 5.1.1.2, Alternative 2 (Split Viaduct), and Section 5.1.1.3, Alternative 3 (Single Viaduct), of Appendix K of the Draft EIS/EIR address, in general, anticipated environmental impacts to sensitive land use types. As stated on page 66 of Appendix K (see first full paragraph), "The project would result in long-term increases in vibration, light and glare, and aesthetic impacts to the land uses adjacent to the LAX Expressway, thereby, resulting in potential land use incompatibility impacts." Please refer to Topical Response TR-APPK-1 for clarification of supplemental project specific CEQA analysis with respect to cultural and historic resources.

AL00018-127

Comment:

3) Visual Impact

The EIS/EIR stated that "views of the road" were more important than "views from the road" for purposes of assessing the impact of the expressway (Appendix K, page 60). We do not understand why only one of these can be considered. As the stewards of a large green area in the middle of a community of commercial and residential properties, we are always aware that we are responsible for providing a beautiful landscape for travelers on the 405. Our rolling hillsides and majestic buildings are very impressive when viewed from the 405. The loss or disruption of this view is a significant factor to be considered; at least as much as the item deemed most visually dominant by the EIS/EIR (the multi-story office building on the west side of the I-90 junction-Appendix K, page 61). We are very concerned that given the proposed height of the expressway (6 meters or 20 feet: Appendix K, page 16) and its location in Alternative 3, we will be dramatically impacted by shade, shadow, noise, vibration and aesthetically at the entrance area and Southwest corner of our Park (Appendix K, photo 10).

Response:

Please see Response to Comment AL00018-118 regarding the application of 'views from the road' as opposed to 'views of the road' as well as the potential for shade/shadow impacts. Appendix K does not

provide for a project level or detailed analysis of the proposed Expressway for shade/shadow/lighting, vibration, and access impacts in that it is merely a project element of a larger Master Plan. Hence, only a programmatic level of analysis is warranted to identify potential issue areas requiring further analysis at the time the project element is initiated. Upon adoption of either Master Plan proposed alternative that includes these off-airport roadway improvements, a more detailed CEQA review would be conducted in support of the Project Study Report (PSR) required by Caltrans. The Caltrans PSR and Project Report would include design plans that address roadway elevations, setbacks, and landscape buffer areas in sufficient detail as to conduct the supplemental CEQA analysis for aesthetic/visual, vibration, lighting and access impacts. Please see Topical Response TR-APPK-1 for clarification of supplemental analysis at the specific project level stage. Please note that Alternative D does not include the LAX Expressway or the proposed ring road. Alternative D is LAWA staff's preferred alternative.

AL00018-128

Comment:

In addition, we wonder about the safety of having an elevated expressway located above an open area and adjacent to two chapel buildings that are used for funeral services. We did not see the potential effect of a large accident on the area below the expressway addressed in the EIR/EIS.

Response:

Please refer to Topical Response TR-APPK-1 for information about the future project-specific design phases that would occur if the LAX Expressway is adopted as an element of one of the LAX Master Plan alternatives. Please note that Alternative D, now LAWA staff's preferred alternative, does not include the proposed LAX Expressway as a project component. The design of side barriers and walls along elevated portions of the roadway would be in compliance with Caltrans design standards for impact safety.

AL00018-129

Comment:

4) Traffic

The EIS/EIR states that the intersection at Centinela & Sepulveda has the lowest level of service rating for peak periods (Appendix K, page 9). Both of the proposed Alternatives include pillars 2 meters wide along the freeway (Appendix K, page 16). We feel the addition of more surface obstacles to the intersection of Centinela and Sepulveda (where there is already a freeway underpass) would make this intersection considerably more congested and, more significantly, very dangerous. We did not see the analysis of the impact of these pillars in the document at all.

The EIS/EIR states that during construction "inconvenience (delays, etc) may occur particularly at intersections where the expressway crosses or connects to Florence, La Cienega, La Tijera, Bristol Parkway & the 405" (Appendix K, page 69). With the exception of the Florence intersection, all of this is taking place in a small section of surface streets that are major arteries used to access our location. In addition, the intersections involving Bristol Parkway and the 405 are within yards of the aforementioned Centinela & Sepulveda intersection. We are not convinced that the true catastrophic nature of the impact for traffic along Centinela between Sepulveda and La Tijera has been addressed. Nor do we find any mitigation plans for this problem.

Response:

Please see Response to Comment AL00018-13 and Topical Response TR-APPK-1 regarding the future project-specific traffic analysis that would be completed for the LAX Expressway if it is ultimately adopted and carried forward in the planning process. The precise placement of support pillars for the proposed LAX Expressway would be determined during future project design phases. Traffic safety considerations would be considered in determining the precise placement of the pillars. Please refer to Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR for a summary of Master Plan Commitments and mitigation measures related to off-airport surface transportation that would apply during the construction period to minimize traffic impacts. Also, please see Topical Response TR-ST-2 concerning traffic, Topical Response TR-ST-3 concerning construction traffic, Topical Response TR-ST-4 concerning Airport Area Traffic, and TR-ST-6 concerning Neighborhood Traffic Impacts.

3. Comments and Responses

Please note that Alternative D, now LAWA staff's preferred alternative, does not include an LAX Expressway.

AL00018-130

Comment:

5) Social & Economic

Although all of the above concerns have the potential to severely affect us financially, we have one additional concern. The visibility of the waterfall, Jolson Memorial and our signage from the 405 is tremendously important to us in maintaining our place in a highly competitive market. We use the Jolson Memorial as our corporate logo on all of our advertising and it has become a landmark and a symbol we refer to with pride. Compromising the view of this historical feature would be a tremendous blow for us economically.

Response:

Please refer to Response to Comment AL00018-118.

AL00019 **Casey, Paul** **City of Santa Monica**

AL00019-1

Comment:

Background

The Big Blue Bus operates Line 3, connecting Santa Monica, Venice and Marina del Rey with LAX Transit Center via Lincoln Boulevard. Line 3 has over 12,000 passenger boardings on a typical weekday. The Lincoln Boulevard corridor has been one of our fastest growing routes since it was extended beyond the airport to the Metro Green Line at Aviation. This service provides a vital link between the growing job market in Santa Monica and residents of southeast Los Angeles County. Every weekday, approximately 3,500 passengers travel through LAX on Line 3. Line 3 has more passenger boardings in the LAX area than any other bus route.

Response:

Comment noted.

AL00019-2

Comment:

Summary of Comments

The City of Santa Monica Big Blue Bus concludes that the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) addresses public transit in only the most superficial and cursory manner. It is unacceptable.

The principal shortcomings are summarized as follows.

- The DEIS/EIR states that the current LAX Transit Center will be eliminated in all Master Plan alternatives. However, no location for a replacement facility has been identified. The facility in Lot C currently has approximately 525 Big Blue Bus passenger boardings each weekday.

Response:

Under all Master Plan alternatives, the LAX Transit Center is relocated to a new site in the southwestern portion of the project. The LAX Transit Center is not eliminated under any of the alternatives being studied. Please see Topical Response TR-ST-5 (see Subtopical Response TR-ST-5.3 on Transit) for more information. The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00019-3

Comment:

- There is no discussion, not even on an abstract policy level, of how transit passengers would access the terminals.
- There are no dedicated lanes proposed anywhere for Bus Rapid Transit. This is inconsistent with county-wide policy to develop roadway priority measures for transit buses on major corridors. The Master Plan alternatives do not address transit bus circulation on the re-engineered roadway system. There is no discussion of convenient bus access to any replacement transit center facility .

Response:

The Master Plan alternatives do not preclude the development of bus rapid transit or other forms of mass transit in the future on roadways and rights-of-way adjacent to the airport. Provisions would be made for bus passengers to transfer to airport shuttles at the relocated LAX Transit Center and Intermodal Transportation Center in Alternative D. Also, bus passengers would be able to transfer to the Metro Green Line which would be extended to the new Westside terminal under Master Plan Alternatives A, B, and C. Please see Topical Response TR-ST-5 (see Subtopical Response TR-ST-5.3 on Transit) for more information. The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00019-4

Comment:

- The extension of the Metro Green Line to a new passenger terminal on the west side of the airport does not provide for transfers between trains and transit buses.
 - The implementation of a Green Line extension is not tied to the opening date of the new terminals it is supposed to serve.
- Recommendations
- The Metro Green Line should be extended further than is proposed in the alternatives, to the intersection of Lincoln boulevard and Manchester Boulevard. This would provide a convenient connection between the Metro Rail system and bus service to the Westside. By avoiding roadway congestion in the airport area, transit users traveling through LAX would benefit from a reduction in their daily commute time of at least 25 minutes. This Green Line extension should already be operational during airport construction to mitigate disruptions to through traffic.

The provision of a rail tunnel under the north runways is consistent with the overall Project because Alternatives A, B, and C all feature a series of a new tunnels. There is a new tunnel for Sepulveda Boulevard included in the Master Plan under the north runways. For Aviation Boulevard, there are two tunnels under new taxiways on the north and south sides of the airport.

The alignment of a Green Line extension from the West Terminal to the intersection of Manchester Boulevard at Lincoln Boulevard is entirely within airport property, except for the final quarter mile which is owned by the City of Los Angeles. Funding could come primarily from Airport revenues.

Response:

Comment noted. The Metro Green Line extension to the Westside terminal is a specific feature of the 2015 LAX Airport Master Plan Alternatives A, B, and C, and does not preclude further extensions to the north by the MTA in the post-2015 timeframe. Under Alternative D, the Green Line connection would be via the Intermodal Transportation Center, but future extension may be possible. Please see Topical Response TR-ST-5 (see Subtopical Response TR-ST-5.4 regarding Green Line extension to the West Terminal) for more information.

3. Comments and Responses

AL00019-5

Comment:

- The new transit center should provide cross platform transfers between buses and the automated people mover system. There should be curb space for at least ten buses to board passengers. Access to and from the transit center should not require circuitous routing for buses traveling from any direction. There should be no unprotected left turns for buses servicing the new transit center. Layover space for at least five buses should be located no more than two minutes drive from the transit center. A transit customer service center should be provided at the transit center where employees and arriving passengers could get travel information and purchase tickets and passes.

The Big Blue Bus is willing to work with Los Angeles World Airports to create viable on-airport and off-airport surface transportation elements for the Proposed Master Plan Improvements.

Response:

Comment noted. This level of detail has not yet been developed at the master planning stage of the LAX Airport Program. The specifics of the relocated LAX Transit Center would be identified in sufficient detail later in the project development stage. This would occur during the design stages for any of the build alternatives including, for example, design of the Ground Transportation Center and the Intermodal Transportation Center under Alternative D, as described in the Supplement to the Draft EIS/EIR. Please see Topical Response TR-ST-5 (see Subtopical Response TR-ST-5.3 on Transit) for more information.

AL00020

Rogers, Gene

City of Moreno Valley

7/25/2001

AL00020-1

Comment:

The City of Moreno Valley is concerned that the EIS/EIR fails to adequately address the feasibility of March GlobalPort, as well as other Inland Empire airports.

Chapter I, Regional Context, Section 1.2.2.11 of the EIS/EIR states that "March Air Reserve Base/March Inland Port" is currently marketed only for cargo operations. Consequently, the EIS/EIR concludes, March GlobalPort's ability to attract scheduled passenger air service is untested and uncertain. However in Section 1.2.2.9 of that same chapter, the EIS/EIR dismisses the feasibility of passenger air travel at the San Bernardino International Airport because it would need to compete with well-established service at other airports, and with proposed commercial air service at March Air Reserve Base/March Inland Port. The EIS/EIR provides no discussion of the proposed commercial air service operations at March GlobalPort, and provides no data to support its dismissal of the feasibility of increased passenger travel at March GlobalPort as well as other Inland Empire airports.

The City of Moreno Valley requests that the EIS/EIR be amended to clearly document its findings regarding the feasibility of Inland Empire airport expansions and the regional impacts of the proposed LAX Master Plan on Inland Empire airport existing and proposed facilities. In addition, the City requests that the EIS/EIR include in its review of project alternatives an expanded passenger air travel facility at March GlobalPort. To assist your agency in this effort, the City of Moreno Valley requests the EIS/EIR consider the following information:

According to state of California Finance Department estimates, San Bernardino and Riverside Counties' combined population reached 3.34 million in 2001, a population greater than 21 of our nation's states. By 2020, SCAG forecasts that the Inland Empire's population will grow by an additional 1.83 million residents, to over 5 million, a population that will exceed that of 47 of our nation's states.

The state of California Employment Development Department reports that as of 2001, the Inland Empire has an economy with over 1 million jobs. According to SCAG, the Inland Empire will expand to a 1.8 million-job economy by 2020. Many of these jobs will be in the manufacturing and logistics sectors, adding more truck and commuter traffic to our already clogged freeways.

This future growth will create a huge increase in demand for inland passenger and cargo flights. Recent SCAG research on air passenger demand predicts an enormous increase in volume for airports in the Inland Empire. Between 2000-2020, annual airport passenger volume at inland airports will rise from 6.7 million to 43.4 million. Similarly, SCAG's research shows air cargo demand will soar. Between 2000-2020, annual air cargo at inland airports will rise from 0.6 million to 5.2 million tons. This increase is expected to be greater than in Los Angeles County, and in Orange, San Diego, Ventura and Imperial Counties combined.

Yet despite this current and expected demand for airport services in the Inland Empire, most airlines concentrate their airport planning efforts in the highly urbanized Los Angeles and Orange Counties. Efforts to expand aviation services in these urbanized counties are hampered by environmental concerns and community resistance. At the same time, these efforts draw much needed airport services away from the Inland Empire.

Response:

The goals, plans and wishes of the Inland Empire airports have varied over time as various ideas and proposals have been considered and developed. According to the most recent (July 2003) publication of the Inland Empire Economic Partnership, "Soaring Into The Future", March Globalport is being marketed primarily as an air cargo facility. San Bernardino International is courting aircraft maintenance, air cargo, and commercial passenger service. The allocation of domestic Origin and Destination (O&D) demand to LAX was developed using the Regional Airport Demand Allocation Model (RADAM). The model was developed specifically for the Los Angeles region to assess the future implications of various changes in the Los Angeles region airport system. RADAM was used to allocate domestic O&D demand within the region only. No forecasts were developed for the other airports in the region. Sections 5.4, Description of the LA Region Airport Demand Allocation Model (RADAM) and 5.5, LAX Domestic O&D Demand Allocation Scenarios and Forecast of the Draft LAX Master Plan discussed the RADAM model and documented the results of an allocation of domestic O&D demand developed using the model. The City of Los Angeles owns and LAWA controls the operation and potential expansion of four airports: LAX, Ontario, Palmdale, and Van Nuys. The other regional airports are controlled by other jurisdictions that are responsible for their respective operation and expansion. As of 2001, the Southern California Association of Governments (SCAG) in its 2001 Regional Transportation Plan (RTP) estimated the existing airport capacity in the region at approximately 120 MAP. The 2001 RTP included El Toro as an integral part of the region plan to meet the forecast demand. Without the conversion of El Toro to a civilian airport, the region's airports would have a projected shortfall of approximately 30 MAP, and would not have the capacity to accommodate the 2025 forecast for air services. Although SCAG's forecast horizon is 10-years beyond the planning horizon of this Master Plan, there is inadequate existing airport capacity in the region to serve long-term passenger demand. Please see Topical Response TR-RC-1 that discusses demand and capacity at the region's airports. Also please refer to Topical Response TR-MP-2 regarding LAWA's efforts to ensure compatibility between the LAX Master Plan and the SCAG RTP.

AL00020-2

Comment:

The price for concentration of airline activity in Los Angeles and Orange Counties is both increased traffic congestion and air pollution. March GlobalPort, as well as San Bernardino International Airport, Southern California Logistics Airport, Ontario International Airport and Palm Springs Regional are inland airport facilities that are well located to serve future Southern California aviation needs. Each of these inland airports has great unused capacity, and is located within communities that are generally supportive of those airports and that would greatly benefit from the increased use of those facilities.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate

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future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00021 Urrutia, Ed Lennox School District Board of Trustees 6/9/2001

AL00021-1

Comment:

I am gravely concerned about the inadequacy of the Draft EIR/EIS, in terms of fulfilling the responsibility of informing the public of the potential effect of airport expansion. Given the limited time I have available, I will focus on a few of my most serious concerns.

Response:

Comment noted.

AL00021-2

Comment:

The manner in which Environmental Justice is addressed, I believe, is completely inadequate. Requirements to mitigate Environmental Justice are not firmly stated, rather the approach is that it is an issue to be handled later. Therefore, it is impossible to determine whether or not Environmental Justice mitigation is adequate.

Response:

The reason the Draft EIS/EIR did not include a program with mitigation measures and benefits fully reflective of community input, was because the preliminary findings on environmental justice were not known until the document was finalized. It was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected communities and their representatives.

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the Supplement to the Draft EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

AL00021-3**Comment:**

Furthermore, there is no comparison between the options presented and an alternative for the development of regionalized expansion of areas throughout the Los Angeles basin. This is a glaring flaw in the document because the regionalized airport approach should be presented as an alternative for discussion, and should also be evaluated relative to the comparative impact on Environmental Justice.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR. As indicated in the topical response, subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - is designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP), and shifts the accommodation of future aviation demand to other airports in the region. The environmental impacts of Alternative D, including environmental justice, were evaluated in the Supplement to the Draft EIS/EIR, which was circulated for public review and comment.

AL00021-4**Comment:**

Additionally, in terms of Environmental Justice, there should be an analysis of the degree of usage of LAX by Lennox residents, as well as the surrounding communities, to determine the degree to which use of the airport is serving the needs of its most immediate neighbors, as opposed to meeting the needs of others who do not feel the impact of the environmental concerns associated with the airport.

Response:

Section 4.4.3 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed Environmental Justice pursuant to Executive Order 12898 and other relevant guidance with emphasis on identifying and addressing disproportionately high and adverse human health or environmental effects on minority and low-income populations. While Department of Transportation Order 5610.2 indicates that offsetting benefits may be taken into account in making determinations on whether an action would have a disproportionately high and adverse human health or environmental effect on minority or low-income populations, it is beyond the scope of the EIS/EIR to undertake an evaluation of airport service demand in various communities. It should be noted however, that the purpose of the project is one of providing transportation infrastructure to serve needs throughout the region, including those in close proximity to LAX. Please see Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR regarding benefits and mitigation measures that address the disproportionately high and adverse effects of the project. Please see Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00021-5**Comment:**

On a different topic related to the issue of noise, I was not able to find in the report any analysis of single-flight noise, and only the average calculation of CNEL noise effects is utilized. This, once again, is a glaring error in that single-flight noise levels do have a tremendous impact on Lennox residents and students within the Lennox School District. This analysis should be a part of the Draft Report.

Response:

Single event noise is presented in the Supplemental Metrics section of Appendix D, Aircraft Noise Technical Report. Single event noise impacts, including impacts to schools, were presented in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, with supporting information in Appendix S-C1 and Technical Report S-1. For additional information about single event

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noise and its relationship to cumulative noise levels, please see Topical Response TR-N-2, in particular Subtopical Response TR-N-2.1 and Subtopical Response TR-N-2.4.

AL00021-6

Comment:

The issue of noise is a serious concern to the Lennox School District in that a variety of studies have confirmed that children who live near LAX are hindered in their academic performance due to exposure of excessive aircraft noise. This negative effect occurs even though the school program offers noise-abated classrooms. The document should more fully explore the negative effects of noise on schoolchildren, and should provide specific mitigation measures to offset this negative effect on students. The proposed remedy, to be credible, needs to be based on existing research findings.

Response:

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Based on careful review of numerous studies and research related to school disruption from single event noise, LAWA developed thresholds of significance to be used in the CEQA analysis of the four build alternatives for the LAX Master Plan. The development and application of these thresholds relative to the four build alternatives was presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR.

AL00022 Antonovich, Michael County of Los Angeles 7/13/2001

AL00022-1

Comment:

Consistent with unanimous action of our Board on July 10, 2001, we formally submit the attached document as the County of Los Angeles' final comments on the Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) for Proposed Master Plan Improvements at Los Angeles International Airport (LAX).

We continue to believe that LAX is vitally important to the City, County, and to this region, and that there is need for some improvements at this facility. However, the deficiencies reflected in the Draft EIS/EIR, as detailed in the attached, are serious, pervasive, and systematic. Notably, the Draft EIS/EIR fails to explore the preferred and more economically, environmentally, and socially salutary alternative of a regional approach to planning for and meeting airport demand and capacity. In this regard, we believe that Los Angeles World Airports and the Federal Aviation Administration should support the efforts of the Southern California Regional Airport Authority, which has recently reactivated and is preparing a comprehensive work plan of activities over the next 18 months that will employ a consensus-building process to develop a regional airport strategic master for Southern California.

Over 100 other local and regional governmental agencies have gone on record supporting a regional approach to airport expansion. Therefore, we respectfully request that the Los Angeles World Airports and the Federal Aviation Administration restart the process and incorporate a regional approach to airport expansion, and resolve the deficiencies in the Draft EIS/EIR, including those involving noise, transportation, air quality, and environmental justice impacts.

Response:

Comment noted. The Southern California Regional Airport Authority (SCRAA) is inactive. Riverside County voted in July 2002 to withdraw from SCRAA. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements while being designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation

Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00022-2

Comment:

FINAL REPORT ON DRAFT EIS/EIR FOR PROPOSED MASTER PLAN IMPROVEMENTS AT LAX (ALL DISTRICTS AFFECTED) (3 VOTES)

IT IS RECOMMENDED THAT YOUR BOARD:

1. Approve the final report on the Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) for the Proposed Master Plan Improvements at Los Angeles International Airport (LAX) submitted by A.C. Lazzaretto & Associates as the County's official comments on the Draft EIS/EIR.
2. Send a five-signature letter to Los Angeles World Airports (LAWA) and Federal Aviation Administration (FAA) submitting the final report as the County's final comments on the Draft EIS/EIR and requesting LAWA and the FAA to restart the process and incorporate a regional approach to airport expansion.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The purpose of this recommended action is to accept the attached final report as the County's official response to the Draft EIS/EIR and present it to LAWA and FAA prior to the July 25, 2001 comment period deadline. Submission of the County's official response allows for the concerns and suggestions detailed in the final report to be addressed by LAWA and FAA. If County's concerns and suggestions are not adequately addressed and/or incorporated into the final EIS/EIR, the County retains the ability and opportunity to challenge the LAX Master Plan Improvement project based on those issues discussed in the final report.

It is important to stress that, although LAX is entirely within the jurisdiction of the City of Los Angeles, as proposed the Master Plan Improvement is an airport expansion project that impacts the region as a whole. It is for this reason that the Board of Supervisors on April 4, 1998 went on record to "oppose restricting further air traffic expansion at Los Angeles International Airport only, and supporting instead, a regional approach to expansion including Palmdale Regional Airport." A regional approach does not stop expansion at LAX, but rather addresses the limits of LAX in meeting the region's air travel needs, and promotes a more collaborative and balanced approach to meeting regional needs by distributing air service to airports around the region. The consultants state in the final report that the "process needs to begin with a scoping process that acknowledges the regional nature of the undertaking and follows with a fresh look at Alternatives that include regional options."

The position on incorporating a regional approach to any expansion plan to LAX is one that is shared by many cities within Los Angeles County. In addition, the County of Los Angeles is a member of the Southern California Regional Airport Authority (SCRAA), which is a Joint Powers Agreement with the Counties of Orange, San Bernardino, Riverside, and City of Los Angeles. The SCRAA, which is chaired by Supervisor Knabe, has conceptually endorsed a work plan to develop a regional aviation master plan.

The recommendations in this letter are consistent with actions taken by your Board on June 5, 2001, based on the initial findings of the consultant's review of the Draft EIS/EIR. Among these actions, your Board took a "do not support" position on the Draft LAX expansion plan, supported a cap of the annual number of landings and take offs at LAX of 790,000, and instructed County staff attending the June 9, 2001 public hearings on the Draft LAX expansion plan to request that a rewritten plan also include viable regional airports as a means to mitigate increased air traffic.

Implementation of Strategic Plan Goals

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These recommendations are consistent with the following Strategic Plan Goal and Strategy:

Goal: Organizational Effectiveness: Ensure that service delivery systems are efficient, effective, and goal-oriented.

Strategy: Collaborate across functional and jurisdictional boundaries.

By promoting a regional approach to air service, the County is seeking to collaborate and work with other city and county jurisdictions to ensure that any air service expansion plan is environmentally, economically, and socially beneficial to the region as a whole.

FISCAL IMPACT/FINANCING

Not applicable.

FACTS AND PROVISIONS

On March 13, 2001, this office entered into an agreement with A.C. Lazzaretto & Associates to provide expert technical assistance in reviewing and commenting on the Draft EIS/EIR for the Proposed Master Plan Improvements at LAX. In accordance with that contract, the consultant assembled a team of environmental experts to review the document for consistency and accuracy, with special attention to the major areas of noise, traffic, air and water quality, and environmental justice.

On June 5, 2001, the consultant presented the Board of Supervisors with a preliminary report outlining major flaws and inadequacies with the Draft EIS/EIR. On June 9, 2001, Board members Burke, Knabe, and Antonovich, and/or their representatives, presented verbal comments regarding these flaws and inadequacies of the Draft EIS/EIR at LAWA's and FAA's public hearing.

Consistent with their contract, the consultant is presenting the attached final report to the Board of Supervisors commenting on the Draft EIS/EIR for the Proposed Master Plan Improvements at LAX. The consultant concludes that LAX is vitally important to the City, County, and to this region, and that there is need for some improvements. However, the problems associated with this Draft EIS/EIR are so serious, pervasive, and systematic that the only practical remedy is to start the process over again. The following are key findings supporting this conclusion:

- The preferred Project Alternative C has more significant unavoidable adverse effects than either of the other two Alternatives, yet fails to meet the projected demand, as do the other Alternatives.
- The EIS/EIR conclusion that the development of regional airports is an unreasonable Alternative is not supported by evidence provided in the EIS/EIR.
- The scoping outreach effort did not include a single agency within the County governments of Los Angeles, San Bernardino, Orange, Riverside, or Ventura.
- The Alternatives fail to acknowledge changes occurring at regional airports, such as the favorable marketing study regarding activating commercial air service at Palmdale; Ontario's ability to accommodate international flights as well as possible expansion in capacity; increased cargo capacity at Southern California Logistics Airport (formerly George Air Force Base); the expiration of the cap on John Wayne; and the recently invalidated Measure F at El Toro, which would have required a two-thirds vote of approval to construct a civilian airport in the future.
- The EIS/EIR fails to comply with the intent of California Environmental Quality Act (CEQA) to facilitate an understanding of changes in the environment associated with the proposed project by using a "baseline" that was five years old at the time of the EIR/EIR release date.
- The EIS/EIR contains numerous comments and conclusive statements that create an appearance of project advocacy.
- Many impacts in the Environmental Justice analysis were not addressed, reportedly because the preparers were not able to quantify or analyze the impacts.
- The on-site traffic, noise, and air quality impact analyses are inadequate.

- Although the EIS/EIR indicates the Alternatives may have significant human health effects, no mitigation measures are offered.

IMPACT ON CURRENT SERVICES

Although this action will not have a direct impact on current County services, the promotion of a regional approach to air service expansion may provide a positive stimulus to the regional economy, while enhancing and meeting air service demand in a responsible measured manner.

Response:

Comment noted. Please see Responses to Comments AL00022-3 through AL00022-190 below.

AL00022-3

Comment:

1.1 Project Alternatives

The stated project purpose identifies only three Master Plan objectives, which is unusually limited for a project of this scale. Moreover, the objectives omit any mention of environmental goals, such as enhanced access, or improved quality of life. The Draft EIS/EIR fails to comply with the cornerstone element of California Environmental Quality Act (CEQA) - that an EIR must describe a reasonable range of Alternatives that would feasibly meet most objectives, but would avoid or lessen significant effects of the project. In terms of ability to reduce significant effects for key impact categories such as noise, land use, environmental justice, and air quality, there is no substantive difference among the Alternatives. For instance:

- Of the 25 impacts identified as significant and unavoidable for any one of the project Alternatives:
- 22 are significant and unavoidable for all 3 Alternatives;
- 1 impact is cited as unknown for all 3 Alternatives; and
- Only 2 impacts show variation among the Alternatives in the level of impact severity.

Response:

Regarding the comment that the objectives omit any mention of environmental goals, Chapter 2, Purpose and Need for the Proposed Action, of the Draft EIS/EIR states as follows: "The purpose and objectives of the Master Plan are to provide, in an environmentally sound manner that is compatible with surrounding land uses, sufficient airport capacity for passengers and freight in the Los Angeles region to sustain and advance the economic growth and vitality of the Los Angeles region."

Regarding the number of significant, unavoidable impacts under each alternative, the Draft EIS/EIR identified a total of 25 significant unavoidable impacts, 3 potentially significant unavoidable impacts, and 1 impact that could not be determined (pertaining to environmental justice). Of the 28 significant or potentially significant unavoidable impacts identified in the Draft EIS/EIR, 19 are common to Alternatives A, B, and C and 6 (or 21 percent) showed a variation between the alternatives. The number of significant or potentially significant unavoidable impacts under each alternative is 23, 26, and 25 for Alternatives A, B, and C, respectively.

Although Alternatives A, B, and C are similar in terms of the number of significant, unavoidable impacts and the number of impacts that can be mitigated to a level that is less than significant, there are differences between the severity of impacts among the three alternatives. For example, Alternative C would newly expose the fewest people to noise levels in excess of 65 CNEL and the fewest people to a 1.5 CNEL increase above 65 CNEL. Alternative C would generate the fewest number of vehicle trips on local roadways and freeways, and would have the lowest air pollutant emissions of the three alternatives. Alternative C would also result in the least amount of business acquisition, both in acres and in numbers of businesses acquired. Of Alternatives A, B, and C, Alternative C would have the fewest negative impacts to the surrounding communities and the region of the alternatives evaluated in the Draft EIS/EIR.

Although the purpose and need as stated in the Draft EIS/EIR remains valid, subsequent to the publication of the Draft EIS/EIR, an additional option - Alternative D, Enhanced Safety and Security Plan

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- was formulated for the LAX Master Plan in consideration of input from the public on the Draft EIS/EIR and the events of September 11, 2001. Although the conclusion of the Draft EIS/EIR was that Alternative C would have the fewest negative impacts to the surrounding communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmentally Superior alternative and would have the fewest negative impacts to local communities and the region of the four build alternatives. Alternative D has replaced Alternative C as the LAWA staff-preferred alternative.

The environmental impacts specific to Alternative D are fully addressed in the Supplement to the Draft EIS/EIR.

The Supplement to the Draft EIS/EIR also included new analyses for each of the build alternatives, such as single event noise and acute health risk. Additionally, revisions were made to some of the analyses conducted for the Draft EIS/EIR, such as combining air emissions from construction and operations. As a result, several significant unavoidable impacts pertaining to noise, health risk, and air quality have changed in the Supplement to the Draft EIS/EIR. The net total of significant unavoidable impacts has increased by 3, for a total of 28 significant unavoidable impacts, 3 potentially significant unavoidable impacts, and 1 impact that could not be determined (pertaining to environmental justice). Of the 31 significant or potentially significant unavoidable impacts identified in the Supplement to the Draft, 22 are common to Alternatives A, B, C, and D and 6 (or 19 percent) showed a variation between the alternatives. The number of significant or potential significant unavoidable impacts under Alternatives A, B, C, and D is 26, 29, 29, and 23, respectively. This is an increase of 3, 3, and 4, respectively, from the Draft EIS/EIR.

In addition, please see Topical Response TR-ALT-1 regarding the extensive process undertaken by LAWA to develop alternatives for consideration in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00022-4

Comment:

Most significantly, the preferred Project Alternative C has more significant unavoidable adverse effects than either of the other two Alternatives yet fails to meet the projected demand, as do the other Alternatives. In effect, LAWA is recommending approval of the Alternative that would cause the greatest number of adverse impacts, while meeting the fewest number of project objectives. A full discussion of how and why Alternative C became the preferred Alternative, recognizing that it offers fewer benefits than the remaining Alternatives without any substantive reduction in adverse impacts, is necessary to justify its utility as the Preferred Project Alternative.

Response:

Please see Response to Comment AL00022-3 regarding the number and severity of impacts associated with Alternative C compared to Alternatives A and B. It should be noted that, subsequent to the publication of the Draft EIS/EIR, an additional option -Alternative D, Enhanced Safety and Security Plan- was formulated for the LAX Master Plan. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and will make the airport safer and more secure, convenient, and efficient. Although the conclusion of the Draft EIS/EIR was that Alternative C would have the fewest negative impacts to the surrounding communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmentally Superior alternative and would have the fewest negative impacts to the local communities and the region. Alternative D has replaced Alternative C as the LAWA staff's preferred alternative.

AL00022-5

Comment:

The Alternatives contain several assumptions that are inconsistent and lack justification. For example, the Alternatives assume that new cargo facilities are less efficient than the old LAX facilities and fail to recognize that modern facilities may handle twice the amount of cargo per square foot. In addition, the

Draft EIS/EIR nearly doubles the terminal space yet assumes a very modest increase in passengers and operations. The All Weather Peak Hour Operations is greater in the baseline than in Alternative C and the All Weather Average Delay is shorter in the baseline than in Alternative C. All of these assumptions are illogical and challenge the credibility of the forecasts upon which the analyses are based.

Response:

The commentor is incorrect in asserting that the alternatives assume that new cargo facilities are less efficient than the old LAX facilities. To the contrary, formulation of the build alternatives assumed increased efficiencies in the design and operation of new cargo facilities. As described in Section 1.2.3 of the Draft Master Plan, the 2nd iteration concept analysis, which provided the basis for the subsequent formulation and refinement of Alternatives A, B, and C as addressed in the Draft EIS/EIR, determined that "development of new cargo facilities and redevelopment of the existing Century Cargo complex can increase efficiencies." Such increases in efficiencies, as well as the many other factors that influence the demand, nature and amount of cargo handled at LAX, which are described in the Draft Master Plan - specifically, Chapter 2, Section 4 regarding Cargo Facilities Existing Conditions and Chapter 3, Section 9 regarding the LAX Air Cargo Forecast - are appropriately reflected in the assumptions for, and analysis of the Master Plan alternatives. In addition, please see Topical Response TR-MP-1 regarding cargo handling. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity-including cargo activity-comparable to the No Action/No Project Alternative.

The increases in terminal space associated with the build alternatives are the result of building the new facilities to current industry standards, and making modifications to existing terminals to eliminate preexisting deficiencies and improve the level of service in the terminals. The number of gates and their utilization determines the capacity of the terminal, not the square footage of the terminal facility. The number and types of gates proposed under Alternative D, and their projected utilization, are designed to provide only a modest increase in passengers and operations consistent with the future (2015) activity levels of the No Action/No Project Alternative.

Please see Response to Comment AL00022-101 regarding differences in peak hour operations and delay between baseline conditions and Alternative C in 2015.

AL00022-6

Comment:

1.2 No Project Alternative

The No Project Alternative provided in the Draft EIS/EIR poorly serves the goals of CEQA and National Environmental Policy Act (NEPA). On the one hand, the analysis takes unwarranted liberty in defining this Alternative to include improvements that are only in the "planning stages" at this time. On the other hand, the analysis provides an excessively narrow definition of the improvements that may occur at LAX under the No Project Alternative and thereby understates the improvements that would likely occur at LAX without the Master Plan. In both cases, the resulting assessment is impaired, skewing comparison with project Alternatives.

In addition, LAVA has pursued numerous significant improvements at LAX since 1997. Nevertheless, in defining the No Project Alternative, the Draft EIS/EIR assumes that "only minor improvements" would be made. If the proposed expansion project is not approved, it is far more reasonable to assume that LAVA will continue to identify and pursue a wide range of improvements intended to optimize the ability of LAX to meet air service demands. The Draft EIS/EIR should more accurately reflect this situation.

Response:

This comment is similar to comment AL00022-44; please see Response to Comment AL00022-44.

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AL00022-7

Comment:

The No Project Alternative is indicated to have more significant health and safety impacts than any of the build Alternatives. This conclusion is surprising given that aircraft emissions account for 97% of total overall emissions and the No Project Alternative is estimated to have 1.8% less total annual aircraft operations versus Alternative C and 17.3% less total operations than Alternatives A and B.

Response:

Please refer to Response to Comment AL00022-183.

AL00022-8

Comment:

1.3 Regional Alternatives

The Draft EIS/EIR conclusion that the development of regional airports is an unreasonable Alternative is not supported - and in fact may be refuted - by evidence provided in the Draft EIS/EIR. At the same time it stresses the strength of the regional economy in the global setting and the scope of the regional market demand for international travel, the Draft EIS/EIR contains a series of statements apparently intended to cast doubt on the ability of these demands to be met through regional solutions. This is all the more questionable in light of data indicating that the highest overall demand capture rate is calculated to occur under the scenario with the lowest share allocated to LAX.

The project is primarily a landside development project with no new runways. A major assumption in the document is that some other airport in the region will absorb the unmet aviation demand. The Draft EIS/EIR does not identify which airports will meet this demand or any mechanism to ensure that this assumption is valid. LAWA, as proprietor of multiple airports, is the lead agency for the EIR and the Federal Aviation Administration (FAA) is a lead agency for the EIS. Both agencies have the ability to commit to or fund airport projects outside of LAX. The project either needs to discuss means of ensuring traffic goes to regional airports, as discussed below, or to investigate the impacts of LAX absorbing this extra demand. In addition, SCAG has recently voted to support regional airport development coupled with maintenance of baseline conditions at LAX. Although the actions taken by the Southern California Association of Governments (SCAG) occurred after the release of the Draft EIS/EIR, these considerations should be included in the project analysis.

As mentioned, LAWA needs to evaluate and consider at least one regional alternative among its options. As part of this consideration, the proposal should link improvements at LAX to improvements at other airports in the five-County region. This proposal could be structured in many ways, and the following hypothetical example is offered only to illustrate the concept. Improvements at LAX could be grouped into discrete phases (e.g., Phase 1 might include lengthening a runway, or expanding an existing terminal; Phase 2 might include new cargo handling facilities; Phase 3 might include a new perimeter roadway). Similarly, conceptual "phases" would be defined to describe thresholds of increased service at other regional facilities. There would be no need to specify where such improvements occur, merely that they must occur at an airport facility (or combination of airport facilities) within the defined five-county regional study area. Each of the LAX improvement phases would then be linked to the regional facility improvements (e.g., Phase 1 of LAX improvements can be undertaken when the regional facilities offer a combined capacity for 25 million annual passengers (MAP); Phase 2 of LAX improvements can be undertaken when regional facilities offer a combined capacity for 30 MAP; etc.). This requirement would provide the means to strengthen LAX, within the framework of an incentive program that balances both the burdens and the benefits of expanded air service throughout the region.

The Alternatives also fail to acknowledge changes occurring at regional airports such as Ontario's ability to accommodate international flights as well as a possible expansion in capacity,

Response:

LAWA only controls the operations and potential improvements at LAX, Ontario, Palmdale, and Van Nuys airports. Other jurisdictions are responsible for developing the other regional airports. LAWA is not obligated to formulate and consider an alternative that includes capacity development and servicing demand at airports outside its jurisdiction in order to meet the purpose and need of the LAX Master Plan.

Alternative D for LAX, as detailed in the Supplement to the Draft EIS/EIR, emphasizes safety and security improvements, rather than capacity increases. By not increasing the capacity of LAX, it is incumbent on the other airports in the region to serve a larger percentage of the regional demand. Master plan updates are currently underway for both Ontario and Palmdale airports. The master plans will recommend improvements to meet the projected demand. Expansion at Ontario, Palmdale, or any of the other regional airports will not negate the need for modernization of LAX.

LAWA has planned Alternative D to be in compliance with SCAG's 2001 and Draft 2004 RTP allocations to LAX. Please see Topical Response TR-MP-2 for additional detail on the SCAG RTP.

The Ontario Master Plan will recommend improvements to address the projected demand of 17.6 MAP in 2015 and 30 MAP in 2025. Ontario is projected to serve some international passenger demand, but cannot be developed to replace the international service infrastructure and connecting facilities at LAX within the planning horizon of the LAX Master Plan.

AL00022-9

Comment:

increased cargo capacity at Southern California Logistics Airport, the expiration of the cap on John Wayne, and the recently invalidated Measure F at El Toro.

Response:

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-4 regarding Orange County air transportation demand.

AL00022-10

Comment:

The document also fails to account for the potential of High Speed Rail systems that could come online within the planning horizon.

Response:

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AL00022-11

Comment:

Finally, there are several locations within the Draft EIS/EIR where the possibility of remote terminals is mentioned; however, no analysis is undertaken to determine their impacts. The Draft EIS/EIR should be expanded to include a full characterization of these remote terminals, as well as a description of the baseline setting for the proposed locations, the impacts of their construction and use, and mitigation measures to address any adverse effects.

Response:

The concept of remote terminals is very similar to the new Enhanced Safety and Security Plan, Alternative D, which was analyzed in detail in the Supplement to the Draft EIS/EIR. The proposed Ground Transportation Center (GTC), which would be the primary access center for private and commercial vehicles, was described in Section 3.3.2 of the Supplement to the EIS/EIR. A people mover

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would connect the GTC to the central terminal area. The environmental impacts and mitigation measures associated with the GTC were described in Chapter 4 of the Supplement to the EIS/EIR.

AL00022-12

Comment:

1.4 Definition of Baseline

The Draft EIS/EIR complies with the CEQA requirement that the baseline be defined by conditions extant at the time the Notice of Preparation was released. However, because the baseline was already five years old at the time of the Draft EIS/EIR release, the Draft EIS/EIR fails to comply with the intent of CEQA to facilitate an understanding of changes in the environment associated with the proposed project. Use of the five-year old baseline, coupled with the document's frequent assumption that mitigative actions addressing air quality, noise, traffic, water quality, and other topical issues will occur primarily (or only) through project-related activities, tends to consistently overstate the impacts of the No Project Alternative relative to other Alternatives. Moreover, CEQA clearly intends that the baseline should reflect the existing level of actual development to the maximum extent possible; since the Draft EIS/EIR baseline is set at 58 MAP versus the 68+ MAP at present, this intent is clearly not met. In addition, the baselines used for analysis are poorly defined and shift timeframes, using 1996 for traffic, air and aircraft noise, while using 2000 for biology, earth and water resources. The frequent shifting from one baseline nomenclature and timeframe to another is, at best, confusing; at worst, it confuses the underlying impacts that this Draft EIS/EIR is intended to clarify.

Response:

The Supplement to the Draft EIS/EIR included a description of the most current environmental conditions that are meaningful and relevant to the analysis of the LAX Master Plan. In instances where these conditions are materially different from those of the 1996 baseline conditions, such differences were described in the Supplement to the Draft EIS/EIR, as were any material differences in the impacts that would result by using the Year 2000 conditions instead of 1996 baseline conditions. Disciplines where impacts would be materially different depending upon the baseline year of comparison include noise, air quality, human health risk, employment/socioeconomics, environmental justice, and others. By providing an evaluation of Year 2000 conditions, the Supplement to the Draft EIS/EIR complies with the intent of CEQA to facilitate an understanding of changes in the environment associated with the proposed project. However, in accordance with the State CEQA Guidelines, conclusions regarding the significance of impacts for all the build alternatives are based on the 1996 baseline or the adjusted environmental baseline. For many environmental disciplines, use of the 1996 baseline results in a conservative environmental analysis.

The commentor is incorrect that the Draft EIS/EIR and Supplement to the Draft EIS/EIR only assume that "mitigative actions" will occur through project-related activities. Both documents account for future local, state, and federal laws and regulations, as well as improvements in technology, in the evaluation of impacts associated with the No Action/No Project Alternative and the build alternatives. Please see Response to Comment AL00022-44 for additional discussion of this issue. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR both properly assume that mitigation measures specifically identified, adopted, and implemented by FAA and LAWA to reduce or eliminate project-related impacts only apply to the build alternatives. In the absence of a discretionary action by FAA or the City of Los Angeles, such as would occur under the No Action/No Project Alternative, there is no mechanism that would trigger the need to adopt or implement mitigation measures.

Every effort was made in the Supplement to the Draft EIS/EIR to clearly distinguish between information pertaining to 1996 conditions and information pertaining to Year 2000 conditions, including use of column titles in tables that included the appropriate year. Moreover, the use of the 1996 baseline as compared to the adjusted environmental baseline is described in the Introduction to Chapter 4 of both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Conclusions regarding the significance of impacts for all the build alternatives are based on the 1996 baseline or the adjusted environmental baseline, as clearly described in the introduction to Chapter 4 of the Supplement to the Draft EIS/EIR. The Executive Summary table of the Draft EIS/EIR concisely identifies all project impacts using the appropriate baseline (i.e., 1996 or adjusted environmental baseline). Please also see Response to Comment AL00022-55 regarding the nomenclature used pertaining to baseline conditions and Topical Response TR-GEN-1 regarding baseline issues in general.

AL00022-13

Comment:

1.5 Project Phasing

A phasing program that is outdated further complicates the difficulty of tracking an outdated baseline. The Draft EIS/EIR notes that considerable increases in travel activity would occur even without the expansion project and it is unclear to what extent the Phase 1 objectives have already been met, and to what extent they will be surpassed by 2005 even without project approval. It is clear that 2005 is an unrealistic target date for Phase 1 improvements at LAX. Given the year-by-year summary provided, Phase 1 would now be complete in 2009. Given the level of "natural growth" that can be anticipated in air travel services at LAX over the next seven years, the phasing plans will most likely differ significantly from what is described in the Draft EIS/EIR.

Response:

Alternative D, the Enhanced Safety and Security Plan, was published in July 2003. The phasing plan for Alternative D is current and does not need to be revised. The phasing plan for Alternative D is presented in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR beginning on page 3-48 under the heading, Proposed Phasing, and summarized in Figure S3-15.

AL00022-14

Comment:

The phasing of the project also appears to make access circulation improvements in Phase 2 after the new West Terminal, runway extension, new cargo areas, and the mid-field concourse are built in Phase 1. This format would seem to offer more significant impacts at LAX than if the situation were reversed (circulation improvements before terminal and runway improvements).

Response:

Comment noted. Please see Response to Comment AL00022-59.

AL00022-15

Comment:

1.6 Inconsistency

Throughout the document and associated materials, the numbers and assumptions that are provided do not present a cohesive picture. When compared with data provided throughout the baseline and impact analyses, the information appears to be fundamentally lacking in logical internal consistency. For instance, in describing assumptions made for the No Project Alternative, the peak period is shown to exceed the airfield's capacity and that congestion, delays, and passenger inconvenience would be common all year, not just during peak holiday periods. However, another section shows that the No Project Alternative would have fewer all-weather delays than Alternative C, fewer annual cancellations than Alternatives A and C, more public parking stalls than Alternative B, and the same number of all-weather peak operations and three-hour average operations.

Response:

The description of airport activity characteristics for each of the alternatives presented in Chapter 3 of the Draft EIS/EIR is accurate and internally consistent. The comment's comparison of the various alternatives mixes different aspects of airport activity that are not on an equal basis of comparison and/or are out of context (i.e., comparing "apples and oranges"). Future operations under the No Action/No Project Alternative would exceed the airfield's existing capacity and congestion, delays, and passenger inconvenience would occur on airside operations and on landside operations, in particular, at the curbside constraint of the existing access roads within the Central Terminal Area. The No Action/No Project Alternative would have, numerically, fewer all-weather delays than Alternative C and fewer cancellations than Alternatives A and C because it is handling substantially fewer passengers (i.e., 78

3. Comments and Responses

MAP versus 89-98 MAP), would have a different aircraft fleet mix, and would have different airfield/configuration operation characteristics. The technical facts and bases supporting the airfield operations analyses were presented in the Draft Master Plan. Regarding the fact that Alternative B would have less public parking stalls than under the No Action/No Project Alternative, that is simply a characteristics of Alternative B as proposed, and the impacts of having fewer public parking spaces was addressed in the Draft EIS/EIR - specifically in Section 4.3.1, On-Airport Surface Transportation, wherein Table 4.3.1-7 discloses that Alternative B would be the most deficient of all the alternatives relative to meeting the future demand for public parking spaces.

AL00022-16

Comment:

1.7 Appearance of Advocacy

The Draft EIS/EIR contains numerous comments and conclusive statements that create an appearance of project advocacy. This is inappropriate given the policy guidelines contained in CEQA and NEPA and it undermines confidence in the objectivity of the Draft EIS/EIR and its commitment to full disclosure. Some of the technical assumptions contained in the Draft EIS/EIR serve to overstate project benefits and/or overstate the adverse impacts of the No Project Alternative. For example, the discussion notes that the airlines will establish additional service at regional airports only if the local market generates sufficient demand and the text indicates that such demand already exists. This would seem to create justification for studying the development of other regional airports as a reasonable Alternative rather than providing the basis for the conclusion that it is not a viable Alternative.

Response:

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand

AL00022-17

Comment:

1.8 Scoping

With respect to the scoping process, the Draft EIS/EIR is inadequate for a number of reasons. LAWA first initiated this project in 1996 and released scoping information to the public; however, the Preferred Project Alternative was never identified in the scoping process. The scoping outreach process did not include input from Los Angeles County Government or the public at large with regards to Alternative C. The assessments provided for this Alternative reflect no public input as to what should be included in the scope of analysis. In effect, this project lacks proper scoping, which is an integral and essential element of the NEPA review process.

Response:

Comment noted. Neither the Board of Airport Commissioners nor the City of Los Angeles has ever identified a preferred Master Plan Alternative. At the time of the publication of the Draft EIS/EIR, Alternative C was the LAWA staff-preferred alternative. Presently, Alternative D is the LAWA staff-preferred alternative. LAWA met all requirements under CEQA and NEPA pertaining to scoping. In June 1997, a Notice of Intent and Notice of Preparation were published, which identified four build alternatives. Three public scoping meetings and one agency scoping meeting were held. In response to input from the community obtained through the public scoping process as well as other outreach

efforts by LAWA, three of the four original build alternatives were eliminated from consideration and two new build alternatives (subsequently referred to as Alternatives B and C) were proposed. A Supplemental Notice regarding the preparation of an EIS/EIR for the LAX Master Plan was circulated identifying the new alternatives. Following input from the public on the Draft EIS/EIR, and the events of September 11, 2001, a fourth build alternative (Alternative D) was proposed.

AL00022-18

Comment:

In addition, the Draft EIS/EIR makes frequent mention of the regional significance of LAX and this emphasis is an integral part of the Purpose and Objectives statement. Nevertheless, the scoping outreach effort did not include a single agency within the county governments of San Bernardino County, Orange County, Riverside County, or Ventura County. This is a serious omission, particularly in light of the NEPA mandate to establish close nexus between project goals and project Alternatives.

Response:

Comment noted. Please see Response to Comment AL00007-1 regarding the scoping undertaken for the LAX Master Plan.

AL00022-19

Comment:

1.9 Mitigation Measures

In several instances, the Draft EIS/EIR states that mitigation programs will be developed prior to final project approval. This approach fails to advance public discourse and deprives reviewing agencies of the opportunity to review and comment on important project issues. Moreover, the mitigation measures may in themselves have impacts that require consideration and analysis. The vague and general mitigation concepts addressed within the Draft EIS/EIR do not meet the CEQA and NEPA requirement to avoid, minimize, rectify, reduce, or compensate for adverse project impacts. All identified adverse impacts need to be accompanied by specific and defined mitigation measures that are evaluated thoroughly.

Response:

Please see Response to Comment AR00003-63.

AL00022-20

Comment:

1.10 Environmental Justice

Many impacts in the Environmental Justice analysis were not addressed, reportedly because LAWA was not able to quantify or analyze the impacts. According to NEPA, this information needs to be provided to the greatest extent possible. The Environmental Justice discussion simply fails to meet these requirements and the review demands a more rigorous analysis than is currently provided in the Draft EIS/EIR. As currently written, valid review is not possible.

Response:

The analyses contained in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided extensive information (over 125 pages of narrative, maps and tabular data) pursuant to NEPA and CEQA and consistent with Executive Order 12898 and DOT Order 1610.2 that is sufficient to support informed decision making. Supporting technical data and analyses are provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR. It should also be noted, as indicated in subsection 4.4.3.5 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, that the environmental justice analysis focuses on those issues with potential for disproportionate effects on minority or low-income communities and also draws on extensive quantitative analyses contained in the other technical sections of these documents. Also please see

3. Comments and Responses

Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

AL00022-21

Comment:

In addition, the Environmental Justice analysis only addresses census tracts surrounding LAX; no regional analysis was completed, although the area of study was clearly identified in the Purpose and Objectives Statement to include the region as a whole.

Response:

Please see Response to Comment AL00040-94 regarding the boundaries for the environmental justice analysis and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00022-22

Comment:

1.11 Traffic

A major concern is the trip generation assumptions used in the traffic analysis; there does not appear to be any mechanism for limiting airport activity to the stated MAP level and the relationship between the assumed MAP and the trip generation is difficult to understand. In addition, the Master Plan includes development of a new terminal on the west side of the airport. Since this will replace existing uses in that area, the Draft EIS/EIR projects a reduction in trips due to those non-aviation uses being replaced by aviation uses. It is difficult to find an explanation of how this reduction would occur and the degree to which existing and future traffic is broken out.

Response:

The airport is prohibited by law from enforcing a cap on activity. However, it is believed that facility capacity constraints will ultimately limit new growth. The relationship between MAP and the hourly passenger schedule is detailed in the Master Plan documents, which are part of the Draft EIS/EIR (Section 4.3.1) documentation, while the relationship between the hourly passenger schedule and peak hour vehicle trips is explained in Technical Reports 3a, On-Airport Surface Transportation Technical Report, and S-2a, Supplemental On-Airport Surface Transportation Technical Report. Future trips generated on the west side from existing land uses (i.e., the No Action/No Project Alternative) would be replaced with the trips generated from a new west terminal in Alternatives A, B, and C. (In Alternative D, the existing west side land uses remain.) Detailed trip generation tables for the No Action/No Project Alternative and Alternatives A, B, and C are included in Appendix A to the Technical Report 3a. The trips the commentor is questioning are categorized as World Way West trips.

AL00022-23

Comment:

As identified in each of the Alternatives, the congestion relief package includes direct freeway access to all parts of the airport via the Ring Road. However, the feasibility of funding and constructing the extensive package of traffic mitigation measures,

Response:

Please see Response to Comment AL00008-6 regarding funding.

AL00022-24

Comment:

the impacts on Interstate 405 and parallel north/south arterials (in build and not build scenarios), the impact on nearby unincorporated areas, adequate access to Main Street in El Segundo, and the

configuration of Imperial Highway as the south part of the Ring Road are all in need of further discussion.

Response:

Chapter 4.3.2 and Technical Report 3b of the Draft EIS/EIR and Chapter 4.3.2 and Technical Report S-2b of the Supplement to the Draft EIS/EIR details the results of the traffic impact studies completed for the alternatives. These reports include a discussion of the impacts to the I-405 Freeway and north/south arterials. Please see Topical Response TR-ST-4, and in particular Subtopical Response TR-ST-4.6 for additional information regarding impacts to the I-405 Freeway.

Please see Topical Response TR-ST-2, and in particular Subtopical Responses TR-ST-2. 1 and TR-ST-2.3 for additional information regarding the study areas and facilities analyzed. Note that some of the ten additional intersections analyzed as part of the traffic impact study for Alternative D are located in unincorporated areas of LA County.

Additional analysis of Main Street in the City of El Segundo and the configuration of Imperial Highway will be conducted as part of the Neighborhood Traffic Management Program and in the subsequent design and environmental review of the Ring Road, provided that one of the project alternatives that includes the Ring Road (A, B, or C) is approved. Under Alternative D, the traffic mitigation plan proposes improvements at the intersection of Imperial Highway and Main Street, including an addition of a second left-turn lane for westbound traffic.

AL00022-25

Comment:

The Department of Transportation Act section should include the No Project/No Action Alternative for purposes of comparison with the build Alternatives, and should note that it would avoid impacts to resources, specifically the Centinela Adobe.

Response:

The DOT Section 4(f) analysis that was presented in Section 4.8 of the Draft EIS/EIR was updated within Section 4.8, Department of Transportation Act, Section 4(f), and Appendix S-F, Supplemental Department of Transportation Act Section 4(f) Report, of the Supplement to the Draft EIS/EIR. A brief discussion of the No Action/No Project Alternative was provided therein. As discussed, although the No Action/No Project Alternative would not introduce activities constituting a use or constructive use of Section 4(f) resources, implementation of this alternative would involve the continuation of an existing use within the Habitat Restoration Area due to continued operation of existing navigational aids. Finally, please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

AL00022-26

Comment:

1.12 Noise

If increases in outdoor noise levels within the 65-75 Community Noise Equivalent Level (CNEL) contours are perceptible and could affect outdoor speech as well as the quality of outdoor activities, then effects should be considered significant. Therefore, the Level of Significance thresholds need to be modified to reflect appropriate levels.

CEQA does not mandate or endorse a specific decibel standard to determine if a project engenders a significant adverse environmental impact for aircraft noise; however, the Draft EIS/EIR should have employed available standard criteria to allow a survey of a larger area and reveal the true pervasiveness of sound that was not identified in the Draft EIS/EIR. This would be important in the discussion of impacts and mitigation of noise to show that "average" threshold levels were not sufficient to show the chronic and long term effects within the LAX flight path. It is apparent that there will be exacerbated and disproportionate levels of impacts on unincorporated neighborhoods under the flight path approaches to LAX.

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There is a significant discrepancy in the number of dwelling units and population impacted between the Draft EIS/EIR baseline year impacts and data published by LAWA. Since the 1970's, California law as required the airport to publish a Quarterly Report that describes noise impacts. The difference between the impacts as defined by the Draft EIS/EIR for the 4th quarter of 1996 and the impacts as identified by LAWA in its 4th quarter 1996 report is dramatic and significant (15,000 homes/37,000 residents).

Response:

Lead agencies may use federal, state, and local adopted standards, or other standards they consider appropriate, as a CEQA threshold. However, in the absence of adopted local standards of land use compatibility and commensurate control of land use development to those standards, airports in California use the standards set forth in the California Airport Land Use Planning Handbook, which are virtually identical to the guidance prepared and published by the FAA. While local communities may legislate other local land use and zoning standards, in their absence, this document has adopted the guidance set forth in the FAA and California guidance documents.

Additionally, increases of 5 CNEL in areas exposed to less than 60 CNEL are also considered for CEQA analysis. For further information regarding the threshold of significance for noise impacts, see subsection 4.1.4 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Subtopical Response TR-N-2.2. For additional information regarding outdoor noise levels and related mitigation please see Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Topical Response TR-LU-4. The commentor is correct in identifying the discrepancy between modeled INM contours and the measured noise levels identified in LAWA's Quarterly Reports to the State of California. This discrepancy is addressed in Section 2.2, Comparison of Environmental Baseline Noise To Quarterly Noise Report, in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR. For more information please see Subtopical Response TR-N-1.1 and Response to Comment AL00022-95 and Response to Comment AL00022-112 regarding the Draft LA CEQA Threshold Guidelines.

AL00022-27

Comment:

The document also identifies that the noise contours are adjusted to reflect noise monitoring data. The results of the noise monitoring data show noise in sites east of the airport, primarily in Inglewood, at significantly higher level than the models predict. This makes it difficult to establish a credible disclosure statement to the general public and no attempt is made in the Draft EIS/EIR to examine the reason for the noise model underprediction of aircraft noise. Both of these errors tend to underestimate noise impacts.

The operational assumptions in the Draft EIS/EIR are unreasonable and lack justification, making any analysis of the noise impacts speculative and lower than might actually occur. The following areas are of concern: passengers per departure, cargo activity/cargo building space, maximum airside capacity, peak hour operations/delay, terminal space/number of gates, and regional airports.

Response:

For noise modeling purposes noise levels were not adjusted to reflect noise monitoring data. The commentor may have confused the Draft EIS/EIR modeling with the Quarterly Report to the State of California. The INM is intended to be a planning tool for the relative comparison of noise exposure patterns and intensities among the 1996 baseline year and the Master Plan alternatives development conditions. It was not designed for, nor intended to provide, highly defined noise levels reflecting measured local conditions. Consequently, the modeled noise levels associated with environmental baseline conditions will have consistent relative relationships to future noise patterns prepared with the INM. Please see Topical Response TR-N-1, in particular Subtopical Response TR-N-1.1 and Subtopical Response TR-N-1.2 for more information on the INM and modeled versus measured baseline year noise levels. The commentor's concern regarding forecast accuracy, passengers per departure, cargo activity/cargo building space, maximum airside capacity, peak hour operations/delay, terminal space/number of gates, and regional airports is acknowledged. Please see Subtopical Response TR-N-1.5 for information regarding forecast accuracy and Chapter IV, Section 2, Future Design Day Activity, in the Draft LAX Master Plan for information on passengers per departure. With the expected growth in air cargo, the need for improvement in technologies and building efficiencies will result in the rebuilding and expanding of current cargo facilities. In response to meeting that cargo demand, each of the Master Plan alternatives would improve the efficiency of the cargo area and in

some alternatives increase the cargo area (from 197 total cargo acres in 1996, to 280 in Alternative C) from the existing condition. Some improvements in the cargo facilities would include the demolition of older and functionally obsolete air freight facilities, a new Century Cargo frontage roadway on the south side to reduce cargo truck use of Century Boulevard and to provide better landside connection, a setback area to provide space for street widenings and turning lanes. Please see Chapter III, Section 9, LAX Cargo Forecast, and Chapter IV, Section 5, Facility Requirements, of the Draft LAX Master Plan for the methodology in determining the growth of the cargo. Additionally, please see Cargo Activity in Chapter 3, Alternatives, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Chapter V, Section 3.3, Constrained Concepts Evaluation, and Appendix O of the LAX Draft Master Plan for a discussion of improvements to the existing and the additional new cargo facilities in each of the Master Plan alternatives.

Each of the Master Plan alternatives was designed to maximize the amount of traffic that could be served in the limited space available. To accommodate the maximum amount of activity, an increase in the overall size of the fleet mix would be the expected response of the airlines. Please see Chapter IV, Section 3, Airside System, of the Draft LAX Master Plan for information on maximum airside capacity and peak hour operations/delay; Chapter IV, Section 4, Terminal Facilities Requirements, of the LAX Master Plan for information on terminal space/number of gates, and Chapter 1, Section 1, Air Transportation in the Los Angeles Region, in the LAX Master Plan. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-2 regarding the role of deregulation in aviation planning, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

AL00022-28

Comment:

The proposed project includes no noise mitigation recommendations. While LAWA has an ongoing noise mitigation program, it is not clear why the proposed project does not address any new noise mitigation programs.

Response:

Section 4.1, Noise (subsection 4.1.8.1), of the Supplement to the Draft EIS/EIR, included noise Mitigation Measures MM-N-1 through MM-N-3 to address runway approach and departure procedures and MM-N-4 to update the Aircraft Noise Abatement Program Elements. In addition, a new Mitigation Measure, MM-N-5, was added to conduct a Part 161 Study to make over-ocean procedures mandatory in an effort to reduce single event noise levels. Section 4.2, Land Use (subsection 4.2.8), of the Supplement to the Draft EIS/EIR, included measures to revise the current ANMP under Mitigation Measure MM-LU-1. The following new mitigation is also proposed: revise the ANMP to include residential uses exposed to single event noise levels that result in nighttime awakening (under Mitigation Measure MM-LU-2), revise the ANMP to include schools without existing aviation easements that are newly exposed to single event or cumulative noise levels that result in classroom disruption (under Mitigation Measures MM-LU-3 and MM-LU-4), upgrade and expand the noise monitoring program (under Mitigation Measure MM-LU-5). Also please see Topical Response TR-LU-5 and Topical Response TR-N-4 regarding noise mitigation.

AL00022-29

Comment:

Several are discussed but not recommended. In addition, the expansion of the sound insulation program to homes within 60 CNEL contour should be given consideration. Because community concerns about the impact of aircraft noise goes so far beyond the boundary of the 65 CNEL contour, consideration of expanding the program should be given a thorough evaluation in the Draft EIS/EIR. Such a program may not qualify for traditional Federal funding but other opportunities may exist.

Response:

Comment noted. To further address single event noise impacts, the Supplement to the Draft EIS/EIR included an analysis of single event noise levels that may result in nighttime awakenings or classroom disruption. As stated in Section 4.2, Land Use (subsection 4.2.8), of the Supplement to the Draft EIS/EIR, the ANMP would be revised to include any areas newly exposed to these noise levels. Please

3. Comments and Responses

see Response to Comment AL00022-28 above regarding mitigation measures included in the Supplement to the Draft EIS/EIR that address noise. Please see Topical Response TR-N-2, in particular Subtopical Response TR-N-2.2, regarding why noise impacts would not be extended to include the 60 CNEL.

AL00022-30

Comment:

Substantial reliance is placed on Mitigation Measure LU-1 "Implement Revised Aircraft Noise Mitigation Program (ANMP)." This measure is broad in scope, and depends upon the cooperation and funding of agencies outside of LAWA. Consequently, the ability of LAWA to implement this measure in a timely manner is by no means assured. Moreover, a number of commitments to properties already included within the ANMP current boundaries have not yet been fulfilled. A discussion of unmet commitments from prior actions is appropriate for this document along with an evaluation of the impacts that would result if LAWA were unable to fulfill the new commitments described in this Draft EIS/EIR.

Response:

Mitigation Measure MM-LU-1 has been modified since publication of the Draft EIS/EIR to more specifically define and commit to those measures determined feasible by LAWA under their current authority. It is acknowledged that this measure does depend on funding by the FAA and cooperation by the FAA, County of Los Angeles, City of Inglewood, and City of El Segundo. However, the lack of participation by other agencies would not make MM-LU-1 infeasible for LAWA to implement. In addition, MM-LU-1 includes the following provisions to accelerate the program and facilitate cooperation of agencies outside of LAWA: reevaluate the current requirement for granting of avigation easements with sound insulation mitigation; provide technical assistance to local jurisdictions to support more rapid implementation of their land use mitigation programs; reduce or eliminate, to the extent feasible, structural or building code compliance constraints to mitigation of substandard housing; and accelerate the fulfillment of existing commitments to owners wishing to participate within the current ANMP boundaries prior to proceeding with newly eligible properties. LAWA continues to work with other jurisdictions to remove constraints to residential sound insulation as demonstrated under the current Memorandum of Understanding with Inglewood, which suspends the requirement for an avigation easement in exchange for sound insulation. LAWA has also been evaluating the feasibility of removing this requirement for other jurisdictions as a condition of the 2001 Noise Variance and through the LAX Community Noise Round Table meetings (see Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR). Of the 33,099 residential units within the current ANMP boundaries, 6,685 previously incompatible uses are now compatible (as of June 2002). Since publication of the Supplement to the Draft EIS/EIR, LAWA has notified all property owners within the City of Los Angeles ANMP boundaries of their eligibility to participate in the program. Meetings to explain the concepts of soundproofing and the process for participation in the program have also been held in these areas. Residential soundproofing within the City of Los Angeles is expected to be completed by 2008. As stated in Subtopical Response TR-LU-3.8, according to the 2001 ANMP acoustical treatment for all jurisdictions within the ANMP boundaries is anticipated to be achieved by 2015. See also Subtopical Response TR-LU-3.10 regarding current impediments to a more rapid implementation of the ANMP. LAWA is committed to continue working with other jurisdictions to ensure that new commitments identified under MM-LU-1 are fulfilled in a timely manner. However, it is acknowledged in Section 4.2, Land Use (subsection 4.2.9.1) of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, interim impacts on noise-sensitive uses newly exposed to high noise levels would be significant and unavoidable, prior to the completion of sound insulation under the revised ANMP. Regarding a discussion of unmet commitments for properties already included within the ANMP boundaries, please note that the availability of funds from LAWA for soundproofing has not been a limiting factor in Los Angeles County; rather it has been a lack of progress in completing mitigation with existing LAWA funds. Similarly, the FAA carefully reviews the County's application for federal assistance for each fiscal year and approves appropriate funding levels for noise mitigation projects consistent with the County's ability to utilize those funds in a timely and efficient manner based on the County's past history with previous grants-in-aid, subject to availability of funds.

AL00022-31

Comment:

1.13 Air Quality

The maximum carbon monoxide (CO) concentrations for future scenarios from on-airport sources are predicted to increase by as much as 400% compared to the Environmental Baseline data, and nitrogen dioxide concentrations are forecast to increase by as much as 1,000%. Given the projected change in airport operations and the expected decrease in background concentrations, these predicted impacts for the future scenarios do not appear to be reasonable.

Response:

Please see Topical Response TR-AQ-3 regarding air pollution increase. It is unclear which numbers the commentor is referring to concerning the increase in ambient air concentrations. As was shown in Table 4.6-20, Mitigated Peak Concentrations from On-Airport Sources, of the Draft EIS/EIR, CO is predicted to increase approximately 20 percent by 2015 (based on a 1-hour averaging period) and NO₂ is predicted to increase approximately 700 percent by 2015 (based on a 1-hour averaging period) under Alternative C. Please note that since publication of the Draft EIS/EIR, the ambient air concentration analysis has been updated using the latest available emission factors and modeling techniques. Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, regarding the updated air quality analysis. As was described therein and illustrated in Table S4.6-22, ambient concentrations of CO and NO₂ (1-hour) and PM₁₀ would decrease in 2015 under Alternative D compared to environmental baseline conditions.

AL00022-32

Comment:

In addition, nitrogen oxides (NO_x) were determined to have significant impacts before and after mitigation and the Draft EIS/EIR indicates that NO_x emissions will be reduced the least under the proposed mitigation measures. Thus, the proposed mitigation measures do not appear to successfully address this issue.

Response:

CEQA allows for the approval of projects with environmental impacts that cannot be mitigated below significance. However, Alternative D as analyzed in the Supplement to the Draft EIS/EIR (subsection 4.6.9.2) would not result in significant NO_x impacts after mitigation.

AL00022-33

Comment:

LAWA did not analyze the mitigated CO concentrations at off-airport intersections because the projected unmitigated concentrations were relatively low. However, the projected unmitigated concentrations appear to be unreasonably low when compared to the estimated background concentrations. Further, the direct use of hourly wind data from the airport may be questionable for use in modeling air quality at off-airport roadway intersections. Adjusting to correct for the difference between airport wind speeds and the wind speeds at off-airport intersections would likely increase the predicted concentrations by as much as 200%.

Response:

The CO hot spot analysis was performed using the CAL3QHCR dispersion model which requires one year of hourly meteorological data. The meteorological data used for all air quality dispersion modeling was provided by the South Coast Air Quality Management District (SCAQMD) for use with the LAX EIS/EIR analysis. Please see Section 2.2.1, Meteorological Data, of Appendix G of the Draft EIS/EIR regarding use of the SCAQMD site specific meteorological data.

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AL00022-34

Comment:

In discussing the impact of toxic air pollutants associated with current airport operations, the Draft EIS/EIR notes that LAWA is initiating an "independent" study of air quality in the area around LAX to examine impacts. Given that the results are necessary to establish the baseline setting, the Draft EIS/EIR needs to include consideration of toxic air pollutants associated with current airport operations.

Response:

Please see Topical Response TR-AQ-2 regarding the study of toxic air pollutants.

AL00022-35

Comment:

1.14 Social Impacts

The analysis assumes that productivity gains will be the same for all Alternatives. In reality, productivity rates are variable over time and highly sensitive to changes in the economy's overall growth rate. When Gross Domestic Product growth is decelerating, productivity slows. Given the repeated emphasis throughout the Draft EIS/EIR that failure to pursue the expansion project would have a negative ripple effect throughout the southern California economy, it would have been more logical to link the No Project Alternative with productivity gains lower than those associated with the build Alternatives.

Response:

Comment noted. Productivity changes used in the economic impact analysis of the LAX Master Plan alternatives (Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data in Technical Report 5 of the Draft EIS/EIR and Technical Report S-3 of the Supplement to the Draft EIS/EIR) were based on industry-specific factors contained in the REMI econometric model, which do in fact change over time. There is no basis for modifying productivity factors by alternative, since each alternative involves the same industry sectors. See also Response to Comment SAL00013-133 and SAL-00013-134 regarding productivity factors used in the EIS/EIR's analysis of the economic impacts of the LAX Master Plan alternatives.

AL00022-36

Comment:

The Socioeconomic Trend Report (STR) notes that since 1972, as LAX has grown, the services and tourism/entertainment sectors showed substantial employment gains. The Draft EIS/EIR assumptions regarding the No Project Alternative show passenger volumes increasing. In combination, these facts would point to positive employment gains in at least those sectors. Nevertheless, the STR forecasts losses in direct LAX-related employment for the service industry. This contradiction needs to either be explained or corrected.

Response:

Comment noted. The comment confuses employment gains in specific sectors of the regional economy as a whole between 1972 and 1993, as discussed in Technical Report 5 to the Draft EIS/EIR (page 49), with changes in employment that are directly associated with the operation of LAX under the LAX Master Plan alternatives, as analyzed in Technical Report 5. As explained in Section 5.1.3 of Technical Report 5 (page 80), the decline in total jobs between 1996 and 2015 for the No Action/No Project Alternative is a result of the fact that productivity increases over that time period, which reduce the number of baseline year (1996) LAX-related employees, overwhelm the relatively modest number of jobs added as a result of the modest increase in air transportation-related employment over the base year that is associated with the No Action/No Project Alternative, particularly in the manufacturing sectors related to air cargo. Thus, there is no contradiction in the analysis presented in the Draft EIS/EIR.

AL00022-37**Comment:****1.15 Hydrology and Water Quality**

The document indicates an overall increase in pollutant loads resulting from the development of LAX Northside. Conversely, for other developments at LAX, the Draft EIS/EIR states that a detailed drainage plan that would prevent a net increase in pollutant loads is expected. It needs to be explained why the program developed for the Northside would perform so poorly, while a similar program for LAX expansion would have no net increase in pollutant loads.

Response:

Please see Topical Response TR-HWQ-2 regarding commitments related to the No Action/No Project Alternative.

AL00022-38**Comment:****1.16 Human Health and Safety**

The Human Health Risk Assessment indicates that Alternatives might have significant human health impacts and that there are no mitigation measures proposed for human health effects. In this context, it is difficult to understand how the Human Health Risk Assessment determined that the build Alternatives, with mitigation, would have no significant human health impacts.

Response:

Please see Topical Response TR-HRA-4 regarding human health mitigation strategies.

All post-mitigation analyses have been revised since publication of the Draft EIS/EIR and were presented in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.9, Level of Significance after Mitigation), of the Supplement to the Draft EIS/EIR. Mitigation measures currently proposed differ from those under consideration during the preparation of the Draft EIS/EIR. Recommended mitigation measures were identified in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR to reduce impacts from airport operations and construction as well as from regional vehicular traffic under Alternatives A, B, C, and D. These recommended mitigation measures would also reduce impacts to human health associated with exposure to toxic air pollutants (TAPs). Mitigation measures considered in the analysis include: continued conversion of GSE to alternative fuel, multiple construction-related measures including use of alternative fuels and add-on emission control devices on construction equipment, and expansion of flyaway bus service between LAX and other locations in the South Coast Air Basin using alternative-fueled buses. These mitigation measures, in combination with other proposed mitigation measures, would reduce emissions of TAPs during LAX operations and construction primarily by reducing exhaust emissions from mobile sources and reducing traffic congestion near the airport, thereby reducing VOC and PM emissions. As discussed in Section 4.6, Air Quality, in the Supplement to the Draft EIS/EIR, mitigation measures are expected to reduce operational emissions of VOCs, such as benzene, for on-airport sources by 8 percent in the Interim Year and by 54 percent in the Horizon Year. These recommended mitigation measures would also reduce impacts to human health associated with exposure to TAPs.

AL00022-39**Comment:****1.17 Conclusions**

The Los Angeles International Airport is vitally important to the City, the County, and to this region. There is a need for some improvements at LAX; however, the problems associated with this Draft

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EIS/EIR are so serious, pervasive, and systemic that the only practical remedy is to start the process over again.

Baselines are inconsistent and inappropriate, selected Alternatives have not met CEQA and/or NEPA mitigation requirements, and the depth of analysis has not been sufficient to support the adoption of the Master Plan, as proposed. The project's stated objectives have not been met through the preferred Alternative, biases are evident, and the No Project Alternative is consistently misleading and inaccurate. As such, the only appropriate action is for LAWA to issue an entirely new Draft EIS/EIR that properly and effectively explores viable Alternatives and identifies appropriate mitigation measures to lessen environmental impacts. This process needs to begin with a scoping process that acknowledges the regional nature of the undertaking and follows with a fresh look at Alternatives that include regional options.

Response:

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment. Although the conclusion of the Draft EIS/EIR was that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region. LAWA and FAA find that the Draft EIS/EIR and Supplement to the Draft EIS/EIR meet the requirements of NEPA and CEQA. Please see Topical Response TR-GEN-1 regarding the baseline issues.

AL00022-40

Comment:

3 General Issues

This section identifies issues that are evident throughout the entire Draft EIS/EIR document. Typically, the issues that are raised in this section deal with the backbone of the Draft EIS/EIR document and, therefore, the errors, omissions, and faulty conclusions identified herein are those that compromise the validity of the entire Draft EIS/EIR document.

Response:

Please see Responses to Comments AL00022-41 through AL00022-64 below.

AL00022-41

Comment:

3.1 Purpose and Need Statement

The stated project purpose identifies only three Master Plan objectives, which is unusually limited for a project of this scale. Moreover, the objectives omit any mention of environmental goals, such as enhanced access or improved quality of life. Either the factors considered in developing this discussion need to be discussed to justify these limitations or the Purpose and Need Statement needs to be expanded to include a greater number of clearly identifiable objectives and goals. Without these modifications, the document cannot be defensible.

Response:

There is no requirement under NEPA or CEQA specifying the number or nature of objectives to be formulated for a project. Regarding the comment that the objectives omit any mention of environmental goals, Chapter 2, Purpose and Need for the Proposed Action, of the Draft EIS/EIR states as follows: "The purpose and objectives of the Master Plan are to provide, in an environmentally sound manner that is compatible with surrounding land uses, sufficient airport capacity for passengers and freight in

the Los Angeles region to sustain and advance the economic growth and vitality of the Los Angeles region."

AL00022-42

Comment:

3.2 Alternatives

3.2.1 Definition and Evaluation of Project Alternatives

The Draft EIS/EIR fails to comply with the cornerstone element of the California Environmental Quality Act (CEQA) - that an EIR must describe a reasonable range of Alternatives that would feasibly meet most objectives, but would avoid or lessen significant effects of the project.¹ This failure is evident in the following facts:

- Of 25 impacts identified in the Summary Comparison of Environmental Impacts from Alternatives A, B, and C as significant and unavoidable for any one of the project Alternatives:²
- Twenty-two are significant and unavoidable for all three Alternatives;
- One impact is cited as "unknown" for all three Alternatives; and
- Only 2 impacts show variation among the Alternatives in the level of impact severity.

In terms of ability to reduce significant effects for key impact categories such as noise, land use, environmental justice, and air quality, there is no substantive difference among the Alternatives.

¹ CEQA Guidelines Section 15126.6(f), the Rule of Reason, states, "Alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project."

² Pages ES-40 through ES-59.

Response:

Please see Response to Comment AL00022-3 regarding the number and severity of impacts associated with Alternative C compared to Alternatives A and B and Response to Comment AL00033-315 regarding the provisions of the State CEQA Guidelines pertaining to the evaluation of alternatives. In addition, please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00022-43

Comment:

Ironically, the preferred Project Alternative C has more significant unavoidable adverse effects than either of the other two build Alternatives (25 for C; 23 for A; 22 for B), yet fails to meet the projected demand (as do the other two Alternatives, with marginally fewer impacts). In effect, LAWA is recommending approval of the build Alternative that would cause the greatest number of serious impacts, while meeting the fewest number of project objectives. Two of the three Alternatives show an additional runway at LAX; the fact that the preferred Alternative omits a fifth runway is clear evidence that this particular element is not essential to meeting the project objectives. It follows that the Draft EIS/EIR should provide in-depth analysis for at least one additional non-runway Alternative - one that has specifically been developed to avoid or substantially lessen the significant effects of the project as proposed.

Response:

Please see Response to Comment AL00022-3 regarding the number and severity of impacts associated with Alternative C compared to Alternatives A and B.

Regarding the comment that the fifth runway is not essential to meeting the project objectives, without the fifth runway, LAX will not meet the forecasted aviation demand. Alternative C would meet only a portion of the region's aviation demand, although it would fulfill the overall project purpose and objectives with fewer and less severe environmental impacts. Thus, in the context of the Draft EIS/EIR, Alternative C represented a less intensive alternative than those originally considered. In order to be

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responsive to community concerns, Alternative C became the LAWA staff-preferred alternative because it had fewer impacts to the surrounding community than the other alternatives under consideration at the time.

Nevertheless, in response to public comments received on the three build alternatives included in the Draft EIS/EIR, subsequent to the publication of the Draft EIS/EIR, an additional option-Alternative D, Enhanced Safety and Security Plan- was formulated for the LAX Master Plan. Alternative D is considered to be the Environmentally Superior alternative and would have the fewest negative impacts to the local communities and the region of the four build alternatives. Alternative D does not include a fifth runway. Please see Topical Response TR-ALT-1 regarding the extensive process undertaken by LAWA to develop alternatives for consideration in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00022-44

Comment:

3.2.2 No Project Alternative

The goals of CEQA and the National Environmental Policy Act (NEPA) are very poorly served by the No Project Alternative provided in this Draft EIS/EIR. On the one hand, the analysis takes unwarranted liberty in defining this Alternative to include improvements that are only in the "planning stages" at this time. Clearly, projects in the planning stages may not materialize. On the other hand, the analysis provides an excessively narrow definition of the improvements that may occur at LAX under the No Project Alternative, and thereby understates the improvements that would likely occur at LAX even without the Master Plan. In both cases, the Draft EIS/EIR assessment would be impaired, skewing comparison with project Alternatives.

Given the length of the planning horizon, the scope of the project elements, and the extent of the planning area, this analysis should have offered two separate No Project Scenarios. One of these scenarios should have confined the definition of No Project to improvements that are now underway or have been formally approved for implementation. The other scenario should have expanded the definition of No Project to include not only those underway or approved, but also those that are in the planning stages and those that can be reasonably anticipated to occur over the project horizon, based on past practices. As noted on page 3-8, LAWA has pursued numerous improvements at LAX since 1997, including taxiway improvements, construction of new cargo building space, and additions to onsite and offsite parking facilities. Nevertheless, in defining the No Project Alternative, the Draft EIS/EIR assumes that "only minor improvements that are currently approved or in the planning stages would be made at the airport."

If the proposed expansion project is not approved, it is far more reasonable to project that LAWA will continue to identify and pursue a wide range of improvements intended to optimize the ability of LAX to meet air service demands. Moreover, this assumption is consistent with CEQA,3 which indicates:

If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed [and] the analysis should identify the practical result of the project's non-approval.

Because of the importance of this analysis to the assessment of other Alternatives, LAWA needs to revise the No Project condition to incorporate these two approaches and then compare these Alternatives to the Project Alternatives in the document.

The Draft EIS/EIR contains numerous analyses of the No Project Alternative that assume that mitigative actions addressing air quality, noise, traffic, and the like will occur primarily (or solely) through project-related activities. In fact, the larger share of environmental remediation occurs through legislative action affecting codes, ordinances, standards and regulations at the local, regional, State, and Federal levels. To the extent that it minimizes this larger framework, the approach taken in the Draft EIS/EIR tends to consistently overstate the impacts of the No Project Alternative relative to other Alternatives. To remedy this shortcoming, the Draft EIS/EIR needs to state explicitly, for each topical issue, the quantitative assumptions made concerning improvements that: (1) would result from defined mitigation measures; (2) those that would result from ordinances and regulations unrelated to the project; and (3)

those that would occur as a result of technology or investment decisions unrelated to the project. Only in this way will it be possible for readers to evaluate the merit of conclusions presented throughout this Draft EIS/EIR.

3 CEQA Guidelines, Section 15126.6(e).

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. The Draft EIS/EIR and Supplement to the Draft EIS/EIR accounted for future local, state, and federal laws and regulations, as well as improvements in technology, in the evaluation of impacts associated with the No Action/No Project Alternative and the build alternatives. In both documents, assumptions regarding laws and regulations were identified in the discussion of approach and methodology, where appropriate and applicable, with detailed information provided in technical reports and appendices. For example, the water quality analysis anticipates implementation of Total Maximum Daily Load (TMDL) standards for water pollutants and the air quality analysis accounted for future implementation of a city ordinance regulating the sulfur content of diesel fuel. Traffic-related air emissions for all the alternatives were modeled using EMFAC2002, which includes built-in emission reductions associated with adopted regulations pertaining to engine emission standards for on-road motor vehicles. The air quality analysis also recognized the continuing progress made by LAWA and the airlines, enabled by advances in technology, to convert GSE to alternative fuels and assumed future ongoing conversion of GSE to alternative fuels under all the alternatives.

AL00022-45

Comment:

Finally, Executive Summary Table, titled "Summary Comparison of Environmental Impacts From Alternatives A, B, and C"⁴ should be expanded to include the No Action/No Project Alternative for comparison purposes.

4 Pages ES-41 through ES-59

Response:

The summary table in the Executive Summary identifies Master Plan commitments and mitigation measures related to each individual impact as well as the level of significance of the impact following the implementation of these measures. Pursuant to Section 15126.2(a) of the CEQA Guidelines, the identification of significant impacts only applies to the proposed project, in this case, the build alternatives. Accordingly, the consideration of mitigation measures also applies only to the proposed project. A comparison to the No Action/No Project Alternative is provided for each environmental discipline in Chapter 4 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00022-46

Comment:

3.2.3 Inconsistency of Alternatives with Baseline Data

On close review, the numbers provided in the Tables entitled "Summary of Activity, Comparison of Alternatives and Summary of Features, Comparison of Alternatives"⁵ do not present a cohesive picture. When compared with data provided throughout the baseline and impact analyses, information contained in this summary statement appears to be fundamentally lacking in logical internal consistency. For example, in describing assumptions made for the No Project Alternative, the Socioeconomic Technical Report⁶ indicates, "The schedule of operations would still show variations throughout the day but the peak period would be at or exceed the airfield's capacity. Congestion, delays and passenger inconvenience would be common all year, not just during peak holiday periods." However, the "Summary of Features, Comparison of Alternatives" indicates that the No Project Alternative would have: (1) fewer all-weather delays than Alternative C (13.2 vs.13.59); (2) fewer annual cancellations than Alternatives A and C (9,969 vs. 15,477 and 15,814); (3) more public parking stalls than Alternative B; and (4) the same number of all-weather peak operations and 3-hour average operations.

5 Pages ES-9 through ES-11.

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6 Section 5.1.1.

Response:

Please see Response to Comment AL00022-15 regarding the internal consistency of project description information.

AL00022-47

Comment:

3.2.4 Preferred Alternative

It is not clear that Alternative C substantially reduces impacts in comparison with Alternatives A and B. In fact, the Alternatives have very little differentiation in terms of significant effects, as discussed further in a previous comment. The Preferred Alternative section needs to be greatly expanded with supporting documentation and references to the technical analyses in order to justify its inclusion as the preferred Alternative. Recognizing that it offers fewer benefits than the remaining Alternatives without any substantive reduction in adverse impacts, a discussion of how and why Alternative C became the preferred Alternative is essential.

Response:

This comment is similar to comment AL00022-4; please see Response to Comment AL00022-4.

AL00022-48

Comment:

3.2.5 Regional Alternatives

The Draft EIS/EIR conclusion that "development of other regional airports is not a reasonable Alternative to increasing the capacity of LAX" is not supported - and in fact may be refuted - by evidence provided in the Draft EIS/EIR. There are numerous factors cited in the document that explain the strength of air transportation demand in the L.A. region,⁷ and the strength of the region as an international gateway.⁸ While some of these factors apply specifically to LAX, many are generalized characteristics of the region as a whole - characteristics that apparently are unique. Indeed, one of the first statements contained in the Draft EIS/EIR notes that "the geographic size of the Los Angeles region coupled with the widespread distribution of population and employment has caused the evolution of a multi-airport system found in only a few large metropolitan areas."⁹

The Draft EIS/EIR simultaneously stresses the strength of the regional economy in the global setting and the scope of the regional market demand for international travel, and contains a series of statements apparently intended to cast doubt on the ability of these demands to be met through regional solutions.¹⁰ These statements often include the threat of economic dislocation if such Alternatives are seriously entertained. For example, the document states, "the health of the economy in the Los Angeles region depends in large part on the continuing role of LAX as an international gateway."¹¹

It is implied that essentially all of the intra-regional options within the L.A. Basin have a lower chance of success than any number of extra-regional options in the western states: "Although LAX's role as an international gateway cannot readily be duplicated by other airports within the region, there is a chance that future growth in international service - and the jobs and investment stimulated by this activity - could be lost to airports outside the region, perhaps outside the State."¹² Page 2-8 takes this theme further, without substantiating or citing a reference, through the statements that "23% of the unconstrained potential increases in international air service will be lost to the region" under the No Project Alternative and, "without Master Plan improvements, air service and activity will be constrained.. This lower air service and activity potential will mean an annual loss to the region of \$20 billion in economic activity and 98,000 jobs as described in Section 4.4.1, Employment/Socio-Economics."

Inherent in all of these statements is the little-examined presumption that regional Alternatives cannot succeed in place of the proposed project. The Summary of Comments Received contains two sections

(Impacts on Reliever Airports and Alternatives) that indicate that the Draft EIS/EIR will analyze regional impacts; however, the Draft EIS/EIR does not provide such an analysis, as indicated below.

7 These factors are indicated to include (1) characteristics of the passengers - high percentage of local O&D, (2) relative accessibility of local airports to meet O&D demand, (3) the amount and type of air service at each of the airports, and (4) the availability and quality of air service at each of the airports.

8 These factors are indicated to include (1) historic position as an ocean port with strong associations to countries served, (2) local market strength with a high percentage of O&D passengers, (3) air service to meet connecting passenger demands, and (4) airport facilities and infrastructure.

9 Section 1.1, Page 1-1.

10 Pages 1-23,2-8, and elsewhere.

11 Section 1.4, Page 1-29.

12 Section 1.2.3, Page 1-23.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00022-49

Comment:

3.2.5.1 Impacts of Reliever Airports

Several cities commented that increased aircraft operations at LAX could increase airport activity at reliever airports (e.g., Santa Monica Airport and Torrance Airport). The response in Appendix B was: "To the extent increased operations at nearby airports can be predicted the EIS/EIR will consider the potential associated environmental impacts." In fact, the EIS/EIR does not attempt to estimate or predict increased operations at nearby airports, nor does it consider the environmental ramifications thereof.

Response:

Comment noted. Please see Topical Response TR-GEN-4 regarding potential impacts on other airports as a result of the LAX Master Plan.

AL00022-50

Comment:

3.2.5.2 Potential Regional Growth

Several persons commenting on the EIR scoping argued that all variations of potential growth were not presented in the Alternatives. They felt there should be Alternatives that would utilize other airports in the region (e.g., Palmdale, Ontario, a future facility at El Toro, or Long Beach). The response in Appendix B was:

The EIS/EIR will include an expanded analysis of the regional airport system. The initial feasibility study undertaken prior to the LAX Master Plan proposal assumed expanded operation would occur at all

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airports within the regional system. The EIS/EIR will consider the feasibility and analyze the associated impact of further expanding operations at those airports. The analysis will compare the ability of such Alternative scenarios to meet the purpose and need of the proposed project, including time and economic constraints.

Although the Draft briefly discusses the feasibility of expanding operations at other airports in the region, it does not examine the degree to which component elements (i.e., demand management, aviation activity shifts, and transportation nodes) might offset the need for increased capacity at LAX. Nor does it examine how implementation of Alternative C would impact the other airports, even though Alternative C would fall short of meeting project demand by an estimated 8 million annual passengers (MAP).

Had the Draft EIS/EIR contained a detailed analysis of one or more Regional Airport Alternatives, it may have been possible to evaluate the merit of these key statements; however, the Regional Airport Alternative was not examined and consequently a central thesis of the Draft EIS/EIR cannot be validated by the information provided. Indeed, the very brief regional airport analysis contained in Draft EIS/EIR13 is all the more intriguing in light of data contained in Table 1-13, indicating that the highest overall demand capture rate is calculated to occur under the scenario with the lowest share allocated to LAX.

The EIS/EIR needs to be amended to include at least one regional airport alternative among the primary project Alternatives evaluated. It should be defined and formulated in a manner that optimizes the ability of the region to capture its full potential for market share in the international, domestic, and cargo travel sectors. Such an analysis may conclude that the L.A. Basin is in a position to reinforce the role of LAX as an international gateway and increase the market share of the region generally. That is, by escalating the role of secondary airports, Los Angeles would be able to compete more effectively as a region than LAX can do alone against other major U.S. markets. If, after reasoned analysis, the assessment concludes that regional Alternatives cannot capture future growth in international service, the results would carry far more weight than do the ominous but unsubstantiated claims now made in the Draft EIS/EIR. Without such analysis, this Draft EIS/EIR is unable to meet the minimum level of adequacy required by CEQA and NEPA.

13 Section 1.2.4 "Forecast Distribution of Demand".

Response:

As discussed in Response to Comment AL00022-8, LAWA only controls the operations and potential improvements at LAX, Ontario, Palmdale, and Van Nuys airports. Other jurisdictions are responsible for developing the other regional airports. LAWA is not obligated to formulate and consider an alternative that includes capacity development and servicing demand at airports outside its jurisdiction in order to meet the purpose and need of the LAX Master Plan. Alternative D for LAX, as detailed in the Supplement to the Draft EIS/EIR, emphasizes safety and security improvements, rather than capacity increases. By not increasing the capacity of LAX, it is incumbent on the other airports in the region to serve a larger percentage of the regional demand. LAWA has planned Alternative D to be in compliance with SCAG's 2001 and draft 2004 RTP allocations to LAX.

AL00022-51

Comment:

3.2.5.3 Proposed Regional Project Alternative

In order to be a defensible and realistic document, the LAX Master Plan and Draft EIS/EIR needs to consider an Alternative and/or mitigation measures that would be linked to increased use of other airports in the region. To illustrate this concept, a sample mitigation measure that is regional in concept and flexible in design is proposed below. It is acknowledged that the measure could be structured many ways, and the following is offered purely as a hypothetical example.

Improvements at LAX would be grouped into discrete phases, or increments. For example, Phase 1 might include lengthening a runway, or expanding an existing terminal; Phase 2 might include a designated number of square feet of new cargo handling facilities; Phase 3 might include a new perimeter roadway or any other logical sequencing of phases. Similarly, conceptual "phases" would be

linked to thresholds of increased service at other regional facilities. There would be no need to specify where such increases occur, merely that they must occur at an airport facility (or combination of airport facilities) within the defined five-County regional study area. Each of the LAX improvement phases would then be linked to the increase in passenger utilization at the other regional facilities (e.g., Phase 1 of LAX improvements can be undertaken when the regional facilities increase in passengers by 5 MAP relative to Year 2000 traffic levels; Phase 2 of LAX improvements can be undertaken when regional facilities are handling 10 MAP more than they were in the year 2000, etc.). The threshold levels here are mere examples, and it may be desirable to link the final phase to a threshold that corresponds to the difference between the desired MAP level at LAX and the estimated regional demand.

A key aspect of this mitigation measure is that the thresholds are tied to actual increases in passenger traffic at other regional airports and not to added capacity available in the region. In this way, airlines that may benefit from improvements at LAX have a strong incentive to offer and maintain service at the other airports in the region. This requirement would provide the means to strengthen LAX, under the aegis of an incentive program that balances both the burdens and the benefits of expanded air service throughout the region. As it stands today, the Draft EIS/EIR relies on demand being absorbed regionally but does not have any stated mechanism for ensuring that this occurs.

Response:

The City of Los Angeles owns and LAWA controls the operation and potential expansion of four airports: LAX, Ontario, Palmdale, and Van Nuys. The other regional airports are controlled by other jurisdictions that are responsible for their respective operation and expansion. LAWA is not obligated to consider, as an alternative for the LAX Master Plan, an alternative that includes as an explicit part of the plan expansion of airports that LAWA does not control. Similarly, LAWA cannot make the phased implementation of the LAX Master Plan contingent upon the development or improvement of other airports in the region that LAWA has no control over. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00022-52

Comment:

3.2.6 Additional Alternatives

In addition to a regional concept, it may be worthwhile to revisit an Alternative that was considered and rejected during the review of project options. Alternative C (as well as all of the build Alternatives) incorporates a plan to lengthen the inboard runway on the north side of the airport. While the importance of a longer runway is not in question, the proposal to extend the runway to the east, with all of the costs and impacts that will entail (including a new bridge over Sepulveda, massive property acquisition, and dislocation of essential airport services) is in need of further justification. It seems that other options may achieve the same goals with far fewer impacts. In particular, LAWA considered at least one Alternative that would have extended the outboard runway on the north side to the west. This earlier proposal would have extended the runway into a westerly area that is outside of the existing butterfly habitat zone (albeit in an area proposed for future butterfly habitat).

This concept should be revisited by developing at least one Alternative in which the runway extension is on the outboard runway on the north side and the extension is to the west. The Alternative should be specifically developed with the goal of avoiding or substantially lessening the significant effects of the project as proposed. The resulting analysis should be recirculated for public review and comment as a revised (or entirely new) Draft EIS/EIR. Note that this assessment would be in keeping with CEQA's requirement that a lead agency must pursue Alternatives that would feasibly reduce the significant environmental impacts of a proposed project. Certainly, the differential magnitude of impacts between these two concepts is sufficient to warrant reconsideration.

Response:

The process of evaluating potential concepts for the LAX Master Plan is described in Chapter 3 (subsection 3.1.3) of the Draft EIS/EIR and in Chapter V, Concept Development, of the Draft Master Plan. As described in those documents, during concept development, numerous concepts were developed and evaluated for their potential to serve as Master Plan alternatives. Several of the concepts that were evaluated included development of runways into the Los Angeles/El Segundo Dunes (the Dunes) located west of Pershing Drive. The Dunes occupy a 307-acre site immediately

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west of LAX. In 1992, the Los Angeles City Council adopted an ordinance establishing the Los Angeles Airport/EI Segundo Dunes Specific Plan. City Ordinance No. 169,767, approved in 1994, limits development within the 104-acre northern portion of the Dunes--the area referred to by the commentor--to a nature preserve and accessory uses. Moreover, a 1998 recovery plan for the EI Segundo blue butterfly prepared by the U.S. Fish and Wildlife Service includes the Los Angeles/EI Segundo Dunes as one of four recovery units that contain restorable habitat for the federally-endangered EI Segundo blue butterfly. The entire 307-acre Dunes is also designated as a County Significant Ecological Area. Due to the environmentally sensitive nature of the Dunes, all concepts that considered this area for the development of runways were eliminated from further consideration. Please also see Response to Comment SAL00013-99.

It should be noted that, under Alternative D, Runway 6L/24R on the north airfield would be extended approximately 1,495 feet to the west, the farthest west of any of the build alternatives.

AL00022-53

Comment:

3.2.7 Project Alternatives Sequence

Section 3.1.3 of the Draft EIS/EIR provides a good overview of the iterations that were conducted in the review of Alternatives; however, this section does not provide a sequence that would allow readers to understand how much time was given to each stage. With the information provided, it was not possible to piece this sequence together, even after reviewing the detailed and lengthy scoping materials contained in Appendix A including the Notice Of Preparation (NOP), the Notice Of Intent (NOI), and the (apparently undated) Supplemental Notice. LAWA needs to provide a timeline that indicates the number of months associated with each of the three primary iterations, the sub-phases within each stage, and the planning and environmental review process as a whole that has occurred to date.

Response:

Subsection 3.1.3 of Chapter 3, Alternatives, of the Draft EIS/EIR provided a detailed discussion of the alternative selection process. The timeframes associated with the sequence of events were described narratively. Timeframes associated with the 2nd and 3rd iterations were illustrated in Figure 3-2, 2nd Iteration Concept Development, and Figure 3-3, 3rd Iteration Concept Development, of the Draft EIS/EIR.

AL00022-54

Comment:

3.3 Baseline Data

3.3.1 Outdated Baseline Assessment

The Draft EIS/EIR complies with the CEQA requirement that the "baseline" be defined by conditions extant at the time the NOP was released. However, because the baseline was already five years old at the time of the Draft EIS/EIR release, the Draft EIS/EIR fails to comply with the intent of CEQA relative to the Baseline Analysis - i.e., to facilitate an understanding of changes in the environment associated with the proposed project and project Alternatives. Using a five year old baseline tends to consistently overstate the impacts of the No Project Alternative relative to other Alternatives. When coupled with the Draft EIS/EIR's frequent assumption that mitigative actions addressing air quality, noise, traffic, water quality, and other topical issues will occur primarily (or only) through project-related activities, the error is even more apparent. Moreover, CEQA clearly intends that the baseline should reflect the existing level of actual development to the maximum extent possible; since the Draft EIS/EIR baseline is set at 58 MAP (vs. 67+ MAP at present - a 15%+ discrepancy), this intent is clearly not met.

In order to be a usable document, LAWA needs to provide an updated baseline for all topical sections where data that is more current is available. Doing so will minimize the risk of an unfavorable ruling such as the situation encountered by Logan Airport in Boston. The United States Environmental Protection Agency rated the 1999 Logan Airport EIS as "Environmental Objection, Insufficient Information" for, among other concerns, the use of the outdated baseline year of 1993.

Response:

This comment is similar to comment AL00022-12; please see Response to Comment AL00022-12. The commentor is correct in stating that LAX handled 58 MAP in 1996. However, in 2001, when the comment was written, LAX handled 61.6 MAP, not 67+ MAP as stated. In 2003, activity levels at LAX were within 5 percent of 1996 levels ([www.lawa.org/LAX/News & Airport Facts/Statistics](http://www.lawa.org/LAX/News%20&%20Airport%20Facts/Statistics)).

AL00022-55**Comment:****3.3.2 Inconsistent Baseline**

The baseline data itself appears to be equally inconsistent. This problem extends not only to the many different years used as the "baseline", but also to incorrect identification of the base year for given data sets. For example, the 4th quarter 1996 database cited for the noise calibration does not match actual 4th quarter data according to published noise contours.

Table 3.1
Difference Between Draft EIS/EIR Noise impact and LAWA 1996 Quarterly Report

	Dwellings Inside 65	Population Inside 65
	CNEL	CNEL

LAWA 1996 Fourth Quarter Report	31,968	85,907
EIS/EIR Table 4.1-2 for 1996	16,900	49,000
Difference	15,068	36,907

Therefore, the question arises as to how the "Environmental Baseline" is actually defined. That is, is it the same as the "Adjusted Environmental Baseline"? Or the Future Without Project Scenario (i.e., cumulative without project)? Or the No Action/No Project Alternative? Or none of these? Does the environmental baseline include the phase-out of older, noisier Stage 2 jets, as assumed with the build Alternatives? The forecast reduction in noise exposure for Alternatives A and C, as compared with the No Action/No Project Alternative,¹⁴ appears to conflict with the numbers cited in the penultimate paragraph on page ES-21. It is not clear which of the congestion relief package features are scheduled for completion in Phase 1 and which will be deferred to Phase 2.

14 First bar chart on Page ES-22 titled, "Population Exposed to Noise Above 65 CNEL in 2015."

Response:

Regarding the nomenclature used in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR pertaining to the environmental baseline, the Introduction to Chapter 4 of the Draft EIS/EIR includes detailed definitions of the environmental baseline and the adjusted environmental baseline. The term "Future Without Project Scenario" was not used in the Draft EIS/EIR or the Supplement to the Draft EIS/EIR. The basis for the cumulative analysis is described in Chapter 2, Purpose and Need for the Proposed Project, Section 2.6, Non-LAX Development Having Cumulative Impact, of the Draft EIS/EIR. The definition of the No Action/No Project Alternative is provided in Chapter 3, Alternatives, Section 3.2.4, of the Draft EIS/EIR, and in the Introduction to Chapter 4 of the Draft EIS/EIR.

As described in the Introduction to Chapter 4 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, in accordance with the State CEQA Guidelines, the environmental baseline, or, in some cases, the adjusted environmental baseline, was used as the basis for determining the significance of impacts for all the build alternatives. For comparative purposes, the impacts of the build alternatives were also compared to the effects that would occur under the No Action/No Project Alternative. The Introduction to Chapter 4 indicates which disciplines used the environmental baseline and which used the adjusted environmental baseline. These baselines were consistently employed throughout the Draft EIS/EIR and Supplement to the Draft EIS/EIR for those disciplines where a quantitative analysis was conducted. As described in Topical Response TR-GEN-1, for some environmental topics, conditions later than 1996/1997 were described. These descriptions provided context for the environmental analysis, but were not used as the basis of a quantitative analysis of impacts. As stated in the topical response, in instances where data later than 1996/1997 are reported, these data have no bearing on the validity and appropriateness of the 1996 operational data used for the traffic, air quality, noise, and other analyses. Moreover, whenever calculations were required to determine a project impact (for example, increased

3. Comments and Responses

noise levels, increase water consumption, etc.), calculations were consistently performed using 1996 as the baseline. Please also see Topical Response TR-GEN-1 regarding baseline issues.

Please see Response to Comment AL00022-94 and Topical Response TR-N-1 regarding the difference between modeled noise data used for baseline purposes and monitored data. Please see Response to Comment AL00033-87 and Subtopical Response TR-N-1.3 regarding the 1996 baseline relative to Stage 2 aircraft. The commentor is incorrect that the forecast reduction in noise exposure for Alternatives A, C and D, as compared with the No Action/No Project Alternative appears to conflict with the numbers cited in the paragraph on page ES-21. The total population exposed in Impact Comparison ES-1 and Impact Comparison ES-2 of the Executive Summary of the Supplement to Draft EIS/EIR is based on Table S4.1-1, Aircraft Noise Exposure by Noise Level Range-1996 Baseline and Year 2000, of Section 4.1, Noise, of the Supplement to the Draft EIS/EIR as the benchmarks. The following alternatives were subtracted to determine those totals: Table 17, No Action/No Project Alternative CNEL Noise Contours Incompatible Residential and Noise-Sensitive Properties by Jurisdiction; Table 26, Alternative A CNEL Noise Contours Incompatible Residential and Noise-Sensitive Properties by Jurisdiction; Table 42, Alternative B CNEL Noise Contours Incompatible Residential and Noise-Sensitive Properties by Jurisdiction; and Table 56, Alternative C CNEL Noise Contours Incompatible Residential and Noise-Sensitive Properties by Jurisdiction of Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR. Additionally, Table S49, Alternative D 2015 CNEL Noise Contours Incompatible Residential and Noise-Sensitive Properties by Jurisdiction of Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR was used for determining Alternative D totals.

Please see Table S4.3.2-13, Off-Airport Surface Transportation Phasing Plan, of the Supplement to the Draft EIS/EIR for a detailed traffic mitigation phasing plan for Alternative D.

AL00022-56

Comment:

The Summary of Alternatives¹⁵ notes, in discussing baseline conditions, that "physical conditions are represented as they existed in 1997 and in more current years when possible to provide the most up-to-date information available." It is not clear why "up-to-date" information is possible in some categories but not others. LAWA has had five years to update the information and is anticipating spending significant amounts of funds to implement the project; therefore, neither time nor cost would be a justifiable reason for exclusion of current information.

Each of the different baseline and future condition scenarios used in the Draft EIS/EIR need to be clearly defined, with the rationale for its use made explicit. Referenced scenarios include "environmental baseline," "environmental baseline (1996)," "environmental baseline (2000)," "adjusted environmental baseline," "environmental baseline (2015)," "non-LAX development having cumulative impact," and "No Action/No Project". None of these terms are defined in the Glossary and the analysis constantly shifts the baseline time frame to inaccurately limit the impacts of projects, using 1996 for traffic, air and aircraft noise, while using 2000 for biology, earth, and water resources. The frequent shifting from one baseline nomenclature and timeframe to another is, at best, confusing; at worst, it confuses the underlying impacts that this Draft EIS/EIR is intended to illuminate.

15 Section 3.2.1, Pages 3-8 through 3-18.

Response:

Please see Response to Comment AL00022-55.

AL00022-57

Comment:

3.3.3 "Unconstrained Forecast" and "Adjusted Baseline"

There is no clear definition of the term "Unconstrained Forecast" anywhere in the Environmental Summary or in Sections 1, 2 or 3. Therefore, it is not known what the term is intended to portray, where

it fits into the long-range forecasts for LAX and other regional airports¹⁶ or the estimates of rising aviation demand.¹⁷

This lack of definition and intent extends to the term "Adjusted Baseline." This condition has never existed, and will never exist (i.e., 1996/97 airport activity and physical facilities plus 2005 and 2015 land use activity and regional traffic). The utility and basis in CEQA and/or NEPA for this term is not known and therefore either requires clarification or should be removed from the document in favor of more traditional, clearly defined comparative data.

¹⁶ Table 1-13.

¹⁷ Depicted in the Exhibit on Page ES-3.

Response:

The use of the term "unconstrained forecast" is explained in the Executive Summary, Section 3, of the Draft LAX Master Plan (page i-3.1). The term Adjusted Environmental Baseline is defined and explained in Chapter 3 of the Draft EIS/EIR, as well as in the Introduction to Chapter 4 (pages 4-7 and 4-8) of that document. The adjusted environmental baseline was used for the traffic analysis and for other traffic-related impacts (e.g., roadway noise). Without using an adjusted environmental baseline, the analysis would have underestimated project impacts because background traffic at the affected intersections and roadways would not have been fully accounted for. In addition, please see Topical Response TR-GEN-1 regarding baseline issues.

AL00022-58

Comment:

3.4 Project Phasing

3.4.1 Baseline and Project Phasing

The difficulty of tracking an outdated baseline is further complicated by a phasing program that is also outdated. For example, the discussion indicates that Phase 1, scheduled to be completed by 2005, would "accommodate approximately 785,000 total aircraft operations, 71.2 MAP, and 3.1 million tons of cargo annually."¹⁸ Elsewhere, the Draft EIS/EIR notes that considerable increases in travel activity would occur even without the expansion project, and it is unclear to what extent the Phase 1 objectives have already been met, and to what extent they will be met (or surpassed) by 2005 even without project approval. What is clear, however, is that 2005 is an unrealistic target date for Phase 1 improvements at LAX. Given the year-by-year summary provided on Draft EIS/EIR,¹⁹ it can be surmised that Phase 1 would now be complete in 2009 at the earliest if the environmental process is complete in 2002. Through this same assumption, it can be concluded that the sixteen-year development schedule anticipated in the Draft EIS/EIR would not be completed by the horizon year of 2015. This fact alone calls for the complete reworking of the document.

Given the level of natural growth that can be anticipated in air travel services at LAX over the next seven years, the phasing plans may differ significantly from what is described in the Draft EIS/EIR. Delays are often unavoidable, but it would be appropriate to have a more current and accurate understanding of baseline conditions and phasing goals than what is currently provided.

¹⁸ Section 2.4, Page 2-12. Also note the inconsistency on Page 2-10 that shows a 2005 cargo load totaling 2.4 million annual tons.

¹⁹ Pages 2-12 through 2-14.

Response:

As discussed in Response to Comment AL00022-13, Alternative D, LAWA staff's preferred alternative, detailed in the Supplement to the Draft EIS/EIR, is properly phased for the constrained demand the alternative is designed to meet in 2015. Although the unconstrained cargo demand is projected to be 4.2 MAT in 2015, Alternative D cargo facilities will have a capacity of 3.1 MAT.

3. Comments and Responses

AL00022-59

Comment:

3.4.2 Phasing Plan

It appears that virtually all access and circulation improvements are planned to occur in Phase 2 after LAWA has developed the new West Terminal, the runway extension, the new cargo areas and the mid-field concourse in Phase 1. These east side activities will involve a large number of significant construction-related impacts affecting a wide range of land uses - many of which are services essential to airport operation. Nevertheless, construction in this area is proposed to be undertaken before provision is made for interim alternate parking or satisfactory relocation of businesses and services. A more practical staging plan would incorporate all of the west-side improvements first, to create interim parking and allow for a more orderly relocation of airport services and local businesses. The east side improvements could then be completed with fewer impacts and dislocations to local residents, businesses and services, and less inconvenience to all who work at and use LAX. At a minimum, the document needs to consider other provisions that could be made to minimize the impacts on circulation and access associated with the proposed Phasing Plan.

Response:

Nearly all access improvements including westside parking facilities and circulation elements are to be completed within the first phase of development and their completion coincides with opening of the West Terminal facilities. The only major access project that cannot be completed by 2005 is the LAX Expressway. Because this expressway would involve extensive permitting, agency coordination, and design, as well as completion of the entire northern section of the ring road to connect it to the West Terminal, it is highly unlikely that the Expressway could be operational by 2005. It is anticipated that it could be under construction; however, in order to achieve the project schedule of creating eastside facilities by 2005, the properties within this area would need to be relocated/acquired as delineated in Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR, and Chapter 5 of the Preliminary Property Acquisition and Relocation Plan (Appendix P to Chapter V of the Draft LAX Master Plan). The construction phasing of the eastside improvements would have no effect as to the number of residents, business and services that need to be relocated.

Following the publication of the Draft EIS/EIR, LAWA developed a new alternative that, consistent with public comments calling for a regional approach alternative, is designed to accommodate passenger and cargo activity at LAX that would approximate those of the No Action/No Project Alternative, has fewer environmental impacts, and improves airport safety and security. Alternative D would not include a new West Terminal which was proposed in the previous build alternatives.

AL00022-60

Comment:

3.5 Appearance of Advocacy

The Draft EIS/EIR contains numerous comments and conclusive statements that create an appearance of project advocacy. This is inappropriate given the policy guidelines contained in CEQA and NEPA, and it undermines confidence in the objectivity of the Draft EIS/EIR and its commitment to full disclosure.²⁰ Some of the technical assumptions contained in the Draft EIS/EIR serve to overstate project benefits and/or overstate the adverse impacts of the No Project Alternative. The appearance of advocacy is also evident in the many instances of phrasing that create - intentionally or otherwise - an inappropriate aura of urgency regarding the purpose and need for LAX expansion.

Project advocacy may also contribute to the circular logic found in portions of the Draft EIS/EIR. For example, the discussion of "Allocation of Air Service Among Regional Airports" on Page 1-14 notes, "Airlines will establish additional service at secondary airports in the region only if the local market generates sufficient demand." The text on Page 1-17 appears to strongly indicate that such demand does in fact exist, stating that:

LAX's domestic O&D [origin and destination] activity in 1997 was approximately 33 MAP, 7 MAP greater than the passenger market within the airport's 60-minute access zone; that is, it drew 7 MAP from outside its own access zone, from the access zones of the other regional airports.

Yet the discussion of "Alternative Airport Locations" concludes, on Page 3-2, that:

Analysis by SCAG [the Southern California Association of Governments] indicates that limiting the growth of LAX in an attempt to force the development of other airports would result in air service leaving the region, which would result in a loss of 6 MAP to 26 MAP. While it is recognized that other commercial service airports in the region will continue to grow and to serve a greater share of the regional demand, development of other regional airports is not a reasonable Alternative to increasing the capacity of LAX.

The fact that more than 20% of passengers are traveling outside of their "catchment area" to use LAX is evidence of significant demand for service at other regional airports, and would seem to create justification for studying the development of other regional airports as a reasonable Alternative rather than providing the basis for the conclusion actually provided. Repeatedly, the Draft EIS/EIR gives ample basis for the analysis of a regional airport development Alternative.

20 CEQA Guidelines, Section 15003(i), Policies.

Response:

Comment noted. The Draft EIS/EIR presents objectively each of the alternatives and does not overstate or understate benefits and impacts. Please see Response to Comment AL00022-39 regarding the introduction of Alternative D as a new alternative consistent with the policy framework of the SCAG 2001 RTP to shift regional aviation activities to airports other than LAX. Please see also Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan (RTP) and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00022-61

Comment:

Another example of circular logic that shows the bias of advocacy can be seen in the discussion in Section 2.3.9, on Page 2-12, where it is stated that various airport improvements have been identified to limit the negative impacts on noise, air pollution, and traffic associated with the proposed airport development. Although the "various airport improvements" (including reduced development intensity along LAX Northside, with incorporation of a community commercial "village" and business park to receive displaced businesses) are intended to mitigate adverse project impacts, the text claims that, "without the improvements to LAX, positive aspects of the program cannot be implemented." This is a deceptive statement, akin to claiming that the benefits of radiation treatment cannot be implemented in the absence of cancer. This statement is further refuted given that LAWA often exercises its right to propose and pursue improvements independent of the proposed LAX Expansion Project or other major proposals.

Response:

Comment noted. With the exception of residential soundproofing as part of the ANMP, LAWA is restricted by federal law from expending airport funds within off-airport areas for addressing existing environmental impacts without the Master Plan and the EIS/EIR Mitigation Measures.

AL00022-62

Comment:

3.6 Scoping

The Draft EIS/EIR makes frequent mention of the regional significance of LAX and of the Master Plan process. This emphasis on regional context is evident not only in the discussions and analyses provided throughout the text, but more significantly is an integral part of the Purpose and Objectives statement:21

3. Comments and Responses

The purpose and objectives of the Master Plan are to provide, in an environmentally sound manner that is compatible with surrounding land uses, sufficient airport capacity for passengers and freight in the Los Angeles region to sustain and advance the economic growth and vitality of the Los Angeles region. In particular, the proposed project intends to achieve these objectives:

- To respond to local and regional demand for air transportation during the period 2000 to 2015, taking into consideration the amount, type, location, and timing of such demand.
- To ensure that new investments in airport capacity are efficient and cost effective, maximizing the return on existing infrastructure capital.
- To sustain and advance the international trade component of the regional economy and the international commercial gateway role of the City of Los Angeles.

Nevertheless, the scoping outreach effort did not include a single agency within the county governments of San Bernardino County, Orange County, Riverside County, or Ventura County.²² Nor did the scoping outreach include any municipal agencies, airport officials, businesses, or services within any of these four counties, although many such entities could be expected to have had an interest in the regional issues addressed and in the development and analysis of project Alternatives. This is a serious omission, particularly in light of the NEPA mandate to establish close nexus between project goals and project Alternatives. It may also explain why none of the project Alternatives incorporates even minimal regional elements.

21 Section 2.1, Page 2-1.

22 Based on a review of the EIS Agency Scoping Coordination Letter Mailing List and other materials provided in Appendix A.

Response:

Comment noted. Please see Response to Comment AL00007-1 regarding the scoping undertaken for the LAX Master Plan. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00022-63

Comment:

Furthermore, the scoping process is intended to identify and disclose all of the potential Alternatives under consideration by the lead agency. This provides the public with the greatest ability for input and understanding into the potential project and offers an opportunity to comment. In fact, it is common for Alternatives to be removed between the scoping process and the distribution of the Draft EIS/EIR after the initial outreach. In this case, the scoping outreach did not include Alternative C, which became the preferred Alternative. This not only denies the public the opportunity to comment, but it brings into question how the Alternative became the preferred Alternative between the scoping outreach and the circulation of the Draft EIS/EIR. If the objectives and the scope of the project changed so drastically between the initial outreach and the circulation of the Draft that the document included a preferred Alternative that was not even included in the original outreach, then the scoping process should have started again. If the scope and objectives did not change, why was the Alternative not included in the scoping process in 1996? Either way, the preferred Alternative was not disclosed to the public prior to the release of the Draft document; this fails to meet CEQA/NEPA standards.

Response:

The purpose of the scoping process under NEPA and CEQA is to determine the issues to be addressed in the environmental document, not to determine the nature of the proposed project. As stated in 40 C.F.R. §1507.1, the purpose of the scoping process under NEPA is to determine the scope of issues to be addressed and to identify significant issues related to a proposed action. The purpose of scoping under CEQA is to establish a consultation process between a Lead Agency and any Responsible

Agencies for the purpose of identifying the scope and content of the environmental information related to the Responsible Agency's area of statutory responsibility that must be included in the draft EIR. (State CEQA Guidelines, Section 15082). In this case, the original scoping process identified the key issues to be addressed in the analysis of the alternatives selected by the Lead Agency. Each of the alternatives selected addresses each of the issues identified. Please see Response to Comment AL00022-17 regarding the public notice pertaining to Alternative C.

AL00022-64

Comment:

3.7 Affected Environment, Consequences, and Mitigation Measures

The analytic framework of the Draft EIS/EIR is described as one in which the current document is meant to set the basis for "tiered" environmental review pursuant to both NEPA and CEQA.²³ The tiered concept assumes that subsequent environmental documents will be required to focus the analysis on site-specific, project-level issues, impacts, and mitigation measures. However, in light of the program-level analyses and vague mitigation commitments, the Federal Aviation Administration (FAA) will not have an adequate basis on which to issue an "unconditional approval" of the airport layout plan (ALP). An unconditional approval assumes that appropriate analysis has been completed for all development actions and the circulated document does not meet this requirement.

23 Section 4, Pages 4-5 and 4-6.

Response:

As noted by the commentor, the Draft EIS/EIR is an overall program-level document for all actions associated with the LAX Master Plan development. It is anticipated that additional environmental documents will be prepared as further levels of detail are reached, as various agencies determine whether to approve permits and other entitlements, and as Master Plan improvements requiring further discretionary actions become closer to construction. (See Preface to the Draft EIS/EIR, page 2.) Nevertheless, as indicated in the Preface (page 2) of the Draft EIS/EIR, the first phase of development (defined in Chapter 3 of the Draft EIS/EIR for Alternatives A, B, and C, and in Chapter 3 of the Supplement to the Draft EIS/EIR for Alternative D) is sufficiently detailed to serve as the basis for the FAA's Record of Decision for the proposed project.

AL00022-65

Comment:

4 Environmental Justice

The analysis of environmental justice fails to meet the most elementary NEPA requirements for this topical issue. The specific concerns are identified below.

Response:

Comment noted. Please see Responses to Comments AL00022-66 through AL00022-78 below.

AL00022-66

Comment:

4.1 Scoping

Scoping is a public process required by NEPA, which should be conducted as early as possible after a Lead Agency decides to prepare an EIS. The scoping process is designed to determine the scope of issues to be addressed in an EIS, and should be conducted as early as possible after a Lead Agency decides to prepare an EIS. It is intended to be an open process, incorporating the views of other agencies and the public regarding the scope of an EIS.

3. Comments and Responses

Environmental Justice issues are usually a major component of the scoping process, and the Draft EIS/EIR does list 126 outreach efforts with low-income and minority communities. However, the Draft EIS/EIR provides no indication of the specific environmental justice concerns or issues for which these groups were contacted. The Draft EIS/EIR needs to be expanded to include: (1) a description of the efforts made to gather information from low-income and minority communities; (2) copies of materials provided in languages other than English; and (3) a table that identifies the specific concerns raised by each of these groups.

Response:

Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR, provided a discussion under the heading "Environmental Justice Program, Environmental Justice Community Outreach Program," that includes information on the format of the community workshops and the efforts undertaken in order to receive community input and feedback. A list of recommendations gathered through these efforts was compiled, and was ultimately instrumental in defining the benefit and mitigation proposals presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. Copies of materials provided in languages other than English during the Environmental Justice Workshops were provided in Attachment 1 of Appendix S-D, Supplemental Environmental Justice Technical Report, of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, additional environmental justice workshops and public hearings were held during circulation of the Supplement to the Draft EIS/EIR, and more recent community outreach was undertaken with civic leaders. The final Environmental Justice Program, developed with this community input, is presented in Section 4.4.3, Environmental Justice, of this Final EIS/EIR. Regarding specific concerns raised by groups that participated in the environmental justice outreach process, please see Appendix F-A, Attachment 1, of this Final EIS/EIR, which lists the various recommendations for offsetting benefits and mitigation measures relating to the proposed LAX Master Plan. Please see Response to Comment PC00178-2 for information about outreach efforts made by LAWA. Please also see Topical Response TR-PO-1 for information about the overall public outreach process, public hearings, and public workshops administered by LAWA for the LAX Master Plan Draft EIS/EIR and Supplement to the Draft EIS/EIR, and Topical Response TR-EJ-2 regarding the environmental justice public outreach program.

AL00022-67

Comment:

4.2 Level of Analytic Detail

Many impacts in the Environmental Justice analysis were not addressed, reportedly because LAWA was not able to quantify or analyze the impacts. NEPA states that when information is incomplete or unavailable, the information must be obtained if costs are not exorbitant.²⁴ According to CEQA, the analysis must be specific enough to permit informed decision-making and public participation. The following subsections include some of the impact discussions considered inadequate.

24 NEPA Guidelines, Section 15022.22.

Response:

Please see Response to Comment AL00022-20 and AL00022-73.

AL00022-68

Comment:

4.2.1 Air Quality and Health Effects

The Draft EIS/EIR states:

Due to the lack of available background data and limited information on the cumulative effect of multiple air pollutants, the effect of the LAX Master Plan on cumulative health risks among minority and low-income population cannot be quantified or fully analyzed.²⁵

All available data should be included, consistent with the mandate of NEPA. The report should document efforts made to obtain needed data. Where data is found to be unavailable or limited, the report should identify the cost associated with developing original data and indicate why such cost was determined to be exorbitant in the context of overall project costs.

25 Section 4.4.3, Page 4-425.

Response:

Please see Response to Comments AL00017-190 and AL00017-194.

AL00022-69

Comment:

The document further asserts,

Due to the lack of available background data, the cumulative or synergistic health effects of [toxic air pollutants (TAP)] emissions associated with the build Alternatives and other environmental hazards could not be quantitatively analyzed within the scope and timeframe of this Draft EIS/EIR.²⁶

The Draft EIS/EIR could and should have made assumptions in order to determine such impacts. These assumptions need to be developed and applied to quantitatively analyze the cumulative and synergistic health effects of TAP emissions associated with the build Alternatives and other environmental hazards. Without these assumptions, fair environmental review is not possible.

26 Section 4.4.3, Page 4-426.

Response:

Please see Response to Comment AL00017-190. Particularly, Section 6.2 of Technical Report S-9a provides discussion regarding the analysis of TAPs and the methodology to assess cumulative impacts.

AL00022-70

Comment:

4.2.2 Relocation

The Draft EIS/EIR proposes,

Minority-owned businesses or businesses with a high proportion of minority employees or minority/low-income customers may face special challenges that need to be considered in developing a Business Relocation Plan.²⁷

The document provides no further explanation or definition of "special challenges". The term needs to be clarified and LAWA needs to indicate how these challenges should be considered in developing a business relocation plan.

27 Section 4.4.3, Page 4-430.

Response:

Special challenges refers to the need for the Relocation Plan to ensure that the relocation process does not result in different or separate treatment because of race or other arbitrary circumstances, and that the plan provides assistance and materials in Spanish and other languages as necessary.

3. Comments and Responses

AL00022-71

Comment:

The document further states, "Data is currently not available regarding the number of minority owned businesses or minority employees that might be affected by proposed acquisition."²⁸ In fact, the referenced data is generally available and can be obtained with reasonable effort. This data needs to be obtained and analyzed.

28 Section 4.4.3, Page 4-428.

Response:

Public information on the demographics of business ownership and employment is limited. As a result, and based on issues related to privacy rights and the difficulty of completing a survey within the study area, this information was not included in the Draft EIS/EIR or the Supplement to the Draft EIS/EIR. However, the potential for relocation effects on minority businesses or residents was identified on pages 4-428, 4-430, and 4-432 of the Draft EIS/EIR and on pages 4-336, 4-337, and 4-339 of the Supplement to the Draft EIS/EIR. As stated in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, relocation would be undertaken in compliance with the Uniform Relocation Act and pursuant to a LAWA Relocation Plan that would include special provisions to assist minority owned businesses or residents to the extent necessary. To the extent that there could be a disproportionate effect on minority businesses or residents, the effect would be addressed through these provisions contained within LAWA's Relocation Plan and through the Environmental Justice Program described in subsection 4.4.3.7 of the Final EIS/EIR, including Mitigation Measure MM-RBR-2 and the job related provisions for disadvantaged business enterprises described under the environmental justice benefit "Job Outreach Center." As demonstrated by the provisions outlined above, the lack of greater specificity on demographics has not compromised the environmental justice analyses or the adequacy of LAWA's Environmental Justice Program, Mitigation Measures or Master Plan Commitments that address and offset potential disproportionate effects.

AL00022-72

Comment:

4.2.3 Noise

The circulated Draft asserts,

Certain areas affected by noise would still be faced with significant impacts due to constraints that apply most directly to minority and/or low-income communities. These include residential areas ineligible for mitigation due to inconsistent zoning or land use designations and substandard housing that may be infeasible to insulate.²⁹

At the very least, the Draft EIS/EIR needs to clearly delineate where these areas are located. A more appropriate solution would be to identify and implement specific mitigation measures to reduce impacts on minority neighborhoods; the document did not contain any noise mitigation measures, as discussed in detail later in this report.

29 Section 4.4.3, Page 4-430.

Response:

It is noted that there would be unavoidable impacts due to noise on certain residential properties ineligible for mitigation and infeasible to insulate due to inconsistent zoning or land use designations and substandard housing. It is beyond the scope of this document and considered infeasible to identify the extent to which individual properties under the various Master Plan build alternative scenarios may or may not be feasible to insulate. LAWA's existing policy provides that as property owners apply for participation in the sound insulation program, inspections and evaluations are undertaken to determine their eligibility. As presented in the Draft EIS/EIR, as part of Mitigation Measure MM-LU-1, LAWA will reduce or eliminate, to the extent feasible, structural and building code compliance constraints for mitigation of sub-standard housing. Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement

to the Draft EIS/EIR incorporated new and refined mitigation measures that were not included in the Draft EIS/EIR. Also note that subsequent to circulation of the Supplement to the Draft EIS/EIR, LAWA changed the policy in their ANMP such that properties with inconsistent zoning or land use designations are no longer rendered ineligible for participation in the soundproofing program. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program, Topical Response TR-LU-4 regarding outdoor noise levels, and Topical Response TR-LU-5 regarding noise mitigation.

AL00022-73

Comment:

4.2.4 General Comments

The impacts associated with Environmental Justice, demand a more rigorous analysis than is currently provided in the Draft EIS/EIR. As noted above, NEPA requires that information be included in the EIS if costs of obtaining the information are not exorbitant. Where such costs are exorbitant, NEPA requires that the EIS: (1) state that the information is complete or unavailable; (2) state the relevance of the information to the analysis; (3) summarize credible scientific information about the impacts; and/or (4) use other methods of assessing impacts that are generally accepted by the scientific community. CEQA also addresses the issue of analytic detail, requiring that an EIR provide information and analyses with a sufficient level of detail to permit informed decision making and public participation. These very basic NEPA and CEQA requirements need to be applied to the Draft EIS/EIR assessment of Environmental Justice.

Response:

Please see Response to Comment AL00022-20 regarding the extent of analysis provided on the issue of environmental justice. While it is not clear what specific information is considered lacking by this comment, the absence of certain information or quantitative analysis for air quality and health risk as relates to environmental justice, was not about cost but the lack of available background data, accepted or feasible methodologies, and the need for long-term health studies beyond the scope and reasonable time frame for completion of the EIS/EIR.

AL00022-74

Comment:

4.3 Outdated Source Materials

The Draft EIS/EIR notes that the year 2000 estimates of population suggest that the area's population has increased by 10% and reflects a higher proportion of Hispanic influx into the area. This phenomenon may have resulted in more census tracts comprised of predominantly minority or low-income communities, but these issues have not been analyzed. The Draft EIS/EIR should be revised to incorporate the 2000 Census data on population, which was released in March of this year, along with an assessment of impacts based on the current data.

Response:

Please note that LAWA has completed and circulated a Supplement to the Draft EIS/EIR for public review that incorporates an assessment of environmental justice according to the 2000 U.S. Census. Although this new demographic information is carried through the new analysis, as indicated in Section 4.4.3, Environmental Justice (subsection 4.4.3.3), of the Supplement to the Draft EIS/EIR, the new demographic data does not materially change the findings in the Draft EIS/EIR.

AL00022-75

Comment:

4.4 Area of Analysis

The Environmental Justice analysis only addresses existing conditions and impacts on census tracts surrounding LAX. No regional analysis was completed, although the area of study was clearly identified

3. Comments and Responses

to include the region as a whole. The analysis needs to be expanded to incorporate the region that is referenced in Section 2.1, the Purpose and Objectives of the Project of the Draft EIS/EIR.

Response:

Please see Response to Comment AL00040-94 regarding the boundaries for the environmental justice analysis and Topical Response TR-EJ-3 regarding environmental justice and regional context. While the analysis of environmental justice describes and considers existing conditions, future (2015) conditions are the primary basis for environmental findings associated with buildout of the LAX Master Plan. This future (2015) analysis is reflected in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00022-76

Comment:

4.5 Deferral of Mitigation Measures

The Draft EIS/EIR fails to put forth Environmental Justice mitigation measures, as required by CEQA and NEPA. Instead, the Draft EIS/EIR states:

Once LAWA has committed to specific measures as part of its Environmental Justice Program, the FAA will make its final determination as to whether the Master Plan has a disproportionately high and adverse human health or environmental effect on minority or low-income populations, taking into account mitigation and offsetting benefits.³⁰

The Draft EIS/EIR also indicates that,

FAA and LAWA will work with the affected communities to develop mitigation programs tailored to the needs of these communities prior to final project approval. Should the FAA conclude that disproportionately high and adverse human health or environmental effects on minority and low-income populations would still occur as a result of the LAX Master plan, findings under the DOT Order would have to be made prior to project approval. The final EIS/EIR will disclose those findings.³¹

This approach fails to advance public discourse, and deprives reviewing agencies and the public of an opportunity to review and comment on information about this important project issue. Moreover, the mitigation measures may in themselves have impacts that require consideration and analysis. For these reasons, new mitigation measures cannot be introduced in a final version of an environmental document.

³⁰ Appendix F, Environmental Technical Report, Page 5.

³¹ Appendix F, Environmental Technical Report, Page 5.

Response:

Although a scoping process and environmental justice related outreach were undertaken in advance of preparing the Draft EIS/EIR, the reason the Draft EIS/EIR did not include a program with mitigation measures and benefits fully reflective of community input, was because the preliminary findings on environmental justice were not known until the document was finalized. As noted by the commentor, it was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected communities and their representatives.

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical

Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the Supplement to the Draft EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR. Although the EIS/EIR is a program-level document, no unmitigated secondary impacts associated with implementation of environmental justice related mitigation measures were identified.

AL00022-77

Comment:

4.6 Use of Mitigation Concepts

It also does not suffice to outline tentative mitigation concepts as "a starting point for the public involvement process that will lead to the development of the Environmental Justice Program."³² Nonetheless, the Draft EIS/EIR frequently offers concepts in lieu of defined mitigation measures, as evidenced by the following quotes from the Draft EIS/EIR:

Noise

Accelerate or expand sound insulation offered under the existing LAX Aircraft Noise Mitigation Program.³³

Offer increased opportunities for residents to move out.³⁴

Increase annual funding.³⁵

Incorporate newly exposed areas into the LAX Aircraft Noise Mitigation Program.³⁶

Air Quality and Health Effects

Support and participate in long-term studies that would contribute to an understanding of air quality and health effects on low-income and minority populations.³⁷

In 2015, all of the build Alternatives would exceed thresholds of significance for non-cancer health risks, with the areas of significant impact falling on minority community's east/northeast of the north runway and largely west of I-405.³⁸

Surface Transportation

LAWA will take into consideration the special needs of minority and low-income individuals who rely heavily on public transportation in implementing traffic mitigation measures.³⁹

Remote Terminals

In furtherance of the Environmental Justice Program, LAWA would undertake to avoid locating remote terminals in locations where they might have disproportionate adverse environmental impacts on minority or low-income communities.⁴⁰

In general, the "mitigation measures" identified in these quotes require deeper definition as to how and when they will be implemented as well as a clear statement as to how they mitigate the adverse impacts that are created by the project. Mitigation measures are needed that are designed to address impacts on minority and low-income communities.

The vague and general mitigation concepts addressed within the Draft EIS/EIR do not meet the CEQA and NEPA requirement to avoid, minimize, rectify, reduce, or compensate for adverse project impacts. All identified adverse impacts need to be accompanied by specific and defined mitigation measures.

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The proposed measures must then be evaluated in terms of their efficacy in reducing the identified primary impacts as well as any secondary impacts that may result from their implementation. With respect to impacts for which no measures are proposed, the Draft EIS/EIR should indicate that this is the case and state that the impacts shall remain unmitigated along with an indication of their severity.

32 Section 4.4.3, Page 4-432.

33 Section 4.4.3, Page 4-432.

34 Section 4.4.3, Page 4-432.

35 Section 4.4.3, Page 4-432.

36 Section 4.4.3, Page 4-432.

37 Section 4.4.3, Page 4-433.

38 Section 4-4.3, Page 4-426.

39 Section 4.4.3, Page 4-433.

40 Section 4.4.3, Page 4-433.

Response:

Please see the mitigation measures contained in Chapter 5 of this Final EIS/EIR (as derived from the Supplement to the Draft EIS/EIR), including those applicable to noise, land use, air quality and human health, transportation, and those most relevant to environmental justice outlined under the Environmental Justice Program. These measures represent new information and more detailed mitigation than presented in the Draft EIS/EIR. Also see the discussions throughout Chapter 4 of the Supplement to the Draft EIS/EIR under the heading "Level of Significance After Mitigation." The mitigation measures presented in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR have been evaluated relative to their potential to result in significant impacts on the environment. Where potential impacts have been identified as significant, specific mitigation approaches are discussed. Also, please see Topical Response TR-N-4 regarding noise mitigation, Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program, Topical Response TR-AQ-3 regarding air pollution increases, Topical Response TR-ST-2 regarding surface transportation analysis methodology, Topical Response TR-ST-4 regarding airport area traffic concerns, Topical Response TR-ST-6 regarding neighborhood traffic impacts, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits, and Topical Response TR-HRA-4 regarding human health mitigation strategies.

AL00022-78

Comment:

When completed, the revised analysis must be recirculated for public review and comment as part of a revised (or entirely new) Draft EIS/EIR. Only by these means can the Draft EIS/EIR achieve adequacy with respect to the analysis of Environmental Justice. Absent these changes, valid review is simply not possible.

Response:

Please note that LAWA has completed and circulated the Supplement to the Draft EIS/EIR for public review. See Section 4.4.3, Environmental Justice, and supporting technical data and analyses provided in Appendix S-D of the Supplement to the Draft EIS/EIR.

AL00022-79

Comment:

5 Traffic

Overall, the traffic review indicates that the detailed analysis work has been thorough and has followed accepted traffic modeling and analysis principles; however, there are several serious deficiencies that compromise the entire section. These issues are described below.

Response:

Please see Responses to Comments AL00022-80 through AL00022-91 below.

AL00022-80

Comment:

5.1 Baseline

The baseline used for the traffic analysis is 1996. It is recognized that the use of 1996 data was necessary due to the time involved in collecting information, developing traffic models, and preparing the Draft EIS/EIR. However, the environmental documentation would be strengthened with the inclusion of recent benchmark data with respect to traffic. It would be useful to include data in the form of volume comparisons at key locations and verification of overall current airport trip generation compared to 1996. In particular, it would strengthen the validity of the 2005 projections. The validity of the model used is not conclusive without the comparison between current data and the data figured from the 1996 models. Furthermore, without comparison to recent data, it is not clear whether the model achieves an acceptable replication of the baseline results.

Response:

Please see Subtopical Response TR-ST-2.4 regarding definition of baseline scenarios and incorporation of local/regional plans and programs. The Supplement to the Draft EIS/EIR provided a comparison of the traffic conditions in 1994, 1995, and 2000. That analysis shows that the traffic conditions were not notably different between those years, and the continued use of the earlier data is appropriate and justified.

AL00022-81

Comment:

5.2 Unconstrained Forecasting

The analysis does not provide any assurance that the Master Plan will not exceed the stated MAP level of 89.6. The Draft EIS/EIR shows an unconstrained forecast of 97.9 MAP, but estimates 78.7 for the No-Action Alternative and 89.6 MAP for Alternative C, the preferred Alternative. The Master Plan is essentially a set of physical improvements that do not in themselves imply a level of usage; for Alternative C, the Draft EIS/EIR simply notes, "it would accommodate only 89.6 million passengers (a shortfall of 8.3 million passengers) in 2015."⁴¹ The Draft EIS/EIR needs to specify the actions that will limit the usage of the preferred Alternative to 89.6 MAP, versus the unconstrained forecast of 97.9. Alternatively, some evaluation needs to be made as to the outcome that would occur if the 89.6 MAP figures were exceeded. That is, identification of the most serious deficiencies that would occur if more people were to use LAX than anticipated in Alternative C.

41 Page ES-12.

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX. Under federal law, there are no legal means available to local, regional, or federal officials to force airlines to serve one airport over the other or to 'cap' the number of flights at an airport. The LAX Master Plan includes design constraints that are not absolute limits on airport activity levels, but rather are market-related thresholds that, if exceeded, would result in delays, inefficiencies, and reduced levels of customer service. Given the highly competitive commercial aviation market and the presence of several other major commercial airports both within the region and outside the region, it is anticipated that the additional increment of activity at LAX that cannot be satisfactorily served by the proposed airport design would move to, and be met by, other airports in the region or would be lost from the region completely.

3. Comments and Responses

AL00022-82

Comment:

5.3 Future Traffic Forecasts

The traffic forecasts use 2005 and 2015 as their projection years. Of importance as far as the Master Plan is concerned is the year 2015 since this represents the design year for the proposed Master Plan. In order to authenticate the projections, the Draft EIS/EIR should provide a clearer overview of the underlying assumptions and basic data used to carry out this analysis. The following headings give some examples of where this should be strengthened.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-ST-2 for a discussion of the underlying assumptions and basic data used to develop the future year forecasts.

AL00022-83

Comment:

5.3.1 Trip Generation

It is difficult to find trip generation summaries for the No Project and the project Alternatives. While there are overall figures given in the Executive Summary, there is no tabular summary that shows the airport-generated trips separated into the various components. The onsite traffic analysis (apparently carried out by a different consultant than the offsite) does not provide a table that coincides exactly with the trip generation assumptions used by the offsite transportation consultant. The offsite transportation information does include a trip generation summary; however, the sum of the various items for the onsite trip generation gives similar, but not exactly the same, results. The Draft EIS/EIR should include a summary of both the onsite and offsite traffic analyses to demonstrate that they are identical or to identify the reasons for the apparent discrepancy.

In addition, the underlying trip generation relationships need to be explained. For example, identification of the variables involved and the sensitivity to various assumptions would have aided the validity of the review. The trip generation information related to the estimated MAP levels needs to be fully explained, particularly in light of the assumptions used to estimate the trip generation (e.g., change in passenger mix). While there is discussion regarding the model that was used for this derivation process, it is not possible to verify the relationships involved. The trip generation estimate is a fundamental starting point for the detailed traffic analysis and a clear explanation and justification need to be included. Without this basic information, valid review is not possible.

Response:

Detailed trip generation tables for the No Action/No Project Alternative and Alternatives A, B, and C are included in Appendix A to Technical Report 3a of the Draft EIS/EIR. The trip generation was a detailed, iterative process between the on-airport and off-airport transportation consultants. The on-airport consultants were responsible for determining the number and type of trips generated by airport passengers, while the off-airport consultants determined the number of trips generated by airport employees and ancillary uses, including cargo. Details of the procedures used by each are summarized in the Technical Reports 3a, On-Airport Surface Transportation Technical Report, and 3b, Off-Airport Surface Transportation Technical Report, of the Draft EIS/EIR. The end result of the trip generation procedure was vehicle volumes that were almost identical between the two disciplines, although there may be a very slight difference due to each model's calibration techniques. Any slight discrepancy would not impact the results of the analysis. The relationship between the hourly passenger schedule and peak hour vehicle trips is explained in Technical Reports 3a and S-2a, Supplemental On-Airport Surface Transportation Technical Report. Please also see Topical Response TR-ST-2 for an explanation of the travel demand models and trip generation procedures. Note that vehicle trip generation reflects trips during the peak hour of the peak month, average day. This is a

much different metric than Million Annual Passengers (MAP). Therefore, peak hour vehicle traffic demand does not necessarily follow the trends exhibited over time by MAP.

AL00022-84

Comment:

5.3.2 Collateral Trips

The Master Plan includes development of a new terminal on the west side of the airport. The proposal suggests that the new terminal will replace existing uses in that area, resulting in a reduction in trips due to the non-aviation uses being replaced by aviation uses. It is difficult to find an explanation of how this reduction occurs and the degree to which it is existing traffic versus future potential traffic. This again pertains to the difficulty in finding trip generation summary tables that demonstrate the trip generation estimates and assumptions used in the analysis.

Response:

The terminal on the west side would not displace non-aviation uses, as all of the uses on the west side are currently aviation-related. However, there would be a reduction of trips (compared to the No Action/No Project Alternative) in the Manchester Square area, as high traffic-generating non-aviation uses in that area are replaced with aviation uses. A comparison of trips generated by each alternative, and including the No Action/No Project Alternative and Adjusted Environmental Baseline, is provided in Technical Reports 3b, Off-Airport Surface Transportation Technical Report, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, respectively. See also Response to Comment AL00022-22.

AL00022-85

Comment:

5.3.3 Peak Hour Relationships

The future peak hour relationships differ from those measured in the baseline. This is apparently due to different air passenger market segments in the future and is derived from the air transportation/ground transportation model use in the analysis. The Draft EIS/EIR needs to include an explanation of how this difference occurs and should identify the relationships involved.

Response:

The same peak hours were indeed used to measure the potential traffic impacts for the Adjusted Environmental Baseline, the No Action/No Project Alternative, and the four build alternatives. The analysis reviewed the traffic conditions during each peak hour for each alternative and each year scenario, independent of any relationships that may exist during those same peak hours in other scenarios. This was done because, as the commentor correctly suggested, the model was ultimately based on the air passenger forecasts, which shows varying peaking characteristics for each year and each alternative. Therefore, it is not expected that the relationships that may exist in one scenario would be the same in another scenario. Also, there are actually several peak hours displayed by the traffic conditions in and around LAX. The peak hours of commuter traffic are represented by the 8:00 to 9:00 a.m. and 4:00 to 5:00 p.m. hours. These are the hours that most background traffic peaks on the west side of Los Angeles. However, some traffic peaks at different hours than these shown and the general area traffic may shift slightly month-to-month. Likewise, the airport peak hour was determined to be approximated by the 11:00 to 12:00 noon hour. Some types of traffic may peak at a different time, but the hour that the overall passenger traffic peaks—based on the air passenger flight schedule—is 11:00 to 12:00 noon. Like background traffic, the hour that air passenger traffic peaks may shift slightly from year to year, however, it is not expected to shift substantially from the mid-day hour of 11:00 to 12:00 noon from year to year. Therefore, these hours were determined to be the most appropriate for the analysis. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology.

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AL00022-86

Comment:

5.4 Transportation Improvements

The Master Plan proposes an ambitious set of transportation improvements, particularly those related to the new west terminal. There are also major roadway facility improvements proposed, including new freeways and freeway connections. The detailed traffic modeling analysis appears to have satisfactorily matched this system with the needed capacity. However, in order to ensure the estimated traffic demand is served, it is important that a formal commitment to implement such facilities is secured. In addition, this is an important economic consideration in the overall financing of the Master Plan. The extensive transportation improvement program is a key element of the Master Plan and is the basis for the offsite analysis in the Draft EIS/EIR. Therefore, it is essential that assurance of funding and implementation of the improvements be included in the form of a mitigation program.

Response:

Please see Response to Comment AL00008-6 regarding funding.

AL00022-87

Comment:

Also of importance is the phasing of improvements; there is minimum discussion in the Draft EIS/EIR on this topic. There is a perception that traffic is bad today; however, it is difficult to verify to what extent traffic problems exist considering the 1996 baseline does not measure traffic increases that have occurred over the past five years. Without a phasing or mitigation monitoring program, there is no assurance that traffic conditions will be improved as a result of the proposed improvement program.

Response:

Please see Topical Response TR-ST-3 regarding phasing. Also, a mitigation phasing plan was included as Table S4.3.2-13 in the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00016-24 regarding the mitigation monitoring program.

AL00022-88

Comment:

5.5 Discussion of Impacts

While the Traffic section identifies several major improvements to circulation around the airport through the construction of the Ring Road and the LAX Expressway, there are many key areas that need to be discussed, but were apparently not considered. These include: (1) the impacts on the Interstate 405 (I-405) Freeway north of the LAX Expressway; (2) the impact of spillover traffic from the overloaded I-405 Freeway onto parallel north/south arterials, Lincoln, Sepulveda, and La Cienega Boulevards; (3) the impact of the spillover from the I-405 Freeway onto streets in Culver City; (4) the impact on nearby unincorporated areas of Marina del Rey, Lennox, Ladera Heights, Baldwin Hills, Athens, Del Aire, and El Camino Village; (5) the impact of not constructing the Arbor Vitae/I-405 Freeway ramps; (6) the configuration of Imperial Highway as the south part of the Ring Road; (7) the method of providing direct access to Main Street in El Segundo from the Ring Road; and (8) the impacts on the freeways, arterials, and communities if the proposed project is not approved and the mitigation measures are not implemented. As previously stated, the Draft EIS/EIR requires full disclosure and is intended to insure that all significant impacts are considered prior to project approval; without addressing the issues presented above, the Draft EIS/EIR cannot be considered adequate.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR

and the Supplement to the Draft EIS/EIR. The following addresses each of the specific concerns raised in the comment, as keyed to the parenthetical numbering of each concern:

(1) The impacts on I-405 north of the LAX Expressway are discussed in Topical Response TR-ST-4.

(2) The impact of spillover traffic from the overloaded I-405 is discussed in the impact and mitigation analyses in subsections 4.3.2.6 and 4.3.2.9 of the Draft EIS/EIR, as well as in Technical Report 3b, Sections 4 and 5.

(3),(4) Please see Topical Response TR-ST-2 for a discussion on study area definition and identification of facilities analyzed.

(5) The analysis in the Draft EIS/EIR and Supplement to the Draft EIS/EIR assumed that no portion of the Arbor Vitae interchange will be built in any pre-2015 scenarios. The year 2005 analysis in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and in Technical Reports 3b and S-2b, therefore show project impacts without the Arbor Vitae interchange for the year 2005. The Arbor Vitae half-interchange is not proposed as a mitigation measure for the LAX Master Plan, nor is it an element of the Master Plan itself. The half-interchange is on the list of background transportation improvements to be implemented in the future. As shown in Table 2.3 of Technical Report 3b, all year 2015 scenarios analyzed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR (all baseline alternatives and all project alternatives) include the assumption that one-half of the Arbor Vitae Interchange at I-405 will be built by the year 2015. This assumption is made in order to achieve conformity with NEPA and CEQA requirements for environmental impact analysis. The half-interchange project was funded in the Regional Transportation Improvement Program (RTIP) and included in the Regional Transportation Plan (RTP) at the time the EIS/EIR project began, and is in both adopted documents at the present time. It is noted that the Southern California Association of Governments (SCAG) removed the Arbor Vitae half-interchange from the RTP and RTIP on April 12, 2001, but then amended the RTP and RTIP on March 9, 2002 to incorporate the half-interchange. The Draft EIS/EIR and Supplement to the Draft EIS/EIR analyses indicated that only a small number of airport trips use this half-interchange. In Alternatives A, B, and C, vehicles on I-405 to/from the north wishing to connect to Arbor Vitae Street and the LAX Ring Road would not be able to use the Arbor Vitae ramps (they do not connect to/from the north). Vehicles connecting between I-405 north and Arbor Vitae west/ring road have a separate expressway facility that makes the connection. Vehicles wishing to connect between LAX and I-405 south generally would not use the Arbor Vitae ramps but instead would have several more convenient opportunities further south including ramps at Century Boulevard, Sepulveda Boulevard, Imperial Highway, and I-105. A scenario in which the half-interchange is not built by 2015, together with a scenario in which a full-interchange is built, will be studied in the near future as a part of the ongoing planning activities for LAX.

(6),(7) Additional analysis of the configuration of Imperial Highway will be conducted as a part of the Neighborhood Traffic Management Program and (if one of the project alternatives that include the ring road is approved) in the subsequent design and environmental review of the ring road.

(8) The analysis of the No Action/No Project Alternative is precisely an analysis of the impacts on the freeways, arterials and communities if the proposed project is not approved and the mitigation measures not implemented.

AL00022-89

Comment:

5.6 Department of Transportation Act

The Department of Transportation Act section should include the No Project/No Action Alternative for purposes of comparison with the build Alternatives and should note that it would avoid impacts to Section 4(f) resources.

Response:

The comment is essentially the same as Comment AL00022-25. Please see Response to Comment AL00022-25.

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AL00022-90

Comment:

In addition, impacts on the Centinela Adobe, a listed National Register site, can be avoided with the "Single Viaduct LAX Expressway options" (Alternatives A or C), but not with the "Split Viaduct LAX Expressway option."

Response:

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

AL00022-91

Comment:

It appears that there are internal inconsistencies throughout the document with regard to the LAX Expressway component of the Master Plan. In Section 3, it is discussed as a feature of each of the build Alternatives (A, B and C). In other sections, it appears to have been deleted from Alternative B. This situation requires further clarification.

Response:

The LAX Expressway is included as a project component of Alternatives A, B, and C. There is no LAX Expressway under the No Action/No Project Alternative and under Alternative D, which was introduced subsequent to publication of the Draft EIS/EIR.

AL00022-92

Comment:

6 Noise

It is important to note that the findings of the Draft EIS/EIR include a finding of significant noise impact that cannot be mitigated to a point of insignificance. The issues raised in our analysis do not change this finding of significance. The comments presented here address whether or not the Draft EIS/EIR adequately discloses the extent and magnitude of the impact and whether or not mitigation issues are addressed adequately.

Response:

Please see Responses to Comments AL00022-93 through AL00022-121 below.

AL00022-93

Comment:

6.1 Determination of Potentially Significant Impacts

CEQA requires that the Draft EIR identify all impacts that could arise to significant levels and must employ the proper "thresholds of significance" to make that identification. CEQA also requires that the document "challenge" and "update" thresholds that may not be current or protective of the public interest. This notion includes the idea of setting thresholds that will improve the quality of life of residents. As it relates to the impacts identified below, LAWA should seize this opportunity to push the Draft EIS/EIR beyond mere minimum standards or code compliance, and assert a more conservative approach to identifying significant impacts. The following identified impacts relate to the use of minimum standards.

The California Environmental Quality Act does not mandate, require or endorse a specific decibel standard or noise metric to determine if a project engenders a significant adverse environmental impact with respect to aircraft noise; however, a significant aircraft noise impact is said to have occurred if one or both of the following conditions exist as described in the California Aircraft Noise Standards:42 noise

sensitive areas (such as residences, churches, and hospitals) are newly exposed to 65 Community Noise Equivalent Level (CNEL) or greater; and, noise sensitive uses within the 65 CNEL contour of a "build" alternative experience an increase of 1.5 CNEL or greater compared with the environmental baseline conditions.

The Airport Noise Compatibility Planning guideline⁴³ is the primary Federal regulation guiding and controlling planning for aviation noise compatibility on and around airports. It establishes, for most land uses and noise sensitive uses, the standard of < 65 day-night average noise level (DNL or Ldn) as "acceptable," although it recognizes that local communities may choose to mitigate impacts below the Ldn of 65 dB.

The Federal Interagency Commission of Noise (FICON) has identified 65 Ldn as the 24 hour day-night average sound level at which most people become highly annoyed by noise. However, FICON has acknowledged that people may and do become highly annoyed by noise levels well below 65 Ldn. Indeed, many commentators and acoustic researchers are seriously questioning the validity of the 65 dB Ldn criteria for planning purposes, as research has shown that at this level about 15% of the population remains "highly annoyed" and that the standard is an average sound level, not a measurement of individual sound events which tend to effect people more than average levels.

The Draft EIS/EIR should have employed these conservative criteria to allow a survey of a larger area and reveal the true-pervasiveness of sound that was not identified in the Draft EIS/EIR. This would be important in the discussion of impacts and mitigation of noise to show that "average" threshold levels were not sufficient to show the chronic and long term effects within the LAX flight path. It is likely that there will be exacerbated and disproportionate levels of impacts on unincorporated neighborhoods under the flight path approaches to LAX.

42 Title 21 of the California Code of Regulations.

43 Title 14 of the Code of Federal Regulations, Part 150.

Response:

The commentor is correct in identifying that noise sensitive uses are defined by Federal Standards as impact areas of 65 dB DNL/CNEL or greater. The State of California has also adopted the 65 dB CNEL metric as incompatible land use. Numerous studies have demonstrated that annoyance with aircraft noise is most closely correlated with the cumulative noise level (DNL or CNEL), and also that the only useful land use compatibility guidelines for planning in an airport environment are based on cumulative metrics. Therefore, the FAA has developed its land use guidance and compatibility criteria around the cumulative metrics. It has determined that 65 CNEL is the level at which significant impacts are present. Use of the CNEL does not contend that individuals are not bothered or annoyed by single noise events, but rather that a more scientifically acceptable correlation for land use planning purposes is present with the cumulative metric. For more information on 1.5 CNEL or greater impacts, please see Section 4.2, Land Use, and Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR. Nighttime single event noise impacts and mitigation for LAX Master Plan alternatives were presented in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, with supporting information in Appendix S-C1 and Technical Report S-1. Please see Topical Response TR-N-2, single event noise and CNEL differences in particular Subtopical Responses TR-N-2.1 and TR-N-2.2.

AL00022-94

Comment:

6.2 Number of People Impacted by Noise

There is a significant discrepancy in the number of dwelling units and population impacted between the EIS/EIR baseline year impacts and data published by LAWA. Under California law, the airport must publish a quarterly report that describes the noise impact of the airport. This law has been in effect since the early 1970s and LAWA has published the Quarterly Reports as required. Appendix D of the EIS/EIR states that the base year noise impact is based on data published by LAWA in the 1996 Fourth Quarter Report⁴⁴ Chapter 4, Section 4.1.3.1.2 states that the EIS/EIR relies on the Fourth Quarter 1996 operational data but does adjust the EIS/EIR contours to reflect the noise monitoring data that are collected by the airport. The difference between the impacts as defined by the EIS/EIR and the impacts

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as identified by LAWA in its Quarterly Report is dramatic and significant. The following data compare the number of dwellings and population impacted as defined by LAWA in the 1996 Fourth Quarter Report and as defined in the EIS/EIR for baseline year 1996:

Table 6.1 Difference Between Draft EIS/EIR Noise Impact and LAWA 1996 Quarterly Report		
	Dwellings Inside 65 CNEL	Population Inside 65 CNEL
LAWA 1996 Fourth Quarter Report	31,968	85,907
EIS/EIR Table 4.1-2 for 1996	16,900	49,000
Difference	15,068	36,907

The differences shown in the above table are not presented, reconciled, or explained in the Draft EIS/EIR. The population and dwelling data shown in the LAWA 1996 Quarterly Report are not mentioned in the Draft EIS/EIR even though the Quarterly Report shows noise impacts nearly twice as large as those reported in the Draft EIS/EIR. Sections 4.1.3.1.2 and Appendix D Section 2.2 include discussions of the LAWA Quarterly Reports and the fact that the noise contours in the Quarterly Reports are adjusted to reflect noise monitoring data. Appendix D presents the difference between the noise monitoring results and the EIS/EIR noise model results in the terms of dB CNEL in Table 5. The average difference between the two is presented as an under prediction in the model of approximately 1.1 dB. Examination of the data shows that the noise monitor sites east of the airport, primarily in Inglewood, consistently show noise levels nearly 3 dB greater than the EIS/EIR noise modeling predicts. While the differences are smaller in other communities, the bulk of the population impacted is in the area where the monitors show that the noise model has under-predicted the impact.

LAWA operates a permanent noise monitoring system as required by the California Airport Noise Regulations that has been approved by the State of California Division of Aeronautics. LAWA has been monitoring noise on a continuous basis and submitting Quarterly Reports since the early 1970's and every Quarterly Report includes noise impact data based on noise contours that have been adjusted to match noise monitoring data. Nevertheless, the Draft EIS/EIR relies on a noise computer model output that has not been adjusted to reflect the noise monitoring data even though the noise monitoring data show a consistent 3 dB bias in the east approach corridor to LAX.

There is no doubt that there is a consistent bias in modeling data in the Inglewood approach corridor; the size of the difference in the Inglewood area compared to the system accuracy is significant. Appendix D, in the paragraph just below Table 6 makes the misleading and inaccurate statement that the Draft EIS/EIR noise contours "were generally confirmed by the actual noise measurements." This statement is based on the overall average difference at all sites, and fails to recognize the bias in the Inglewood approach corridor. The Draft EIS/EIR contours underpredict the noise impact as measured by the number of dwellings and population within the 65 CNEL contour by an amount that makes it difficult to establish a credible disclosure statement to the general public.

No attempt is made in the Draft EIS/EIR to examine the reason for the noise model underpredicting aircraft noise. The Draft EIS/EIR rationalizes the lack of contour adjustment by stating, "draft FAA Order 1050.E indicates that measurements should not be used to calibrate noise contours."⁴⁵ However, no attempt is made to identify the cause of the discrepancy. The difference could be due to errors in input data to the noise model, not a calibration issue. Failure to adequately account for flight track dispersion could cause the kind of discrepancies the data shows. The model has the capability to report noise levels by aircraft type at each location. Such data should be compared to measurement data for those aircraft and a rational and detailed explanation of the model/measurement differences should be made. At the least, the source of the difference would then be identified (i.e., input data errors, model database differences, or model algorithm shortcomings).

The FAA has a history of being reluctant to adjust noise contours based on measurement data. This policy was based on historical attempts to use short term monitoring data to make adjustments that are not statistically justified. Such a policy is justified, in particular when attempts are made to use a few hours of monitoring data to move noise contours; however, in this case LAWA operates noise monitoring sites 24 hours a day, measuring every aircraft and has been doing so for over 20 years. These data do justify adjusting the noise contours; either by correcting input errors or modifying model databases, such as noise curves and aircraft profiles. These changes are not prohibited by the FAA. The FAA provides a mechanism for user changes to the database. The "INM Users Guide,"⁴⁶ contains

Appendix B, "FAA Profile Review Checklist." The first paragraph of that appendix contains the following statement,

The Office of Environment and Energy (AEE) requires prior written approval for all user changes to the Integrated Noise Model (INM) standard profiles for FAR Part 150 studies. A similar requirement under National Environmental Policy Act (NEPA) will take effect pending FAA Order 1050.1E.

Following that paragraph is a detailed list of information required for the FAA review of user made changes. It is not known if any attempt was made to seek FAA approval of changes needed to make the model better match measurement data. If there was no attempt, the decision should be explained. This last comment is especially appropriate if input errors have already been eliminated as a possible source of the difference.

44 Appendix D Section 2.1, Appendix D Section 2.2.

45 Appendix D, Page 17.

46 For INM Version 6, dated September 1999.

Response:

Appendix D, Aircraft Noise Technical Report, Section 2.2, Comparison of Environmental Baseline Noise To Quarterly Noise Report, explains the differences in the modeling vs. monitoring process. The measured noise data collected at the various sites around the Airport is not adequate to allow the modification of the INM databases to better reflect measured noise levels. The absence of thrust level information for each distance (from ARTS) and noise level combination produced by the monitoring system prevents the modification of the databases in accord with the guidance of the FAA as provided in Appendix C of the INM User's Guide. The INM is intended to be a planning tool for the relative comparison of noise exposure patterns and intensities among environmental baseline, future No Action/No Project Alternative and build alternative development conditions. It was not designed for, nor intended to provide, highly defined noise levels reflecting measured local conditions. Consequently, the modeled noise levels associated with environmental baseline conditions will have consistent relative relationships to future noise patterns prepared with the INM. The Draft EIS/EIR acknowledges and shows the differences in Table 6 that the model under predicts noise levels for some noise monitoring sites. Please see Topical Response TR-N-1 regarding the noise modeling approach. Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information on and comparisons of noise and noise-related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives including new Alternative D.

AL00022-95

Comment:

6.3 Change in Number of People Impacted by Noise

The Draft EIS/EIR relies on the noise model to identify relative changes between baseline and future Alternative conditions. The Draft states, "the modeled noise levels associated with environmental baseline conditions will have consistent relative relationships to future noise patterns prepared with the INM."⁴⁷ This statement, while possibly true for changes in noise level, is not accurate with respect to the area of noise impact, the number of dwelling units, and the population within the noise contours. The implication of the statement quoted above is that the increased number of people identified as impacted will be the same whether or not the noise contours are adjusted to reflect noise monitoring results. This is not true and fails to reflect that area, dwelling units, and population are second order functions of the size of the contour. The change in the number of people residing inside the 65 CNEL contour will be much larger than reported in the Draft EIS/EIR. The percent change may remain nearly constant, but the absolute magnitude will be larger.

If the Draft EIS/EIR contours are not adjusted to reflect monitoring data then the document should attempt to estimate the correct number of dwellings and people inside the contours by using an adjustment factor based on the differences identified for the baseline conditions. While this is far less

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satisfactory than adjusting the contours, the impacts identified would be a far better disclosure of the magnitude of the impact than is now included in the document.

47 Appendix D, Page 17.

Response:

The INM is intended to be a planning tool for the relative comparison of noise exposure patterns and intensities among the 1996 environmental baseline, the No Action/No Project Alternative and build alternative development conditions. It was not designed for, nor intended to provide, highly defined noise levels reflecting measured local conditions. Consequently, the modeled noise levels associated with environmental baseline conditions will have consistent relative relationships to future modeled noise patterns prepared with the INM. Baseline and projected noise levels are provided in detail in Section 4.1, Noise, Appendix S-C1, Supplemental Aircraft Noise Technical Report, Section 4.2, Land Use, and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR. The INM is a planning tool and FAA Order 1050.1D, Change 4 indicated that measurements should not be used to calibrate noise contours. The theory that absolute impact levels would change proportionately, as suggested by the commentor, is correct, but not relevant. Unadjusted INM contour output is required for presentation in EIS documents. It is important to restate that all mitigation associated with the noise levels at LAX will be based on future measured noise levels as measured for Quarterly Report submissions to Caltrans. For more information, please see Topical Response TR-N-1 and Appendix D, Aircraft Noise Technical Report, Section 2.2, Comparison of Environmental Baseline Noise To Quarterly Noise Report, of the Draft EIS/EIR.

AL00022-96

Comment:

6.4 Use of 1996 as Base Year

There is reason to question the use of 1996 as the baseline year. Use of the 1996 baseline appears to underestimate the impact of the project (in addition to the contour adjustment issue identified above). The following table compares 1996, 1999, and Year 2000 noise impacts at LAX:

Table 6.2 LAWA 1996, 1999 and 2000 Quarterly Report Noise Impacts		
	Dwellings Inside 65 CNEL	Population Inside 65 CNEL
1996 Fourth Quarter Report	31,968	85,907
1999 Fourth Quarter Report	26,422	78,026
2000 Fourth Quarter Report	27,312	80,211

The above data show that the use of the 1996 baseline, with its larger impact area, would result in underestimating impacts compared to using 1999 or 2000. The difference in the number of people impacted for the year 1996 and the year 2000 is potentially large enough to change the conclusions as to whether future year contours impact a larger or smaller number of people than baseline conditions. As a result, the noise study should be updated to a more current year.

Response:

The Supplement to the Draft EIS/EIR included a description of the most current environmental conditions that are meaningful and relevant to the analysis of the LAX Master Plan. In instances where these conditions are materially different from those of the 1996 baseline conditions, such differences were described in the Supplement to the Draft EIS/EIR, as were any material differences in the impacts that would result by using the Year 2000 conditions instead of 1996 baseline conditions. Year 2000 conditions were compared to the 1996 environmental baseline conditions in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1, of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-N-1, particularly Subtopical Response TR-N-1.3, regarding a comparison of the 1996 baseline and Year 2000 conditions relative to the noise analysis and Topical Response TR-GEN-1 regarding general baseline issues.

AL00022-97**Comment:****6.5 Project Description/Operational Assumptions**

The noise analysis is a comprehensive analysis that attempts to identify cumulative and single event noise impacts as well as detailed tables of time above specific thresholds. However, in addition to failing to adjust the contours to reflect noise monitoring data, there is substantial uncertainty associated with the future operational assumptions. The operational assumptions are in many cases counter intuitive and lack justification. This makes any analysis of the noise impacts speculative, and potentially underpredicts the impact. The following are examples of areas of concern and point to a need to do a "worst case" analysis in the event that these assumptions can't be assured or justified. The following data were taken from the Executive Summary, Pages ES-9 and ES-10.

Response:

As discussed above, for noise modeling purposes noise levels were not adjusted to reflect noise monitoring data. The INM is intended to be a planning tool for the relative comparison of noise exposure patterns and intensities among future No Action (baseline) and build alternative development conditions. It was not designed for, nor intended to provide, highly defined noise levels reflecting measured local conditions. Consequently, the modeled noise levels associated with environmental baseline conditions will have consistent relative relationships to future noise patterns prepared with the INM. Topical Response TR-N-1 addresses the commentor's concerns regarding noise modeling approach.

AL00022-98**Comment:****6.5.1 Passengers Per Departure**

The baseline passengers per departure are 90.76 while Alternative C assumes 145.09. It is not explained how LAWA expects the project to result in a relocation of short haul operations to some other airport and an increase in average aircraft size. There is no component of Alternative C that results in a nearly 60% increase in passengers per departure. This increase is extraordinarily large given that no part of the project forces commuter or short haul aircraft to move or even includes a design feature that discourages these aircraft. In light of this, the Draft EIS/EIR should contemplate the noise impacts if this assumption proves to be false and commuter and short haul carriers do not move to some other airport. Further, the extent to which the passenger per departure increase is due to increased load factors needs to be addressed and a discussion of whether or not this increase in load factor (expressed as an increase in aircraft weight) was included in the INM input for the future case scenarios needs to be explored.

Response:

Comment noted. The Master Plan predicts that the airlines would adjust air service patterns in several ways in response to capacity constraints at LAX. The No Action/No Project Alternative assumes that the runways would not be changed from baseline conditions and only maintenance or rebuilding projects and those airfield projects that are assumed to be finished and that have environmental approval are completed. Under the No Action/No Project Alternative condition, as well as Alternative C, the 2015 unconstrained demand cannot be accommodated due to capacity constraints. However, the differences in the type and size of facilities available in the No Action/No Project Alternative versus Alternative C provide different opportunities for the airlines to make adjustments to air service patterns. The proposed developments included in Alternative C, provide the airlines with the ability to bring larger aircraft into LAX. As a result, the predicted air service for Alternative C includes growth in international service, a focus on O&D passengers, a reduction in commuter service, and reduced service to short-haul markets with high levels of air service (or an increase in the size of the aircraft serving these markets). See Draft LAX Master Plan Chapter 5, Section 3.3.2 ,Final Iteration Constrained Activity, on page V-3.181 for more information on the predicted air service adjustments. One of the implications of the described air service changes is an overall increase in the average size of the aircraft using the airport (while the number of flights would remain within the limits of the airfield's practical capacity based

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on maximum tolerable average delays of 10 to 15 minutes) in order to maximize the use of the limited airside capacity. The increase in average aircraft size would not happen immediately and would more likely occur over time throughout the planning period as airlines adjust air service patterns.

The design day passengers per departure ratio is projected to increase from 90.76 in 1996 baseline to 145.09 in Alternative C by 2015 as a result of predicted air service changes. The higher enplanements per departure ratio with the Alternative C activity scenario reflects that under constrained conditions, the airlines will focus on the most profitable routes and service and attempt to serve as many passengers as possible, through the use of larger aircraft, within limits. In order to do so, a reduction in commuter operations is predicted. Therefore, while the enplanements per departure ratio does not increase beyond the unconstrained forecast ratio for any particular air service region (commuter, international, domestic) the overall enplanements per departure ratio is higher with Alternative C than the unconstrained forecast because of the shift to domestic and international air carrier service over commuter service. See Chapter V, page V-3.195 of the Draft LAX Master Plan for a summary of the enplanements per departure ratios for each region.

The predicted air service changes are reasonable assumptions since they are based on historical observations and aviation industry trends. The Master Plan acknowledges that these air service and activity levels are dependent on the collective decisions of the airlines and the predicted adjustments may not be fully realized. For example, if the airlines do not choose to reduce commuter service, the average aircraft size would be smaller and fewer passengers could be served with Alternative C than is predicted in the Master Plan (although operations levels would be similar). The environmental analyses in the EIS/EIR, including noise and air quality, have addressed the potential impacts under the most practical and most likely activity level for Alternative C. This fulfills the requirement of National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) to evaluate reasonable alternatives.

Significant increases in load factors were not assumed for any of the alternatives. The resulting 2015 load factor for Alternative C is 74.01 percent, only slightly higher than the 1996 average load factor of 72.25 percent.

AL00022-99

Comment:

6.5.2 Cargo Activity/Cargo Building Space

The baseline cargo activity is 1.9 million tons of cargo using 1.9 million square feet of space. Alternative C activity is 4.1 million tons using 5 million square feet. The future ratio assumes that new cargo facilities are no more efficient than the old LAX facilities and fails to recognize that modern facilities may handle twice the amount of cargo per square foot. The basis for the assumption is not provided. The noise analysis should be based on the potential impact of far more cargo traffic than is currently estimated.

Response:

Please see Chapter 2, Section 4, regarding Cargo Facilities Existing Conditions, and Chapter 3, Section 9, regarding the LAX Air Cargo Forecast, in the Draft LAX Master Plan. In addition, please see Topical Response TR-MP-1 regarding cargo handling. The new Enhanced Safety and Security Plan Alternative, Alternative D, analyzed in the Supplement to the Draft EIS/EIR, was added to provide a build alternative designed to serve a level of future (2015) airport activity, including cargo activity, comparable to the No Action/No Project Alternative. It should be noted that the formulation of the build alternatives assumed increased efficiencies in cargo processing - see Response to Comment AL00022-5. Please also see Subtopical Response TR-N-6.2 regarding the relationship between air traffic and noise and Subtopical Response TR-N-6.3 regarding the relationship between aircraft size and noise.

AL00022-100

Comment:

6.5.3 Maximum Airside Capacity

The Draft EIS/EIR nearly doubles the terminal space and assumes a very modest increase in passengers and operations. This is based on the assumption that future technology will not increase the capacity of existing runways. However, the opposite should be explored. That is, what would the result be if improved technology results in increases in airside capacity? Given the increase in terminal space, how much air traffic could those terminals handle? Noise impacts should be disclosed for air traffic estimates based on maximum terminal capacity for the proposed project.

Response:

Please see Response to Comment AL00036-30 for a discussion on the impact of technology improvements on capacity. Please also see Response to Comment PC00599-7 for a discussion on the requirements of NEPA and CEQA in evaluating different activity levels. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient.

AL00022-101

Comment:

6.5.4 Peak Hour Operations/Delay

The All Weather Peak Hour Operations are identified as 150 for the baseline condition and 145 for Alternative C. The All Weather Average Delay is identified as 8.69 minutes while the Alternative C delay is identified as 13.59 minutes. This is counterintuitive and at the very least challenges the credibility of the aviation forecasts upon which the noise analysis is based.

Response:

The All Weather Average Delay for Alternative C in 2015 is incorrectly noted in the Draft EIS/EIR, Table 3-2 and Chapter V of the Master Plan, Figure V-3.39 as 13.59 minutes, as referenced by the commentor. These tables will be updated to reflect the correct value of 13.81 minutes, referenced in the Chapter V of the Draft LAX Master Plan, Table V-3.36.

The higher delay and lower hourly capacity for Alternative C in the year 2015, as compared to the 1996 baseline, are the result of the larger aircraft fleet mix anticipated for Alternative C to accommodate passenger demand in the year 2015. The differences in air service, aircraft size and enplanements per departure between 2015 Alternative C and the 1996 baseline are explained in Response to Comment AL00022-98. Bigger, heavy aircraft capable of takeoff weights of more than 255,000 pounds, such as the Boeing 767 and 747 aircraft, require that a greater separation (or distance) be maintained due to wake turbulence. The greater separation required following a heavy aircraft reduces the number of aircraft take-offs and landings on the runway system in a given period time, thereby increasing delay and reducing aircraft operations. The net result is that in 2015 Alternative C can accommodate more total passengers than the 1996 baseline by using bigger aircraft, but a lesser number of operations are conducted in the peak hour and, on average, each operation incurs more delay.

Delays in the year 2015 are also estimated to increase in the No Action/No Project Alternative to 13.33 minutes/operation (from 8.69 minutes in the 1996 baseline). As such, in the year 2015 delays are estimated to be very similar between the No Action/No Project Alternative (13.33) and Alternative C (13.81). A bigger aircraft fleet mix in the year 2015 is also in part the reason for the No Action/No Project Alternative's substantial increase in delay. Additionally, delays increase in the 2015 No Action/No Project Alternative due to the constraints of the existing airfield and terminal ramp. As a result, in the year 2015 Alternative C accommodates 10.9 million annual passengers more than the No Action/No Project Alternative without a significant increase in delay.

AL00022-102

Comment:

6.5.5 Terminal Space/Number of Gates

Alternative C increases terminal space from 4 million square feet to 7.3 million while gates increase from 165 to 172 (186 to 228 narrow body equivalents). The narrow body equivalent ratio increases

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from 21,500 square feet per narrow body equivalent gate (baseline) to 32,000 square feet per gate, which is nearly a 50% increase. It appears that the project will have a larger gate capacity than is being reported and, if so, this needs to be accounted for in the noise analysis.

Response:

Terminal space requirements are defined by the passenger volume for the terminal functional areas such as departure lounges, concession, public space, Federal Inspection Services, airline, non-public, and mechanical areas. In contrast, the number of aircraft gates is determined by the number of aircraft operations and fleet mix. Since Alternative C is projected to have a larger fleet than existing conditions, terminal space requirements for passenger processing functions increase at a greater rate than the number of gates. The methods used for determining gate requirements and terminal space requirements for Alternative C are described in the following paragraphs.

Peak hour passengers, Narrow Body Equivalent Gate (NBEG), and Equivalent Aircraft (EQA) have been used to estimate the demand for terminal and gate facilities for Alternative C. Aircraft gate requirements in terms of NBEG have been estimated using two methods, the annual passengers per gate approach and flights per gate approach. The NBEG index was used to standardize the definition of "gate" and to provide a consistent means for evaluating apron utilization. This index converts the gate requirements of diverse aircraft - from small commuters to new large aircraft - so they are equivalent to the apron capacity of a typical narrow body aircraft gate. The recommended gate mix in terms of nominal gates has then been finalized based on the forecast fleet mix. Alternative C increases the number of nominal gates from 165 to 168. The increase is larger in terms of NBEG (NBEG increases from 185.0 to 222.2), reflecting the larger fleet mix that is projected for Alternative C. See Table V-3.26 of the Draft LAX Master Plan for a comparison of the existing terminal and gate facilities to Alternative C.

Once the nominal gate mix is determined, the concept of Equivalent Aircraft (EQA) is introduced for sizing terminal facilities by determining the passenger capacity of a gate. EQA, however, normalizes each gate based on the seating capacity of the aircraft which can be accommodated. In addition to EQA index, peak hour passenger volume is used since it is one of the standard aviation industry parameters by which airport terminal facilities are planned. To accommodate the forecast peak hour passenger volume for Alternative C, calculations were made to determine area per passenger, area per gate, and other industry determinants of demand. The needed space of each element of a terminal facility can vary depending on the acceptable level of crowding and processing time. To develop terminal facility requirements for LAX, a demand/capacity analysis was completed for each major terminal component, along with observations conducted in the facilities during typically busy periods. The planning factors used to project space requirements are based on observations made in major activity areas of the terminals, accepted airline industry standards, facilities programs, and other independent capacity studies with enhancing passenger comfort level in mind. The terminal space for Alternative C is nearly doubled to serve projected peak hour passengers in 2015 which is also almost doubled from 16,682 in 1996 to 24,519 in 2015. See Chapter IV, Facility Requirement, Section 4.1, Peak Hour Passenger Activity, and Section 4.3, Terminal Facility Requirements, of the Draft LAX Master Plan for a detailed explanation of development of the terminal facility requirements.

The noise analysis is consistent with the Master Plan's future terminal and gate capacity assumptions.

Alternative C does provide increased terminal and landside capacity. However, the airfield constraints would still limit the amount of activity that can be served at LAX under this alternative. It is possible that the terminal facilities could serve more than the 89.6 MAP (at a lower level of service than is desired) if there were no other constraints at the airport. However, because the airfield will already be operating at high delays at 89.6 MAP, the ability of the terminal to serve beyond 89.6 MAP is not an issue.

Alternative D was developed as a new alternative in response to public comment on Master Plan Alternatives A, B, C, and the No Action/No Project Alternative. Alternative D, the LAWA staff's preferred alternative, would be designed to serve approximately 78 MAP, which is similar to the activity level identified in the scenario adopted by SCAG for LAX. Alternative D would consist of a total terminal gross area of about 6.5 million square feet with a total of 153 contact and commuter gates in 2015 (179 narrow body equivalents). Alternative D would require the use of fewer gates to achieve the same level of activity due to the higher utilization rates of contact gates at a level of service that exceeds the No Action/No Project Alternative. Similar to the other Master Plan alternatives, the airfield constraints of Alternative D would limit the amount of activity that can be served at LAX. For further discussion on the

terminal facilities and activity levels associated with Alternative D, please see Chapter 2, Section 2, and Chapter 3, Section 3, respectively, of the Draft LAX Master Plan Addendum.

AL00022-103

Comment:

6.5.6 Regional Issues

The project is primarily a landside development project (terminals and roads) with no new runways. A major assumption in the document is that some other airport in the region will absorb the unmet aviation demand. The Draft EIS/EIR does not identify which airports will meet this demand or any mechanism to ensure that this assumption is valid. LAWA, as proprietor of multiple airports is lead agency for the EIR and the FAA is a lead agency for the EIS. Both agencies have the ability to commit to or fund airport projects outside of LAX. The document needs to address the noise issues in the event that future airport capacity is not developed elsewhere in the region. The Draft EIS/EIR should include an Alternative that meets the aviation demand for the region - either through committing to a regional solution or anticipating additional runways in Alternative C - and discloses the noise impact of that Alternative.

Response:

The City of Los Angeles owns and LAWA controls the operation and potential expansion of four airports: LAX, Ontario, Palmdale, and Van Nuys. The other regional airports are controlled by other jurisdictions that are responsible for their respective operation and expansion. Please see Topical Response TR-RC-1 that discusses demand and capacity at the region's airports.

An update of the master plan for Ontario is currently underway in order for Ontario to play its part in addressing the anticipated regional demand. The local community supports the airport's growth, and Ontario has the potential to capture a much larger share of total regional demand. Space is available for terminal development between and adjacent to the existing terminals.

In response to the direction of Mayor Hahn, LAWA has developed a new alternative for consideration as part of the LAX Master Plan. Alternative D, the Enhanced Safety and Security Plan Alternative, is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. To ensure that the LAX Master Plan Alternative D has been fully analyzed to the level of the previous Master Plan alternatives, LAWA prepared a Supplement to the Draft EIS/EIR. Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR provided extensive information on the formulation of this alternative and its consistency with the SCAG 2001 RTP.

AL00022-104

Comment:

6.6 Health Effects of Noise Technical Report

Technical Report 14b contains a generalized discussion of the effects of noise on people. In the last paragraph of Section 1, the report concludes with the statement, "It is, therefore, assumed that compliance with the compatibility criteria is sufficient to protect human health." The statement in itself is correct, but is misleading in its implication that LAX complies with the compatibility criteria. The report fails to make a most important conclusion related to health effects of noise: LAX does not comply with the compatibility criteria. Based on this factor, it can then be concluded that noise levels associated with aircraft operations at LAX have adverse health effects on people. This should be addressed in the Technical Report and the Draft EIS/EIR should identify the health effects associated with high noise levels including the fact that in 1996 over 85,000 people resided in areas that exceeded the compatibility criteria.

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

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AL00022-105

Comment:

6.7 Mitigation of Noise Impacts

The proposed project includes no noise mitigation recommendations for the proposed project. It should be noted and clearly recognized that LAWA has an ongoing noise mitigation program that has been in place for many years and has periodically introduced new programs as appropriate.

Response:

Comment noted. Please see Topical Responses TR-LU-5 and TR-N-4 regarding noise mitigation measures presented in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The Supplement to the Draft EIS/EIR included new mitigation measures that would revise the Aircraft Noise Mitigation Program to encompass noise-sensitive uses newly exposed to single event noise levels that may result in nighttime awakening and classroom disruption. For a description of the Aircraft Noise Mitigation Program see Topical Response TR-LU-3. One example of a new program that is currently administered by LAWA to remove incompatible residential uses from areas exposed to high noise levels is the Voluntary Residential Acquisition/Relocation Program for the Manchester Square and Belford areas. As further described in Section 4.2, Land Use (subsection 4.2.3), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Topical Response TR-MP-3, the Voluntary Residential Acquisition/Relocation Program for the Manchester Square and Belford area is a separate program from the LAX Master Plan and was established based on interest from homeowners and residents who requested that LAWA purchase their property in lieu of soundproofing. A discussion of measures considered under the Noise Abatement Program is provided in Response to Comment AL00022-106 below and Topical Response TR-N-7. Also see Response to Comment AL00022-28 regarding noise mitigation recommendations.

AL00022-106

Comment:

What is not clear is why the proposed project does not address any new noise mitigation programs. Several are discussed in detail in Appendix D but not recommended. These include the following that should be given further consideration for inclusion as recommended programs for the proposed project:

- Shorten downwind leg approach to reduce number of overflights to communities well east of the airport.⁴⁸
- Eliminate early turns over El Segundo.
- Reevaluate the benefit of restricting outboard runways to arrivals only in terms of number of people and dwellings inside the 65 CNEL contour.

The analysis in Appendix D only describes benefits and impacts in general terms of change in noise level but not in area impacted. Further, the analysis appears to rely on questionable economic data to estimate the mitigation cost. Specifically, the analysis assumes that the delay of 2 to 4 minutes associated with the measure would apply to all flights independent of time of day. It would be more logical to assume that the delay would be longer during peak periods and shorter during the off peaks.

An important aspect of the existing LAX noise mitigation program is the preference for west flow departure operations. The project assumptions presented in Appendix D appear to assume some degradation in the amount of time that the airport is in west flow for departures. Figure 10 of Appendix D shows 5.71% of operations in east flow for the proposed project. Table 3 of Appendix D indicates that less than 1% of departures are to the east for baseline conditions. Figure 10 and Table 3 are in different formats, so the above comparison may not be fair, however, the Draft EIS/EIR does not provide assurance that the project will not result in an increase in east flow departures.

48 Exhibit 29 of Appendix D.

Response:

New mitigation programs were discussed in the Draft EIS/EIR. Section 7 of Appendix D, in particular Section 7.2, Alternative-Specific Abatement Opportunities, identify potential mitigation measures. The continuation of existing mitigation measures and the implementation of new measures were discussed in subsection 4.1.8, Mitigation Measures, of the Draft EIS/EIR and subsection 4.2.8 of the Supplement to the Draft EIS/EIR. Noise mitigation is also addressed in Topical Response TR-N-4.

The commentor is correct in identifying that numerous cities east of LAX are impacted by aircraft operations. The commentor suggests that the base leg (perpendicular) segment of the westerly approaches to the airport be conducted nearer the airport. This general approach is used by all traffic arriving from west coast, Pacific and European origins. Under varying traffic conditions, the base leg moves eastward or westward over communities east of the airport to better increase the separations between arriving aircraft and to safely and efficiently sequence them into the arrival flows coming directly from the east. The reduction of the length of the downwind segment of the approach would result in a reduction of the ability to air traffic control to handle traffic during the busiest hours. Any modifications to the base leg approach to reduce the impacts of flights over communities under them beyond the 65 CNEL contour will be undertaken independent of the Draft EIS/EIR process (see Subtopical Response TR-N-3.5). For further information on the effect of these approaches, see Subtopical Response TR-N-3.5 regarding the effects of elevation on noise.

Early turns over El Segundo have been a focus of public complaint for years. The airport has attempted to deal with the issue for years through the posting of signs at the end of each runway calling for flight to the coastline prior to turns, but occasional deviations from the procedure continue to occur. A part of the reason is the alignment of the runways relative to the community. The west-end of the runways nearest El Segundo are closer to the community than the east ends (the runways are aimed more toward the community's west end). Mitigation measures proposed for implementation during future years include the continuation of the current measure to fly to the coastline prior to turns, as well as the development of instrument departure procedures that would provide additional guidance to properly-equipped aircraft to better enable them to fly to achieve that intent. For further information about the early turns and their mitigation, please see Topical Response TR-N-3, in particular Subtopical Response TR-N-3.2.

The restriction of the outboard runways to arrival operations only was evaluated, but found to be operationally inefficient in the various alternatives. While the measure has the potential to minimally improve the noise levels over slivers of land north and south of the airport, the cost of additional air traffic delays associated with its implementation was deemed to outweigh its benefits. One purpose of the proposed development actions is to sustain and improve the operational efficiency of the airport to enable it to meet future demand levels. The introduction of noise abatement actions that reduce operational efficiency (such as the limitation of the outboard runways to arrivals only) was rejected as impractical and in contravention to the project purpose and need. Detailed contour analysis of the alternative was not conducted, but a qualitative analysis of the number of operations and their related noise levels was conducted to draw these conclusions.

The analyses did quantify the area impacted. Throughout Appendix D of the Draft EIS/EIR as well as within the text of the Draft EIS/EIR - see in particular Table 4.1-9, Table 4.1-10, Table 4.1-13, and Table 4.1-16, and in Appendix S-C1 of the Supplement to the Draft EIS/EIR, as well as Table S4.1-24 of the text of the Supplement to the Draft EIS/EIR, provide the commentor with area impacted. The economic estimates of the costs of the various mitigation actions were based on average delays of 2 to 4 minutes each. Obviously, during periods of light operations, there may be zero delay, but during periods of peak operations, the delay will be significantly greater than average. The average used in the analysis is derived from total daily delay divided by the number of operations affected.

The commentor correctly states that Figure 10 -The Assumed Runway Characteristics-Alternative C, and Table 3, Flight Track Utilization Percentages -Environmental Baseline, are two different charts that are in two different formats. The two charts present different information. A better comparison would be for the commentor to use Table 32, 2005 Flight Track Utilization Percentages Alternative C, or Table 33, 2015 Flight Track Utilization Percentages Alternative C, to compare to Table 3. Table 3 presents historical information related to the actual operations that occurred during 1996. The tables of projected future flight track utilization are based on the application of long-term wind and weather data for the LAX environs to simulations of airfield operating conditions. The results of those evaluations indicated that the application of federal standard tail-wind and visibility criteria to the operating environment resulted in nearly 6 percent of all operations being conducted in east flow. During a recent 18 month period, 82

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jets departed to the east when over-ocean procedures were in effect, an average of about one per week. No assurance can be provided that the projects will not result in an increase of east flow departures because it is not in LAWA's power to make such assurances. However, LAWA will base its mitigation program for sound insulation on actual noise levels from measured conditions, and will be pursuing Federal approval of a restriction to make over-ocean procedures mandatory when they are in effect between midnight and 6:30 a.m. As noted by the noise abatement procedures delineated in Topical Response TR-N-7, easterly operations occur when weather or wind conditions require east traffic flow.

AL00022-107

Comment:

The last mitigation measure that should be given consideration is the expansion of the sound insulation program to homes within the 60 CNEL contour. Such a program may not qualify for traditional Federal funding but there may be an opportunity to use passenger facility charge (PFC) funding for such a program. Because community concerns about the impact of aircraft noise goes so far beyond the boundary of the 65 CNEL contour (particularly when the contour is not adjusted to match noise measurement data), consideration of expanding the program should be given a thorough evaluation in the Draft EIS/EIR. Figure 4.2-5 shows the 1992 65 CNEL contour upon which the insulation program is based. The Draft EIS/EIR should compare this contour with the project 60 CNEL contour and evaluate the cost of expanding the program to include the 60 CNEL contour.

Response:

Comment noted. Refer to Topical Response TR-N-2, in particular Subtopical Response TR-N-2.2 regarding why the expansion of the ANMP under the LAX Master Plan would not be extended to include the 60 CNEL. As stated in that response, the Supplement to the Draft EIS/EIR included an analysis of single event noise levels that may result in nighttime awakenings. As stated in Section 4.2, Land Use (subsection 4.2.8), of the Supplement to the Draft EIS/EIR, the ANMP would be revised to include areas newly exposed to these noise levels (defined by the 94 dBA SEL noise contour). Under the Aircraft Noise Mitigation Program, the boundary of the noise impact area is validated through continuous noise monitoring at 25 sites in the area surrounding LAX. Regarding additional funding through a PFC, a PFC increase is currently proposed to supplement the current ANMP.

AL00022-108

Comment:

6.8 Miscellaneous Noise Comments

6.8.1 Data Sources and Assumptions

In Section 2.1, the third from last sentence of the second paragraph states, "this EIS/EIR will rely on the results of the Noise Management Bureau's system in the definition of environmental baseline noise levels (per the Fourth Quarter 1996 Report)." This statement is categorically wrong and misleading. It implies that the report relies on the calibrated noise contours produced by LAWA. The report relies on uncalibrated noise contours generated by the noise model that are considerably smaller than the contours presented in the Fourth Quarter 1996 Report.

Response:

Comment noted. The operational data from which LAWA's Noise Management Division prepared its Fourth Quarter 1996 noise contours provides the foundation for defining the environmental baseline (Department of Airports Noise Management Bureau, Fourth Quarter 1996 Noise Report, 1997). For Year 2000 comparisons the Fourth Quarter 2000 Quarterly Noise Report was used. These reports relied extensively on the information from the airport's noise monitoring system and the aircraft operations monitoring system for tracking runway use, flight path utilization, daily distribution of flights, and frequency of operations. To that analysis was added noise of ground maintenance run-up activity to form a baseline noise condition for comparison with future conditions. The details of this evaluation are provided in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR and Appendix S-C1, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-N-1 regarding the noise modeling approach.

AL00022-109

Comment:

6.8.2 Environmental Baseline vs. Quarterly Noise Report

Section 2.2 attempts to downplay the differences between the Quarterly Report contours and the baseline contours in the Draft EIS/EIR. The first paragraph cites a Figure 49 that would help the reader understand that the Draft EIS/EIR baseline is considerably smaller than the Quarterly Report contours, but the figure is missing from the report. The statistical analysis of the noise measurement data and noise model results from Table 6 is completely inadequate and fails to identify the bias in the noise model to under predict noise levels in the approach corridor over Inglewood.

49 Figure 2.3.

Response:

The numbers identified in Table 6 do show that the INM's forecast is less than the measured noise levels for 18 of the 25 noise monitoring sites when compared to the Fourth Quarter 1996 Quarterly Report Data. The INM is intended to be a planning tool for the relative comparison of noise exposure patterns and intensities among the environmental baseline, the No Action/No Project Alternative, and the build alternative development conditions. It was not designed for, nor intended to provide, highly defined noise levels reflecting measured local conditions. Consequently, the modeled noise levels associated with environmental baseline conditions will have consistent relative relationships to future noise patterns prepared with the INM. Please also see Topical Response TR-N-1 regarding the noise modeling approach.

AL00022-110

Comment:

6.8.3 Impact on Schools

Section 3.3 of Technical Report 14b, Health Effects of Noise, has a footnote explaining the 1980 lawsuit settlement with the school district. The analysis appears to assume that because of this settlement there is no impact on schools. The noise analysis should identify which schools have been insulated, which schools remain to be insulated, and how many more schools will need to be insulated as a result of the project.

Response:

As described in subsection 4.2.8 of the Draft EIS/EIR, mitigation in the form of sound insulation or relocation would be provided under Mitigation Measure MM-LU-1 for those schools that experience a significant noise increase unless they are subject to an existing aviation easement. As discussed in 4.2, Land Use, and Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR, several schools within the Los Angeles Unified School District, Inglewood School District, the Centinela Valley Union High School District, and the Lennox School District received \$21 million in settlement funds from the City of Los Angeles as a result of a lawsuit in the mid-1970s. The settlement funds were stipulated to be used for sound insulation of affected schools identified in the 1980 Settlement Agreement (which at the time of the settlement included 64 schools or related school uses). Under the terms of the settlements, each school that participated in the lawsuit agreed to allow an aviation easement deeming the school to be compatible with the airport. The agreement states in part that, on receipt of the Noise Payment, all of the claims were "fully satisfied," and that the Aviation Easements are "for the purposes of resolving all questions between the parties arising out to [LAX operations] . . . with the attendant consequences of noise, vibrations, and fumes interfering with [the affected schools]." The aviation easement was awarded based on 1970 noise impacts with additional surcharge allowances for future construction and growth. 1970 aircraft noise impacts were much more extensive than identified in the 1996 baseline or projected to occur under the Master Plan alternatives. A copy of the Settlement Agreement is provided in Attachment 4, Amended Judgment and Final Order Entered by the Los Angeles Superior Court in January 1980 ("Settlement Agreement"), of this Final EIS/EIR.

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Since publication of the Draft EIS/EIR, a Supplement to the Draft EIS/EIR was prepared to evaluate an additional Master Plan alternative (Alternative D), incorporate information on Year 2000 conditions, and provide new analysis of single event aircraft noise levels that result in classroom disruption. This information was provided in Section 4.1, Noise, Section 4.2, Land Use, Appendix S-C1, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR.

Public and private schools that would be newly exposed to high single event noise levels that result in classroom disruption under each Master Plan alternative, compared to 1996 baseline and Year 2000 conditions, were listed in Section 4.2.6 of the Supplement to the Draft EIS/EIR (Tables S4.2-10, S4.2-14, S4.2-18, and S4.2-28). As was indicated in subsection 4.2.8 of the Supplement to the Draft EIS/EIR, approval of the LAX Master Plan would trigger implementation of Mitigation Measures MM-LU-3 and MM-LU-4 to address aircraft noise impacts on schools. Under these measures, mitigation is provided to establish noise thresholds and provide sound insulation for schools determined to be significantly impacted by single event noise levels that result in classroom disruption and are not already subject to an aviation easement. Until the study referenced in MM-LU-3 is completed, mitigation measure MM-LU-1 would incorporate eligible schools which are significantly impacted by single event noise levels into the ANMP and provide sound insulation to reduce interior noise at or below the aircraft noise thresholds evaluated for classroom disruption.

AL00022-111

Comment:

6.8.4 Federal Standards

Section 4.1.4.1.2 in the last sentence states that the "...FAA has adopted standards and guidance governing airport noise compatibility." The FAA has only published land use compatibility guidelines and has not adopted noise standards. It is up to the local authorities to adopt noise/land use compatibility standards.

Response:

The commentor is correct. However, in the absence of adopted local standards of land use compatibility and commensurate control of land use development to those standards, airports in California use the standards set forth in the California Airport Land Use Planning Handbook, which are virtually identical to the guidance prepared and published by the FAA. While local communities may legislate other local land use and zoning standards, in their absence, this document has adopted the guidance set forth in the FAA and California guidance documents.

AL00022-112

Comment:

6.8.5 Construction Noise

Section 4.1.4.3.1 should reference the City of Los Angeles and the County of Los Angeles Noise Ordinances which contain noise limits and limits on the hours of activity. The noise limits in the ordinance should be identified as a threshold of significance.

Response:

The times reflecting noise ordinances by the City of Los Angeles and County of Los Angeles are not included in the Draft EIS/EIR. Construction noise followed the Draft LA CEQA Threshold Guidelines that did make reference to the Los Angeles Municipal Code referencing noise. While the County and City both have noise limits and limits on hours of activity, each agency does provide a means for a variance either through the County Engineer or City of Los Angeles Police Department Board for work outside those designated hours.

AL00022-113**Comment:****6.8.6 Operations Data**

In the discussion on noise patterns⁵⁰ the first bullet point outlines an increase in heavy aircraft and a decrease in small aircraft. There is no explanation as to how Alternative C accomplishes this transition and there are no explicit features of Alternative C that would appear to encourage it. If the assumption cannot be justified, the noise analysis should be based on trends that reflect a fleet mix that does not rely on heavy aircraft for achieving the passenger demand.

⁵⁰ Section 4.1.6.1.2.2, Alternative C, Aircraft Noise Pattern At 2015.

Response:

As disclosed in Section 3.4.1, Alternative C Operations and Fleet Mix, of Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR, the aircraft fleet mix is forecast to include more heavy aircraft than the No Action/No Project Alternative. In 2005, the proportion of operations by heavy aircraft is forecast to be 26 percent (less than one percent higher than the No Action/No Project Alternative, but an increase of 9 percent from environmental baseline conditions). However, by 2015, the proportion of heavy jet operations is forecast to increase to 38 percent (814 of 2,141 total operations), while in the No Action/No Project Alternative case heavy jets are projected to comprise only 33 percent of the mix (706 of 2,119 operations). The limitation of operational capacity of Alternative C, as compared to Alternatives A and B, will result in a greater proportion of the fleet consisting of larger international aircraft. The propeller aircraft category will shrink substantially from No Action/No Project Alternative numbers and fleet percentage aspects as operators are expected to increase aircraft size to serve passenger demand. For further information please see Subtopical Response TR-N-1.5. The Supplement to the Draft EIS/EIR addresses noise impacts associated with Alternative D in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

AL00022-114**Comment:****6.8.7 Construction Scheduling**

The City and County of Los Angeles have ordinances that limit the hours of construction activity. Section 4.1.8.3, MM-N-9, should reference those ordinances and identify the hours that construction is permitted.

Response:

Please see Response to Comment AL00022-112 regarding the hours of construction activity.

AL00022-115**Comment:****6.8.8 Location Impact Analysis**

The last sentence of the last paragraph on Page 87 states that only CNEL and DNL have a regulatory function. This is a very limiting assumption and fails to recognize that for some types of impacts, these metrics may be inadequate. Specifically, FICON identifies these metrics as potentially inadequate for assessing noise impacts on sleep or noise impacts on the classroom environment. FICON recommends the use of supplement metrics for analysis of these impacts and that should have been done in this Draft EIS/EIR. While the document does present some Sound Exposure Level (SEL) contours and tables of time above data at specific points, the Draft EIS/EIR fails to use these data to assess sleep disturbance or school impacts.

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Response:

The Supplement to the Draft EIS/EIR included a substantial new assessment of single event impacts on sleep disturbance and school disruption. For additional information on sleep disturbance and school disruption, please see Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, as well as Appendix S-C1 and Technical Report S-1.

AL00022-116

Comment:

6.8.9 No-Action/No Project Comparisons

The first sentence of Section 5.1.3 identifies that 11 grid points will be exposed to increases of 1.5 dB. This comparison of the number of grid points is used throughout the analysis. This type of analysis fails to account for the land use that may occur at the grid points. In effect, the grid points, while regularly spaced, are located on random land uses. It would be more accurate to use INM to construct a different contour that shows all areas exposed to a change of 1.5 dB or more, and this contour should be used to quantify the land use impact. The INM has the ability to construct such a different contour.

Response:

The INM does indeed have the ability to generate contours of noise level difference. In fact, maps of areas newly exposed to 65 CNEL also provide contours of 1.5 dB change in CNEL was presented in Section 4.2, Land Use, of the Draft EIS/EIR for each comparison of future alternative to the environmental baseline condition and for each future build alternative and the No Action/No Project Alternative condition. This information was provided for Alternative D and benchmark comparative Year 2000 conditions in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR. Tables in the Land Use section also quantify all the impacts associated with this level of change.

AL00022-117

Comment:

6.8.10 Noise Mitigation

The first sentence of Section 7 identifies the need for mitigation of significant impacts. Since the project is shown to have a significant impact, noise mitigation measures should be proposed.

Response:

Section 7, Noise Mitigation, of Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR, provides for several actions related to aircraft operational noise mitigation, but the substantive mitigation actions for noise impacts are those related to inclusion of newly impacted properties within the Aircraft Noise Mitigation Program (ANMP) boundaries. This action is specifically discussed for each alternative in Section 4.2, Land Use, of the Draft EIS/EIR and Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR. For additional information on this topic, please see Topical Response TR-N-4 regarding noise mitigation and Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

AL00022-118

Comment:

6.8.11 Alternative C Figures

Alternative C, Figure 11, does not use flight track dispersion in the noise model; however, LAWA has radar-tracking ability. A 24-hour period of actual radar tracks should be provided so the reader can see an example of the extent of track dispersion over the affected areas.

Response:

Comment noted. It is not possible to provide flight track mapping for Alternative C because the runway configuration associated with that alternative is not in place. For additional information regarding simplified line drawing flight tracks vs. track dispersion please see Subtopical Response TR-N-1.4.

AL00022-119

Comment:

6.8.12 Area Wide Flight Paths

Alternative C, Figure 17 should be supplemented with one chart for existing conditions. so the reader can identify differences. At a minimum, the text should describe how this chart changes paths relative to existing conditions.

Response:

Comment noted. Exhibits showing the Area Wide Flight Paths for each of the Master Plan alternatives (No Action/No Project, Alternatives A-C) can be found in Appendix J, Constrained Alternatives Airside Simulation Assumptions and Results, Exhibits V-J.38 through V-J.41 of the LAX Draft Master Plan for comparison. Airspace routes for Alternative C are the same as the No Action/No Project Alternative. Additionally, Alternative D airspace routes can be found in Figure E-9, Generalized West Flow Primary Airspace Routes Alternative D of Appendix E - Alternative D Airside Analysis, of the Draft LAX Master Plan Addendum. A description of the changes in the area wide flights paths between the existing conditions and the Master Plan alternatives can be found in Section 2.2.4, Airside Operating Assumptions, of Appendix J of the LAX Draft Master Plan and Section E.1.4.2, Airspace Operating Assumptions, of Appendix E, of the Draft LAX Master Plan Addendum. These sections describe the no build conditions relative to flight paths (i.e., existing conditions) and illustrate such conditions in Figures V-J.16 (westflow) and V-J.23 (eastflow).

AL00022-120

Comment:

6.8.13 Appendix D

Table 7 of Appendix D identifies the forecast year 2005 baseline conditions as 2,107 operations per day and year 2015 are shown as 2,124 operations per day.⁵¹ The Quarterly Report for the Fourth Quarter of the year 2000 shows that current operation levels are 2,280 operations per day (201,347 quarterly operations). Existing operations are already exceeding the 10 and 20-year projections for the No Action/No Project case. Noise analyses and comparisons should be based on realistic descriptions of future no project conditions.

51 Table 8.

Response:

The forecast of aviation activity at LAX for the years 2005 through 2015 reflects the general longer term trends of the aviation industry, but more specifically, the anticipated response from the airlines operating at LAX in a constrained operational environment, where the airport has a limited operational capacity. The forecast anticipates that in response to a limited number of aircraft operations that can land and depart LAX, the airlines will use larger aircraft in order to serve as much of the passenger demand as possible. As the fleet mix becomes larger, and a greater number of "heavy" aircraft (such as the Boeing 767 and Boeing 747) are used at LAX, multiple smaller aircraft positions would be replaced by larger aircraft positions and consequently fewer operations would be needed to accommodate higher passenger activity levels. In the near term, the airlines air service and fleet mix strategies may differ from the longer term forecast conditions.

Following September 11, 2001, air travel declined at most U.S. airports. In light of the current economic conditions and reduced travel, most airlines reduced the number of available seats from 2000 fourth quarter levels to control costs. Compared to the same period in 2000, LAX scheduled seats were down 19 percent for the fourth quarter of 2001. As long as the economy remains in a recession, traffic will likely lag behind passenger forecast levels; however as the economy recovers, traffic can be expected

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to recover to historical growth trends. From 1996 to 2000 trends included the replacement of turboprop aircraft by regional jet aircraft and the continued increase in passenger enplanements.

Please see Response to Comments PC00599-7 and PC00593-1 for a discussion on the fleet mix assumptions. See Chapter V, Concept Development (November 2000), Section 3.3.2, Final Iteration Constrained Activity, of the Draft LAX Master Plan for more information on the activity associated with each alternative and Appendix B, Baseline Update, of the Draft LAX Master Plan Addendum for more information on historical trends and activity levels.

AL00022-121

Comment:

6.8.14 Reduced Impact of Approach Overflights

Exhibit 29, Reduced Impact of Approach Overflights, shows (and the accompanying text contains) an analysis of this approach procedure and there appear to be community benefits to this procedure. Therefore, it is concerning as to why is it not included as a recommended mitigation measure.

Response:

The text in Section 7.2, Alternative-Specific Abatement Opportunities, located in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR, clearly states that for Alternative A, the limitation of the outboard runways to arrival operations only would have an insignificant and virtually unnoticeable effect on the cumulative noise levels east of the airport, virtually no change in the contours north and south of the airport, and would increase annual operating delay by approximately 23,000 hours annually at an annual cost of \$41,500,000. Furthermore, all properties that fall within the 65 CNEL contour are proposed for mitigation through sound insulation. Consequently, the measure's benefits do not exceed its costs, and the inclusion of impacted properties in the sound insulation program is a more expedient means of mitigation. Therefore, the measure was not recommended for inclusion within the operational mitigation program.

AL00022-122

Comment:

7 Air Quality

The key input data used by LAWA in the air quality analysis fall into three major categories. These included the following:

- Ambient air quality data
- Emission data
- Meteorological data

The reasonableness of these data and some of the assumptions that were used in the air quality analysis are discussed in the following subsections.

Response:

Please see Responses to Comments AL00022-123 through AL00022-137 below.

AL00022-123

Comment:

7.1 Ambient Air Quality Data

Ambient air quality data were used for two purposes in the study. One purpose was to define baseline conditions and the other was to estimate background concentrations. Baseline conditions in this case were defined as the maximum air quality concentrations in the vicinity of the airport for existing conditions (an approximate 1996-98 timeframe). Background concentrations, on the other hand, are

defined as the concentrations present in the absence of nearby sources. In other words, the concentrations due to multiple small sources and distant large sources not directly accounted for in the air quality impact assessment. Estimates of background concentrations were used in the analysis to add to the concentration estimates generated by computer dispersion models for the airport and other nearby sources to arrive at estimates of total ambient concentrations.

Data from two air quality monitoring stations were used to characterize both baseline and background ambient air quality conditions. One station was located onsite and immediately to the east of the airport runways in the South Airfield Complex. This station was operated by LAWA for approximately 7.5 months, from August 1997 until March 1998, and measured carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂) and particulate matter (PM₁₀). The other station was located approximately 0.6 mile south of LAX. This station, located in Hawthorne and designated as Station No. 094, was operated by the South Coast Air Quality Management District (SCAQMD) and measured ozone (O₃), lead (Pb), sulfates, CO, NO₂, SO₂, and PM₁₀.

The Draft EIS/EIR does not provide any justification for the location of the onsite ambient air quality monitoring station or any information concerning the primary purpose of the station. Typically, a monitoring station will be located and operated to either measure background concentrations or maximum source impact. Given the location of the station with respect to the prevailing wind direction and the airport runways, the station appears to be situated near the likely maximum source impact area. Data from the station are used to describe "Environmental Baseline" conditions, which is apparently intended to mean maximum source impact for existing conditions. In most cases, computer modeling would be done to identify the locations of maximum concentrations for baseline conditions, and then one or more monitoring stations would be positioned at these locations. If the onsite monitoring station was not positioned at the expected location of maximum concentration, then it is possible that concentrations higher than those reported at the station occurred in the area.

The Draft EIS/EIR does not discuss this, but maximum concentrations from the nearby SCAQMD station are comparable to the concentrations reported onsite by LAWA for the same timeframe. This suggests either that maximum concentrations do not vary significantly in the area or that both stations are similarly effected by nearby sources. The document shows that the maximum concentrations from the onsite monitoring station actually occurred when the station was upwind of the airport.⁵² Thus, the maximum 1-hour CO concentration shown as the Environmental Baseline value in Table 4.6-11 was apparently due to other sources in the area and not the airport. This needs to be rectified.

The basis for locating the onsite ambient air quality monitoring station needs to be explained. If it was located at, or near, the expected location of maximum concentration (for all pollutants) an explanation of how this location was determined should be provided.

It is not clear whether the data from the onsite monitoring station characterize the true maximum baseline (existing) concentrations in the area or only the maximum concentrations at the monitoring site location. If the data do not characterize the existing maximum concentrations, they need to be identified. Finally, the Environmental Baseline concentrations shown in Table 4.6-11 need to identify whether they represent maximum impacts from the airport emissions or if they are due to other sources in the area.

52 Technical Report 4, Attachment Y.

Response:

The on-airport monitoring station was set up to be downwind of the major runway and therefore likely to capture taxi/idle emissions and takeoff emissions. Concentrations from the on-airport monitoring station were compared with data from the Hawthorne monitoring station and found to be similar. Therefore, data from the on-airport monitoring station was found to be representative of the airport environment and was used for this analysis.

The methodologies used to determine the environmental baseline concentrations and ambient background were discussed with South Coast Air Quality Management District (SCAQMD) staff on June 4, 1998, and on December 16, 1998. SCAQMD recommendations were incorporated into the Air Quality Modeling Protocol for Criteria Pollutants, which can be found in Technical Report 4 of the Draft EIS/EIR. This protocol was followed when conducting the air quality impact assessment described in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Therefore, the

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methods used to estimate environmental baseline and background air quality were consistent with SCAQMD guidance.

AL00022-124

Comment:

7.2 Emission Data

LAWA put substantial effort into both identifying and quantifying all on- and off-airport emission sources associated with LAX. Aircraft emissions of the criteria pollutants (except particulate matter) were estimated based on the FAA-approved computerized emission model, EDMS Version 3.2, and the existing aircraft operations. EDMS does not provide emission estimates for particulate matter. Therefore, emissions of particulate matter were estimated based on fuel usage. As part of this review, the resulting baseline estimates for aircraft operations at LAX were compared to emission estimates that have been made for other airports, and they compare very favorably when scaled for activity level. Thus, it appears that the baseline estimates given for aircraft emissions are reasonable but the emission estimates for particulate matter from aircraft operations are probably not highly accurate.

Response:

Since readily available particulate matter emission factors for aircraft engines are outdated or do not exist, scientific and engineering judgment was used to develop estimates of particulate emissions as accurately as possible. This approach is discussed in Attachment H of Technical Report 4 of the Draft EIS/EIR and in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

AL00022-125

Comment:

Table 4.6-8 indicates that CO and volatile organic compound (VOC) emissions will decrease by 2015 with or without the project, while nitrogen oxides (NOx), SO₂, and PM₁₀ will increase. Thus, even in the no-action case, CO and VOC emissions are predicted to decrease by 2015 despite a projected increase of 3 percent in the total aircraft operations. NOx emissions in the year 2015 are projected to increase by 22 percent in the no-action case and even more in the build Alternatives. The Draft EIS/EIR mentions these changes, but it does not offer any explanations. Presumably, these are due to airport improvements that will occur with or without the project; however, the Draft EIS/EIR needs to identify why these changes occur as they are reported.

Response:

As noted by the commentor, future emissions of the No Action/No Project Alternative as well as the build alternatives, are predicated to increase. Appendix G of the Draft EIS/EIR and Appendix S-E of the Supplement to the Draft EIS/EIR offer a more detailed discussion on emission inventory inputs and emission factors used in the development of the on-airport emission inventories. The technical data supporting these inputs can be found in Technical Report 4 of the Draft EIS/EIR and Technical Report S-4 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-AQ-3 regarding emission increases.

AL00022-126

Comment:

Appendix G, page 11, indicates that a memorandum of agreement setting forth goals for reducing emissions from ground support equipment was due to be finalized by the end of 2000 and that the air quality analysis does not necessarily reflect the final agreement. Emissions from ground support equipment are estimated to account for a substantial portion of the on-airport emissions, and thus this agreement could be an important factor. The document should identify the status of this agreement and, if it has been finalized, its affect on results of the air quality analysis should be identified.

Response:

The GSE memorandum of understanding (MOU) is discussed in further detail in Section 2.3 of Appendix S-E of the Supplement to the Draft EIS/EIR.

AL00022-127

Comment:

7.3 Meteorological Data

Meteorological data used in the analyses were obtained from SCAQMD and consisted of 12 months of hourly surface and upper air data collected by the National Weather Service (NWS) at LAX between March 1996 and February 1997. These data were collected onsite at the NWS station located in the South Airfield Complex. Section 4.6 of the Draft EIS/EIR does not specify, but presumably, the wind data were obtained at the standard measurement height of 10 meters (33 feet).

These data were used as input for the dispersion modeling of both the on-airport and off-airport sources. While the correctness of the data for the modeling of on-airport sources probably cannot be questioned, the use of these data for off-airport analyses is of some concern. This is a result of the many off-airport sites that were studied, which likely have much more surface roughness that may cause reduced wind speeds and may also cause the wind direction to be somewhat deviated. Also, if the wind data at LAX pertains to a measurement height of 10 meters, it is likely the winds at 1 meter (the relevant height for modeling offsite intersections) would be lower. For the type of analysis that was conducted at offsite intersections, reduced wind speeds would result in higher predicted concentrations. Therefore, it is not known whether the wind data used for the dispersion analyses at offsite roadway intersections is representative of these locations.

If the wind data from the NWS station at LAX was collected at the standard measurement height of 10 meters, the data needs to be adjusted for the relevant height (approximately 1m) for the dispersion modeling analyses at offsite intersections. If this was not done, the effects on the predicted concentrations need to be explored.

Response:

The 12 months of surface and upper air meteorological data used in dispersion modeling was collected on site at LAX in a special study by SCAQMD. Intersection modeling was performed according to methods outlined in the modeling protocol titled "LAX Master Plan EIS/EIR Air Quality Modeling Protocol for Criteria Pollutants" which was reviewed by SCAQMD and whose comments and suggestions were incorporated into the analyses. The protocol allows for the use of meteorological inputs that are representative of the project location. The meteorological data was obtained at the standard measurement height of 10 meters, and is the data approved for use in this study. Department of Transportation guidance for Transportation Project-Level CO analysis does not include or suggest any alterations to meteorological databases on measurement heights.

As with all dispersion modeling, the peak-value (or worst-case value) for each of the relevant averaging periods was reported for each location. It should be noted that the meteorological data used for the analysis did contain wind speeds of 1 m/s, and, therefore, slower wind speed conditions were included in the analysis.

AL00022-128

Comment:

7.4 Appropriateness Of Analysis Methodology

Computer modeling was used to predict future maximum air pollutant concentrations in public areas of the airport and at critical off-airport locations for each of the future scenarios. The predicted concentrations were then added to the estimated background concentrations and compared with State and Federal standards. Mitigation measures were then identified and additional modeling was performed to evaluate their effectiveness. This is a very logical and reasonable approach with the exception that the Draft EIS/EIR should have also modeled existing conditions. The modeling of existing conditions and the comparison of the predicted concentrations with existing ambient air quality

3. Comments and Responses

monitoring data could have provided very useful information concerning how well the models were performing in this particular application. Once it has been established that the analysis methodologies are performing reasonably well for the existing case, there can be more confidence in the results for the future scenarios. In addition, modeling the existing situation would have provided information concerning the location of existing maximum concentrations and would have determined whether these locations correspond to the locations identified as containing monitoring data. Without this or multiple onsite monitoring stations, it cannot be concluded that the current maximum concentrations have been identified. LAWA needs to model the existing situation at LAX and compare the model predictions to existing ambient air quality monitoring data to obtain a benchmark of how well the models were performing.

Response:

Existing ambient air monitoring data were used in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR to describe the baseline air quality. Accepted emissions estimating techniques and dispersion modeling methods were used to predict air quality impacts for all future alternatives.

AL00022-129

Comment:

7.4.1 Aircraft Operations

Perhaps one of the most critical issues in using EDMS to perform dispersion modeling of emission from aircraft and related sources is the queuing of aircraft for takeoff. This is because aircraft take off into the wind and thus queue for takeoff on the downwind end of the runway, which is typically near the airport boundary. In addition, for jet aircraft, CO emissions predominantly occur when the aircraft engines are at or near idle. At higher engine speeds, CO emissions are usually substantially reduced. Unfortunately, EDMS does not have the capability to estimate queue lengths or queue times. This information must be provided by the user. The Draft EIS/EIR indicates that queue lengths were estimated from simulation model (SIMMOD) data.⁵³ Hence, the accuracy of the EDMS results will depend largely on the accuracy of the SIMMOD projections. Details concerning how the SIMMOD estimates queue lengths were not provided. Queue times were estimated based on the estimated runway takeoff capacity and queue length, which is a reasonable approach, but the runway takeoff capacity may present a problem.

Visual Flight Rules (VFR) conditions were assumed for estimating annual emissions since peak activity would occur during these conditions.⁵⁴ This is probably a reasonable approach for estimating annual emissions, but for identifying short-term maximum ambient concentrations, this assumption could be questionable. During Instrument Flight Rules (IFR) conditions, runway capacity will likely be significantly reduced, causing longer aircraft queues to form and longer queue delay times to occur. This issue does not appear to be adequately addressed. LAWA needs to examine the potential short-term impacts that might occur during IFR conditions when runway takeoff capacity is reduced and aircraft queue lengths and queue times increase and should identify the prevalent meteorological dispersion conditions during IFR conditions at LAX.

The Draft EIS/EIR indicates that a coarse receptor grid with 500m spacing was used and that additional receptors were placed no more than 300m apart along the airport boundary.⁵⁵ Unless a receptor spacing of not more than 100m was used in the areas of probable maximum impact, it is doubtful that the maximum predicted concentrations were identified.

Post processing of the hourly concentrations generated by EDMS is discussed in Section 2.2.5.4 of Appendix G. A portion of this discussion involves the post processing of concentration estimates generated by EDMS during calm wind conditions, which could be important in identifying periods of maximum concentration. Calm wind conditions were defined as winds less than 1 meter per second. In reviewing the hourly meteorological data given in Attachment S of Technical Report 4, it appears that periods when the wind speed was less than 1 meter per second have been set equal to 1 meter per second. Thus, it appears there were no calm conditions, as defined, and the discussion of calm processing may not be relevant. Setting the wind speed to a value of 1 meter per second during low-wind speed periods is an accepted practice for air quality modeling, although with the type of wind sensors used at the NWS weather station at LAX, it is doubtful that the wind direction is accurate during such periods.

53 Appendix G, Section 2.2.5.1.

54 Appendix G, Section 2.1.3.1.

55 Appendix G, Section 2.2.2.

Response:

The SIMMOD model was calibrated to ensure that the simulations reflect actual operations at LAX (known as the baseline simulation). The baseline was calibrated by comparing actual versus simulated hourly operations and airfield travel times with the use of Aircraft Communications Addressing and Reporting System (ACARS) data. ACARS data is used to obtain actual aircraft counts at the runway and to compute actual taxi-in and taxi-out time. All of the assumptions made and the methodology used in developing the baseline calibration can be found in Chapter II, Section 2.3 of the Draft LAX Master Plan. For further discussion on the calibration analysis and its results, please see Chapter II, Section 2.4 of the Draft LAX Master Plan.

Although it would appear that IFR conditions would increase emissions when compared to VFR, VFR can be considered the higher emitting scenario due to the reduction of actual aircraft operations that would occur under IFR versus VFR conditions. Please see Response to Comment AL00018-10 regarding placement of dispersion modeling receptors. Please see Response to Comment AR00004-15 regarding use of CALMPRO. Use of CALMPRO is primarily to obtain block averages, rather than the running averages produced by EDMS. In this case, processing of calm winds was a secondary feature, and irrelevant since calm wind speeds were set to 1 m/s.

AL00022-130

Comment:

7.4.2 Use of ISCST3 Model

The Industrial Source Complex Short-Term Model, Version 3, (ISCST3) was used to estimate ambient concentrations of particulate matter from aircraft operations and various other on-airport sources. ISCST3 is an Environmental Protection Agency (EPA) Guideline model, but it is not designed specifically for airport use. It is probably not exceptionally accurate in this type of application.

Response:

ISCST3 is not specifically designed for airport use. However, EDMS 3.2 dispersion algorithms are based on PAL and CALINE3 dispersion models. Since ISCST3 is a more current and complex model than either PAL or CALINE3 and the airport sources can be reasonably represented in ISCST3, it is believed that ISCST3 is more accurate and equally appropriate as used in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. EDMS 4.1 uses the successor to ISCST3, AERMOD, which contains even more accurate and complex dispersion algorithms and is currently considered the state-of-the-science of EPA's Gaussian dispersion models.

AL00022-131

Comment:

7.4.3 Off-Airport Motor Vehicles

The assessment of air pollution concentrations from motor vehicles at off-airport locations was performed using CAL3QHCR, which is an EPA Guideline model. One year of hourly meteorological data from the airport, along with one week of traffic data, were used to perform a "refined" analysis, as opposed to a worst-case analysis. In a worst-case analysis, generally, a wind speed of 1 meter per second is assumed and all possible wind directions are examined. A refined analysis is less conservative and attempts to more accurately mimic the actual conditions that cause maximum concentrations. Seventeen roadway intersections were selected for analysis. As mentioned previously, the direct use of hourly wind data from the airport to model emissions from off-airport traffic may be questionable. At a minimum, it would probably be appropriate to adjust the wind speed if the measurement height at the airport was 10 meters.

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In Section 2.2.4 of Appendix G, it is indicated that to comply with CalTrans CO modeling protocols specified by the SCAQMD, four receptors (one at each corner of each intersection) were used. If only one receptor was used at each corner in the modeling, as indicated in the document, it is unlikely that the maximum concentrations were accurately identified. Several receptors would need to be placed on each roadway approach to be able to ascertain that the maximum concentration had been located.

Response:

As noted, use of CAL3QHCR requires one year of hourly meteorological data which can provide a more accurate depiction of actual conditions at each intersection. Use of the CAL3QHCR model, and the year of hourly meteorological data, was also necessary to calculate the peak 8-hour average CO concentration for comparison against the 8-hour average National Ambient Air Quality Standard (AAQS) and California AAQS. The South Coast Air Quality Management District provided the meteorological data for use with the LAX EIS/EIR air quality dispersion analysis. Please see Section 2.2.1, Meteorological Data, of Appendix G, of the Draft EIS/EIR for additional information regarding meteorological data used for this analysis.

As noted, the CO hot spot analysis, including receptor locations, followed the Caltrans CO Protocol. Please see Section 2.2.4, CAL3QHCR Model for Local Roadway Intersections, of Appendix G, Air Quality, in the Draft EIS/EIR regarding the CO hot spot modeling parameters.

AL00022-132

Comment:

7.5 Accuracy Of Analysis

The accuracy of the analysis is a function of both the computer dispersion models that were used and the data that were used as input to those models. Of the three computerized atmospheric dispersion models that were utilized (EDMS, ISCST3 and CAL3QHCR), EDMS has probably received the least amount of validation. The FAA has in fact budgeted money to perform additional validation studies during the next few years; however, it should be understood that the accuracy of the analysis for LAX depends not only on the inherent accuracy of the computer models but also on how they were applied and the quality of the input data that was used to drive the models. In the case of EDMS, the accuracy of the predicted concentrations is also substantially dependent on the accuracy of the SIMMOD data. The accuracy of the predicted concentrations for CO and NO_x is probably the most critical in this analysis.

Table 4.6-11 shows the Environmental Baseline concentrations and the predicted unmitigated concentrations for the future Alternatives for on-airport sources. At least in the case of the 1-hour CO concentration, it is almost certainly inappropriate to compare the future predicted concentrations to the Environmental Baseline concentration because the latter was apparently not due to on-airport sources. The indicated maximum 1-hour CO concentration from on-airport sources⁵⁶ was most likely only about one-half the value shown in the table. If this is the case, the predicted unmitigated 1-hour CO concentrations for the 2005 and 2015 No-Action Alternatives are three to four times higher than the maximum concentration that was measured onsite during 1997-98. Given that the projected increase in airport operations is only a few percent and that the background concentration is projected to decrease substantially, this seems very improbable, unless perhaps the onsite monitoring station was not located at or near the location of maximum impact. From this perspective, it appears that the predicted impacts may be very conservative.

Table 4.6-11 also shows that the predicted unmitigated maximum 1-hour NO₂ concentrations for the 2005 and 2015 No-Action Alternatives are eight to ten times higher than the Environmental Baseline value. These concentrations are predicted to occur in the same general area where the onsite monitoring station was located. A review of Attachment Y of Technical Report 4 shows that the measured NO₂ concentrations were not substantially different whether the station was upwind or downwind of the airport. Again, given the projected change in airport operations and if the Environmental Baseline concentration is representative of existing maximum concentration, it seems difficult to justify a concentration increase of this magnitude.

Another method of examining the predicted impacts for the future scenarios is to examine the ratio of the estimated 8-hour and 1-hour maximum CO concentrations. For the existing case, the Environmental Baseline data, based on monitoring given in Table 4.6-11, show that the ratio is about 0.8:1.0. This is typical for monitoring data reported for many locations. The predicted maximum 1-hour and 8-hour CO concentrations for the future scenarios occur at different locations except in the case of the 2005 scenarios for the build Alternatives. In these scenarios, the examination of the ratio is probably most valid, and the 8-hour to 1-hour CO ratio is approximately 0.5:1.0. This appears to be low compared to the existing case, unless airport activity will change substantially. This again may be evidence that the estimated future 1-hour concentrations are too high.

Table 4.6-12 shows the unmitigated maximum CO concentrations at off-airport intersections that are predicted for the future scenarios. These values appear to be unrealistically low when compared to the estimated future background concentrations given in Table 4.6-2. A comparison of these two tables reveals that many of the predicted maximum CO concentrations are equivalent to, or even lower than, the background concentration.

LAWA attempted to quantify the impacts from PM10 emissions; however, it should be recognized that there are even more uncertainties in the predicted PM10 impacts than there are for the other criteria pollutants. This is due to both the emission estimates and the dispersion techniques are more uncertain. It may be noteworthy that although the 2015 No-Action Alternative has approximately the same total annual unmitigated emission rate as the build Alternatives, the unmitigated maximum concentrations shown in Table 4.6-11 are substantially lower for all of the build Alternatives. It may be appropriate to explore the reasons for this, especially considering the background concentration accounts for a large portion of the predicted concentrations.

As mentioned previously, the direct use of hourly wind data from the airport may be questionable for use in modeling air quality at off-airport roadway intersections. Wind data from the airport were presumably obtained at the standard measurement height of 10m (33ft). The relevant height for the wind speed when modeling roadway intersections is usually 1m (3ft). Wind speeds at 1m above grade at off-airport roadway intersections will generally be much lower than wind speeds measured at 10m at the airport. This is partly due to the height difference and the fact that off-airport areas will generally be more aerodynamically rough (i.e., off-airport areas will have more buildings and trees that will disturb and slow the wind). At a minimum, it would be appropriate to adjust the wind speed for height if the measurement height at the airport was 10 meters. This adjustment would likely lower the wind speeds that were used in the modeling by about one-half. In the CAL3QHCR model that was used, the predicted concentrations are inversely proportional to wind speed. Thus, the predicted concentrations might increase by a factor of two if the adjustment for wind speed is made.

56 Attachment Y of Technical Report 4.

Response:

All dispersion models, including EPA-preferred models, are inherently imperfect due to the scientific inability to exactly simulate complex atmospheric conditions. Therefore, using assumptions regarding the physics and chemistry of the atmosphere, dispersion models have been created with an amount of overestimation error in their concentration calculations. This conservatism allows federal and state environmental agencies the assurance of regulatory compliance as well as the knowledge that actual concentrations would be lower. The high predicted NO₂ concentrations shown in Table 4.6-11 are a product of the ultra-conservatism inherent in the EDMS model. In dispersion modeling the typical ratio of 8-hour to 1-hour concentrations is typically 0.7 (+/- 0.2), according to EPA guidance. Therefore, the 8-hr to 1-hr CO predicted concentration ratio alone is not indicative of any modeling errors. CO background concentrations were included in the results, however these results have been updated since publication of the Draft EIS/EIR. Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR regarding updated CO concentration results. PM₁₀ analyses were conducted using the most recently available data and methodologies and described in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Response to Comment AL00022-127 regarding off-airport intersection modeling for carbon monoxide.

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AL00022-133

Comment:

7.6 Gaps In The Analysis

While the analysis appears to be extremely comprehensive, the lack of evaluation of the existing conditions using the same models used to assess future conditions is a shortcoming. The comparison and correlation of model results for the existing situation with the available monitoring data would have provided confidence that the models were, in fact, performing reasonably. Once this was established, there would be more confidence in the accuracy of the results for the future scenarios, which cannot be corroborated with monitoring data.

Typically, the evaluation of existing conditions is performed using the same methodologies that are used to assess future conditions, both to better evaluate the methodologies for reasonableness and to make the estimates of concentrations for future and existing conditions more directly comparable. Existing (or baseline) conditions in the Draft EIS/EIR are derived from monitoring data, while future conditions are based on modeling results. The baseline concentrations are the maximum values that were measured at the single onsite monitoring station, but it cannot be known if these are the maximum concentrations that occur in the area without having multiple monitoring sites. The modeling results, on the other hand, are based on a network of receptors at many locations, enabling the location of maximum concentration to be accurately identified if receptors are spaced at appropriate intervals.

Response:

The same model, EDMS 3.2 was used to calculate the on-airport emissions inventories for all years and alternatives, including the 1996 environmental baseline. For off-airport, on-road sources, the same methodology was used to calculate the adjusted environmental baselines and all alternatives. For ambient air concentrations, as the commentor notes, available monitoring data was used to define the 1996 environmental baseline. When available, monitoring data is preferred as it provides actual data to help validate any modeling/calculation analysis. Please see Topical Response TR-AQ-2 for a comparison of monitored data with modeling results. Please also see TR-GEN-1 regarding additional information on the environmental baseline.

AL00022-134

Comment:

The Draft EIS/EIR discusses the thresholds of significance.⁵⁷ In determining the significance of emissions from the project, LAWA separately calculated totals for on-airport and off-airport sources and then compared the separate totals for each category to the significance thresholds to determine if the emissions were significant. It is not clear whether the separate totals for on-airport and off-airport sources should be considered individually instead of combined to determine significance. One reason for taking this approach is due to the consideration that the on-airport and off-airport impacts are evaluated separately, but the Draft EIS/EIR does not appear to discuss this issue. The Draft EIS/EIR should have compared the combined total for on-airport and off-airport sources to the significance threshold criteria.

⁵⁷ Section 4.6.4, Table 4.6-7.

Response:

Please see Response to Comment AF00001-24 regarding combining emission inventories and concentration results for comparison against significance thresholds.

AL00022-135

Comment:

7.7 Mitigation Measures

The appropriateness and adequacy of the proposed mitigation measures depend, to a substantial degree, on the accuracy of the analysis and the focus of these measures. It appears as though the unmitigated impacts from on-airport sources may be overestimated, while the unmitigated impacts from off-airport sources could be underestimated. If this is so, the emphasis of the proposed mitigation measures and the mitigated analysis may be misdirected or inadequate.

Most of the quantifiable mitigation measures shown in Table 4.6-16 are related to non-aircraft emission sources, which may well be appropriate. With the exception of NO_x emissions, the unmitigated emission estimates for the related off-airport sources are much higher than the unmitigated estimated emissions for the on-airport sources.

Table 4.6-15, NO_x demonstrates the only parameter that was determined to have significant impacts from on-airport sources in terms of both emissions and dispersion estimates. If this is correct, one of the primary goals of the on-airport mitigation measures should be to reduce NO_x emissions. The mitigated emission estimates for on-airport sources shown in Table 4.6-19 indicate, however, that the reductions in NO_x emissions would be relatively small compared to the emissions reductions for most of the other pollutants. Furthermore, Table 4.6-23 indicates that, after mitigation, the NO_x impacts will still be significant. Thus, the proposed mitigation measures do not seem to effectively address the projected NO_x impacts. Appropriate mitigation measures should, therefore, be considered.

Section 4.6.8.4 of the Draft EIS/EIR indicates that the unmitigated maximum CO concentrations at off-airport roadway intersections would meet State and Federal air quality standards, and therefore no additional analysis of mitigation measures was performed. The proposed mitigation measures include Transit and Intermodal Facilities, Clean Motor Vehicle Fleets, and Traffic Congestion Control. As indicated previously, it appears that the maximum CO concentrations at off-airport roadway intersections could be significantly underestimated, and hence LAWA's reasoning for not analyzing the proposed mitigation measures may not be valid and such analysis could be warranted.

Response:

The extensive analysis conducted and presented in Section 4.6, Air Quality, with supporting technical data and analyses in Appendix G and Technical Report 4, of the Draft EIS/EIR, are based on recent data, modeling analyses and operational projections for the airport.

The Supplement to the Draft EIS/EIR contains a more extensive breakdown of mitigation measures as well as their associated control efficiencies in Section 4.6, Air Quality, with supporting technical data and analyses in Appendix S-E.

Please see Response to Comment AL00022-32 regarding remaining significant NO_x emissions from the proposed project. LAWA has evaluated and included numerous mitigation measures related to off-airport roadways.

AL00022-136

Comment:

7.8 Conformity With State And Federal Standards

Table 4.6-4 indicates that the LAX area is currently considered a nonattainment area with respect to both the State and Federal air quality standards for O₃, CO, and PM₁₀. Section 4.6.3.2 indicates that Federal statutes require the area comply with the national O₃ standard by November 15, 2010, the national CO standard by December 31, 2000 and the national PM₁₀ standards by December 31, 2001. The recent monitoring data suggest that all Federal standards are actually being met except for the O₃ standard and that all State standards are being met except for the O₃ and PM₁₀ standards.⁵⁸

Table 4.6-20 of the Draft EIS/EIR suggests that in both 2005 and 2015 after mitigation emissions from on-airport sources would meet all Federal ambient air quality standards, but NO₂, and PM₁₀ emissions would not conform with the more stringent State ambient air quality standards. Given that the Environmental Baseline NO₂ shown in this table is well within the State standard, that the background NO₂ concentration is projected to decrease with time and comprise only a small portion of the total concentration, and that NO_x emissions are estimated to increase only marginally by 2015, the predicted five- to eight-fold increase in the NO₂ concentration seems difficult to justify. One explanation might be

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that the sources are relocated nearer to public access areas, but the large change in the NO₂ concentrations and the predicted nonconformity with the State standard deserves more scrutiny to ascertain the reasons for this. In other words, the Draft EIS/EIR needs to identify the reasons for the NO₂ concentrations increasing so significantly compared to the Environmental Baseline when the with-project emissions are estimated to increase only modestly.

Given that existing PM₁₀ concentrations do not conform to the State ambient air quality standards and that the background concentration appears to account for a large portion of the estimated future concentrations, conformance with the State PM₁₀ standards may not be possible. LAWA needs to identify the ramifications of not conforming to the PM₁₀ standards.

The Draft EIS/EIR shows that maximum off-airport CO concentrations are well within both State and Federal air quality standards, but it appears that these concentrations could be underestimated. If so, conformance with both State and Federal standards could be an issue.

58 Table 4.6-5.

Response:

The Supplement to the Draft EIS/EIR provided an enhanced analysis of air quality impacts in Section 4.6, Air Quality. This analysis demonstrated that the NO₂ impacts after mitigation will achieve both the annual NAAQS and the one-hour CAAQS for NO₂ under Alternative D, the LAWA-staff preferred alternative.

It should be noted that SCAQMD stated, in its 2003 AQMP (Appendix V Chapter 2), that none of the sites in the South Coast Air Basin will meet the 24-hour CAAQS for PM₁₀ in either 2006 or 2010, even with proposed emission controls. Predicted significant impacts of PM₁₀ reflect the persistent widespread problem in the South Coast Air Basin with this pollutant and the consequent high background levels of this pollutant.

Emissions of CO used in the off-airport impact analysis were calculated using methods acceptable to EPA, CARB, and SCAQMD according to a protocol (see Draft EIS/EIR Technical Report 4 Attachment A) which was reviewed by SCAQMD prior to conducting the analyses, and comments and suggestions from SCAQMD were incorporated into the protocol. Absent more specific information from the commenter, there is no evidence these regional CO emissions were underestimated. The Supplement to the Draft EIS/EIR provided an enhanced analysis of CO hotspots in Section 4.6. Updated mobile-source emissions were calculated using the latest CARB model, EMFAC2002.

AL00022-137

Comment:

7.9 Additional Air Quality Studies

The Draft EIS/EIR indicates that additional air quality studies are being performed; however, no information was provided concerning any additional air quality studies currently being conducted by LAWA. Additional information needs to be provided.

Response:

Please see Topical Response TR-AQ-2 regarding the Source Apportionment Study.

AL00022-138

Comment:

8 Land Use

8.1 SCAG Regional Transportation Plan (RTP)

SCAG has now issued the 2002 Draft RTP for public review. This document should be discussed in the LAX Master Plan Draft EIS/EIR.

Response:

There is no 2002 Draft RTP. The 2001 RTP adopted subsequent to publication of the Draft EIS/EIR was addressed in the Supplement to the Draft EIS/EIR. SCAG is currently preparing the Draft 2004 RTP, as indicated in the Supplement to the Draft EIS/EIR.

AL00022-139

Comment:

8.2 Master Plan Commitments

The referenced Neighborhood Compatibility Program⁵⁹ is vague. The details and "teeth" of this commitment must be clarified in order to allow an assessment of its value. The Program should be linked to the Mitigation Monitoring Program, including identification of a formal role for neighborhood review in the formulation and monitoring of specific development plans at the airport/neighborhood interface.

59 Page 4-116.

Response:

As indicated on page 4-2 of the Supplement to the Draft EIS/EIR, the Master Plan commitments are proposed to be implemented by LAWA in conjunction with implementation of any of the four build alternatives. These commitments are in addition to the proposed mitigation measures. As stated on page 4-6 of the Supplement to the Draft EIS/EIR, the Master Plan commitments were developed in cases where 1) standards and regulations exist with which compliance is already required by the applicable regulating agency; 2) impacts would be adverse but not significant; and 3) design refinements could be incorporated into the project to reduce or avoid potential impacts.

LAWA will incorporate all approved Master Plan commitments and mitigation measures including the Neighborhood Compatibility Program (Master Plan Commitment LU-4) into a mitigation monitoring and reporting program to ensure compliance with Master Plan commitments during project implementation. The mitigation monitoring and reporting program will be adopted at the time of Master Plan approval and will be designed to be fully enforceable through permit conditions, agreements, or other measures. The LAX Zone/LAX Specific Plan will also include specific design and development standards such as types of use, building height, building setbacks, and landscape buffer setbacks, to minimize or eliminate any impacts associated with airport/neighborhood interface. The LAX Zone/LAX Specific Plan will be available for public review as part of the City's review and approval process for the proposed zone change and General Plan amendment. It should be noted that the proposed Master Plan is at a program level of planning, and in conjunction with the more detailed planning and advancement of individual projects, additional public input would occur under CEQA or NEPA along with more detailed project specific mitigation measures.

AL00022-140

Comment:

8.3 Ring Road

Under Alternative A,⁶⁰ there is no discussion of the Ring Road project. Additionally, there are no previous mentions of the component. This issue should be clarified.

60 Page 4-159.

Response:

The analysis of Alternative A in Section 4.2, Land Use, of the Draft EIS/EIR did consider the potential impacts of the proposed ring road. The ring road was identified as a component of Alternative A on page 4-130 of the Draft EIS/EIR. In addition, in the description of Alternative A on page 4-130, the text indicated that Areas A, C, and D, which would be acquired under Alternative A, would be used primarily for open space and berms associated with development of the ring road. Also, the discussion entitled

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Acquisition Areas on page 4-132 of the Draft EIS/EIR identified that a 4-acre parcel in Inglewood would be acquired under Alternative A for an open space/landscape buffer associated with the ring road and LAX Expressway. Furthermore, on page 4-137 of the Draft EIS/EIR, the text stated that changes would be made to the existing circulation system under Alternative A to develop the ring road and LAX Expressway. On page 4-138 of the Draft EIS/EIR, the document disclosed that the development of the ring road would eliminate the existing bike lane and bike path along Imperial Highway. Development of the ring road was also discussed in the analysis of consistency with the Westchester-Playa del Rey Community Plan. The Draft EIS/EIR concluded that development of the ring road, intersection improvements, the LAX Expressway, as well as the extension of the MTA Green Line would fulfill the objective of the Community Plan by providing adequate access to LAX while diverting traffic to the extent possible from that portion of the community north of Westchester Parkway. The ring road was also discussed on page 4-139 of the Draft EIS/EIR under the analysis of compliance with the El Segundo General Plan. Implementation of Master Plan Commitment LU-3 would ensure that the bicycle facilities along Imperial Highway, that would be potentially impacted by the development of the ring road, are retained and that the project would be consistent with the Circulation Element of the El Segundo General Plan. The ring road was again discussed on page 4-160 under the heading of Land Acquisition. As indicated in the Draft EIS/EIR, most of the area to the north, between the ring road and residential uses, is proposed for either open space/landscape buffer, berms, or recreation use. Page 4-162 of the Draft EIS/EIR indicated that a short-term, less than significant, impact would occur from the development of the ring road since it would temporarily remove the bike lane along Westchester Parkway. The ring road was again mentioned as a component of Alternative A on page 4-163 of the Draft EIS/EIR, and was compared to the No Action/No Project Alternative on page 4-164 of the Draft EIS/EIR.

AL00022-141

Comment:

8.4 Other Potential Land Use Incompatibilities

The discussion on Page 4-189 asserts that Master Plan Commitments LI-1 and DA-2 will reduce land use conflicts of the Ring Road on the apartments on Morley Road to less than significant; however, these measures are not described in the Draft EIS/EIR, but only referenced. In fact, throughout the Draft EIS/EIR text Sections 1 through 7, references are made to impacts and mitigation measures described in Appendix K, without any explanation or summary describing such impacts and mitigation measures. Since the LAX Expressway and State Route 1 (SR 1) improvements are integral features of the build Alternatives, the Draft EIS/EIR should be revised to incorporate this information in the body of the text.

Response:

Information contained in the Draft EIS/EIR Appendices, including but not limited to Appendix K, and Draft EIS/EIR Technical Reports is a part of the overall Draft EIS/EIR, and is summarized and/or referenced where appropriate in the main body of text in the Draft EIS/EIR.

AL00022-142

Comment:

8.5 Land Use Assurance

The contents of the Land Use Assurance Letter⁶¹ should be summarized in the text and the document should describe how conflicts would be avoided. This discussion emphasizes noise compatibility considerations and minimizes the combined effects of noise, safety, air quality, lighting, and aesthetics. After acknowledging that land use compatibility is a function of these types of combined effects, very little discussion of combined effects is included in Section 4.2.6. Please identify properties that are subject to such combined effects.

61 Appendix E.

Response:

The Land Use Assurance Letter, Appendix E of the Draft EIS/EIR, in summary, indicates the following:

- LAX is located within the City of Los Angeles.
- The City of Los Angeles regulates and controls land use and zoning within the city limits.
- Heights of structures and objects within the City of Los Angeles in the vicinity of LAX are regulated through Los Angeles Municipal Code Section 12.50, written and adopted in conformance with Federal Aviation Regulation, Part 77.
- The County of Los Angeles Airport Land Use Commission regulates noise and safety issues in County areas surrounding the airport.
- Safety concerns such as the heights of buildings are regulated through local jurisdictions via county hazard maps and other regulations.
- The airport and the City of Los Angeles Planning and Building and Safety Departments work cooperatively to ensure that airport plans and zoning ordinances are compatible with surrounding jurisdictions.
- The City of Los Angeles is involved with neighboring communities in promoting compatible land uses as evidenced by Part 150 noise mitigation efforts and through review of development plans that may affect the airport.
- The City of Los Angeles is committed to every feasible measure to ensure land use compatibility with its surrounding neighborhoods.

The effects of noise, safety, air quality, lighting and aesthetics were addressed in their respective sections of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Section 4.2, Land Use, of the Draft EIS/EIR evaluated consistency with applicable land use plans and the potential for land use incompatibility with particular focus on the effects of aircraft noise. Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR evaluated a new LAWA Staff preferred alternative, Alternative D, incorporated information on Year 2000 conditions, and provided additional analysis of single event aircraft noise levels that result in nighttime awakening or classroom disruption. Other environmental issues relative to land use compatibility were addressed in more summary fashion, such as safety, air quality, aesthetics, lighting and traffic. There was no attempt in the Draft EIS/EIR or Supplement to the Draft EIS/EIR to minimize the combined effects of these issues. As indicated in Section 4.2, Land Use (subsection 4.2.2, Methodology), of the Draft EIS/EIR, the analysis of combined effects focused on those issues and impacts that were seen as having potential for rendering existing or proposed off-airport land uses incompatible.

Regarding safety concerns, under Alternatives A, B, and C, as stated in subsection 4.2.6 of the Draft EIS/EIR and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR, prior to adoption of the proposed Master Plan, documents outlining changes to physical and operating conditions at the airport would be submitted to the ALUC for an amendment to the ALUP. Furthermore, as stated on page 4-136 of the Draft EIS/EIR, "The improvements to the airport proposed under the Master Plan have been designed in conformance with FAA safety requirements set forth by FAR Part 77, and are also in accord with ALUP policies that address RPZs and limit uses within these zones." As stated in Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR, an Airport Comprehensive Land Use Plan (CLUP) for Los Angeles County is currently being prepared. The CLUP for LAX is anticipated to be prepared subsequent to review and approval of the LAX Master Plan by the Airport Land Use Commission (ALUC). Therefore, the preparation of the CLUP would be contingent upon and consistent with the LAX Master Plan that would eventually be adopted by the Board of Airport Commissioners (BOAC). In addition, the LAX Master Plan would incorporate the recommendations of the BOAC and ALUC as part of the LAX Master Plan entitlement process. Alternative D would also be consistent with ALUP safety policies, as described in subsection 4.2.6 of the Supplement to the Draft EIS/EIR. Based on the above, and further analysis provided in Section 4.24.3, Safety, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the proposed Master Plan would not have an impact on public safety, therefore issues associated with safety would not contribute to combined effects.

Concerning lighting and aesthetics, these areas of potential impact were discussed in the Draft EIS/EIR, Section 4.2, Land Use (subsection 4.2.6). As stated in the evaluations of Alternatives A, B, and C,

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under the subheading "Other Potential Land Use Incompatibilities," potential impacts associated with lighting and aesthetics would all be reduced to less than significant levels through implementation of proposed mitigation measures. Regarding lighting impacts under Alternative D, as discussed in Section 4.18, Light Emissions (subsection 4.18.6), of the Supplement to the Draft EIS/EIR, no significant lighting impacts were identified. Regarding aesthetic impacts under Alternative D, as stated in Section 4.21, Design, Art and Architecture Application/Aesthetics (subsection 4.21.6.3), no significant aesthetic impacts were identified with the implementation of the recommended mitigation measure. As a result, the potential for any combined effects associated with these issues would be negligible.

As there would be no impacts related to safety, no significant impacts after mitigation for lighting and aesthetics, the primary potential for combined impacts would be associated with those properties newly exposed to high levels of aircraft noise within the 65 CNEL or greater contour under Alternatives A, B, C, and D (see Figures 4.2-13, 4.2-17, and 4.2-21 of the Draft EIS/EIR and Figure S4.2-16 of the Supplement to the Draft EIS/EIR). In addition, under Alternatives A, B, C, and D, some residential properties would be newly exposed to high single event noise levels that would result in nighttime awakening (defined by the 94 dBA SEL contour) and some schools would be newly exposed to high single event and cumulative noise levels that result in classroom disruption. These residential areas were shown on Figures S4.2-8, S4.2-11, S4.2-14, and S4.2-18 of the Supplement to the Draft EIS/EIR. Schools newly exposed to high single event and cumulative noise levels were listed in Tables S4.2-10, S4.2-14, S4.2-18, and S4.2-28 of the Supplement to the Draft EIS/EIR. See Topical Response TR-LU-3 for a description of prior noise mitigation payments, avigation easements, and other provisions of the "Settlement Agreement" that resolve land use incompatibility issues. Schools without avigation easements that are determined to be subject to significant aircraft noise impacts are eligible for mitigation. Although the properties identified as newly exposed to high noise levels and high single event noise levels in these figures and tables would qualify for noise mitigation (except for schools with existing avigation easements), as stated in subsection 4.2.9.1 of the Supplement to the Draft EIS/EIR, impacts from aircraft noise would remain significant and unavoidable under the following conditions: prior to soundproofing, for certain property types subject to 75 CNEL or greater noise levels (due to outdoor noise), for classroom activities that take place outdoors at schools exposed to high single event noise levels, for properties with inconsistent land use and zoning, and where soundproofing is not feasible due to code issues or substandard structures. These same properties would experience increased exposure to air pollutant emissions from airport operations, although ambient concentrations from airport operations when combined with background concentrations would not exceed National Ambient Air Quality Standards (NAAQS) in areas immediately surrounding LAX and would meet California Ambient Air Quality Standards (CAAQS) except for PM₁₀, which currently exceeds the CAAQS. As described in Section 4.6, Air Quality (subsection 4.6.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, a number of mitigation measures are proposed that would reduce significant adverse air quality impacts resulting from the LAX Master Plan build alternatives. See also Topical Response TR-AQ-3 for additional discussion of air pollution increase.

As described in Section 4.2, Land Use (subsection 4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR under the heading "Construction Impacts" combined effects from construction noise and air quality would affect sensitive land uses, as would construction related traffic. These effects were identified as significant unavoidable impacts. Although it is not feasible to precisely identify specific properties that would be subject to such combined effects, the best representation of the properties most likely to experience combined effects under Alternatives A, B, and C was presented in Figure 4.1-6, Potential Construction Noise Impacts - All Alternatives, in the Draft EIS/EIR and Figure S4.1-5, Potential Construction Noise Impacts - Alternative D, in the Supplement to the Draft EIS/EIR. Due to their proximity to the airport, these properties would temporarily and periodically experience high levels of construction noise and would also be subject to significant impacts from construction-related air emissions. As indicated in Section 4.3.2, Off-Airport Surface Transportation (subsection 4.3.2.7.2), of the Draft EIS/EIR and Section 4.3.2 (subsection 4.3.2.6.2.2), of the Supplement to the Draft EIS/EIR, impacts associated with construction traffic would be felt in the areas surrounding construction sites, which would include streets and intersections that serve the same properties that would be affected by construction noise and construction-related air emissions.

Recognizing that these combined effects would occur as indicated above and in Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, consistent with the Land Use Assurance Letter, LAWA is committed to implementing all feasible mitigation to address the significant impacts of the airport. This is evidenced through LAWA's existing programs and through the measures proposed in the Supplement to the Draft EIS/EIR (see Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR).

AL00022-143**Comment:****8.6 Mitigation Measures**

Substantial reliance is placed on Mitigation Measure LU-1 "Implement Revised Aircraft Noise Mitigation Program." This measure is broad in scope, and depends upon the cooperation and funding of agencies outside of LAWA. Consequently, the ability of LAWA to implement this measure in a timely manner is by no means assured.

Response:

The comment is essentially the same as Comment AL00022-30; please see Response to Comment AL00022-30.

AL00022-144**Comment:**

Moreover, LAWA does not have an outstanding track record, as a number of commitments to properties already included within the current boundaries of the ANMP have not been fulfilled. A discussion of unmet commitments from prior actions should be provided along with an evaluation of the impacts that would result if LAWA were unable to fulfill the new commitments described in the Draft EIS/EIR.

Response:

Please see Subtopical Response TR-LU-3.10 regarding current impediments to a more rapid implementation of the ANMP and Response to Comment AL00022-30 regarding progress achieved under the ANMP and how unmet commitments and interim impacts prior to mitigation were addressed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00022-145**Comment:****9 Safety Issues**

LAWA's discussion of potentially significant air safety impacts is confined to the airport property and FAA measures that have been completed because of the local aircraft operations history. LAWA contends that it cannot control either the ever-increasing demand for LAX services or operations within the airspace that surrounds it due to FAA jurisdiction. However, LAX is eager to propose a plan to embrace all future demands notwithstanding unknown and potentially significant limitations on the use of regional airspace. To meet this information gap, the Draft EIS/EIR should include and report the results of an airspace safety analysis. While the details are not known, it is understood that the FAA has begun a national airspace analysis to enable comprehensive planning of future operations in the U.S. Apparently, the FAA has focused early efforts on the east coast of the U.S. despite the critical need to accommodate growth of air traffic and expanding levels of operations in this region. The EIS/EIR cannot be complete without knowledge of the level of safe saturation of airspace.

9.1 Environmental Setting

An EIS/EIR must include the baseline physical conditions of the surrounding area in order to assess environmental impacts of the project. At least one component has not been included in the setting statement. Inasmuch as safety is a concern and a potentially significant impact of this project, an airspace analysis should be a part of this Draft EIS/EIR. All parties appear to be waiting for the FAA to create this study as part of a national effort; however, it does not appear that the study will be forthcoming. Therefore, local experts should be retained to complete such a study. Jurisdictional issues involving the FAA should not prevent its critical evaluation from appearing in the Draft EIS/EIR.

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Response:

Please see Topical Response TR-SAF-1 regarding airspace capacity in the Los Angeles basin. The National Airspace Redesign (NAR) undertaken by the FAA in 1997 has as its focus the enhancement of aviation system efficiency while ensuring safety. Within the Western-Pacific Region several projects are ongoing, including a review of routes between the Los Angeles and San Francisco Bay areas, though they do not relate to an airspace safety analysis as recommended by the commentor.

AL00022-146

Comment:

10 Social Impacts

10.1 Productivity Variables

The assessment of Employment and Socioeconomic Impacts (and therefore the Growth Inducement Analysis as well) is substantially flawed by assumptions made at the outset of the analysis concerning productivity gains. This conclusion is directed largely at the assumption that productivity gains will be the same for all Alternatives. In fact, productivity rates are variable over time and highly sensitive to changes in the economy's overall rate of growth. These cycles are evident in statistics over the past 50 years, which show national annual productivity growth in the range of 2.8% from 1948-1973, compared with 1.2% during the economic slowdown of 1992-1995.⁶² When Gross Domestic Product growth is decelerating, productivity slows. Given the repeated emphasis throughout the Draft EIS/EIR that failure to pursue the expansion project would have a negative ripple effect throughout the southern California economy, it would have been more logical to link the No Project Alternative with productivity gains lower than those associated with the build Alternatives. The Draft EIS/EIR should provide a reassessment of Employment and Socioeconomic impacts for the No Project Alternative that utilizes a lower estimate for productivity gains.

⁶² Alejandro Bodipo-Memba, "U.S. Productivity Surged During 1998, Hinting at Escape from 25-Year Slump," Wall Street Journal, February 10, 1999; Steve Cochrane, "Productivity Differences Heighten Regional Risks," The Dismal Scientist, October 26, 2000.

Response:

Please see Response to Comment AL00022-35, SAL-00013-133 and SAL-00013-134 regarding productivity factors used in the EIS/EIR's analysis of the economic impacts of the LAX Master Plan alternatives.

AL00022-147

Comment:

10.2 Productivity by Sector

The Socioeconomic Technical Report makes note of the labor-intensive nature of many service industries, and identifies the tendency toward stable or reduced productivity (and resulting job growth per unit of service) in hotels, restaurants, and numerous high-end personal, household and business services.⁶³ At the same time, the Draft EIS/EIR assumptions regarding the No Project Alternative show passenger volumes increasing from 71.2 MAP in 2005 and 78.7 MAP in 2015 (about a 10% gain). The Technical Report notes that the services and tourism/entertainment sectors showed the most substantial employment gains between 1972-1992 and again between 1992-1997.⁶⁴ Finally, the Report allocates substantial passenger spending on these services, particularly for hotels and dining facilities, through the 2015 horizon.

⁶³ Section 3.2.3.

⁶⁴ Section 4.1.1.

Response:

Comment noted.

AL00022-148**Comment:**

In combination, these facts would point to positive employment gains in at least those sectors for which productivity is forecast to slow - eating and drinking establishments, hotels, and amusement and recreation facilities at a minimum. Nevertheless, and in apparent contradiction of its own assessment, the Socioeconomic Technical Report forecasts losses in direct LAX-related employment for both sectors between 2005 and 2015. Eating and drinking establishments are forecast to sustain job losses on the order of 1,725 (a 4% drop); hotels are forecast to sustain job losses on the order of 3,467 (a 7.5% drop); and amusement/recreation facilities are forecast to sustain losses on the order of 4,514 (a 14.8% drop).

An explanation is needed to justify the Technical Report forecasts of job losses that conflict with the discussion of anticipated productivity trends for hotels, restaurants, and services. Job growth in the specified service sectors should be projected.

Response:

Comment noted. Please see Response to Comment AL00022-36 regarding changes in employment directly associated with the operation of LAX.

AL00022-149**Comment:**

10.3 Definition of Improvements for the No Project Alternative

The artificially narrow definition of the No Project Analysis weakens the analyses contained in the Socioeconomic Technical Report. As discussed previously, the Draft EIS/EIR assumes that under the No Project Alternative there would be no new improvements at LAX beyond those now underway, planned, or programmed. This assumption is highly suspect; it is far more reasonable to anticipate that LAWA would pursue a wide range of additional improvements that would in turn boost direct and indirect employment and spending, with far different socioeconomic impacts than indicated in Technical Report estimates for the No Project Alternative.

Response:

Please see Topical Response TR-GEN-2 regarding the No Action/No Project Alternative assumptions. It should be noted that, subsequent to publication of the Draft EIS/EIR, Alternative D was added. Alternative D focuses on improvements to the existing airport facilities and provides for a future (2015) level of airport activity comparable to that of the No Action/No Project Alternative.

AL00022-150**Comment:**

The analysis of Employment and Socioeconomic impacts should be revised to incorporate the expanded assessment of actions that may in the future be taken by LAWA in the event the project is not approved and the outcomes that could reasonably be expected to result from such actions should be addressed.

Response:

Comment noted. Analysis throughout the Draft EIS/EIR and the Supplement to the Draft EIS/EIR of the No Project/No Action Alternative represents the probable situation if the "project" is not approved.

AL00022-151**Comment:**

10.4 Distribution of Regional Spending - Ontario

3. Comments and Responses

In estimating the distribution of passenger spending, Section 3.4.3.1 of Technical Report 5 indicates that it was assumed that LAX would represent the sole source for international traffic, based on historical data for the years 1985-1994. Additionally, the Section notes that:

As a working assumption, it was assumed that there was no connecting traffic at any of the other 4 major airports in the region...the single exception to this rule results from the fact that Ontario 'International' Airport did serve an estimated 50,000 international passengers during late 1993 and early 1994.

It is unclear how the "working assumption" and exception were applied in estimating future contributions under the 2005 and 2015 scenarios. Did the analysis treat the 50,000 international passengers as a one-time event, or did it assume that Ontario would continue to serve 50,000 international passengers (per year) through 2015? In either case, the document should have explored the factors that allowed Ontario to successfully enter this competitive market, with the goal of assessing Ontario's ability to accept future unmet need in the region as a whole. This analysis would have been especially relevant to the socioeconomic analyses of the No Project Alternative, and may have resulted in far different conclusions. If the Socioeconomic Technical Report did base its 2005 and 2015 No Project Alternative scenarios on the assumption that Ontario would serve 0 or 50,000 international passengers (but no more), the analysis should be expanded to provide a more detailed assessment of the potential role of Ontario in meeting international travel demand.

Response:

Comment noted. Even if Ontario International Airport (ONT) increases its volume of international travelers somewhat, as envisioned by various regional transportation planning scenarios, LAX will continue to be the overwhelmingly dominant airport where international travel into and out of the region takes place. And, since the focus of the EIS/EIR is on LAX, not ONT, there is no need to modify either environmental document. See also Response to Comment SAL00013-136 regarding data about ONT as they relate to the EIS/EIR's analysis of economic impacts.

AL00022-152

Comment:

In general, and although the Technical Report promises such an assessment, the Socioeconomic Technical Report did not contain any sustained effort to determine the degree to which the No Project Alternative might result in a redistribution of air services and associated economic activity to other airports in the region. As it stands, the analysis shines a very bright light on variables influencing the LAX growth scenarios, but does little to apply its powerful tools on the potential future role of other facilities in the region. This approach shortchanges the No Project Alternative. The Draft EIS/EIR should be expanded to take a closer look at this issue, considering the amount and type of activity that could reasonably be expected to shift within region, and the direct and indirect economic effects that might result. An update on Ontario's request to increase its cap from 125,000 to 180,000⁶⁵ should also be included in the document.

⁶⁵ Section 2.2.1.

Response:

Comment noted. Please see Response to Comment AL00022-153 below.

AL00022-153

Comment:

10.5 Distribution of Regional Spending - Resident Expenditures

Section 3.4.3.1 notes,⁶⁶

Parking costs are the only local impacts attributed to Resident passengers in the current analysis...[and to] the extent that such passengers spend money at restaurant and retail establishments during the time they spend in one of the region's airports, this analysis may, to a small degree, have underestimated the impacts of Resident passengers.

The analysis also discounted resident expenditures on transportation to and from the airport:

To the extent that such transportation is provided by a private taxicab, limousine or shuttle service will cause some additional impacts on the local economy. This does not apply to connecting and visitor passengers, for whom these impacts have been measured.

On the surface, these assumptions would be expected to impact regional spending estimates in a neutral manner, because it is applied to all airports in the region. However, since the analysis: (1) assumes that facilities other than LAX will be essentially limited to resident passengers; (2) discounts the retail, restaurant and travel expenditures of these passengers; and (3) measures such expenditures for connecting and visitor passengers, the net effect is to disproportionately minimize the regional spending contributions of airports other than LAX. Once again, the assumptions would cast an artificially unfavorable light on the No Project Alternative.

66 In Footnote 32.

Response:

Comment noted. The economic impact analysis of the LAX Master Plan alternatives concerns the regional economic impact of what would happen under alternative development plans for LAX. Neither the Draft EIS/EIR nor the Supplement to the Draft EIS/EIR was intended to be an analysis of changes at all of the region's other air transportation facilities. Economic impacts were addressed in Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 5 of the Draft EIS/EIR and Technical Report S-3 of the Supplement to the Draft EIS/EIR. See also Response to Comment SAL00013-137 regarding parking costs.

AL00022-154

Comment:

11 Hydrology and Water Quality

11.1 BMP Efficacy

The assessment of Hydrology and Water Quality for the No Project Alternative indicates an overall 3-11% increase in pollutant loads, noting that most of this increased pollutant load is "attributed to the development of LAX Northside from open space to mixed use development." Nevertheless, the report also indicates that LAX Northside and Continental City would be required to comply with Standard Urban Stormwater Mitigation Plan requirements, including best management practices (BMPs) designed to reduce water quality impacts "to the maximum extent practicable."⁶⁷ On the other hand, the Draft EIS/EIR states that the build Alternatives would be accompanied by an (as-yet undefined) detailed drainage plan that would include BMPs to minimize the effect of airport operations on surface water quality and prevent a net increase in pollutant loads. It is curious why the BMP program developed for the Northside would perform so poorly as to be largely responsible for an overall 3-11% increase in pollutant loads from LAX, while a similar (but undefined) program for LAX expansion would have no net increase in pollutant loads. As noted in the Draft EIS/EIR,⁶⁸ BMPs vary widely in their pollutant removal efficiency; few approach 100% efficiency even under ideal conditions. These considerations raise reasonable doubt as to the likelihood that the proposed Hydrology and Water Quality (HWQ)-1 BMP program would achieve 100% elimination of pollutant loads above baseline levels.

The BMP program needs to be presented for consideration at this time along with a discussion provided as to why equally effective means (if in fact available) are not being employed by other LAWA-initiated activities such as LAX Northside.

67 Section 4.7.6.1.

68 Section 4.7.5.

3. Comments and Responses

Response:

Please see Section 5.3 of Technical Report S-5 of the Supplement to the Draft EIS/EIR, Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and commitments related to the No Action/No Project Alternative, and Response to Comment SAL00015-302 regarding BMP pollutant removal capability.

AL00022-155

Comment:

Regarding the statement, "commitment to develop a detailed drainage plan for assessing site-specific drainage flows and identifying appropriate measures to alleviate existing drainage deficiencies, while also accommodating future Master Plan-related increases in runoff,"⁶⁹ this violates the spirit, and possibly the letter, of the CEQA Guidelines. Since there may well be impacts associated with implementation of the mitigation measures, public review of this program should not be deferred. The program ought to be presented for public review and comment as part of the recirculated (or new) Draft EIS/EIR.

⁶⁹ Section 4.7, Page 4-532.

Response:

Please see Response to Comment AR00003-63.

AL00022-156

Comment:

11.2 Stormwater Monitoring Program

In a similar vein, Section 4.2.1 notes that a stormwater monitoring program has been developed and implemented as part of the existing Stormwater Pollution Prevention Plan (SWPPP). The results of the monitoring program should be included in the Draft EIS/EIR to illustrate the effectiveness of the BMPs in use.

Response:

The purpose of the monitoring program being performed at LAX as required by the State Water Resources Control Board's NPDES Industrial storm water permit is to assess compliance at outfalls to receiving waters/waters of the U.S. To date, the number of constituents sampled and required detection limits are not sufficient to generate a statistically valid sample set and consequently has limited the use of this data to analyze BMP effectiveness.

AL00022-157

Comment:

11.3 Oil/Water Separator

Section 4.2.2 indicates that an oil/water separator provides primary treatment for stormwater runoff from the Scattergood site, and that the effluent is subsequently combined with secondary treated petroleum process wastewater before discharge to Santa Monica Bay. Most oil/water separators show very poor performance at pollutant removal, and it would be helpful to know what the sampling results have shown under the existing National Pollutant Discharge Elimination System permit in terms of the efficacy of this existing system.

Response:

As stated in Section 4.7, Hydrology and Water Quality (subsection 4.7.3), of the Draft EIS/EIR and Section 4.2.2 of Technical Report 6 of the Draft EIS/EIR, storm water runoff is not generated at the Scattergood Generating Station. Storm water is contained within earthen berms approximately 6 feet high and then percolates into the ground. Storm water runoff at the oil refinery located south of the airport is collected and treated at the refinery's wastewater treatment system where it receives primary

treatment by an oil/water separator consisting of gravity separation and induced air flotation units for oil/water separation. The water is then combined with secondary treated petroleum process wastewater and discharged into the Santa Monica Bay via Chevron's ocean outfall. The water quality of the discharge is sampled and regulated under an NPDES permit. Under Alternative B, the off-site fuel farm would be relocated to either the Scattergood Generating Station or the oil refinery. If relocated to the Scattergood site, all surface water would be addressed through secondary containment in conjunction with an on-site overflow detention basin, and pumped to the Hyperion Treatment Plant. If relocated to the oil refinery site, the combined storm water from the refinery and the off-site fuel farm would be treated by the on-site water treatment facility, prior to being discharged via the oil refinery ocean outfall. The discharge would require a NPDES discharge permit issued through the LARWQB. In this case, an assessment may be needed of the capacity of the on-site water treatment facility to adequately treat the combined flow.

AL00022-158

Comment:

11.4 Aircraft Wash Runoff

Section 4.2.3 70 notes that BMPs have been developed in the LAX SWPPP to minimize the amount of runoff from aircraft and vehicle washing, but that "such discharges may still occur." It is not known whether this reference to continuing discharges pertains to the non-designated wash areas that may discharge to the stormwater conveyance system or other activities. The significance of these discharges needs to be explored.

70 Page 33.

Response:

LAX continues to address dry-weather discharges through its source control and treatment control BMPs. LAX currently employs a complex system of clarifiers to pre-treat dry-weather discharges and direct those discharges to the sanitary sewer system. Under proper operating conditions, the dry-weather flow generated by vehicle washing activities, by design, is directed to the sanitary sewer. Fieldwork conducted on related projects at LAX during the months of July and August 2003 did not identify any washing activities occurring in non-designated areas. The detailed drainage plan to be developed for the selected alternative as part of Master Plan Commitment HWQ-1 will include design of structural source and treatment control BMPs in areas of industrial activities where dry-weather flows may occur.

AL00022-159

Comment:

11.5 Flood Protection

The flood protection section identifies inadequate flood protection for the LAX onsite drainage system under the Environmental Baseline and No Project Alternatives. With commitments to develop a detailed drainage plan for LAX build Alternatives A, B, and C, the Draft EIS/EIR concludes that the build Alternatives would provide adequate flood protection and are therefore superior to the Baseline and No Project scenario. However, the document does not explore the extent to which the No Project scenario would likely include new facilities and BMPs in conjunction with various airport improvements and related projects that are committed, approved, or underway.

Response:

Please see Topical Response TR-HWQ-2 regarding commitments related to the No Action/No Project Alternative.

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AL00022-160

Comment:

Similarly, the commitment to develop a detailed drainage plan for the build Alternatives is a programmatic measure. It includes objectives and BMP options, but no specifics. No plans are provided that would indicate the location and size of facilities needed. As a result, this program may result in its own environmental impacts - effects that have not been evaluated in the current Draft EIS/EIR and require independent review and assessment. A schedule should be developed that shows when such supplemental measures would be defined, when they would be evaluated under CEQA and NEPA, and how this timing relates to the implementation as part of the Master Plan phasing.

Response:

Please see Response to Comment AR00003-63.

AL00022-161

Comment:

Under the No Project Alternative, surface water runoff and peak flow increases are attributable to the conversion of LAX Northside from open space to mixed uses and development of the Continental City site. Both projects are identified as contributing to localized flooding and/or cumulative increases in runoff that exceed capacities of existing drainage systems. As a result, it appears that adequate flood and drainage commitments have not been applied to these projects. In this light, it is not understood why these project components held to a lesser standard under the No Project Alternative.

Response:

Please see Topical Response TR-HWQ-2 regarding commitments related to the No Action/No Project Alternative.

AL00022-162

Comment:

11.6 Recharge

It is not known to what extent, if any, the nominal reductions in recharge associated with the various Alternatives affect the ability to inhibit saltwater intrusion within the West Coast Basin.

Response:

According to calculations presented in Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR (pages 4-540, 4-549, 4-551, 4-552, 4-554, 4-555, and 4-557), and in the Supplement to the Draft EIS/EIR (page 4-417 and 4-418), reduction in recharge is expected to be minimal and consequently is not expected to result in increased seawater intrusion in this area. Also, please see Response to Comment AR00002-8 regarding the effect of decreased surface recharge on seawater intrusion.

AL00022-163

Comment:

12 Regional Transportation Issues

12.1 Southern California Logistics Airport

The text discussion on Page 1-19 notes that the Southern California Logistics Airport (SCLA) is focusing on attracting cargo, but provides no discussion of goals, plans to realize those goals, and success to date; information regarding other airports is limited. Information that is more detailed is necessary concerning the cargo handling goals for SCLA. In addition, the cargo handling objectives of March JPA and other airports in southern California should be provided along with an assessment of the extent to

which competition from these facilities could reduce cargo demands at LAX. It is especially interesting that cargo is the only demand that would be fully met by the preferred Project Alternative C (it meets 79% of unconstrained operations demand, 91.5% of passenger demand, and 100% of cargo demand). This information is especially significant in light of the concerns raised above concerning the potential capacity at LAX for much higher cargo capacity than evaluated in the Draft EIS/EIR - potentially as high as 9-10 million annual tons (MAT), or as much as 15 MAT.

Response:

The Draft LAX Master Plan and the Draft EIS/EIR analyzed potential development alternatives for LAX only. The goals and plans of other regional airports is provided for its information value only. The City of Los Angeles and LAWA can only control the development at four airports: LAX, Ontario, Palmdale, and Van Nuys. Subsequent to the publication of the Draft EIS/EIR, Alternative D was formulated which leaves significant cargo demand to be satisfied by other airports in the region. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00022-164

Comment:

12.2 John Wayne Airport

Both the body of the Draft EIS/EIR and the Economic Impacts Technical Report assume that activity at John Wayne Airport (SNA) will reach the existing cap by 2005 and remain at that level thereafter. In fact, the cap is scheduled to expire in 2005. Although policy decisions could vary considerably, recent discussions at the Orange County Board of Supervisors include a proposal to increase the cap from 8.4 MAP to 9.8 MAP by 2016. It would have been prudent in the Draft EIS/EIR to examine at least one scenario incorporating increased activity levels at SNA. The assessment ought to be revised to consider expiration of the cap and how that might influence future operations and Alternatives for LAX.

Response:

Please see Topical Response TR-RC-4 that discusses the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan. Please see Topical Response TR-RC-1 regarding the Master Plan role in the regional approach to meeting demand.

AL00022-165

Comment:

12.3 No Project Alternative at LAX

The Draft EIS/EIR assumes that cargo volumes would reach 3.1 MAT by 2005 under the No Project Alternative, with no further growth thereafter due to operating constraints at LAX. Under this scenario, it is not clear what assumptions are made regarding cargo services at other regional airports. If it were assumed that growth would stop at 3.1 MAT on a regional basis, an additional calculation would be required that would account for a reallocation of the additional cargo demand (i.e., 1.1 additional MAT) to other facilities in southern California.

Response:

The Draft LAX Master Plan and the Draft EIS/EIR analyze potential development alternatives for LAX only. It is beyond the scope of these documents to provide projections of which regional airports, if any, would handle the unmet cargo demand. The City of Los Angeles and LAWA can only control the development at four airports: LAX, Ontario, Palmdale, and Van Nuys. In formulating the LAX Master Plan alternatives, LAWA took into account potential expanded cargo activity at regional airports. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

3. Comments and Responses

AL00022-166

Comment:

12.4 MCAS El Toro

Measure F was recently invalidated by the courts. There is no indication of the impacts of this Measure in the Draft EIS/EIR. There is a need to discuss the resulting impact or significance with respect to LAX.

Response:

Please see Topical Response TR-RC-4 that discusses the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan.

AL00022-167

Comment:

12.5 Ontario International Airport

The City of Ontario has recently agreed to investigate the feasibility of expanding operations to 30 MAP. The resulting impact or significance of this proposal regarding LAX needs to be discussed in order to validate the conclusions and assumptions made in the Draft EIS/EIR.

Response:

An update of the master plan for Ontario is currently underway in order for Ontario to play its part in addressing the anticipated regional demand. The local community supports the airport's growth, and Ontario has the potential to capture a much larger share of total regional demand. Space is available for terminal development between and adjacent to the existing terminals. Ontario's air service has grown over the past 15 years as development in the region has expanded into the eastern end of the Los Angeles region, known as the Inland Empire, and air travel demand in the area has correspondingly increased. Development of Ontario will only meet part of the regional demand. Please also see Section 2.3, Regional Context, of the Supplement to the Draft EIS/EIR for a description of the other regional airport facilities and their projected role in meeting the region's air transportation needs.

AL00022-168

Comment:

12.6 Rail Technology

Section 1.3.2 fails to incorporate any estimate of the demand that would be reallocated from air to High Speed Rail (HSR) in the year 2017 - the earliest year for HSR deployment. This estimate needs to be included in the text and its impacts evaluated. In addition, in the discussion of Alternatives,⁷¹ HSR is dismissed as being "many years off." Actually, implementation of various segments of HSR in southern California under current plans of the California High Speed Rail Commission is within the LAX Master Plan horizon (i.e., 2015). In this light, the conclusions in Section 3 should be reevaluated.

⁷¹ Section 3, Page 3-2.

Response:

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

AL00022-169

Comment:

13 Biological Resources

Eight distinctive biotic communities were identified without clearly distinguishing among the following: naturally occurring communities; man-influenced/modified natural communities; man-created biotic situations; or areas under complete development, which no longer have biotic value for sensitive plant and animal species. The acreages of biotic habitats were reviewed with value for sensitive species and compared with marginal habitats, non-native habitats, and areas that are developed and no longer supporting habitats. The review indicated that the airport is mostly developed, with open areas that are highly disturbed and offers little or no viable habitat for sensitive plant and animal species. The Los Angeles/El Segundo Dunes and, to a lesser extent, the non-restructured dunes north of this area stand out as the only areas having high biological value that merits recognition and a conservation effort by LAWA. It is therefore recommended that the Master Plan include a "conservation element" dictating how the Los Angeles/El Segundo Dunes will be managed. This goes beyond the requirements to manage the Habitat Restoration Area for the El Segundo Blue Butterfly.

Response:

Classification of the biotic communities is based on R. F. Holland's Preliminary Descriptions of the Terrestrial Natural Communities of California, which is used by the California Department of Fish and Game in the California Natural Diversity Database. Communities that do not adequately fit these descriptions because of disturbance by human activities are termed "Disturbed." As stated on page 4-612 of the Draft EIS/EIR, biotic communities are regional assemblages of vegetation (flora) characterized by the presence of certain dominant species that exist together with associated wildlife species (fauna). Most of the Habitat Restoration Area, while once heavily disturbed, has been restored with appropriate and sufficient vegetation to conform to the natural communities described by Holland. The 38.6 acres of roads and other large remnants of infrastructure on Los Angeles/El Segundo Dunes, including the Habitat Restoration Area, have been classified as "developed" and mapped appropriately.

As of July 2003, the Los Angeles/El Segundo Dunes are still under the jurisdiction of the California Coastal Commission (CCC) until such time as a Local Coastal Program (LCP) is finalized by the City of Los Angeles and submitted to and approved by the CCC. Any "conservation element" for the Los Angeles/El Segundo Dunes would have to be included in an LCP. Currently, a Long-Term Habitat Management Plan exists for the Los Angeles/El Segundo Dunes and it is the responsibility of LAWA to oversee and implement the plan.¹ It is understood that after certification of the Master Plan project, LAWA will continue to implement the plan. In addition, the conservation element of the City General Plan states that management of city-owned property is to protect and/or enhance the survival of sensitive plant and animal species to the largest extent possible.

Mitigation Measures MM-BC-1 and MM-BC-10 through MM-BC-13 described in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR require that LAWA or its designee mitigate for the loss of habitat within the Los Angeles/El Segundo Dunes, including the Habitat Restoration Area. These mitigation measures include the restoration of sensitive habitat, namely Valley Needlegrass Grassland and Southern Foredune, within the Los Angeles/El Segundo Dunes, and monitoring and management of the restored areas for a period of not less than five years to ensure the long-term viability and quality of restored habitat.

¹ City of Los Angeles Environmental Affairs Department, 23 June 1994. Long-Term Habitat Management Plan for Los Angeles Airport, El Segundo Dunes.

AL00022-170

Comment:

13.1 Mitigation Measures

Section 4.10.8 lists several mitigation measures that, if successfully implemented, would reduce potential impacts to sensitive biological resources to a less than significant level. The mitigation measures that are implemented will be determined by which Alternative is chosen. It is expected that a mitigation monitoring program (MMP) will be developed and implemented; however, from a biological perspective, as well as for a more secure point for future negotiations with United States Fish & Wildlife Service (USFWS) regarding potential take issues with listed species, all biological mitigation measures should be separated from the MMP and be integrated into a Conservation Program for LAWA with a

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focus on the Los Angeles/El Segundo Dunes and surrounding areas. This will provide LAWA with a stronger negotiating position with USFWS on future projects.

Response:

The Federal Aviation Administration (FAA) prepared an Endangered Species Conservation Package for the Riverside fairy shrimp and El Segundo blue butterfly in support of the LAX 2015 Master Plan, submitted to the U.S. Fish and Wildlife Service (USFWS) in March 2001. To account for consultation among LAWA, FAA, and USFWS, and to address Alternative D (proposed since publication of the Draft EIS/EIR), a Final Endangered Species Conservation Package will be prepared by the FAA for submission to the USFWS upon acquisition of the conservation site for the disposition of soils containing cysts of the Riverside fairy shrimp from the LAX airfield. The Final Conservation Package will serve to document the conservation intent of FAA, as well as streamline the permitting process for LAWA. In addition, as required under Section 7 of the Endangered Species Act, the FAA has prepared a Biological Assessment in conjunction with the Draft EIS/EIR, an Updated Biological Assessment Technical Report in conjunction with the Supplement to the Draft EIS/EIR, and an Updated Biological Assessment Technical Report for the federally endangered El Segundo blue butterfly within the Los Angeles/El Segundo Dunes submitted to the USFWS in 2003. As a result of Section 7 consultation among LAWA, FAA, and USFWS, a Draft Biological Opinion has been issued by the USFWS. FAA and LAWA have incorporated into the Final EIS/EIR the conservation measures specified in the Draft Biological Opinion, including identification of feasible sites for off-site relocation of cysts of the Riverside fairy shrimp that cannot feasibly be avoided, specifications and performance standards for off-site relocation, construction avoidance measures for sites that would be avoided by Alternative D, and protocols for monitoring and maintaining relocation sites. The Draft Biological Opinion is included as Appendix F-E of this Final EIS/EIR.

AL00022-171

Comment:

Section 4.11.2 mentions that a formal Section 7 consultation with USFWS was initiated on September 5, 2000. The remainder of Section 4.11 discusses several mitigation measures that will be implemented to reduce impacts to listed species to below a significant level. It is not clear whether these mitigation measures are the basis for the formal Section 7 or if they have been included in the required Biological Assessment. Although completion of the Section 7 consultation process by the FAA is not required to be a part of the Draft EIS/EIR analysis, the level of analysis and detail presented in this Draft would suggest that it has been included.

Response:

The Federal Aviation Administration (FAA) began formal Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) in September 2000 with the FAA's submittal of the Biological Assessment Technical Report in partial fulfillment of its responsibilities under Section 7(a)(2) of the Federal Endangered Species Act (16 USC 1536[c]). The Biological Assessment Technical Report analyzes the potential effects of LAX Master Plan improvements on federally listed species within Master Plan boundaries and includes mitigation measures to avoid or reduce potential effects to those species. The mitigation measures in the Biological Assessment Technical Report are the same as those described in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR (June 2001). The Biological Assessment Technical Report is included as Appendix J1 of the Draft EIS/EIR. As a result of consultation among FAA, LAWA, and the USFWS, the Updated Biological Assessment Technical Report was published as Appendix S-H of the Supplement to the Draft EIS/EIR in July 2003. The FAA also submitted to the USFWS the Updated Biological Assessment Technical Report for the Federally Endangered El Segundo Blue Butterfly (*Euphilotes battoides allyni*) at Los Angeles International Airport, Los Angeles, California in support of Alternative D, the Enhanced Safety and Security Plan, analyzed in the Supplement to the Draft EIS/EIR. As a result of Section 7 consultation, the USFWS has issued a Draft Biological Opinion, which is included as Appendix F-E of this Final EIS/EIR. FAA and LAWA have incorporated into the Final EIS/EIR the conservation measures specified in the Draft Biological Opinion, including identification of feasible sites for off-site relocation of cysts of the Riverside fairy shrimp that cannot feasibly be avoided, specifications and performance standards for off-site relocation, construction avoidance measures for sites that would be avoided by Alternative D, and protocols for monitoring and maintaining relocation sites.

AL00022-172

Comment:

Apparently, USFWS and LAWA have not come to terms on the level of mitigation required to mitigate impacts to the Riverside Fairy Shrimp and its habitat. There is a brief mention of this divide at the top of page 4-691. The FAA is rightly concerned that the creation/restoration of fairy shrimp habitat (vernal pools) will create significant safety issues for aircraft by attracting birds (bird air strike hazards). However, the final endangered species mitigation measures and/or conservation management strategies will depend on the final resolution of this issue between USFWS and the FAA.

The Draft EIS/EIR does not give an indication whether the present mitigation measures will be satisfactory to USFWS, or whether these measures will allow the FAA to complete its obligations under the Endangered Species Act. If this is the case, it should be clearly stated. If it is not, the reader needs to know that the mitigation measures have not been approved by USFWS and could change significantly before the Section 7 consultation process is completed and a Biological Opinion is issued by the USFWS.

As discussed above under comments for Section 4.10.5 Master Plan Commitment, all biological mitigation measures should be integrated into a Conservation Program for LAWA with focus on the Los Angeles/El Segundo Dunes and the Riverside Fairy Shrimp.

Response:

Please see Topical Response TR-ET-2 regarding Riverside fairy shrimp mitigation. This comment is similar to Comment SAL00013-142. Please see Response to Comment SAL00013-142 for more details regarding a conservation program and consultation between USFWS and LAWA.

AL00022-173

Comment:

13.2 Wetlands

Only U.S. Army Corps of Engineers jurisdiction was found to occur within the Air Operation Area or the Los Angeles/El Segundo Dunes; no California Department of Fish and Game (CDFG) jurisdiction was determined to occur. The permanent conversion/loss of the 1.3 acres of atypical wetlands is a significant impact that will require a 404 permit. It will also require a Section 7 consultation between the Corps and USFWS because of the presence of embedded Riverside Fairy Shrimp cysts in soil samples.

Response:

In a letter from the U.S. Army Corps of Engineers (USACOE) dated October 17, 2001, the USACOE verified that the proposed project does discharge dredged or fill material within 0.04 acres of jurisdictional atypical wetlands, thus requiring a permit under Section 404 of the federal Clean Water Act. As required under Section 7 of the Endangered Species Act, the FAA initiated consultation with the U.S. Fish and Wildlife Service (USFWS) in June 1999 for operations and maintenance issues regarding the 1.3 acres of jurisdictional wetlands containing embedded cysts of the Riverside fairy shrimp. Formal Section 7 consultation for the Master Plan was initiated on September 5, 2000. The FAA prepared a Biological Assessment in conjunction with the Draft EIS/EIR to address issues pertaining to Riverside fairy shrimp and El Segundo blue butterfly. To account for consultation among LAWA, FAA, and USFWS, and to address Alternative D (proposed since publication of the Draft EIS/EIR), an amendment to the Biological Assessment has been prepared and is provided in Appendix S-H, Updated Biological Assessment Technical Report, of the Supplement to the Draft EIS/EIR. As a result of Section 7 consultation among LAWA, FAA, and USFWS, the soils containing cysts of the Riverside fairy shrimp will be relocated to property owned by the FAA and designated a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS, in conformance with the Draft Biological Opinion issued by the USFWS. The Draft Biological Opinion is included as Appendix F-E of this Final EIS/EIR.

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AL00022-174

Comment:

The biological concerns associated with wetlands should also be included in a Conservation Program rather than addressed as a separate biological issue for which no Master Plan commitments are made. Although there is very limited natural habitat at LAX, any loss of these remaining natural habitats will be considered significant by USFWS, CDFG, and local wildlife protection groups. It would seem an opportune time to develop a long-term management plan for biological resources on airport lands. Once in place, this plan/strategy would set policies and procedures (officially approved by the resources regulators) for the next several years. As the Draft EIS/EIR currently reads, LAWA has identified several biological concerns that are being addressed separately and on a one-time basis. This would leave LAWA vulnerable to future challenges as unanticipated development/programs are proposed.

Response:

The FAA prepared an Endangered Species Conservation Package for the Riverside fairy shrimp and El Segundo blue butterfly in support of the LAX 2015 Master Plan, submitted to the U.S. Fish and Wildlife Service (USFWS) in March 2001. To account for consultation among LAWA, FAA, and USFWS, and to address Alternative D (proposed since publication of the Draft EIS/EIR), a Final Endangered Species Conservation Package will be prepared by the FAA for submission to the USFWS. The Final Conservation Package will serve to document the conservation intent of FAA, as well as streamline the permitting process for LAWA. In addition, as required under Section 7 of the Endangered Species Act, the FAA has prepared a Biological Assessment in conjunction with the Draft EIS/EIR, an Updated Biological Assessment Technical Report in conjunction with the Supplement to the Draft EIS/EIR, and an Updated Biological Assessment Technical Report for the federally endangered El Segundo blue butterfly within the Los Angeles/El Segundo Dunes submitted to the USFWS in July 2003. As a result of Section 7 consultation among LAWA, FAA, and USFWS, a Draft Biological Opinion has been issued by the USFWS. FAA and LAWA have incorporated into the Final EIS/EIR the conservation measures specified in the Draft Biological Opinion, including identification of feasible sites for off-site relocation of cysts of the Riverside fairy shrimp that cannot feasibly be avoided, specifications and performance standards for off-site relocation, construction avoidance measures for sites that would be avoided by Alternative D, and protocols for monitoring and maintaining relocation sites. The Draft Biological Opinion is included as Appendix F-E of this Final EIS/EIR.

AL00022-175

Comment:

13.3 General Comments

Overall, as a NEPA/CEQA document, the biological analysis is well done. Unfortunately, given the amount of time and effort devoted to assessing baseline biological conditions, the remaining step of integrating and folding this information into a long-term Conservation Program is missing. This may be a conscious choice by LAWA management and the City of Los Angeles; however, this approach may deprive LAWA of the opportunity to gain long-term control of its own biological resources.

Response:

Mitigation measures MM-BC-1 through MM-BC-13 in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR and MM-ET-1 through MM-ET-4 in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Supplement to the Draft EIS/EIR, include a component which requires LAWA, or its designee, to monitor and manage for the conservation of floral and faunal resources and for the long-term viability and quality of the natural resources within the restoration sites.

AL00022-176

Comment:

14 Additional Issues

14.1 Historical, Architectural, Archaeological, and Cultural Resources

Illustration of the different impacts associated with the Single v. Split Viaduct LAX Expressway Alternatives should be carried forward from the Appendices to the Historic/Architectural section of the Draft EIS/EIR.

Response:

Information contained in the Draft EIS/EIR Appendices, including but not limited to Appendix K, and Draft EIS/EIR Technical Reports is a part of the overall Draft EIS/EIR, and is summarized and/or referenced where appropriate in the main body of text in the Draft EIS/EIR.

AL00022-177

Comment:

The commitment to have a qualified architectural historian supervise noise abatement of historic properties does not assure that the historic values and character of such properties will not be altered or lost. This possibility should be discussed and alternate mitigation measures or a revised significance finding should be attached, if appropriate.

Response:

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historic properties will be conducted in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, a project's impact on historic properties, for the purposes of CEQA, is considered mitigated below a level of significance and thus, is not significant. Further, supervision and monitoring of the noise attenuation process by a qualified architectural historian shall assure that the Standards are implemented correctly and that the historic character and fabric of these historic properties are not adversely impacted. Additional information regarding noise abatement of historic properties is included in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Noise-related impacts on historic structures also are addressed in Appendix I, Section 106 Report, and Appendix S-G, Supplemental Section 106 Report, respectively, of each document.

AL00022-178

Comment:

14.2 Floodplains

The discussion of floodplains⁷² indicates that the 13-acre parcel currently shown as being within a 100-year floodplain no longer exhibits applicable drainage characteristics. For this reason, the City has initiated consultation with the Federal Emergency Management Agency regarding a "letter of map revision" to remove the floodplain designation for this parcel. Based on the manner in which the Draft EIS/EIR discusses the floodplain issues, it would appear that the consultation process is at this point a mere formality. If this is an incorrect statement, what are the substantive issues yet to be resolved? In the event that the map revision is not approved, a discussion of the potential consequences should have been evaluated in the Draft EIS/EIR.

⁷² Section 4.13.

Response:

Please see Response to Comment AL00033-182 regarding the Letter of Map Revision issued by FEMA that removed the 100-year floodplain designation for the 13-acre area to reflect the current actual conditions.

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AL00022-179

Comment:

Each of the build Alternatives is proposed to fill the floodplain for roadways and parking facilities, and no avoidance Alternatives are proposed. Although development of the site may not result in significant floodplain impacts, it appears that LAWA has not given any consideration to use of this area as a detention facility, consistent with identified hydrology and water quality objectives. This should be given consideration, or explained why it was given consideration and rejected.

Response:

As indicated in Section 4.13, Floodplains, of the Supplement to the Draft EIS/EIR, the 13-acre that was classified as a "Special Flood Hazard Area" (SFHA) has been reclassified by the Federal Emergency Management Agency (FEMA) as being in Zone C, an area subject to minimal flooding outside the SFHA. The subject area was an isolated depression when originally mapped, but was subsequently filled and raised, consequently eliminating the potential for flooding. It is not possible or necessary to use this area as a detention basin.

In addition, the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed impacts to natural flood moderation, water quality maintenance, and groundwater recharge in Section 4.7, Hydrology and Water Quality, with supporting technical data and analyses provided in Technical Report 6, of the Draft EIS/EIR, and Technical Report S-5 of the Supplement to the Draft EIS/EIR. As described in Section 4.7, Hydrology and Water Quality of the Supplement to the Draft EIS/EIR, implementation of any of the build alternatives would require the development of an airport-wide Drainage Plan (Master Plan Commitment HWQ-1) that would provide adequate drainage capacity to prevent flooding and control peak flow discharges and that would incorporate Best Management Practices (BMPs) to minimize impacts on surface water quality.

AL00022-180

Comment:

14.3 Human Health and Safety

In discussing the impact of toxic air pollutants associated with current airport operations, the Draft EIS/EIR notes that, "The HHRA [Human Health Risk Assessment] did not evaluate impacts of toxic air pollutants associated with current airport operations. LAWA is initiating an independent study of air quality in the area around LAX for the purpose of examining these impacts."⁷³ The timing of this independent study should be identified, and a discussion of why it is considered "independent" even though it is certainly relevant and apparently proceeding on a parallel timeframe is merited.

⁷³ Section 4.24.1, Page 4-999.

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please also see Topical Response TR-AQ-2 for additional information regarding the LAX Ambient Air Quality and Source Apportionment Study.

AL00022-181

Comment:

In addition, it is not known why the HHRA excluded consideration of toxic air pollutants associated with current airport operations given that the results are necessary to establish the baseline setting.

Response:

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00022-182**Comment:**

The HHRA indicates, "The three build Alternatives might have significant human health impacts, under pre-mitigation conditions for both horizon years." It also states, "the build Alternatives with mitigation would have no significant human health impacts at either horizon year." The Assessment also asserts that there are no mitigation measures proposed for human health effects, but does state that the Air Quality mitigations would apply to health impacts as well as air quality. However, the Technical Report for Air Quality indicates that mitigation measures have not yet been fully formulated. The extensive list of mitigation options identified in Attachment X of the Air Quality Technical Report does not quantify the anticipated efficacy of the measures listed. Moreover, many of the measures listed in Attachment X of the Technical Report are either already in place, now in progress, supportive in character (i.e., proceeding independent of the Master Plan, and not to be quantified), or not applicable.

Less than one-quarter of the mitigation measures are listed as "in the Master Plan." Many in this group (for example, increase number of aircraft seats) are beyond the control of the Master Plan, and at least one (i.e., consider regional Alternatives to Master Plan) has in fact been rejected. Furthermore, roughly half of the measures are identified as "Applicable" (i.e., measures that "may be assessed for AQ benefit"). Many of the measures included in this group would be expected to occur regardless of what happens with the proposed Master Plan (e.g., parking pricing policies to encourage single trips or minimize idle time at the curb; encourage employee telecommuting, expand off-airport intermodal services to other airports), while others would have no air quality benefit (e.g., unmitigated impacts result in payments to trust fund for community improvements).

In this context, it is difficult to understand how the HHRA determined that the build Alternatives, with mitigation, would have no significant human health impacts at either horizon year. A clarification of the assumptions that were made in order to reach this conclusion is necessary to validate this conclusion.

Response:

The content of this comment is essentially the same as comment AL00022-38; please refer to Response to Comment AL00022-38.

AL00022-183**Comment:**

The No Project Alternative is indicated to have more significant health and safety impacts than any of the build Alternatives. Notwithstanding the points raised in the preceding comment, this conclusion is surprising given the fact that: (1) Phase 1 analyses indicated that aircraft emissions account for about 97% of total emissions and also contribute most to emissions of individual TAPs;⁷⁴ (2) predicted reductions in incremental human health impacts are indicated to result from an "anticipated reduction in older, more polluting engines in aircraft and vehicles resulting from Federal mandates to phase-in cleaner engines," among other factors;⁷⁵ and (3) The No Project Alternative is estimated to have 783,430 total annual aircraft operations, versus 797,249 total annual aircraft operations for Alternative C (1.8% higher), and 935,140 total operations for Alternatives A and B (17.3% higher).⁷⁶ This apparent inconsistency requires clarification and the weight given to each of the factors cited should be included in the discussion.

⁷⁴ Technical Report 14a, Section 3.3.

⁷⁵ Section 4.24.1, Page 4-1000.

⁷⁶ Page ES-9.

Response:

The No Project/No Action Alternative assumes that no substantial changes are made to current LAX facilities, and is based on projections of growth in airport activity between 1996 and horizon year 2015. Airport congestion during this time is expected to grow worse without additional capital improvement. In all cases, build alternatives are expected to relieve current and predicted future congestion. Several

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aspects of these alternatives would contribute to predicted smaller off-airport impacts, including more favorable flight scheduling through the day, movement of many aircraft operations to a western terminal, and accommodation of many larger, newer, and less polluting aircraft.

As a result, after implementation of mitigation measures, the build alternatives would reduce predicted impacts to human health compared with the No Project/No Action Alternative. Implementation of any of the build alternatives is therefore anticipated to reduce future health impacts for most people living, working or going to school near the airport. However, as indicated in the Supplement to the Draft EIS/EIR, predicted chronic non-cancer human health impacts for maximally exposed residents under Alternatives B and C are slightly higher for some areas than those predicted with the No Project/No Action Alternative.

AL00022-184

Comment:

14.4 Environmental Action Plan

Many of the key Master Plan Commitments and mitigation measures in the Environmental Action Plan (EAP) are broad and programmatic in nature. Many will require further study, with choices among specific options deferred to the Final EIS/EIR and other stages of the decision making process. The EAP needs to be expanded to identify when and where such subsequent environmental reviews will be required, with discussion as to how these timeframes relate to the improvement phasing plan set forth by LAWA, and to the sequence for FAA and LAWA consideration of required discretionary actions.

By its own admission, the Draft EIS/EIR indicates that key commitments and mitigation measures are merely "performance standards with a range of options." The EAP, including all Master Plan Commitments and mitigation measures, should be refined and detailed to adequately serve as the CEQA Mitigation Monitoring Program, pursuant to Public Resources Code 21081.6.

Response:

Please see Response to Comment AR00003-63.

AL00022-185

Comment:

14.5 Video-Conferencing Calculations

In the Section 1.3 discussion of Alternatives to air travel, the Draft EIS/EIR notes a study by Apogee Research that contains key findings that video-conferencing has potential to satisfy (1) from 5-30% of non-discretionary travel; and (2) less than 5% of discretionary travel. The discussion in Section 1.3 concludes with: "Given that 50% of LAX users are leisure travelers, it is projected that less than 5% of air travel demand at LAX could be satisfied by communication technologies in 2015. These amounts were factored into the assumptions of the LAX Master Plan forecasts." This appears to be an error. The total amount of air travel demand at LAX that could be satisfied by communication technologies should equal the combined amounts for discretionary travel PLUS non-discretionary travel (i.e., [5-30% of demand x 50% of travel = 2.5% to 15%] + [<5% of demand x 50% of travel = <2.5%] = ~2.5% - 17.5%). It seems that a higher number should be factored into the assumptions of the LAX Master Plan forecasts.

Response:

The conclusions of the Apogee Research were included in Section 1.3, Meeting the Demand for Transportation in the Region of the Draft EIS/EIR as a form of full disclosure. Video conferencing has been touted for many years as a replacement for a percentage of business air travel. Until recently, the impacts of video conferencing on air travel were believed to be negligible. While the impact on business travel in 2015 may indeed be measurable, industry experts disagree on the likely range of the impact. The impact factored into the 2015 LAX passenger forecast was less than 5 percent.

AL00022-186**Comment:****14.6 Reliance on SCAG**

The Draft EIS/EIR refers on a number of occasions to analyses by SCAG that suggest a loss of significant air travel demand would result if an attempt is made to limit growth at LAX in order to "force the development of other airports."⁷⁷ Earlier studies notwithstanding, SCAG has recently voted to support regional airport development coupled with maintenance of baseline conditions at LAX. The basis and importance of SCAG's recent actions should be considered and included in the document, including specific reference to how this would change statements and conclusions in the Draft EIS/EIR that are based on SCAG's earlier findings and positions. The conclusions should be updated in light of the SCAG Board's action recommending a 78 MAP limit on LAX and encouraging growth at other airports.

77 Page 3-2.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements while being designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00022-187**Comment:****14.7 Sixty-Minute Access Zone Map**

The Zone Boundaries shown in Figure 1-3 showing the 60-minute travel time accessibility zones for airports in southern California appear to overstate driving times for at least some of the airports shown. The assumptions that were used in developing this map need to be discussed and clarified in order to support the map, as drawn.

Response:

Please see Response to Comment AL00018-110.

AL00022-188**Comment:****14.8 Weather Conditions**

The Draft EIS/EIR notes that only one of the four runways is sufficiently long to serve the largest aircraft when fully loaded under adverse weather conditions (hot days with little wind).⁷⁸ However, there is no discussion as to how many days of the year, on average, are characterized by these adverse weather conditions. There is also no discussion as to how many runways can accommodate the largest aircraft when fully loaded. Both of these issues require further explanation and investigation by LAWA.

78 Section 2.2.2, Page 2-6.

3. Comments and Responses

Response:

Air Traffic Control Tower personnel have estimated that this restriction related to adverse weather conditions (hot days with little wind) occurs approximately 20 days per year.

Currently there are four runways at LAX, two parallel runways on the south complex and two parallel runways on the north complex. The two inbound runways (6R/24L and 7L/25R) in each complex are primarily used for departures. The outboard runways (6L/24R and 7R/25L) are primarily used for arrivals. (Please see Figure II-2.8 in Chapter II of the LAX Master Plan for a graphical depiction of how the runways are used.) Landing length requirements are typically shorter than departure runway length requirements, thus, the primary departure runways are longer than the primary arrival runways at LAX. The runway length deficiency the commentor refers to is for departing aircraft, therefore, this response focuses on the two primary departure runways - 6R/24L and 7L/25R. Runway 7L/25R (the main departure runway on the south complex) is the longest runway at the airport at 12,091 feet long. The main departure runway on the north complex (Runway 6R/24L) is 10,285 feet long.

A runway length analysis was prepared as part of the Master Plan (see Chapter IV, Section 3.2.2). The determining factors of takeoff runway length requirements are aircraft weight and other physical characteristics; pressure altitude; temperature; and prevailing surface winds. The runway length analysis was prepared for hot day conditions, which are defined as 86 degrees Fahrenheit. This analysis concluded that Runway 6R/24L has insufficient length to accommodate fully loaded takeoffs under hot day conditions of the Boeing 737-300, 747-200/300, 747-400, and MD-11:

Aircraft Type	Takeoff Runway Length Requirement (feet)
B-737-300	10,600
B-747-200/300	11,500
B-747-400	11,100
MD-11	10,950

The New Large Aircraft (NLA), projected to enter service in 2006, are expected to have similar runway length requirements to the B-747-400. Only the southern Runway 7L/25R can accommodate departures by the above aircraft at maximum takeoff weight in hot day conditions.

Takeoff runway length requirements could be even greater than those discussed above. For example, if temperatures are higher than 86 degrees Fahrenheit, runway length requirements would increase. In addition, departing aircraft are affected by surface winds. The runway length requirements described above assume no winds. LAX operates predominantly in a westerly configuration, as the prevailing winds are from the west or southwest. The Los Angeles Airport Traffic Control Tower often will retain the airport in a west configuration even when there is a slight east tailwind. This is done to gain an operational advantage because the west configuration is more efficient and keeps the majority of departing aircraft over the ocean. Aircraft taking off with a slight east tailwind would require a runway length slightly longer than what would be needed without an east tailwind. In addition, the runway length analysis prepared for the Master Plan does not take into consideration the individual requirements of the airlines. Specific airline operating procedures are oftentimes more restrictive.

Lack of adequate length on the north airfield runways would require that northbound departures requiring more length must takeoff from the south complex.. In general, it is preferred for northbound departures to depart from the north complex and for southbound departures to depart from the south complex. Departures are conducted in this manner to avoid coordinated crossings in the air, which reduces the departure capacity of the airfield and can increase delays. However, fully loaded aircraft often request to depart from Runway 7L/25R, regardless of their destination because of wind, temperature, or combinations of the two.

The number of days that pilots are unable to use the northern complex for departure with certain aircraft was not calculated. Air Traffic Control Tower personnel have estimated that this restriction occurs approximately 20 days per year.

Extension of Runway 6R/24L to 12,000 feet as depicted in the Alternatives A, B & C (and in Alternative D through application of Declared Distances providing a take-off distance allowed of 12,000 feet, 300 feet longer than the 11,700 feet of pavement length) would permit departures by the largest aircraft from

either the north or south airfield complex. The increase in length would reduce airfield congestion and eliminate excessive coordinated crossings in the air, thus reducing departure delays.

AL00022-189

Comment:

14.9 Remote Terminals

There are several locations within the Draft EIS/EIR where mention is made of the possibility of remote terminals. However, no analysis is undertaken to determine their impacts. LAWA should expand the Draft EIS/EIR to include a full characterization of these remote terminals as well as a description of the baseline setting for the proposed locations, the impacts of their construction and use, and mitigation measures to address any adverse effects.

Response:

Please see Response to Comment AL00022-11.

AL00022-190

Comment:

15 Conclusions

There is no doubt that Los Angeles International Airport is vitally important to the City of Los Angeles, to the County of Los Angeles, to the region, and to California generally. There is an obvious need for improvements at LAX; however, throughout the Draft EIS/EIR, baselines have been inconsistent and inappropriate, selected Alternatives have not met CEQA and/or NEPA requirements, and the analysis has not been sufficient to support the adoption of the LAX Master Plan, as proposed.

The fundamental requirements of this process require a lead agency to begin with comprehensive scoping. Input from the scoping process should then be used to define alternatives that would avoid or substantially lessen the significant effects of the proposed project. These requirements have not been met in the circulated document. The stated objectives would not be realized through the preferred Alternative, biases are evident, and the No Project Alternative is misleading and inaccurate.

The problems associated with this Draft EIS/EIR are so serious, pervasive, and universal that the only practical remedy is to start the process over again. The revised EIS/EIR would need to provide comprehensive scoping, include an updated and consistent baseline, identify feasible runway expansion methods, be free of internal inconsistencies, offer proper levels of analysis and explanation, and present an entirely new impact assessment that does not defer critical decisions. Only with these extensive modifications could the LAX Master Plan be rendered adequate.

This process needs to acknowledge the regional nature of the undertaking and follow with a fresh look at Alternatives that include regional options. We have offered an example Alternative approach that can serve the objectives of LAX as well as the many regional facilities throughout the five-county area. Impacts on the area immediately surrounding LAX would be lessened, the region would be able to handle a larger share of the national transportation market, and outlying areas and counties would be able to accommodate their "fair share" of air traffic. SCAG's recent approval of the RTP supports the regional approach. Recent FAA actions seem to support the regional approach. It is time for LAWA to consider an Alternative that encourages regional growth rather than unconstrained expansion on an already heavily impacted site.

Response:

Comment noted.

3. Comments and Responses

AL00023 Kennedy, Hilda City of Inglewood 8/2/2001

AL00023-1

Comment:

Enclosed are comments that have been forwarded to the City of Inglewood regarding the Draft LAX Master Plan and EIS/EIR Report concerning the expansion of Los Angeles World Airports over the next fifteen years.

Please record these comments as individual comments from citizens of Inglewood. The attached comments include written remarks from:

- Douglas Fritts, 3674 Kensley Drive, Inglewood, California 90305

- Family Christian Cathedral (Correspondence from this group includes 9 pages of signatures on a "Petition to stop the LAX Expansion Project in the City of Inglewood")

Response:

Comment noted. Please see responses to comment letters PC01878 and PFK00001.

AL00023-2

Comment:

Thank you very much for your assistance. If you have any questions, please phone me at (310) 412-5301.

Response:

Comment noted.

AL00024 Hagekhalil, Adel City of Los Angeles 8/7/2001

AL00024-1

Comment:

No Action/ No Project Alternative

Under this alternative, it is assumed that all improvements to LAX would be completed by 2005. The total wastewater generation within the Master Plan boundaries, including LAX Northside, Continental City, and land within the Master Plan boundaries that would not be acquired under this alternative, would increase by 0.88 mgd (a 44 percent increase) over baseline conditions of approximately 2.0 mgd by 2015. HTP has a design capacity of 450 mgd, and currently has excess wastewater capacity. It is anticipated that the increase in wastewater generation associated under this alternative in 2015, compared to baseline conditions, could be accommodated by the existing HTP wastewater treatment facilities.

Response:

Projected wastewater flows and conveyance/treatment capacity associated with the No Action/No Project Alternative were addressed on pages 4-1154 through 4-1156 in Section 4.25.2, Wastewater (subsection 4.25.2.6.1), of the Draft EIS/EIR. The Draft EIS/EIR discussion is consistent with the conclusions of this comment.

AL00024-2**Comment:**

Currently, the sewers that are scheduled to receive wastewater discharges from LAX can handle the projected flows.

Response:

Please see Response to Comment AL00024-1.

AL00024-3**Comment:**

However, the Integrated Plan for Wastewater Program projections show that wastewater treatment demands will exceed capacity at the HTP in the year 2020. The City is undergoing an extensive planning effort to address this projected demand.

Response:

Comment noted. The Draft EIS/EIR addressed wastewater treatment capacity and projected flows in Section 4.25.2, Wastewater (subsection 4.25.2.6). That analysis acknowledged that projected wastewater flows will exceed the capacity of HTP in 2020. The specific improvements and expansions to the Hyperion Treatment System will be determined by the Bureau of Sanitation at such time that system components are upgraded per the IPWP, based on projected growth in the region. A mitigation measure to address this cumulative impact is included in the Final EIS/EIR (Mitigation Measure MM-WW-1).

AL00024-4**Comment:**

Alternative A- Added Runway North

The total wastewater generation within the Master Plan boundaries would decrease 15 percent from baseline conditions by 2005 and increase 19 percent over baseline conditions by 2015. The impact associated with increased wastewater generation in 2015 would be less than significant.

Response:

Projected wastewater flows and conveyance/treatment capacity associated with Alternative A were addressed on pages 4-1156 and 4-1157 in Section 4.25.2, Wastewater (subsection 4.25.2.6.2), of the Draft EIS/EIR. The Draft EIS/EIR discussion is consistent with the conclusions of this comment.

AL00024-5**Comment:**

Discharges would continue to be regulated by the City of Los Angeles Industrial Waste Control Ordinance, requiring that discharges meet the water quality standards and mandating treatment.

Response:

LAWA will continue to comply with the City of Los Angeles Industrial Waste Control Ordinance. Also, please see Topical Response TR-HWQ-2 regarding compliance with regulations.

AL00024-6**Comment:**

Construction of subsurface structures as part of alternative A may interfere with existing wastewater collection infrastructure such as three major sewer outfalls, the NCOS, NORS, and COS, underlie LAX.

3. Comments and Responses

Response:

The Draft EIS/EIR discussed potential impacts to on- and off-site sewage pipelines, including the NCOS, NORS, and COS in Section 4.25.2, Wastewater (subsection 4.25.2.6). Additionally, Master Plan Commitment PU-1 describes the utility relocation program that LAWA has committed to, which would upgrade/relocate utilities, including wastewater infrastructure, as appropriate to avoid impacts to the conveyance system, prior to construction of Master Plan components.

AL00024-7

Comment:

Alternative B- Added Runway South

The total wastewater generation within the Master Plan boundaries would decrease 22 percent from baseline conditions by 2005 and a 7 percent decrease from baseline conditions by 2015. Wastewater generated under this alternative would not cause an exceedance in the capacity of wastewater treatment facilities and no adverse impacts would occur.

Response:

Projected wastewater flows and conveyance/treatment capacity associated with Alternative B were addressed on page 4-1157 in Section 4.25.2, Wastewater (subsection 4.25.2.6.3), of the Draft EIS/EIR. The Draft EIS/EIR discussion is consistent with the conclusions of this comment.

AL00024-8

Comment:

Alternative C- No Additional Runway

The total wastewater generation within the Master Plan boundaries would decrease 9 percent from baseline conditions by 2005 and a 15 percent increase by 2015. Similar to Alternatives A, and B, Alternative C would result in less wastewater generation within the Master Plan boundaries in both 2005 and 2015 than would be the No Action/ No Project Alternative. It is anticipated that the increase in wastewater generation compared to baseline conditions, could be accommodated by the existing wastewater treatment facilities at HTP. Therefore, the impact associated with increased wastewater generation for this alternative would be less than significant.

Response:

Projected wastewater flows and conveyance/treatment capacity associated with Alternative C were addressed on pages 4-1157 and 4-1158 in Section 4.25.2, Wastewater (subsection 4.25.2.6.4), of the Draft EIS/EIR. The Draft EIS/EIR discussion is consistent with the conclusions of this comment.

AL00025

Guidi, Lawrence

City of Hawthorne

8/22/2001

AL00025-1

Comment:

The City of Hawthorne has reviewed the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) and concurs with the comments that are being submitted under separate cover by the South Bay Cities Council (SBCCOG) of Governments. Accordingly, the City of Hawthorne has adopted the attached Resolution No. 6677 that formally adopts the comments prepared by the SBCCOG as its own.

The City of Hawthorne believes that Los Angeles World Airports should find the Draft EIS/EIR document inadequate for certification and should as a minimum recirculate the document after addressing the deficiencies identified in Resolution No. 6677 and the extensive technical comments that are appended thereto as Exhibit A.

Response:

Comment noted. Please see Responses to Comments below. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

AL00025-2

Comment:

RESOLUTION NO. 6677

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HAWTHORNE, CALIFORNIA, FINDING THAT THE DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED LAX MASTER PLAN IS INADEQUATE AND TRANSMITTING THE OFFICIAL CITY RESPONSE.

WHEREAS, the City of Los Angeles Department of Airports has developed a draft Master Plan for Los Angeles International Airport (LAX) which incorporates capacity enhancements to enable the expansion of passenger activity from a current 60 million passengers per year up to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year through the year 2015; and,

WHEREAS, LAX airport is in close proximity to the City of Hawthorne and the impacts of its operation are of critical interest to the citizens of Hawthorne; and,

WHEREAS, the Los Angeles World Airports (LAWA) and the FAA have prepared a joint Draft EIS/EIR to address the potential environmental impacts caused by the proposed LAX expansion; and,

WHEREAS, on January 18, 2001, the Draft EIS/EIR was released for public review and comment; and,

WHEREAS, the Draft EIS/EIR analyzes four project alternatives, 1) No Action /No Project; 2) Alternative A, Additional runway to the north airfield, 3) Alternative B, an additional runway to the south airfield, and 4) Alternative C, no additional runways but reconfiguration of existing runways including either lengthening, widening, and relocating; and,

WHEREAS, a team of consultants hired by the South Bay Cities Council of Governments has conducted an evaluation and prepared extensive comments on the adequacy of the Draft EIS/EIR as an informational document in addressing potential impacts to the City of Hawthorne and other cities of the South Bay; and,

WHEREAS, the City of Hawthorne considered the Draft EIS/EIR at a public meeting on August 27, 2001.

NOW, THEREFORE, the City Council of the City of Hawthorne, California, DOES HEREBY RESOLVE as follows:

SECTION1. Pursuant to the foregoing recitations, the following findings are hereby made:

SECTION 2. Pursuant to the foregoing recitation and findings, the City Council of the City of Hawthorne, California, hereby:

1. Determines that the Draft EIS/EIR is inadequate and/or inaccurate and requests the LAX Draft EIS/EIR include a complete and accurate analysis of potential environmental impacts to the City of Hawthorne from the airport expansion. This would constitute significant new information that would require recirculation of the Draft EIS/EIR, Master Plan, Technical Reports and Appendices.

2. Establishes that this Resolution, including attached Exhibit "A" (Comments of the South Bay Cities Council of Governments), constitutes the City of Hawthorne's formal position on the proposed expansion of LAX and its comments on the Draft EIS/EIR prepared by LAWA and the FAA.

3. Comments and Responses

3. Directs and authorizes Staff to transmit the position and comments of the City of Hawthorne on the Draft EIS/EIR to the Los Angeles World Airports and Federal Aviation Administration.

APPROVED AND ADOPTED THIS 27th DAY OF AUGUST, 2001.

Response:

Comment noted.

AL00025-3

Comment:

The following constitutes the comments of the South Bay Cities Council of Governments (SBCCOG), pursuant to the requirements of the California Environmental Quality Act, Public Resources Code . 21000, et seq., (CEQA) and the National Environmental Policy Act, 42 U.S.C. . 4321, et seq., (.NEPA.), concerning the Draft Environmental Impact Statement/Environmental Impact Report (.Draft EIS/EIR.) for the Los Angeles International Airport (.Airport.) Proposed Master Plan Improvements (.Project.), prepared jointly by the Federal Aviation Administration (.FAA.) and the City of Los Angeles (.Los Angeles.).¹

The issues raised by these comments fall into seven general categories, although they are not limited only to those categories:

(I) the baseline used in the Draft EIS/EIR, against which the various environmental impacts of the Project are compared, is not properly designated;

(II) the discussion of the Project.s surface traffic impacts is misleading;

(III) the noise impacts of the Project are inadequately addressed;

(IV) the potential air quality impacts of the Project are not fully disclosed;

(V) the Draft EIS/EIR does not explore all reasonable alternatives, and, thus, paves the way for its ultimate conclusion that expansion of the Airport.s airside and groundside facilities are the sole way to meet future demand;

(VI) the Draft EIS/EIR fails to adequately specify mitigation measures or methods to enforce them; and

(VII) the recently articulated project goal of increasing safety obscures the Project.s clear capacity-enhancing purpose. As a result of these defects, the Draft EIS/EIR cannot meet the high standards of disclosure that are the gravamen of both CEQA and NEPA.

1 The FAA and Los Angeles shall, for the remainder of this letter, be referred to collectively as .Project Proponents..

Response:

Please see Responses to Comments AL00025-4 through AL00025-67 below.

AL00025-4

Comment:

I. THE DRAFT EIS/EIR DOES NOT PROPERLY DESIGNATE THE BASELINE FOR ANALYSIS.²

The specification of a baseline for comparison with Project impacts is a critical component of analysis under CEQA, because without an accurate specification of the baseline, analysis of impacts, mitigation measures and project alternatives becomes impossible.. County of Amador v. El Dorado County Water Agency, 76 Cal.App.4th 931,953 (1999). A central concept of CEQA is that .a baseline figure must represent an environmental condition existing on the property prior to the project.. Save Our Peninsula Committee, et al. v. Monterey County Board of Supervisors, et al., 87 Cal.App.4th 99, 124 (2001). The

regulations implementing CEQA, 14 Cal. Code Regs. . 15000, et seq., (.CEQA Guidelines.) are specific as to the definition of .prior to the project.:

An environmental impact report must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or, if no Notice of Preparation is published, at the time the environmental analysis is commenced . . . This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.. CEQA Guidelines . 15125(a).

While the courts have taken the position that the .date for establishing a baseline cannot be a rigid one. *Save Our Peninsula Committee*, supra, 87 Cal.App.4th at 125, they have also held unequivocally that an EIR must focus on impacts to the existing environment, not hypothetical situations. *County of Amador*, supra, 76 Cal.App.4th at 955. The baseline for analysis in the Draft EIS/EIR does not meet these tests.

2 Later sections II, III and IV more fully discuss the pitfalls arising from the use of the three separate and distinct baseline assumptions used in that analysis; Environmental Baseline, Adjusted Environmental Baseline, No-Project/No-Action.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues.

AL00025-5

Comment:

A. The Draft EIS/EIR.s Base Year Does Not Reflect the Physical Conditions on the Project at the Time of the Publication of its Notice of Preparation.

The Airport Master Plan, November, 2000, Technical Analysis (.Master Plan.) is the basis of the analysis contained in the Draft EIS/EIR (Master Plan, Preface, page i). The analyses contained in Master Plan, Chapter II, Existing Conditions Working Paper, 4/19/96, use data from the base year 1994 (see, e.g., . 2.3.1, page II-2.1, re: Annual Weather Conditions; Figure II-2.17, page II-2.53, re: Design Day Hourly Distribution of Operations and Tables following). The Notice of Preparation, however, was published in July, 1997 (Draft EIS/EIR, page ES-2), almost three years after the conditions reflected in the original Master Plan data and analysis. Courts have consistently taken the position that a baseline should not .be set a number of years earlier than the commencement of the current project.. *Save Our Peninsula Committee*, supra, 87 Cal.App.4th at 127.

Moreover, the Master Plan and Draft EIS/EIR contain multiple inconsistent base years such that it is impossible for the public to ascertain which base year is used for a given purpose. On the one hand, the Draft EIS/EIR (page ES-2) states that the environmental analysis normally describes existing conditions as of the July, 1997 date on which the Notice of Preparation was published (even though none of the data in the Master Plan upon which the Draft EIS/EIR is based reflects a 1997 origin). On the other hand, the Draft EIS/EIR states that, where a full year.s worth of data is needed, data from 1996 is used (see, e.g., Draft EIS/EIR Technical Report on Surface Traffic), and sometimes earlier years [unspecified], and sometimes even data from the later years 1999 and 2000 (even though these latter are more than two years after the publication of the Notice of Preparation). Additionally, the Master Plan is unclear as to whether 1994 or 1995 data is used. Finally, different base years are used for different components of the analysis, e.g., 1996 for surface traffic and noise, 2000 for water resources.

Response:

This comment is essentially the same as comment AR00003-4; please see Response to Comment AR00003-4.

AL00025-6

Comment:

Such selective shifting of baselines has substantive consequences. For example, the use of a 1994 (or even 1996) baseline in analysis of aircraft noise impacts artificially elevates the baseline for analysis by

3. Comments and Responses

incorporating noise from the larger numbers of Stage 2 aircraft in the fleet in 1994/96. These aircraft were totally phased out of the United States fleet by the year 2000.

Response:

The 1996 environmental baseline for the Draft EIS/EIR includes many of the noisier Stage 2 aircraft that were phased out in the year 2000. Please see Topical Response TR-N-1, in particular Subtopical Response TR-N-1.3, regarding a comparison of the 1996 baseline and Year 2000 conditions relative to the noise analysis, Topical Response TR-N-3, in particular Subtopical Response TR-N-3.3, regarding noise related to the phase out of Stage 2 aircraft, and Topical Response TR-GEN-1 regarding general baseline issues. The Supplement to the Draft EIS/EIR analyzed and compared Year 2000 conditions to baseline conditions in Section 4.1, Noise, and Section 4.2, Land Use.

AL00025-7

Comment:

Further, the use of a 1994 (or 1996) baseline year in the air quality analysis potentially overstates the baseline level of criteria pollutants in the L.A. region which has since come into attainment for all criteria pollutants except Ozone and Particulate Matter.³ In short, the nonspecificity of both the Master Plan and Draft EIS/EIR with respect to the base year for analysis renders the results of their analyses questionable.

3 The Draft EIS/EIR also states that its use of earlier years results in a more conservative analysis, because there were fewer passengers and operations in earlier years, and, thus, less noise and fewer emissions to compare against those generated by the Project. This claim is inaccurate at least with respect to noise and air quality analyses as set forth below. In any event, it does not account for the opposite effect of using later years 1999/2000 as the baseline, which would, by the logic used in the Draft EIS/EIR, artificially elevate the baseline and, consequently minimize the environmental impacts of the Project. As neither the Master Plan nor Draft EIS/EIR are specific as to the distribution of various baseline years throughout the analysis, it is impossible to ascertain the degree of distortion that may have occurred through the use of these alternate baselines.

Response:

The content of this comment is essentially the same as comment AR00003-6; please see Response to Comment AR00003-6.

AL00025-8

Comment:

B. The Master Plan and Draft EIS/EIR Baseline Analyses Are Based On Incomplete and/or Inaccurate Data.

The Master Plan defines the capacity of the Airport's existing airside facilities as the number of aircraft operations, arrivals and departures, that the Airport can accommodate with a reasonable amount of aircraft delay.. (Master Plan, . 2, page II-2.1) The correct determination of existing airside capacity is critical to identification of the Airport's potential to accommodate future air traffic demand and plan future airport's development. (Master Plan, Chapter 2, page II-2.1) Various independent variables are used in the modeling of existing airport capacity, including, but not limited to: (1) runway operating configurations; (2) noise abatement procedures; (3) airspace operating assumptions; and (4) airfield operating assumptions. (Master Plan, . 2.3, page II-2.21) Delay is also apparently a contributing variable. The relationships within the model are such that, if the definition of a given variable, or the value assigned to it, are questionable, the capacity determination resulting from the model is prejudiced.

Here, even if, for argument's sake, the Draft EIS/EIR had specifically and accurately designated a base year, critical data used in the Master Plan baseline demand/capacity/delay analysis is incomplete or in some cases inaccurate.

Response:

The content of this comment is essentially the same as comment AR00003-7; please see Response to Comment AR00003-7.

AL00025-9**Comment:**

As a threshold matter, the Master Plan demand/capacity/delay analysis is predicated on Aircraft Communications, Addressing and Reporting System (.ACARS.), and Official Airline Guide (.OAG.) data sources. These two data sources exaggerate, or, inaccurately characterize, true (airport capacity related) delay. The Master Plan defines delay as .the difference between the actual time it takes an aircraft to perform an arrival or departure and the normal time it would take to perform the same operation with no interference from other aircraft.. (Master Plan, 2.1, page II-2.2) ACARS data is generated by the airlines, and is based on activities such as push back, parking at the gate, or opening or closing cabin doors. ACARS data includes information about on-time performance, based on the arrival and departure times developed by each airline for each segment of flight. Since the data is airline-generated, airline definitions of delay are automatically built into the report.⁴

Further, the OAG is published for the express purpose of identifying the arrival and departure times of various airlines. When the airlines set up their schedules, they factor in the average delay for each leg of flight between city pairs. Thus, the OAG also builds delay into the departure and arrival times based on each airline.s historical data and operating experience for each flight segment.

In summary, ACARS data is not original source data but is the product of third party intervention. It is manipulated by various airline functionaries before a final report is released. Similarly, OAG data is manipulated to include delay not after, but before the fact. Therefore, because both sources of data already include a delay factor, their use in the Master Plans modeling, as set forth below, is likely to cause a double counting of delay.⁵

Instead of ACARS or OAG data, the Master Plan should have relied on radar data. Radar data is a memorialization of the movement of arriving aircraft from a specified distance outside the terminal control area until touchdown and, conversely, for departing aircraft, from the aircraft.s lift-off from the runway to the same distance outside the airport.s control area. Every operation is tracked in real time without the intervention of third party interpretation, manipulation, or extraneous factors, unrelated to the operational capacity of airport infrastructure.

4 When an aircraft pushes back from the gate or closes the cabin door, the aircraft could be late for a variety of reasons. Many delays are due to factors that are airline-controllable such as late boarding of passengers, customer service delays, maintenance delays, late arriving equipment, catering, fueling, baggage and the unavailability of crew members, to name but a few. Other types of delay would be attributable to airport, runway or taxiway design, airport acceptance rates, airport construction, noise abatement regulations, air traffic control restrictions and weather. These items are also introduced and incorporated into the ACARS report as a delay factor.

5 In addition, the Master Plan analysis relies on numerous sources other than ACARS or OAG data including personal observations, a small sampling of users and an unique determination of aircraft speeds and routes, none of which is suitable, let alone optimal, for developing baseline analyses or formulating assumptions. (See, e.g., Master Plan, . 2.1.3, pages II-2.5 - II-2.6)

Response:

The content of this comment is essentially the same as comment AR00003-8; please see Response to Comment AR00003-8.

AL00025-10**Comment:**

The effects of this confounding of substantive with non-substantive delay factors are reflected in the Master Plan.s modeling of demand/capacity/delay. The FAA.s Simulation Model (.SIMMOD.) Version 2.1, was apparently used in the Master Plan.s demand/capacity/delay analysis. SIMMOD simulates the

3. Comments and Responses

movement of arriving and departing aircraft from their entry/exit into the Los Angeles Terminal Air Traffic Airspace through approach and landing phase, or taxi and takeoff, to their exit from the terminal air traffic airspace. Proper calibration of SIMMOD is essential since the resulting statistics depend upon the data used to develop the baseline assumptions and operating instructions for the model. In this case, ACARS and OAG data were used to calibrate SIMMOD. Because of the potential double counting inherent in these data sources, and the consequent exaggeration of delay in the model, the principal conclusion that is drawn from SIMMOD is that the only way to remedy delay is to build additional airport infrastructure. The most obvious flaw of such an analysis is that it eliminates, at the outset, opportunities to gain efficiency through improvements in operating practices and minor modifications to the air traffic system. Thus, what seems like a relatively minor data collection/designation problem pervades the demand/capacity/delay modeling upon which the Draft EIS/EIR's environmental analysis is based, and subtly biases the results.

C. The Draft EIS/EIR is Based on Implausible Modeling Assumptions.

The accuracy of SIMMOD's results depends on an accurate .description. of the .airport.s operating environment.. (Master Plan, . 2.1, page II-2.2) Both the Master Plan and Draft EIS/EIR acknowledge that the .description. is made up not merely of data purporting to represent actual current conditions, but also assumptions arising from that data (see, e.g., Master Plan, . 2, page II-2.1). Therefore, to the extent data and assumptions are incorrect or incomplete, so too will be the results of the model. In addition to the data problems specified above, SIMMOD, as used in the Master Plan, incorporates implausible, or biased, assumptions which, in turn, call into question the integrity of its output.

Response:

The content of this comment is essentially the same as comment AR00003-9; please see Response to Comment AR00003-9.

AL00025-11

Comment:

1. Assumptions Concerning Aircraft Delay Are Unexplained and Unsupported.

The Master Plan.s (and Draft EIS/EIR.s) definition and description of the delays at the existing (pre-Project) Airport are based on consultants. opinions and not on factual information. First, while the Master Plan acknowledges that .a standard definition of acceptable delay is not used in the industry. (Master Plan, . 2.1.3, page II-2.5), it then concludes that .delay levels of six to ten minutes indicate the need for additional facilities.; that .as average aircraft delay increases above six minutes, passengers tend to perceive service reliability problems.; .as delay approaches ten minutes per operation, further increases in demand are limited., and, flight cancellations were assumed when delays exceed 20 minutes per average annual aircraft operation.. (Master Plan, .2.1.3, pages II-2.5 - II-2.6) These assumptions are apparently based on information derived from prior studies by the Master Plan consultants at airports other than Los Angeles, in years as early as 1988. In other words, the delay standards relied upon in the Master Plan are based on outdated data concerning potentially irrelevant subject airports. All of these have unique characteristics that may have influenced creation or perception of delay, and none of them are discussed in the Master Plan or Draft EIS/EIR.

Further, these unsupported assumptions do not reflect an understanding of the diverse ways in which delay is determined by the airlines, Air Traffic Control and the Department of Transportation. First, a typical airline will develop performance criteria for each phase of flight based on company goals and performance percentages, including arrival and departure delay. Airlines use .zero variance. as a standard for .on time. performance (i.e., zero difference between arrival and/or departure times and published schedules). The percentage goal for each activity will be based on the level of performance the airline hopes to, or, in some cases, must attain in order to remain competitive. Some airlines track on time performance plus five minutes and most will track on time performance plus 14 minutes.

FAA Air Traffic Control, on the other hand, computes delay based on actual delay time en route. An arriving aircraft is considered delayed only if the aircraft is held en route to the destination for 15 minutes or more at any given moment during the flight. It is possible that these aircraft could be held at more than one interval during a flight. However, if each holding period does not exceed the 15 minute threshold, no delay is recorded, even though the total delay might well be in excess of 15 minutes.

Further, inbound delay is kept separate from outbound delay. A departing aircraft is not counted as delayed until: (1) the average taxi time for the airport; (2) the time from the gate to the runway; and (3) 15 minutes have cumulatively elapsed. Air Traffic Control delays do not consider airline schedules or internally generated delays in their reporting system. The majority of Air Traffic Control delays are as a result of weather and not system capacity. Finally, the Department of Transportation grades airline performance on the time of arrival at the destination airport within 14 minutes of the scheduled arrival time. The Master Plan utilizes none of those benchmarks. Thus, the Master Plan fails to adequately explain the basis for its demand/capacity/delay analysis.

Response:

The content of this comment is essentially the same as comment AR00003-10; please see Response to Comment AR00003-10.

AL00025-12

Comment:

2. The Master Plan.s Assumptions Concerning Turboprop Operations are Manifestly Inaccurate.

Referring to its analysis of existing noise abatement procedures as they pertain to the creation or maintenance of demand/capacity/delay, the Master Plan states that .based on actual information obtained by the Los Angeles Noise Management Bureau, turboprop departures were permitted to turn slightly earlier than jet departures at the Airport VOR, which is located between runways 7L and 7R, west of Pershing Drive. (Master Plan, . 2.3.3, page II-2.31). In addition, Figures II-2.11 and II-2.12 indicate that, when the Airport is operating on a west flow, turboprop aircraft turn at the VOR.

These representations are inaccurate and lead to incorrect assumptions about flight paths. In fact, if such a turn were permitted, it would occur prior to the shoreline, contrary to current noise abatement procedures. Turning the turboprops early allows faster aircraft to depart behind the turboprops at a more accelerated rate than is currently allowed, thus allowing more aircraft to depart in a given interval. The results of this inaccurate assumption are that: (1) the baseline departure capacity is artificially elevated to a level higher than would be realized had actual air traffic data been used and the noise abatement procedures modeled as they are actually used; and (2) turboprops, as depicted in the Master Plan and Draft EIS/EIR, are directed over noise sensitive areas not previously overflown, and, as a result, elevate the baseline noise levels, thereby concomitantly reducing the apparent noise impacts of the Project.

Response:

The content of this comment is essentially the same as comment AR00003-11; please see Response to Comment AR00003-11.

AL00025-13

Comment:

3. The Master Plan.s Flight Schedule Assumptions Are Outdated.

The Master Plan reports the results of a SIMMOD analysis conducted in 1994, using 1994 data and 1994 assumptions. In addition to this obsolete data, the ACARS data upon which the SIMMOD analysis is based includes less than 51% of commercial operations and more than 46% of the total operations in the design day flight schedule. As: (1) operational configurations long pre-date the commencement of the environmental process; (2) current schedules were not used (although available), the assumptions concerning a typical day.s traffic are substantially unsupported; and (3) not all of the aircraft operators were considered, the assumptions concerning a typical day.s traffic are substantially unsupported.

Response:

The content of this comment is essentially the same as comment AR00003-12; please see Response to Comment AR00003-12.

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AL00025-14

Comment:

4. The Master Plan's Fleet Mix Assumptions are Inaccurate.

The Master Plan relies on a fleet mix distribution derived from August 11, 1994 OAG, NMB Do Daily Operations Records and LADOA 1994 Monthly Air Traffic Volumes. (Master Plan, Table II-2.16, page II-2.58). This 1994 fleet mix distribution is outdated and, thus, inadequate for use in SIMMOD. Specifically, it includes a large number of Stage 2 aircraft which are no longer in operation at the Airport. Not only are Stage 2 aircraft noisier, but they have different emissions characteristics from the newer high bypass ratio, Stage 3 aircraft. If a more recent base year had been selected, the proportion of Stage 2 aircraft would have been smaller, and the noise baseline lower, and, thus, more accurate.

Response:

This comment is essentially the same as comment AR00003-13; please see Response to Comment AR00003-13.

AL00025-15

Comment:

5. The Master Plan's Assumptions Concerning Aircraft Speed Are Inaccurate.

The Master Plan's assumptions concerning aircraft speeds were apparently inflated to fit the underlying assumption of unconstrained aircraft flows. The Master Plan model calls for all aircraft to operate at the same constant air speed before proceeding to the Airport and landing. The model further assumes that all aircraft exit the runway at the same point and within the same amount of time in order to reach the modeled flow rate. In actual conditions, the speeds of the aircraft vary, with high airspeed greatly reduced as the aircraft approaches the airport. Nor would all aircraft exit the runway at the same location. In short, this assumption of high constant speed will have an as yet unascertained impact on the model's results but would tend to overstate capacity of the existing facility, and, thus, the baseline for comparison with the Project's improvements.

Response:

The content of this comment is essentially the same as comment AR00003-14; please see Response to Comment AR00003-14.

AL00025-16

Comment:

- D. The Master Plan's Model Omits Critical Variables.

Another crucial issue revolves around variables the Master Plan fails to include in its model. Specifically these include: (1) the capacity of the airspace beyond the Airport Terminal Control Area (.TRACON.); and (2) gate capacity for future scenarios.

- 1 . The Master Plan Should Have Considered Airspace Capacity Beyond The Airport's Terminal Area Airspace.

According to the Master Plan, airspace considerations were limited to entry (and exit) from the Airport's TRACON airspace. (Master Plan, . 2.1.1, page II-2.3) The failure to consider airspace capacity beyond that point is a material omission from the analysis. This is because the majority of aircraft delays are absorbed in the en route environment before an aircraft arrives in TRACON airspace. By modeling only the terminal area, the results of the model are skewed for both arriving and departing aircraft. For departing aircraft, if the model does not consider the inherent constraints of the en route air traffic system, including differences in aircraft performance and the impacts of other air traffic transiting the area for other airports, the departure flow pictured in the model will remain unconstrained and aircraft

can take off at a constant, predetermined rate. When reaching the boundary, the aircraft are dropped from the scenario, and the model does not further consider constraints of the en route system which naturally impact the TRACON airspace. Unfortunately, this unconstrained flow scenario is not normally possible in today's complex air traffic control system.

Similar problems exist in modeling arrivals without consideration of airspace outside the TRACON. Inbound aircraft are assumed, in the Master Plan model, to be at the entry point of terminal airspace when required by the model. Aircraft proceed inbound at a set speed, reduce speed at a predetermined point, land and proceed unimpeded to their gate. This is not a reasonable representation of a typical aircraft arrival. In fact, there is almost no likelihood that aircraft can be delivered to the terminal inbound fix at a rate consistent with the model's assumptions.

Instead, the Master Plan's arrival model appears to have been developed to insure that an arriving aircraft would be at the inbound fix at the specific time required in order to maximize the arrival rate for the airport. Although Air Traffic Control consistently tries to keep the aircraft sequenced as closely as possible in trail, it is not possible to consistently space aircraft a set distance apart for extended periods of time. The availability of aircraft to fit into the sequence, aircraft speeds, the mix of large and small aircraft, a lack of demand, aircraft deviations due to weather, in trail restrictions though an en route sector or in trail restrictions required for an airport approach control facility and other variables cause the in trail spacing of arrival aircraft to be inconsistent. As a result of these and many other factors, there is unused capacity in each of these arrival sequences. In summary, the Master Plan's failure to adequately consider constraining factors outside the TRACON airspace calls into question the validity of the model's result.

Response:

The content of this comment is essentially the same as comment AR00003-15. Please see Response to Comment AR00003-15 regarding analysis of the airspace capacity beyond the terminal area airspace and Response to Comment AR00003-14 regarding the assumptions used in the simulation analysis.

AL00025-17

Comment:

2. The Master Plan Should Have Modeled Gate Capacity.

The Master Plan did not include in its modeling aircraft gate operations for future activity levels, allegedly because of the inability of the existing gate facilities to accommodate the higher activity levels.⁶ (Master Plan, . 2.5.3, page II-2.104) The Master Plan disclaims the importance of this omission [The inability to model gate operations in detail does not impact the results of the airspace capacity analysis since at higher activity levels the runway system tends to be the primary constraint . . . Master Plan, . 2.5.3, page II-2.110]. The Master Plan is in error.

If an aircraft cannot get to the gate unimpeded, the resulting delay must be factored into the analysis. In the Master Plan, taxi patterns are consistent and aircraft are dropped from the model when they reach the gate area. The model does not capture any delays in the gate area or any delays that might occur in reaching the gate due to congestion on the ramp. The same is true for departing aircraft. If a departing aircraft cannot leave the gate due to inbound traffic or other traffic in the gate area, the departure demand at the airport may not be as regular as is assumed in the Master Plan's model.

The importance of this omission is that it precludes development of a clear picture of the delay reduction, and consequent capacity enhancing, attributes of the Project. Without estimation of the potential groundside/terminal structure constraints on operations (capacity), the actual delay reducing, and capacity enhancing, benefits of the Project as a whole cannot be accurately ascertained.

6 Performance measures contained in the Master Plan, . 2.5.1, include .outbound ground delay. which, in turn, appear to include gate related variables such as .gate push-back delay.. This performance measure was apparently used in the modeling of existing gate operations but not future ones. (Master Plan, . 2.5.1, page II-2.97)

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Response:

The content of this comment is essentially the same as comment AR00003-16; please see Response to Comment AR00003-16.

AL00025-18

Comment:

3. The Master Plan Should Have Considered Currently Implemented Air Traffic Procedures.

While the Master Plan acknowledges the existence of the current Dual Civet Arrival procedure, it fails to analyze its delay reducing, or consequent capacity enhancing efficiencies. The procedure is mentioned, then drops off the radar screen. The Dual Civet Arrivals, however, have so greatly reduced arrival delay at the Airport that no national delay program for the airport has been established since the procedure's implementation. Ignoring the impacts of Dual Civet Arrivals results in an exaggeration of existing delay and a consequent exaggeration of the Project's delay reducing, and capacity enhancing benefits.

Response:

The content of this comment is essentially the same as comment AR00003-17; please see Response to Comment AR00003-17.

AL00025-19

Comment:

E. Demand, as Defined in the Master Plan, is an Identity with Capacity.

Inaccurate data and assumptions are not alone in influencing the outcome of a modeling effort. Inadequate specification of a variable may also lead to an unrepresentative result. In this case, the independent variable, demand, as defined, is not independent but is virtually synonymous with, or surrogate for, the dependent variable, capacity. Thus, the demand variable has an interactive relationship with the dependent variable which influences the model's outcome in significant ways.

For example, the Master Plan defines aircraft demand as a 24-hour flight schedule representative of design day activity.. (Master Plan, . 2.1.2, page II-2.3) The 24-hour flight schedule definition is almost identical to the definition of capacity., the number of aircraft operations, arrivals and departures, that the Airport can accommodate with a reasonable amount of aircraft delay.. (Master Plan, . 2, page II-2.1) The two variables, therefore, vary together, i.e., as capacity increases, demand will also increase, rendering demand useless as a predictor of capacity. The precise degree in which the interaction of the independent and dependent variables in the model affect the analysis cannot be ascertained at this point without re-running SIMMOD. Suffice it to say that a new surrogate for demand, derived, for example, from airline market surveys, or annual enplanements, is necessary to insure the integrity of the model's results.

Response:

The content of this comment is essentially the same as comment AR00003-18; please see Response to Comment AR00003-18.

AL00025-20

Comment:

II. THE DRAFT EIS/EIR DOES NOT FULLY ANALYZE THE PROJECT'S OFF-AIRPORT SURFACE TRAFFIC IMPACTS.

While the Draft EIS/EIR's off airport surface traffic analysis adequately depicts some aspects of the Project's surface traffic generation potential, it is notably deficient in the following ways: (1) the analysis gives little consideration to surface traffic impacts on South Bay Communities other than those directly proximate to the airport;

Response:

Please see Subtopical Response TR-ST-2.1 for a discussion of the study area and facilities analyzed.

AL00025-21

Comment:

(2) the use of the Adjusted Environmental Baseline for comparison with the Project's surface traffic impacts creates a misleading picture of the magnitude of those impacts;

Response:

Please see Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios.

AL00025-22

Comment:

(3) the Draft EIS/EIR improperly equates the direct and cumulative impacts of surface traffic;

Response:

This comment is identical to comment AR00003-21. Please see Response to Comment AR00003-21.

AL00025-23

Comment:

(4) the Draft EIS/EIR provides inadequate information regarding the Northside/Westchester Southside Project;

Response:

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

AL00025-24

Comment:

(5) the Draft EIS/EIR transportation planning horizon is improperly attenuated; and

Response:

This comment is similar to comment AR00003-23. Please see Response to Comment AR00003-23.

AL00025-25

Comment:

(6) the Draft EIS/EIR lacks a mitigation monitoring program detailing implementation of mitigation measures for the impacts of surface traffic.

Response:

This comment is identical to comment AR00003-24. Please see Response to Comment AR00003-24.

AL00025-26

Comment:

A. The Draft EIS/EIR Lacks Adequate Consideration of Surface Traffic Impacts on South Bay Communities.

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The Draft EIS/EIR analyzed 61 intersections, with an additional 15 intersections selected for focused analysis. Only nine of the 76 intersections were south of the I-105 (Century) freeway. The apparent explanation for the focus on the north side of the airport is presented in the Draft EIS/EIR, pages 4-284 - 4-289:

.South of LAX, there is a higher percentage of LAX traffic on I-405 and a lower percentage on the arterials, indicating that airport traffic is in fact staying on the freeway system as desired. However, this is not the result of I-405 operating well, but is more a result of the layout of the roadway network south of LAX. There are no alternative arterial routes that closely parallel I-405 south. In fact, south of LAX, all major arterial routes change to a north/south orientation, while I-405 south of Rosecrans Avenue continues in a northwest/southeast direction..

This explanation does not account, however, for at least three conditions acknowledged in the Draft EIS/EIR which exist south of the Airport: (1) airport traffic south of the airport represents a significant component of traffic on local streets; (2) interviews at freeway intersections south of the airport indicate a large percentage of airport trips; and (3) the Draft EIS/EIR claims a benefit from redistribution of traffic south of the airport off the freeway and onto local streets.

1 . Airport Traffic Represents a Significant Component of Traffic on Local Streets South of the Airport.

The Draft EIS/EIR notes that 8% of the afternoon peak on Sepulveda Boulevard south of El Segundo Boulevard is airport related, but concludes even if all the Airport bound traffic were removed, there would be little noticeable difference on most roads outside of the immediate vicinity of the airport, particularly during the morning and evening rush hours.. (Draft EIS/EIR, page 4-289) The 8% reported in the Draft EIS/EIR is, however, more important to traffic flow than it appears. For example, the intersection of Sepulveda and El Segundo Boulevards has a reported 1996 Volume to Capacity (V/C) of .869 and a projected 2005 V/C ratio of 1.062 (Draft EIS/EIR, Table 4.3.2-23, page 4-334). Eight percent of the 1996 traffic represents an airport contribution at this intersection of .069. The benchmark of .significant impact. is defined in the Draft EIS/EIR as a change in V/C ratio of .01 for an intersection operating at Level of Service (.LOS.) F (Draft EIS/EIR, page 4-291). Therefore, at the intersection of Sepulveda and El Segundo Boulevards, a contribution of .069 to the V/C ratio can hardly be considered as representing little noticeable difference

2. Freeway Ramp Data Shows Traffic Exiting the I-405 South of the Airport

Master Plan, Chapter II, Section 7.3, reports the results of a survey conducted at area intersections during the A.M. and P.M. peak hours. The results of that survey call into question the assumption that traffic is not diverted off the I-405 onto local streets south of the Airport, where it demonstrates that more than 30% of the trips at northbound I-405 ramps at El Segundo were Airport related.

3. The Draft EIS/EIR Is Internally Contradictory with Respect to Use of Off-Freeway Traffic Routes South of the Airport.

The Draft EIS/EIR states, in pertinent part: .Further, although it would be ideal for airport access to be provided directly via freeways, the dispersion of Airport traffic onto many arterial and freeway routes does have a side benefit in that its impact is minimized on any given route. (Draft EIS/EIR, page 4-289). This statement directly contradicts the Draft EIS/EIR.s initial assumption that the roadway system is designed such that freeway traffic is not diverted to the local street system south of the airport. If, in fact, airport traffic is diverted from the freeway, as claimed for traffic to and from the north, would not a similar set of traffic solutions be applicable to the south as well?

In addition, Master Plan, Table II-7.12 also sets forth data that calls into question the assumption of the limited diversion of freeway traffic onto local streets south of the airport. Table II-7.12 illustrates that, by absolute volume, only 3 of 30 .key roadway segments. carry more Airport related morning peak hour traffic than does Sepulveda Boulevard north of Rosecrans Avenue, and in the afternoon only four key segments carry more peak hour traffic than that intersection.

In short, the failure to consider traffic impacts south of Rosecrans Avenue appears arbitrary. At a minimum, the Draft EIS/EIR and its technical appendices need to provide a much clearer statement of why the intersections evaluated were selected, and why no consideration was given to areas south of Rosecrans Avenue.

Response:

This comment is similar to comment AR00003-25. Please see Response to Comment AR00003-25.

AL00025-27

Comment:

B. The Use of the Adjusted Environmental Baseline for Comparison With the Project's Surface Traffic Impacts is Misleading.

Three scenarios were used as baselines against which to evaluate the surface traffic effects of the proposed Master Plan improvements: (1) Environmental Baseline; (2) Adjusted Environmental Baseline; and (3) the No-Project/No-Action alternative. The Environmental Baseline is the existing condition pre-project. It includes existing roadways and land uses, and the current airport configuration. The year used in this baseline changed during the development of the Master Plan. At the initiation of the Master Plan process, the baseline year used was 1994. Information is reported in different Master Plan sections for 1994 and 1995. For the third iteration of the Master Plan, the baseline became 1996. The technical reports for the Draft EIS/EIR used 1996.

The Adjusted Environmental Baseline uses the current airport configuration but assumes that future off airport roadways and land uses already in the pipeline will be completed (see Section B.1 below). As with the Environmental Baseline, the definition of Adjusted Environmental Baseline changed with the development of the Master Plan. The existing condition section of the Master Plan (Chapter IV, Section 7) used horizon years of 2000 to 2015. The constrained alternatives section (Chapter V, Section 3) used the years 2005 and 2015. Finally, the No-Action/No-Project Alternative is the converse of the Adjusted Environmental Baseline and assumes that off-airport development will remain constant, but currently approved airport projects will be completed.

There are at least two issues of importance raised by reliance on the Adjusted Environmental Baseline: (1) accuracy of the Adjusted Environmental Baseline and its resulting projections; and (2) applicability of the Adjusted Environmental Baseline to the environmental impact analysis.

1. The Uncertain Definition of the Adjusted Environmental Baseline Makes the Results of its Comparison With Project Impacts Questionable.

The initial question about the Adjusted Environmental Baseline is the accuracy of the definition of .Existing Condition/Environmental Baseline. on which it is purportedly based. There are significant differences between the 1995 data concerning the .Existing Condition/Environmental Baseline. contained in the proposed Master Plan and the 1996 data contained in the Draft EIS/EIR. A comparison of Master Plan, Table II-7.2 and Draft EIS/EIR, Table 4.3.2-24, for the a.m. peak hour, shows changes in the .Existing Conditions/Environmental Baseline. between 1995 and 1996. As illustrated in the following Table, some intersections got significantly better and some significantly worse. In all but one case, the difference in V/C ratios between 1995 and 1996 exceeds thresholds used for determining significance in the Draft EIS/EIR.

Intersection	Master Plan Table II 7.2 1995 V/C*	EIS/EIR Table 4.3.2-24 1996 V/C	V/C Difference
Aviation/EI Segundo	0.981(E)	0.835(D)	-.146
Aviation/Rosecrans	0.915(E)	1.121(F)	.206
Highland/Rosecrans	0.714(C)	1.069(F)	.335
Sepulveda/EI Segundo	0.840(D)	0.869(D)	.029
Sepulveda/Mariposa	0.776(C)	0.730(C)	-.046
Sepulveda/Rosecrans	1.238(F)	1.220(F)	-.018
Vista Del Mar/Grand	0.755(C)	0.749(C)	-.006
Vista Del Mar/Imperial	0.821(D)	0.465(A)	-.356

* In Master Plan Table II 7.2 the first column heading is apparently mislabeled

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Moreover, the adjustments to the Existing Conditions/Environmental Baseline involved adding additional roadways and additional traffic to the system based on anticipated projects. The definitions of these adjustments is not consistent within the Draft EIS/EIR, or between it and the Master Plan. For example, the Draft EIS/EIR states that: A list of approved development projects were developed. . . (Draft EIS/EIR, page 4-279). [Emphasis added.] The traffic technical report on which the Draft EIS/EIR is based states: A list of planned development projects was developed (Technical Report, 3b, page 2-3). [Emphasis added.] Master Plan, Table IV-8.3; Master Plan, Chapter V, Appendix L; and Technical Report, 3b, Table 2-3, present projected regional roadway improvements. Master Plan, Chapter V, Section 2.6 indicates that the future roadway network used in the analysis includes those projects currently funded and approved or which have a high probability for completion by 2015 Clearly, the distinction between approved and planned projects is critical to a functional definition of Adjusted Environmental Baseline. The baseline will be set much higher (and the consequent relationship of the Adjusted Environmental Baseline with the Project's impacts much lower) if all planned projects are included in addition to all approved projects.

Finally, Chapter IV of the Master Plan (Table VI-8.1, page IV-8.5) provides a preliminary list of related projects that differs from the list presented in Table 2.2 of the Draft EIS/EIR Traffic Technical Report, 3b. While differences are to be expected between the 1996 version of the Master Plan and the Updated 2000 version of the Traffic Technical Report, one difference may be more crucial than others - the projected size and resulting traffic impact of the Playa Vista Project. For example, according to the Master Plan, Table IV-8.1, the Playa Vista Project will contain 13,156 single-family units and 8,262 multi-family units. Master Plan, Chapter V, Appendix L, and the Draft EIS/EIR Traffic Technical Report specifies 13,085 multi-family units and no single-family units for the same Project. There is no explanation for the change, nor any reference to the source of either number. The difference is crucial because the traffic analysis assumed three people for each single-family home, and only two for each multi-family residence. The change therefore results in a significant diminution in traffic if the latter multi-family numbers are correct. Considering the potential of over 13,000 housing units for traffic generation, a complete explanation is needed to render the Draft EIS/EIR surface traffic analysis.

2. The Applicability of the Adjusted Environmental Baseline to the Draft EIS/EIR Traffic Analysis is Questionable.

As set forth above, the off airport surface traffic analysis in the Draft EIS/EIR uses the Adjusted Environmental Baseline as the basis of comparison under CEQA for future mitigation for the three build alternatives. (Draft EIS/EIR, page 4-276). The Adjusted Environmental Baseline reflects projected conditions in the years 2005 and 2015 with off airport land use activities completed and regional circulation improvements in place, but without any increased use of the airport. This approach minimizes the potential direct impact from the adoption of the proposed Master Plan because: (1) the future traffic volumes without the Project increase thereby reducing the proportional effect of the added airport traffic from the Project and (2) additional circulation system improvements provide additional capacity. While it is reasonable to assess particular impacts at the time at which they might occur, relying on this approach requires assurances that the projected circulation improvements will actually be in place. No such assurances are provided in the Draft EIS/EIR.

The Off Airport Technical Report lists circulation system improvements that were included in the modeling process. This listing provides an indication of when certain improvements are anticipated. Without these improvements, the circulation system for the Adjusted Environmental Baseline would, apparently, be the same as for the 1996 condition, and many more intersections and roadway segments would be subject to significant adverse impacts as a result of the proposed Master Plan.

Response:

Please see Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios.

AL00025-28

Comment:

It is important, therefore, that the Draft EIS/EIR traffic analysis include projected phasing of the anticipated improvements relative to the additional traffic resulting from airport use. This should include a discussion of the phasing of airport improvements as they pertain to traffic generation with respect to the circulation improvements used in the Adjusted Environmental Baseline. Limitations should be

placed on airport traffic generation if anticipated circulation improvements off-airport do not occur. Once the Adjusted Environmental Baseline is accepted as accurate and the conditions to achieve it are assured, the next issue concerns the significance of surface traffic impacts and the mitigation measures needed to reduce those impacts.

Response:

Please see Topical Response TR-ST-3 regarding construction traffic and Topical Response TR-ST-2 regarding the Adjusted Environmental Baseline. A mitigation phasing plan is included in Table S4.3.2-13 in Section 4.3, Surface Transportation, of the Supplement to the Draft EIS/EIR.

AL00025-29

Comment:

C. The Direct and Cumulative Impacts of Surface Traffic Are Improperly Equated.

The surface traffic analysis uses traffic volumes from airport and non-airport projects. (See, e.g., Master Plan . 2.6.2, page V-2.279). Therefore, it is at least partially a cumulative impact analysis.⁷ Because the surface traffic analysis is based on cumulative traffic volumes, the significance of the direct impacts and the cumulative impacts are equated. However, the use of the Adjusted Environmental Baseline makes this equation between direct and indirect effects inappropriate. While comparing the Project to the adjusted future conditions may be appropriate for assessing direct impacts, the cumulative impact is the impact of all traffic relative to the existing condition, not expected future conditions as contained in the Adjusted Environmental Baseline.

The result of this improper equation of direct and indirect effects is material. The following Table (derived from Draft EIS/EIR, Table 4.3.2-24) for the a.m. peak hour illustrates the problem. The reported change in congestion between the existing conditions and Alternative C, the preferred project alternative, is often significant, while the comparison of Alternative C with the Adjusted Environmental Baseline (which incorporates future conditions) is not.

Intersection ⁸	Existing V/C(LOS)	Adjusted Baseline V/C(LOS)	Alternative C (w/mit) V/C(LOS)	Difference (w) Existing	Difference (w) Adjusted
Aviation/El Segundo	0.835(D)	1.097(F)	0.865(F)*		
Aviation/Rosecrans	1.121(F)	1.164(F)	1.171(F)	+ .050	+ .007
Highland/Rosecrans	1.069(F)	1.211(F)	0.947(E)	- .122	- .264
Sepulveda/El Segundo	0.869(D)	1.190(F)	1.161(F)	+ .292	- .029
Sepulveda/Mariposa	0.730(C)	0.772(C)	0.803(D)	+ .073	+ .031
Sepulveda/Rosecrans	1.220(F)	1.275(F)	1.243(F)	+ .023	- .032
Vista Del Mar/Grand	0.749(C)	0.918(E)	0.729(C)	- .02	- .189
Vista Del Mar/Imperial	0.465(A)	1.098(F)	0.903(E)	+ .438	- .195

* Apparent error in Table 4.3.2-24 of the EIS/EIR (page 4-340)

Using this concept of the Adjusted Environmental Baseline, the result is that the cumulative impacts of the Project are often significant and not mitigated even when the Project's direct effects have been.⁹

⁷ The cumulative impact from several projects is the change in the environment which results from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable probable future projects.. (CEQA Guidelines, . 15355(b))

⁸ Change in V/C Rates of .01 defines significant impact for intersections at LOS F (Draft EIS/EIR, p. 4-291).

⁹ Note that if the comparison had been between Alternative C and the No-Project/ No-Action Alternative, the difference would have been even greater, as the No-Project/ No-Action Alternative provides for on-airport, potentially capacity-enhancing, improvements, but not off-airport surface traffic impact mitigation.

3. Comments and Responses

Response:

Please see Response to Comment AR00003-21 regarding cumulative impacts.

AL00025-30

Comment:

D. The Draft EIS/EIR Inadequately Documents the Northside/Westchester Southside Project.

The Draft EIS/EIR.s impact analysis for off airport surface traffic is dependent upon the assumption that there will be a substantial reduction in the number of trips generated from the Northside Project. By .reconstituting. the Northside Project into the Westchester Southside Project, the Draft EIS/EIR projects that there will be a significant decrease in collateral trips with the adoption of the proposed Master Plan.

The source of the collateral trip reduction is the change in the land use for the Northside Project and Continental City Project, Attachment A of Technical Report 3b provides the basis for the reduction in collateral trips.

	AM PEAK			PM PEAK		
	Adjusted Baseline	No Alternative Project	C	Adjusted Baseline	No Alternative Project	C
Northside	0	7,217	3,922	0	7,131	4,423
Continental City	0	5,323	0	0	5,348	0
Manchester Square	0	0	212	0	0	233
Total	0	12,540	4,134	0	12,479	4,656

The issue here is the same as that concerning the Adjusted Environmental Baseline, i.e., the actions needed to insure that the reduction is achieved. The principal question is what specific discretionary actions are required to modify the allowable land uses in the Northside Project and in Continental City property, and how will compliance be assured?

The land use component of the Draft EIS/EIR and Condition LU-1 in Chapter V, Environmental Action Plan, presents a .Master Plan commitment. that:

.To the maximum extent feasible, all [Q] conditions . . . from the City of Los Angeles Ordinance No. 159,526 that address the Northside project area will be incorporated by LAWA into the Zoning Code Amendment and LAX Master Plan Implementing Ordinance for the Westchester Southside Project. Accepting that certain conditions may be updated, revised, or determined infeasible as a result of changes to the LAX Northside project, the final [Q] conditions for the Westchester Southside Project will ensure that the level of environmental protection afforded by the full set of LAX Northside projects [Q] conditions is maintained.. (Draft EIS/EIR, Chapter V, page 5-2).

Since this traffic reduction is critical to the projected Master Plan trip generation, the detail associated with this property needs to be firmly established. It is unacceptable to assume that certain conditions may be .updated, revised or determined infeasible. if they are necessary to bring about the decrease in collateral trips upon which the Master Plan projections are based.

While there are some discussions of the Northside/Westchester Southside Project in the Draft EIS/EIR.s purpose and need chapter and Master Plan, Appendix Q, these are brief, general presentations lacking in specificity as to the actions needed to commit the City to limit these uses.

The importance of this lack of specificity in the definition of Project actions, as they relate to the Northside/Westchester Southside Project, is that there is no commitment by Los Angeles to insure that the traffic reduction represented by the changes in allowable land use will occur. The surface traffic capacity for the Project claimed through the reduction of traffic generation from the Westchester Southside Project is significant. Without a more adequate demonstration of the Master Plan.s ability to achieve that reduction, and a concrete commitment to meeting those goals, the Draft EIS/EIR will remain inadequate.

Response:

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

AL00025-31

Comment:

E. The Transportation Planning Horizon Used in the Draft EIS/EIR is Improperly Shortened So As To Minimize the Full Build Out Surface Traffic Impacts of the Project.

The Draft EIS/EIR modeled future conditions for the years 2005 and 2015. The current regional transportation plan, however, uses 2025 as the horizon year. The use of a later year between 2015 and 2025 for analysis is proper in light of the fact that the Project is anticipated to take 16 years to complete.¹⁰ If the Project commences as early as 2002, it will not be completed until 2018, three years after the 2015 horizon has expired. With the year 2013 being the second greatest peak construction year (Draft EIS/EIR, page 4-270), the proposed Master Plan improvements will not be complete by the time the present horizon year of 2015 is reached. The import of the choice of 2015 as horizon year, before the Project is completed, is that the full build-out (.worst case.) impacts of the Project will remain unanalyzed.

¹⁰ The Draft EIS/EIR, Purpose and Need Section (Chapter 2, pages 2-12 through 2-13) indicates that the Project will be implemented in two phases. The first phase will last six years and the following phase 10 more years.

Response:

Please see Response to Comment AR00003-23 regarding the horizon year used in the analysis.

AL00025-32

Comment:

Further, while the impacts resulting from the adoption of the proposed Master Plan are generally evaluated against the Adjusted Environmental Baseline, much of the Draft EIS/EIR.s discussion of surface traffic is compared to the No-Project/No-Action alternative (i.e., the alternative that assumes growth in operations and passenger demand at the Airport, along with completion of improvements already planned, but no off airport traffic or other development improvements). The comparison of the Project with two separate baselines in the years 2015 presents a misleading picture. While the reconstitution of the Northside Project may provide a reduction in the traffic generated in 2015, the existing airport improvements clearly permit growth beyond that currently possible.

Response:

Please see Subtopical Response TR-ST-2.2 regarding the adjusted environmental baseline.

AL00025-33

Comment:

Therefore, the further into the future conditions are projected, the greater the effect of the proposed Master Plan improvements on traffic.

Response:

This comment is similar to comment AR00003-23. Please see Response to Comment AR00003-23.

AL00025-34

Comment:

F. The Impacts of Construction Traffic Are Largely Ignored.

3. Comments and Responses

While the Project's construction will stretch over a period of 14 years, the impacts of the numerous construction vehicles that will be in use during that period remain unexplored. First, the Draft EIS/EIR acknowledges a volume of construction vehicles which includes 2.8 trucks per minute, 10 hours per day, 6 days per week, or 1.2 trips per minute, 20 hours per day in a 7 day work schedule (Draft EIS/EIR, page 4-319). While the Draft EIS/EIR purports to address mitigation by recommending that trucks trips be divided among four locations on the construction site, that purported mitigation does not consider the trucks' impacts on surrounding arteries even a short distance from the construction site.

Response:

This comment is similar to comment AR00003-33. Please see Response to Comment AR00003-33.

AL00025-35

Comment:

Moreover, the Project will admittedly coincide with the construction of Playa Vista, located approximately 2 miles north of the airport (Draft EIS/EIR, page 4-320). The Draft EIS/EIR contains little or no analysis of the cumulative impacts of the construction of these two projects on surface traffic on surrounding arteries and the San Diego Freeway.

Response:

This comment is similar to comment AR00003-34. Please see Response to Comment AR00003-34.

AL00025-36

Comment:

Moreover, the mitigation offered is slight. The Draft EIS/EIR offers to expand the Traffic Coordination Office . . . to minimize the impacts of construction traffic (Draft EIS/EIR, page 4-320). This purported mitigation measure, even when combined with other assurances including that .construction traffic . . . can be managed (Draft EIS/EIR, page 4-320), and .traffic patterns around the airport for the general public would be largely maintained (Id.), does little, if anything, to assure that the manifest impacts of construction will be mitigated. The Draft EIS/EIR admits as much where it states .however, even with these commitments in place, the Project would still cause sufficient construction-related traffic to cause notable disruption of normal traffic flows near the airport.. (Id.) Since construction is planned to last more than 14 years, the Draft EIS/EIR is basically stating that for that entire period, traffic is expected to be disrupted, and the Project's purported mitigation will be insufficient to restore stability.

Response:

This comment is similar to comment AR00003-35. Please see Response to Comment AR00003-35.

AL00025-37

Comment:

Finally, the Draft EIS/EIR pays little or no attention to the traffic impact of vehicles used by construction workers. It states that construction employees will work in three shifts, and that the second shift will arrive before the first shift ends (Draft EIS/EIR, page 4-319). Using simple math, it appears that at some points during the day, parking would have to be provided for more than 8,000 workers when these two shifts overlap. While remote parking areas are suggested for construction employees, they are as far away as Palmdale, Van Nuys and Ontario (Id.). The likelihood of construction workers using such remote parking is slim to none. Therefore, the mitigation measure is largely useless. However, even if remote parking were utilized to any extent, the Draft EIS/EIR fails to discuss the traffic impacts of the shuttles which would bring the construction workers from these remote locations to the airport. In short, even though construction is expected to last for 14 years, the Draft EIS/EIR contains little, if any, analysis of the impacts of construction worker traffic which will take place on the entire street/freeway system 6 or 7 days a week during that period.

Response:

This comment is similar to comment AR00003-36. Please see Response to Comment AR00003-36.

AL00025-38

Comment:

In summary, while the general construction concept is to have many of the transportation improvements completed within the first five years after construction begins (Draft EIS/EIR, page 4-318), the LAX Expressway and northeastern portion of the ring road from the San Diego Freeway to Sepulveda Boulevard would not be available to traffic until well after the first five years (Draft EIS/EIR, Table 4.3.2-18, page 4-318). Therefore, there would be no new routes available for mitigating the above impacts during the heaviest construction period.¹¹ As a consequence of the above omissions, the Draft EIS/EIR's analysis of construction traffic impacts is materially deficient.

¹¹ The Draft EIS/EIR states that Phase 1 of the Project would be 5-6 years long and end in 2005. As the Draft EIS/EIR cannot be approved before late 2001, at the earliest, and Phase 1 of the construction could not then begin before 2002, Phase 1 could not end until at least 2007 or 2008. Similarly, Phase 2 which is estimated to extend 10 years past the completion of Phase 1, would end in 2017 not 2015, as assumed in the Draft EIS/EIR. This is important because the impacts of construction, and associated traffic, will now be extending well past the period anticipated in the Draft EIS/EIR.

Response:

This comment is similar to comment AR00003-37. Please see Response to Comment AR00003-37.

AL00025-39

Comment:

G. The Draft EIS/EIR Lacks a Mitigation Monitoring Program.

The Draft EIS/EIR, Chapter V is entitled .Environmental Action Plan. It is not specific as to whether this constitutes a Mitigation Monitoring Program required by CEQA (CEQA Guidelines . 15091 (d)). If it does represent a Draft Mitigation Monitoring Program, it is inadequate. The Section lacks a clear statement of the party responsible for implementing the mitigation, the mechanism for enforcement of the mitigation and the timing of implementation. Moreover, it lacks detailed explanation of the way in which the diminution of traffic from the Northside Project, as well as other surface traffic mitigation measures will be achieved.

Response:

This comment is identical to comment AR00003-38. Please see Response to Comment AR00003-38.

AL00025-40

Comment:

III. THE DRAFT EIS/EIR NOISE ANALYSIS UNDERSTATES THE PROJECT'S AIRCRAFT NOISE IMPACTS.

The Draft EIS/EIR minimizes the Project's noise impacts by artificially inflating the Environmental Baseline and by failing to disclose the Project's overflight noise impacts.¹²

A. The Draft EIS/EIR Does Not Designate the Proper Baseline for Its Noise Analysis.

As noted earlier, a threshold issue in environmental analysis is the establishment of a .baseline.. The function of a .baseline. is to provide a benchmark of existing conditions against which the environmental impacts of a project may be measured. If the baseline is incorrectly designated at too high a level, the impacts of the Project will be improperly minimized. In this case, the Draft EIS/EIR utilizes three separate and distinct baselines for analyzing the impacts of the Project: (1) the Environmental Baseline (1996), i.e., the purported conditions in existence before implementation of the Project; (2) .No-Project.

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baseline for 2005 (and 2015) which includes .natural. growth on the airport resulting from implementation of already approved airport projects continued in the current Master Plan that purportedly would have occurred even if the Project is not implemented; and (3) Adjusted Environmental Baseline predicated on projected conditions in the years 2005 and 2015 with off-airport land use activities completed and regional circulation improvements in place, but without any improvement to airport facilities.

The Draft EIS/EIR chooses 1996 (i.e., the Environmental Baseline) as the base year for evaluation of aircraft noise impacts, and states that in 2015, the Project.s horizon year, Alternative C .would reduce the total number of people exposed to aircraft noise above 65 CNEL compared to current conditions as represented by the Environmental Baseline year.. (Draft EIS/EIR, page 4-11) By using 1996 as the benchmark, the Draft EIS/EIR.s noise analysis artificially minimizes the apparent growth in noise impacts associated with the Project. This is because, in 1996, many noisy Stage 2 aircraft remained in the fleet (which were then phased out in late 1999). When the Notice of Preparation was published in July 1997, the Project proponents knew with certainty at that time that some of the noisiest aircraft in its fleet would not operate after December 31, 1999, and that the removal of these aircraft from the fleet serving the Airport would reduce the size of the airport.s noise exposure contours. The Draft EIS/EIR concedes that the .reduction in noise exposure is the result of a federally mandated phase out of older, noisier Stage 2 jets, and not the implementation of the Project. Despite that fact, the Draft EIS/EIR consciously skews the analysis by using 1996 as the Base Year for its noise analysis.

The Draft EIS/EIR disregards the fleet mix changes brought about by the Stage 2 phase out. The Draft EIS/EIR.s .Average Annual Day Operations and Fleet Mix - Environmental Baseline. (Draft EIS/EIR, Appendix D, page 11) includes a total of 139 noisy Stage 2 aircraft in the daily operations mix. In other words, nearly 7% of the aircraft included in the calculation of the baseline noise contour analysis are high noise producing aircraft the inclusion of which will increase the size of the baseline noise contours and, thereby minimize the apparent impacts of the Project.

Courts have displayed flexibility in dealing with cases involving complex long term environmental review. They have agreed that, for lengthy environmental review such as that at issue here, the analysis of such impacts as surface traffic (and aircraft operations) which normally fluctuate over time are properly assessed against a later baseline than the time of the publication of the Notice of Preparation. (Save our Peninsula Committee, supra, 87 Cal.App.4th at 125-126) Therefore, Project proponents are not tied to the 1996 baseline, the last full year of data before the year of Notice of Preparation Publication, but should, more properly, have used a year no earlier than 1999, the last full year of data available before publication of the Draft EIS/EIR. Moreover, that data should have been updated with available data from the year 2000. Absent such an update, the Draft EIS/EIR noise analysis is incomplete and, thus, inadequate.

12 Project proponents apparently did not use the most recent Integrated Noise Model (INM) Version 6.0 to calculate aircraft noise as the Draft EIS/EIR discusses INM, Version 5.1a. Draft EIS/EIR, Appendix D, page 6.

Response:

The content of this comment is essentially the same as comment AR00003-39; please see Response to Comment AR00003-39.

AL00025-41

Comment:

B. The Draft EIS/EIR Fails to Disclose the Projects Overflight Noise Impacts.

Under FAA Rules, changes in operations above an altitude of 3,000 feet Above Ground Level (AGL) are categorically excluded from environmental review under NEPA. FAA Order 1050.1D, Appendix 3, paragraph 3.a.13 However, FAA Order 1050.1D, paragraph 32 also mandates that .extraordinary circumstances. such as actions which are likely to have a significant impact on noise levels over noise sensitive areas, or a significant impact on coastal zones, .shall be the subject of an environmental assessment.. (Id., paragraph 32)

Here, the noise analysis in the Draft EIS/EIR narrowly focuses on cumulative aircraft noise impacts created by aircraft approaching the Airport from the east, and from start-of-takeoff roll. However, it completely disregards the impact of single event overflight noise on the South Bay communities: (1) by failing to depict and analyze the noise impacts from additional new routes over areas not previously over-flown; (2) by failing to acknowledge a potential increase in lateral separation of aircraft which could lead to an increase in overflight noise; (3) by failing to report or study the noise impacts of increased operations over coastal zones; and (4) by using an outdated modeling system to justify the decision not to study the noise impacts to South Bay communities.

1 . The Draft EIS/EIR Depicts Additional New Routes Over Noise-Sensitive Areas Within the South Bay Communities but Fails to Analyze the Noise Effects of These New Routes.

CEQ Guidelines . 1502.15 14 state that "[t]he environmental impact statement shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration.. [emphasis added] The Draft EIS/EIR.s failure to comply with this mandate is two-fold. First, the Preferred Alternative includes new routes over areas not previously impacted. Second, the Draft EIS/EIR does not analyze the noise impact created by these new routes over noise sensitive areas, thereby failing to describe the environment of the areas to be affected or created.

Master Plan Maps (pages II-2.36 - II-2.37, Figures II-2.11 and II-2.12) illustrate that when the Airport is operating on a west flow, M-class or turbo-prop aircraft turn at the VOR. This is contrary to stated airport policy and noise abatement procedures which require aircraft to proceed past the shoreline before starting a turn. In fact, twelve of the departure tracks for turbo-props used to establish the baseline integrated noise monitor data are routed over residential areas not previously overflown. (Draft EIS/EIR, Appendix D, page 7, Exhibit 2). The use of these incorrect flight tracks and early turns potentially affects the noise contour on both sides of the airport.

Moreover, if the turbo-prop aircraft turn early, the designated routes will cause them to fly over noise sensitive areas such as parts of El Segundo, thus requiring further review under the .extraordinary circumstances. exception of FAA Order 10501.1D, paragraph 32. In short, the development of these new routes could potentially violate Airport noise abatement policy and could create unacknowledged impacts which must be analyzed.

13 The Draft EIS/EIR improperly relies on draft FAA Order 1050.1E and the City of Los Angeles. Draft L.A. CEQA Thresholds Guide (May 14, 1998) as authority for several of its assertions.

14 The Draft EIS/EIR is also a federal document subject to the requirements of the National Environmental Policy Act, 42 U.S.C. . 4321, et seq., and its implementing regulations, 40 C.F.R. . 1500, et seq. (.CEQ Guidelines.).

Response:

The content of this comment is essentially the same as comment AR00003-40; please see Response to Comment AR00003-40.

AL00025-42

Comment:

2. Greater Lateral Dispersion of Aircraft Will Potentially Occur to Accommodate the Increase in Operations at the Airport Which May Lead to Premature Easterly Turns Over the South Bay Communities and Consequent Increases in Overflight Noise.

Even if no new routes were contemplated, the Draft EIS/EIR states that over 90% of the operations at the Airport are in a west flow with climb out over the ocean. The aircraft then turn either south-east or north-east towards their easterly destination. The Draft EIS/EIR anticipates that the Project will lead to an increase in operations. The Draft EIS/EIR does not, however, discuss the way in which these increased operations will be integrated into the existing Airport air traffic flows. If it did, it would also have to reveal the potential for increased overflights of South Bay communities.

To accommodate this increase in air traffic, more airspace will probably be required to maintain adequate separation between aircraft during climb out. Air traffic controllers separate aircraft in two ways, laterally and vertically. Generally speaking, since heavy departing aircraft are resistant to an

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increase in vertical separations for reasons of both cost and performance, aircraft are dispersed laterally. As lateral separation between departing aircraft must be maintained, a greater number of offshore aircraft may come closer and over the shoreline, which may also lead to premature easterly turns from the initial southerly headings of departing flights. These premature turns will potentially lead to an increase in overflight noise over South Bay Communities, noise sensitive areas not previously included in standard departure tracks. At a minimum, the Draft EIS/EIR should contain a supplementary single-event noise analysis for communities south of the airport.

Response:

The content of this comment is essentially the same as comment AR00003-41; please see Response to Comment AR00003-41.

AL00025-43

Comment:

3. The FAA Fails to Study the Project.s Noise Impacts over Coastal Zones.

FAA Order 1050.1D, paragraph 32, Extraordinary Circumstances, mandates that a normally categorically excluded proposed Federal action which is likely to have a significant impact on natural, ecological, cultural, or scenic resources of national, state, or local significance, including... coastal zones, (FAA Order 1050.1D, paragraph 32) shall be the subject of, at a minimum, an environmental assessment. Included in South Bay communities are the coastal zones south of the airport. As California.s coastal zones are of national, state, and local significance, they fall within the mandate contained in FAA Order 1050.1D. Nevertheless, the Draft EIS/EIR fails to acknowledge, let alone analyze, impacts on South Bay coastal zones.

Response:

The content of this comment is essentially the same as comment AR00003-42; please see Response to Comment AR00003-42.

AL00025-44

Comment:

4. The Draft EIS/EIR Ignores FAA Order 1050.1D. Paragraph 32 and Uses a Modeling System Which Lacks Any Legal or Scientific Basis in Order to Justify the Draft EIS/EIR.s Failure to Examine the Noise Impacts to Communities in the South Bay.

The Draft EIS/EIR noise analysis assumes that noise in the South Bay communities which lies outside the parameters established for the noise analysis, does not exist. The noise analysis is, therefore, incomplete. First, as discussed above, the turbo-prop routes and the potential for increased lateral separation of aircraft will have a material impact on noise levels of noise sensitive areas including coastal zones. Therefore, FAA Order 1050.1D, paragraph 32 calls for at least an assessment of changes in operations above 3,000 feet AGL. Nevertheless, the Draft EIS/EIR, in two paragraphs, completely dismisses this requirement and categorically states that .no further noise review. above 3,000 feet is necessary since the noise associated with jet aircraft weighing more than 75,000 pounds will not change more than five decibels CNEL. (Draft EIS/EIR, Appendix D, page 65)

Second, the rationale for this determination is unexplained and unjustified under either legal or scientific standards. The five decibel CNEL standard is not acknowledged in the procedures and policies of NEPA, FAA Order 1050.1D, or FAA Order 5050.4A. The Draft EIS/EIR.s methodology is further flawed by the use of a patently erroneous measure. The FAA.s benchmark for the measurement of overflight is .Above Ground Level, (AGL).¹⁵ The measure employed in the Draft EIS/EIR is .Above the Airport,. (Draft EIS/EIR, Appendix D; page 65). The potential for mischief with the latter measure is clear. If the Project proponents analyze noise at altitudes greater than .3,000 feet above an airport.s elevation,. then communities in the South Bay and elsewhere which are located well above the airport.s elevation would be at a severe disadvantage. For instance, Palos Verdes is at approximately 1,480 feet elevation,¹⁶ while the Airport is located at 126 feet. ¹⁷ Due to the difference in elevation between Palos Verdes and the Airport, an aircraft may be 3,001 feet .above the airport., and its noise not subject to environmental review, while it is only 1,521 feet above Palos Verdes. Thus, while the noise impact may not meet the

.above the airport. criterion, the noise over Palos Verdes would be significantly greater but remain unaccounted for in the model.

Third, the Draft EIS/EIR claims to have relied upon the Air Traffic Noise Screening Model (ATNS), Version 2.0, to:

.assess the effects of noise level changes associated with air traffic procedure changes at altitudes greater than 3,000 feet above an airport. s elevation. This methodology requires that changes in aircraft noise be evaluated if the noise associated with jet aircraft weighing more than 75,000 pounds changes by more than five decibels of DNL (CNEL in California) over residential areas and the aircraft is in flight at an altitude between 3,000 and 18,000 feet above the airport.. (Draft EIS/EIR, Appendix D, page 65) [Emphasis added.]

It did not. In fact, it appears that the outdated and obsolete checklist from FAA Notice 7210.360 was utilized instead. ATNS is a computerized version of the former FAA Notice 7210.360, and supercedes the checklist method. It requires actual data input, performs the calculations, and prepares written documentation on the findings. The Draft EIS/EIR contains only a checklist. After checking off five boxes from the .departure. N 7210.360 checklist, (Draft EIS/EIR, Volume D, pages 79-86) the Project proponents determined that:

.since the flight tracks of the new and relocated runways will be located within close proximity to the present flight tracks of the existing runways, and the aircraft activity on these tracks will not result in an increase of 5 decibels of DNL (CNEL) over any residential area when the aircraft are above 3,000 feet, the checklist indicates that no further noise review under this requirement is necessary.. Draft EIS/EIR, Volume D, pg, 65. (Italics added for emphasis.)

The checklist itself is proof that the drafters never used the actual ATNS aircraft noise screening modeling system, but, instead, chose to work with its former outdated and obsolete checklist version. The Draft EIS/EIR misleads the public into believing that an actual, scientific analysis was conducted to determine whether noise decibels would increase above 3,000 feet.

In short, the Draft EIS/EIR does a disservice to the South Bay communities by ignoring the potential noise impacts that the new flight tracks and lateral separation of aircraft will cause to the area. Not only should the Project proponents conduct a full environmental review of the noise impacts to the area under FAA 1050.1D, paragraph 32, but a more accurate, and scientifically appropriate methodology should be used to make the determination of the significance of noise impacts over South Bay communities.

15 See, in general, FAA Order 1050.1D which uses the benchmark. ABOVE GROUND LEVEL. as a starting point for altitude measurements.

16 <http://pointvicenteinterpretivecenter.com/rpv/recreationparks/content/rpvfactsheet2000.htm> (accessed June 22, 2001).

17 <http://www.airnav.com/airport/LAX> (accessed June 22, 2001).

Response:

The content of this comment is essentially the same as comment AR00003-43; please see Response to Comment AR00003-43.

AL00025-45

Comment:

IV. THE DRAFT EIS/EIR AIR QUALITY ANALYSIS IS INADEQUATE.

The Draft EIS/EIR.s air quality analysis exhibits serious deficiencies, not the least of which is the total absence of a formal air quality conformity analysis required under federal law where, as here, the Project.s air quality impacts are not claimed to be insignificant (see 42 U.S.C. . 7506 18). The absence of a conformity analysis necessarily renders the following comments preliminary, and SBCCOG reserves the right to comment further upon issuance of the conformity analysis.

3. Comments and Responses

18 .No department, agency, or instrumentality of the federal government shall engage in, support in any way or provide financial assistance for, license, permit or approve any activity which does not conform to an implementation plan ... (42 U.S.C. . 7506(c)(1))

Response:

Plases see Response to Comment AF00001-4 regarding the general conformity determination.

AL00025-46

Comment:

A. The Baseline for the Draft EIS/EIR Air Quality Analysis is Not Appropriately Estimated.

The Draft EIS/EIR assumes that annual aircraft operations will be essentially identical regardless of whether the Preferred Alternative is implemented. Under the No-Action/No-Project Alternative, total operations are expected to be 98 percent of operations under the expanded capacity scenario (air passenger operations activity will actually be higher under the No-Action/No-Project Alternative). At the same time, the Preferred Alternative moves about 15 percent more passengers through higher aircraft load factors.

Basic economic theory, however, dictates that under free market conditions demand will reach equilibrium for a given level of supply at a certain market cost (including time costs associated with delays, congestion, etc.). If the supply curve (for air transportation) is then shifted, as would occur under an increased capacity situation such as that proposed,¹⁹ the supply/demand equilibrium for the same level of market cost will shift to a point of higher demand. This shift is often referred to as induced demand, and analyses which do not consider this effect (or which assume demand levels counter to market behavior as appears to be the case with the Draft EIS/EIR) are not accurate in general, or specifically with respect to future air quality conditions under any of the various alternatives. Viewed from a practical rather than theoretical perspective, the Draft EIS/EIR presumes that the Airport will support over 391,000 aircraft landing and takeoff (LTO) cycles in 2015 by doing nothing other than carrying through with those projects already adopted. Although operations without the Project would be constrained by greater delays as well as excessive times to reach the airport, the Draft EIS/EIR does not account for the discouraging effects of these delays, and assumes that under the Preferred Alternative, specifically designed to relieve these problems of congestion and delay, the total number of annual LTOs will increase by less than 2 percent (to 398,000) over the No-Action/ No-Project Alternative. There are only two possible explanations for this relationship: (1) either usage under the No-Action/No-Project baseline is overstated; or (2) usage under the Preferred Alternative is understated.

¹⁹ The Preferred Alternative lengthens and reconfigures runways, adds a new West Terminal, and improves traffic flow.

Response:

The content of this comment is essentially the same as comment AR00003-45; please see Response to Comment AR00003-45.

AL00025-47

Comment:

Correspondingly, either emissions for the No-Action/No-Project baseline are overstated or emissions for the Preferred Alternative are understated. The result is an artificial (and erroneous) minimization of the difference in emissions between baseline conditions and those of the Project.

Response:

The content of this comment is essentially the same as comment AR00003-46; please see Response to Comment AR00003-46.

AL00025-48

Comment:

This same issue affects stationary source emissions. Increased airport capacity can be expected to attract associated industrial and commercial activity into the area. This attraction would not occur without the increased capacity and, therefore, must be accounted for if a true assessment of airport emission impacts is to be determined. Note that this commercial development is distinct from currently planned commercial development, in that it occurs due to airport capacity expansion, but outside the formal planning process of the airport. One must recognize that the estimates of reduced emissions under the action alternatives (either the preferred or alternative scenarios relative to a No-Action/No-Project scenario) are due almost entirely to flow improvements in the form of reduced taxiway congestion and improved traffic movement both on and offsite. If these congestion reductions are eliminated or reduced through increased air travel or associated demand that is not properly accounted for in the Draft EIS/EIR, the predicted emissions impacts will not be accurate.

Response:

The content of this comment is essentially the same as comment AR00003-47; please see Response to Comment AR00003-47.

AL00025-49

Comment:

B. Future Background Pollutant Concentrations Are Not Appropriately Estimated.

Background pollutant concentrations are required to accurately estimate the impact of the proposed Airport expansion on National Ambient Air Quality Standards/California Ambient Air Quality Standards (.NAAQS/CAAQS.) compliance. These concentrations must account for the combined impacts of the universe of emission sources not explicitly accounted for in the airport analysis. In effect, the background concentrations determine the emissions baseline upon which Airport emissions are placed. If this base is underestimated, the overall affect of airport expansion on NAAQS/CAAQS compliance could be similarly understated. Alternatively, if the base is too high, the Draft EIS/EIR analysis could be conservative. While the Draft EIS/EIR implies the latter, it contains no data to support such a conclusion and some reason to believe that the converse may be true.

Current short term (sub-annual) background concentrations for the Draft EIS/EIR are based on measurements taken at an onsite monitoring station located just east of the southern runway configuration. Current annual concentrations are based on data collected at a South Coast Air Quality Management District (.SCAQMD.) monitoring facility (Hawthorne) located near, but southeast of the Airport. On the premise that measurements from these sites inherently include emissions from the Airport, the Draft EIS/EIR concludes that such emissions represent conservative background concentration baselines for air quality analysis (since Airport emissions will be added on top of a background that already includes Airport emissions).

However, the prevailing wind direction for the Airport area is southwest to northeast. Therefore, there is probably little influence from the Airport on the offsite concentrations used as background, as well as only moderate influence on the onsite-based background concentrations. The bulk of airport activity, including all terminal and motor vehicle operations occur under the influence of a prevailing wind plume that is further north than the onsite monitoring station. While certain aircraft takeoff and queuing emissions are undoubtedly accounted for in the onsite baseline concentrations, these represent only a small fraction of overall airport emissions. Comparative data for concentrations from both monitoring stations could demonstrate the validity of the claim of conservatism, (i.e., do the observed concentrations for identical monitoring periods show a higher background at the onsite station?), but the Draft EIS/EIR apparently contains no data for the offsite monitoring station (other than the specific background concentrations used in the Draft EIS/EIR and associated documents).

More importantly, the emissions inventory rollback techniques used to forecast future background concentrations are of questionable validity for the Airport area. Background concentrations as well as future emission reduction influences around the Airport are constrained by geography. Since the

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prevailing wind flows southwest to northeast, the Pacific Ocean represents a physical constraint that may significantly influence emission reduction impacts on background concentrations. In effect, the implemented rollback procedure to estimate future background concentrations reduces current background concentrations in proportion to expected regional emission inventory reductions over the same time period. Therefore, this procedure inherently assumes that inventory reductions are homogeneous throughout the region in terms of their influence on background concentrations. This is perhaps a viable assumption in instances where one part of a region has similar source characteristics with another, but the Airport region is clearly constrained to those source characteristics along the Pacific coastline to the immediate south of the Airport. It is the expected reductions from these sources in particular that should be used to adjust Airport background concentrations.

Generally background concentrations for 2005 are reduced 30 to 40 percent while concentrations for 2015 are reduced 50 to 60 percent from the current measured data. Clearly this assumes significant emission reductions will affect coastal monitoring sites and provides substantial headroom for emissions increases within the confines of the NAAQS/CAAQS. These reductions probably represent the most significant influence on forecast pollutant concentrations in 2005 and 2015. It is critical that the propriety of the assumed background concentrations at least be supported by comparative analysis of current Airport and offsite monitoring data as well as analysis of emissions source classifications for the area immediately to the south of the Airport with the remainder of the air basin. This comparison will either provide the proper support for the currently implemented approach or suggest a more appropriate alternative.

Response:

The content of this comment is essentially the same as comment AR00003-48; please see Response to Comment AR00003-48.

AL00025-50

Comment:

C. Reverse Thrust Emissions from Aircraft Are Not Included in the Draft EIS/EIR Air Quality Analysis.

The Draft EIS/EIR makes an affirmative determination not to address emissions from aircraft reverse thrust operations, ostensibly on the basis of inadequate emission factors and short usage times. Both of these claims are misleading. First, reverse thrust is essentially a high thrust operating mode and emission factors for such modes (i.e., climbout and takeoff) are readily available. Common practice is to use takeoff emission factors. Second, it is true that the time in mode for reverse thrust operations is short, however high thrust modes produce very high unit time NO_x. For example, at a commonly utilized reverse thrust mode time of 15 seconds, overall effective takeoff time would be increased by 35 percent (0.7 minutes plus 0.25 minutes versus 0.7 minutes), which in turn increases NO_x by 35 percent relative to takeoff alone. Since takeoff accounts for about 35 percent of total aircraft NO_x (according to the Draft EIS/EIR), the overall aircraft NO_x inventory could increase by nearly 13 percent simply due to the inclusion of reverse thrust-related emissions. Without some affirmative determination that such operations will be prohibited under the action alternatives, reverse thrust emissions should be included in the Draft EIS/EIR air quality analysis.

Response:

Please see Response to Comment AF00001-21 regarding the use of reverse thrust in air quality emissions estimates.

AL00025-51

Comment:

D. The Applicability of the Construction Equipment NO_x Standard is Overstated.

The Draft EIS/EIR states that only construction vehicles meeting a 2.5 grams per brake horsepower-hour (g/bhp-hr) NO_x standard will be used for airport construction projects by 2005. Furthermore, this requirement will be phased in between 2001 and 2005, beginning at 20 percent of vehicles and increasing at a rate of 20 percent per year. This requirement raises several concerns as it is applied to the construction equipment emissions analysis in the Draft EIS/EIR.

First, the 3.0 g/bhp-hr NMHC+NO_x standard for construction vehicles does not take effect until 2005 for 300-750 horsepower (hp) engines, 2006 and 2007 for 100-300 hp engines, or not at all for engines of other hp. Mandating this equipment beginning in 2001 may or may not be successful and clearly requires some statement of commitment by the regulated parties. Voluntary, so-called .Blue Sky Series,. engines can be certified by manufacturers before 2005 but there is no requirement to do so (and little incentive since these engines cannot be used in the emissions averaging programs associated with non-Blue Sky engines). In short, construction firms will only be able to provide equipment that is available on the market and it is dubious that the number of engines meeting the suggested standard in the required years will be significant.

Second, the mandatory .clean engine. standards that do begin in 2001 require NO_x at levels around 4.0 g/bhp-hr (an exact value is not possible since the standard is again expressed as NMHC+NO_x, in this case 4.8 g/bhp-hr). However, these standards also only apply to 300-750 hp equipment. While a number of construction engines fall into this category, many others range from as low as 25 hp up through 300 hp. For these lower hp categories, standards do not begin until 2003 or 2004 and get progressively less stringent as engine size decreases (to 5.6 g/bhp-hr for engines below 100 hp).

Third, even if this low emissions requirement could be enforced (i.e., use of only new Blue Sky Series engines at the Airport), an assumption of 100 percent in-use compliance is overly optimistic. While it is not possible to say with certainty what fraction of equipment may operate at emissions levels above certification standards, experience has demonstrated that engines employing sophisticated engine management strategies and aftertreatment controls (as is expected for these engines) are subject to both malperformances and malmaintenance effects. For first generation engines, such problems are usually exacerbated. What can be stated with certainty is that construction emissions impacts will be larger than the level acknowledged in the Draft EIS/EIR.

Response:

The content of this comment is essentially the same as comment AR00003-50; please see Response to Comment AR00003-50.

AL00025-52

Comment:

E. General Emissions Factors for Offroad Equipment are Understated.

In general, it appears that the emission factors employed for offroad engines, even in the absence of the 2.5 g/bhp-hr issue noted above, are significantly underestimated. This underestimation affects not just construction equipment, but both baseline and ongoing Ground Support Equipment (.GSE.) operations, and results from the fact that outdated emission factor sources were utilized. The net effect is that airport emission and air quality impacts are underestimated.

Offroad engine emissions knowledge is currently in a state of rapid development and estimation techniques need to maintain currency with the latest methods. In California, this would imply use of the California Air Resources Board's (.CARB.) OFFROAD emission factor model, while nationally a similar model termed NONROAD has been developed by the U.S. Environmental Protection Agency (.EPA.). While development continues on both, they clearly represent the most up-to-date compendiums of current offroad engine emissions estimation techniques. For example, these models employ the most recent emission factor test data, emissions deterioration test data, and equipment size and activity factors. References cited in the Draft EIS/EIR, such as the EPA's AP-42 and Procedures for Emissions Inventory Preparation documents as well as the SCAQMD's CEQA Handbook, employ less developed and seriously outdated data.

An example of the magnitude of the emissions underestimation can be derived by comparing emission factors across the alternative methods. The Draft EIS/EIR relies on the use of EDMS to generate GSE emission estimates. However, EDMS includes significantly outdated GSE emissions data.²⁰ A quick comparison indicates that CARB OFFROAD model and EPA NONROAD model GSE (average) emission rates (for the same equipment activity distribution assumed in the EIS/EIR) are, for diesel equipment, from 7 to 13 times greater for VOC, 5 to 10 times greater for PM, 5 to 9 times greater for CO, 4 to 5 times greater for NO_x, and 4 to 5 times greater for SO₂. For gasoline GSE, the models

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produce average emission rates 10 to 20 times greater for VOC, 1 to 6 times greater for PM, 15 to 16 times greater for CO, 6 to 9 times greater for NOx, and 2 to 4 times greater for SO2. The impact of using outdated emission rates is clearly significant and should be reevaluated if realistic air quality impacts are to be derived.

F. Ground Support Equipment Populations Are Not Appropriately Specified.

The Draft EIS/EIR uses the FAA's EDMS model to estimate GSE emissions. An inherent assumption within this approach is that EDMS properly estimates GSE populations. Since the current GSE population at the Airport is known, it would be appropriate to determine whether EDMS assumptions are consistent with the Airport's actual population and use-hour statistics. This would provide support for the validity of EDMS equipment estimation algorithms and allow for a more appropriate assessment of the accuracy of the GSE emissions estimates and air quality impacts of the Draft EIS/EIR.

20 This may be improved in the latest version released subsequent to the completion of the Draft EIS/EIR.

Response:

The content of this comment is essentially the same as comment AR00003-51; please see Response to Comment AR00003-51.

AL00025-53

Comment:

G. Emissions Benefits of Conversion of GSE to Electric, Hybrid, and Alternative Fuels are Overstated.

The Draft EIS/EIR contemplates a widespread GSE replacement program under all three of the action alternatives, while retaining primarily fossil fuel powered GSE for the No-Action/ No-Project Alternative. While this could be construed as a mitigation measure and, in fact, is listed as the single most effective mitigation measure on the list of potential mitigation measures included in the Draft EIS/EIR, it is arbitrary to apply the measure only to the action alternatives, as there are no specific constraints to such substitution today or under the No-Action/ No-Project Alternative. Electric GSE is cost effective from a market standpoint today. Therefore, whatever incentive or mandate will be offered under the action alternatives to move toward electrification could just as readily apply today. The infrastructure modifications are relatively modest and implicate no limitation of use to any of the action alternatives. But by far the most troubling issue is that the replacement program already appears to be accounted for in the unmitigated emission estimates for all three action scenarios. If this is the case, no additional emission reductions will be achieved through GSE electrification.

Response:

The content of this comment is essentially the same as comment AR00003-52; please see Response to Comment AR00003-52.

AL00025-54

Comment:

H. Incorrect Aircraft PM Emission Factors Are Used in the Draft EIS/EIR Air Quality Analysis.

Two issues exist with respect to the PM analysis that result in an underestimation of the Project's potential air quality impacts. First, it appears that the Draft EIS/EIR is based on the incorrect emission factors from the analysis undertaken to develop those factors. Second, it appears that the approach used to develop PM emission factors for aircraft²¹ produces estimates that are not consistent with previous PM emissions testing results.²²

Analysis of PM emission factor estimation reveals that the basic estimation approach used in the Draft EIS/EIR yields an emission factor that only considers the basic non-volatile portion of particulate. An adjustment factor (that varies with fuel sulfur content) exists and should be used to correct the estimate to total PM. This factor is calculated to be about 2.6 for low sulfur (about 70 ppmW) jet fuel and 14.7 for high sulfur (about 675 ppmW) jet fuel.²³ Since existing EPA data demonstrates that U.S. jet fuel

averages about 600 ppmW sulfur, the appropriate adjustment factor for the Draft EIS/EIR would be about 13.2. However, from figures presented in the Draft EIS/EIR, it appears that the unadjusted emission factors were used for all emissions analysis. If so, PM emission impacts are significantly underestimated and should be reassessed after applying an adjustment to increase the PM emission rate by a factor of 13.

In addition there is a potential deficiency in the approach employed to estimate PM emission factor data. The underlying need for a statistical estimation technique such as that employed cannot be disputed as the available PM emissions testing database is both small and dated. However, the Draft EIS/EIR statement that the age of that data renders it valueless are questionable. Engine technology has advanced relative to the engines represented in the test database, but the fundamental combustion characteristics that give rise to PM formation have not. While advances in reducing one (or multiple) pollutant(s) have occurred, those advances do not come without penalties in regard to other pollutants. For example, several low emission combustors are marketed for aircraft and these do result in substantially reduced NOx production relative to standard combustor engines. However, they also generate significantly increased HC and CO emissions as a tradeoff. The additional claim that the existing aircraft emission factors are not of value since they reflect total PM as opposed to PM-10 is without merit. Virtually 100 percent of combustion-related PM is PM-10, so any error resulting from the substitution of total PM for PM-10 will be insignificant. In fact, the PM emission factor estimation approach employed in the Draft EIS/EIR requires an assumption of equivalency between total PM and PM-10.

If relationships between aircraft PM and another pollutant can be developed in one or more operating modes, then values for the independent pollutant can be used to estimate PM emission rates in that mode or modes. Such a statistical approach can take advantage of the limited existing PM emissions database while at the same time recognizing the substantial progress that has been made in aircraft engine performance. It is, however, critical that such relationships consider possible mode-specific differences, as engine and combustion efficiency vary substantially across modes. For example, one would expect PM emission rates to be inherently low in high efficiency (high NOx) modes of operation since the same high temperature, high pressure conditions that give rise to high NOx also favor more complete fuel combustion. Conversely, they would be high in low efficiency combustion modes. It is not clear, however, that the significance of the inter-species relationships are invariant across the full range of operating modes.

A very strong statistical relationship between measured PM and the inverse of measured NOx is observed in three of the four standard operating modes (approach, takeoff, and climbout), with coefficient t statistics all significant at 99-plus percent confidence. A strong coefficient can also be observed for the taxi mode, but it explains virtually none of the observed variation in PM and NOx (whereas variance explanatory significance exceeds 99 percent confidence for the other three modes). The magnitude of the relationship coefficients varies from 28.4 in takeoff mode to 45.0 in climbout mode and 33.0 in approach mode. While all three modes exhibit significant relationships, takeoff mode serves as a good relationship basis as it statistically produces the smallest root mean square error based on regression data (an error 35 to 40 percent lower than those of climbout and approach modes). With this lynchpin to the ICAO emissions database in place, PM emission rates for the other three modes (climbout, approach, and taxi) can be developed based on observed statistical relationships with takeoff PM (i.e., PM-to-PM regressions across modes). Linear coefficients for all three modes (1.42 for climbout, 1.53 for approach, and 3.10 for taxi, all in pounds per thousand pounds fuel burned space) are significant at 99-plus percent confidence, with adjusted correlation coefficients for climbout and approach at 0.78 and 0.83 respectively. Taxi mode correlation is poor, but the PM-to-PM relation does account for the observed variance at greater than 99 percent confidence.

The net result of this calculation is a determination that this alternative approach produces PM emission rates that are 4 to 37 times higher than those used in the Draft EIS/EIR. The smallest differentials are observed at the highest thrust modes, and differentials potentially grow with reducing thrust because the Draft EIS/EIR approach does not take operating efficiency differentials between modes into consideration. Nevertheless, for a typical LTO cycle (as per Draft EIS/EIR times-in-mode), the aggregate PM emission factor will be underpredicted by a factor of 17 using the Draft EIS/EIR approach. The effect on PM air quality analyses is obvious.²⁴

²⁴ The International Civil Aviation Organization emissions certification process does not include PM.

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22 Adjustments not employed in the Draft EIS/EIR may compensate for most of this deficiency.

23 This calculation is based on data presented in the Draft EIS/EIR.

24 Interestingly, if the appropriate carbon-to-total PM emission factor correction of 13.2 is implemented as suggested in the support material for the Draft EIS/EIR, the bulk of the emission factor differentials between the two estimation approaches virtually disappear (i.e., a correction factor of 13 versus an underestimation factor of 17 for an aggregate LTO). Nevertheless, significant differences would still exist on a mode specific basis.

Response:

The content of this comment is essentially the same as comment AR00003-53; please see Response to Comment AR00003-53.

AL00025-55

Comment:

I. Aircraft SO₂ Emissions are Underpredicted.

The Draft EIS/EIR relies on version 3.2 of the EDMS model to predict aircraft SO₂ emissions. This model underestimates aircraft SO₂ emissions by a factor of two due to reliance on an incorrect AP-42 emission factor (the factor was developed without accounting for the factor of two ratio between SO₂ mass and fuel sulfur mass). To the extent that the Draft EIS/EIR already demonstrates potential ambient SO₂ concerns, those concerns would be exacerbated by this underprediction.

Response:

The content of this comment is essentially the same as comment AR00003-54; please see Response to Comment AR00003-54.

AL00025-56

Comment:

J. The Assumption of Gate-Based Power and Air for All Aircraft is Questionable.

The Draft EIS/EIR assumes that 100 percent of air carrier gate power and conditioned air needs will be satisfied by gate-based electrically powered systems as opposed to fossil fuel powered auxiliary power units (APU) or GSE. Experience has shown that even under conditions where gate-based equipment is available, not all airlines or aircraft will utilize it consistently. This seems to be especially true for quick-turnaround airlines such as Southwest. Although the assumption of 100 percent availability and usage affects the no action and action scenarios equally, it is important from an ambient air quality perspective to account for the full range of expected emissions. Without some definitive airport policy that gate-based systems (both power and air) be used and that any on-board APU be shut down until needed for main engine startup, the Draft EIS/EIR would present a more realistic assessment of aircraft emissions if it adjusted the percentage of gate-based system usage to match currently observed use rates at the Airport.

K. APU Emission Factors for SO₂ and PM Not Considered.

APU emission factors for both SO₂ and PM are assumed to be zero. This results from deficiencies in the EDMS model and should be corrected to properly estimate aircraft-related air quality impacts. SO₂ emissions are a function of fuel sulfur and emission rates can be readily calculated and applied. APU PM emission rates can be developed using the same methodology applied to main aircraft engines. The potential impacts of this deficiency would be magnified were the Draft EIS/EIR to properly attribute some fraction of gate power and air support to APU.

Response:

The content of this comment is essentially the same as comment AR00003-55; please see Response to Comment AR00003-55.

AL00025-57**Comment:**

L. Aircraft Taxi Times are Not Included in the Draft EIS/EIR or Supporting Data.

Aircraft taxi-idle times are not included in the Draft EIS/EIR, its technical appendices or supporting documentation.²⁵ It can be deduced from the included emissions estimates for aircraft taxiing that those emissions decrease substantially under the action scenarios, but the actual times should be included to allow the public an opportunity to better evaluate their propriety. In addition, the ability of SIMMOD to accurately estimate aircraft taxi times must be demonstrated by comparing SIMMOD predictions for current conditions at the Airport to observed taxi times at the Airport. The issue of aircraft taxi times is critical. The bulk of Aircraft VOC and CO emissions are generated during taxiing. In addition, although NOx emissions rates are low during taxiing, the amount of time spent in taxi mode results in a significant contribution to overall NOx emissions. Clearly, it is important that taxi times be accurately modeled. However, sufficient information is not included in the Draft EIS/EIR to determine that accurate modeling occurred.

²⁵ The Draft EIS/EIR contains references to the development of the taxi/idle times using SIMMOD, but no actual indications of what those times were.

Response:

The content of this comment is essentially the same as comment AR00003-56; please see Response to Comment AR00003-56.

AL00025-58**Comment:**

M. The Project's Conformity Cannot Be Determined from Data and Analysis Contained in the Draft EIS/EIR.

Even without consideration of the various issues noted above, the Draft EIS/EIR presents several air quality concerns relative to the NAAQS/CAAQS under the Preferred Alternative. Although a series of mitigation measures are discussed and preliminary emission reduction estimates presented, these estimates are not documented and methodologies cannot be evaluated. The Draft EIS/EIR defers formal review of potential mitigation measures until a Final EIS/EIR is developed. Similarly, the Draft EIS/EIR acknowledges the applicability of federal conformity requirements, but defers both the conformity analysis and a proposed conformity determination to the Final EIS/EIR. Unfortunately, such an approach makes it impossible to comment constructively on either potential emission mitigation measures or the conformity process, since these processes will be released for comment only after the underlying decision-making has been finalized.

Response:

The Supplement to the Draft EIS/EIR presented an enhanced discussion and evaluation of air quality mitigation measures in Section 4.6.8, Mitigation Measures, and in Appendix S-E, Section 2.3. Also, please see Response to Comment AF00001-4 regarding general conformity. The LAX Master Plan Mitigation Monitoring and Reporting Plan (MMRP) has been published which describes the specific mitigation measures adopted for the Master Plan. Please see Response to Comment AR00003-63 regarding the Mitigation Monitoring and Reporting Plan.

AL00025-59**Comment:**

V. THE DRAFT EIS/EIR'S ALTERNATIVES FAIL TO SATISFY THE PURPOSE AND NEED FOR THE PROJECT.

3. Comments and Responses

The mandate to evaluate and compare alternatives is the heart of an EIS (CEQ Guidelines, 1502.14). FAA Order 1050.1D, paragraph 63, implementing NEPA, mandates that an EIS shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action. The FAA Order further requires that the EIS Alternatives analysis include a rigorous exploration and objective evaluation of all reasonable alternatives. Courts have concluded that to be reasonable, the suggested alternatives must meet the goals of the proposed action.²⁶

The Draft EIR/EIS.s alternatives analysis fails to meet the stated goals of the Project. The Draft EIS/EIR states that the general purpose and objectives of the Master Plan are to provide... sufficient airport capacity for passengers and freight in the Los Angeles region to sustain and advance the economic growth and vitality of the Los Angeles region. (Draft EIS/EIR, volume 1, pg. 2-1) More specifically, the Draft EIS/EIR outlines three objectives which the Project needs to satisfy: (1) to respond to the local and regional demand for air transportation during the period 2000 to 2015, taking into consideration the amount, type, location, and timing of such demand.; (2) to ensure that new investments in airport capacity are efficient and cost-effective, maximizing the return on existing infrastructure capital.; and (3) to sustain and advance the international trade component of the regional economy and the international commercial gateway role of Los Angeles.²⁷

²⁶ See, generally, *City of Carmel-By-The-Sea v. United States DOT*, 123 F.3d 1142 (1997); *National Wildlife Federation v. Federal Energy Regulatory Commission*, 912 F.2d 1471 (1990).
²⁷ *Id.*

Response:

The Draft EIS/EIR presents the purpose and need, and project objectives, in Chapter 2, Purpose and Need for the Proposed Action, describes the basis and nature of a reasonable range of alternatives for the proposed action in Chapter 3, Alternatives, and provides a comprehensive comparative analysis of those alternatives in Chapter 4, Affected Environment, Consequences, and Mitigation Measures. Neither NEPA or CEQA require that all alternatives meet the purpose and need/project objectives to the full extent and the same degree. Section 15126.6(a) of the CEQA Guidelines requires an EIR to include a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects. Section 15126.6(b) of the CEQA Guidelines goes on to state that an EIR focus on alternatives to the project which are capable of avoiding or reducing significant impacts, even if these alternatives would impede to some degree the attainment of the project objectives. The Draft EIS/EIR provide the public and decision-makers with a range of alternatives that provide relatively greater or lesser environmental impacts, depending on the particular alternative and specific environmental discipline, recognizing that the comparative differences in impacts can be weighed against the degree to which each alternative meets the purpose and need/project objectives. Additionally, the Supplement to the Draft EIS/EIR expanded the range of alternatives being considered through the introduction of Alternative D, which avoids or substantially reduces many of the significant environmental impacts associated with the other alternatives, while also responding to the purpose and need/project objectives to a degree different than the other alternatives. Both the process and the documentation provided for the LAX Master Plan EIS/EIR relative to purpose and need/project objectives and alternatives are consistent with the requirements of NEPA and CEQA. Please also see Topical Response TR-ALT-1 for additional discussion regarding the range of alternatives evaluated for the proposed project.

AL00025-60

Comment:

It is not clear, however, that the proposed runway improvements that form an integral part of Alternative C, the Preferred Alternative, constitute a superior, or even an efficient way to accomplish the Project.s stated purposes. For example, all three of the Project.s objectives could potentially be, at least partially, achieved through airspace/air traffic modifications, both within the terminal airspace and in the en route system. This alternative is neither acknowledged nor explored in the Draft EIS/EIR. Nevertheless, this conclusion is supported by the fact that the Dual Civet arrival configuration has reduced arrival delay for operations from the east significantly since 1998 and has resulted in an average time-savings of 4.4 minutes per Civet turbojet arrival aircraft. In fact, since the Dual Civet arrival procedures were implemented, there have been no national delay programs set up for the Airport, since delay has not been an issue. However, the Draft EIS/EIR does neither addresses nor incorporates the capacity or delay reduction efficiencies gained through this procedure in any of its modeling.²⁸

28 Where the Master Plan does address air traffic procedures, it is in error. The Master Plan states that the Departure Sequencing Program (DSP), a program that provides the capability to sequence departures from Los Angeles basin airports, would enhance capacity at the Airport. (Master Plan, . 2.6.1.3, page II-2.137) However, the DSP program has been cancelled by the FAA due to a lack of benefit. Essentially, the Southern California TRACON consolidation effort occurred many years ago and the references to it in the Master Plan and the Draft EIS/EIR are outdated. Many innovations and changes in airspace and procedures at the TRACON over the past few years have occurred, and none are referenced or adequately considered in the Draft EIS/EIR. Basically, the Draft EIS/EIR does not address the changes in airspace design or the new routes that have been developed as a result of airspace enhancements in Southern California.

Response:

The content of this comment is essentially the same as comment AR00003-59; please see Response to Comment AR00003-59.

AL00025-61

Comment:

Moreover, a closer examination of the Master Plan and the Draft EIS/EIR reveals that the Draft EIS/EIR may have ignored relatively inexpensive improvements in air traffic procedures in favor of very expensive, physical changes to the airfield. This is apparently because the Project's true purpose does not include the first two claimed in the Draft EIS/EIR, i.e., the broad ones of providing sufficient airport capacity for passengers and freight in the Los Angeles region. (Draft EIS/EIR, Volume 1, page 2-1), in an efficient and cost effective way (Draft EIS/EIR, page 2-1). Instead, the Project's principal purpose is the narrow and singular one of accommodating New Large Aircraft (NLA) that, with their long haul capabilities, would potentially serve the Airport in order to sustain and advance the international trade component of the regional economy.. (Draft EIS/EIR, page 2-1)29

This conclusion is substantiated by the fact that the current aircraft fleet does not require 12,000 feet of runway to take off. Even today's heavy aircraft such as the B-747-400 and the B-777-400 only need 8,000 - 10,000 feet of runway for take-off and landing (under the weather conditions prevailing at the Airport). The Airport's existing runways are 8,295-feet, 10,285-feet, 12,091-feet, and 11,096-feet in length. Thus, even the shortest runway at the Airport can accommodate the heaviest and largest aircraft in the fleet under prevailing circumstances today.

The result of the Draft EIS/EIR's failure to acknowledge the Project's primary purpose, i.e., to increase the proportion of super long-haul aircraft in the fleet, is a concomitant failure to analyze the full range and magnitude of environmental impacts that may arise from the desired change in fleet mix. While it is, as yet, early in the NLA development process, some technical facts about the aircraft are already known, sufficient to make at least some educated projections concerning its impact. For instance, ascertaining the projected climb rate will enable an estimate of whether the NLA can meet current airport noise abatement operational requirements; or whether those will have to be altered; or whether the NLA will, ultimately, overfly noise sensitive communities at lower (or higher) altitudes, resulting in higher (or lower) noise levels over those communities. Similarly, preliminary data concerning engine type and emissions characteristics would enable at least a preliminary analysis of the air quality impact of the NLA, as well as the GSE needed to support it, if different from those categories already in use. Finally, the Draft EIS/EIR should have included the capacity/delay impacts from the increased use of NLA. As the Draft EIS/EIR fails to model ground operations in detail, the delay impacts that may result are not considered in developing an accurate analysis of arrival and departure flows and the congestion which may ensue even after Project implementation.

29 The Draft EIS/EIR comes close to admitting as much: Development of NLA aircraft is driven by increasing demand and constrained international gateway airports around the world, including LAX . . . Development of the NLA will allow these airports to continue to meet the growing demand for travel between primary trading partners. As one of the three major (and busiest) gateway airports in the nation, LAX would be one of the first airports to be served by NLA.. (Draft EIS/EIR, page 2-11)

3. Comments and Responses

Response:

The content of this comment is essentially the same as comment AR00003-60; please see Response to Comment AR00003-60.

AL00025-62

Comment:

In summary, because the alternatives analysis is the .heart. of the NEPA process; because the Draft EIS/EIR fails to consider, or analyze, the impacts of eminently reasonable alternatives such as airspace changes to meet the Project.s stated purposes; because Alternative C does not alone meet the Project.s stated purposes; and because the most significant result of implementing Alternative C, the increased capacity to accommodate NLAs, remains unanalyzed from an environmental perspective, the Draft EIS/EIR.s alternatives analysis is seriously flawed.

Response:

Comment noted. Please see Responses to Comments AL00036-30 regarding airspace issues, AL00016-53 regarding the relationship between the purpose and need/objectives of the project and the alternatives evaluated in the EIS/EIR, and PC00686-2 regarding NLAs.

AL00025-63

Comment:

VI. THE DRAFT EIS/EIR DOES NOT ADEQUATELY SPECIFY MITIGATION MEASURES OR METHODS TO ENFORCE THEM.

CEQA requires that agencies identify the environmental impacts of a project, and implement mitigation measures to lessen the adverse environmental impacts. (CEQA Guidelines .15002 (a)(3)). However, the Draft EIS/EIR fails to comply with CEQA by (1) failing to provide a complete list of mitigation measures, and (2) failing to specify, at a minimum, a Draft Mitigation Monitoring Program to inform the public of how the project proponents intend to ensure the implementation of mitigation measures.

Response:

Please see Response to Comment AR00003-63.

AL00025-64

Comment:

A. The Draft EIS/EIR Delays Disclosure of the Full List of Mitigation Measures Until the Final EIS/EIR.

CEQA Guidelines .15126.4(a)(1)(B) mandates that the [f]ormulation of mitigation measures should not be deferred until some further time.. While the Draft EIS/EIR acknowledges the existence of significant unmitigable impacts, it also states that, .A final package of design features, Master Plan Commitments, and Mitigation Measures will be developed . . . The resulting Environmental Action Plan will be published in the Final EIS/EIR.. (Draft EIS/EIR, Executive Summary, pg. ES-30) By deferring to the Final EIS/EIR to reveal the mitigation measures, the public.s opportunity comment will have been attenuated. The SBCCOG, therefore, reserves the right to comment on items, including the Draft Conformity and Mitigation Monitoring Program that should have been included, but were omitted from the Draft EIS/EIR.

Response:

The content of this comment is essentially the same as comment AR00003-63; please see Response to Comment AR00003-63.

AL00025-65

Comment:

B. The Draft EIS/EIR Fails to Provide a Draft Mitigation Monitoring Program.

California Public Resources Code .21081.6 requires that a public agency .adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.. (Cal. Pub. Resources Code .21081.6 (a)(1)). If an EIR .identifies one or more significant environmental effects of the project,. CEQA Guidelines .15091 (a) requires an agency to .make one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.. With these findings, the CEQA Guidelines mandate that .the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.. (CEQA .15091(d))

The Draft EIS/EIR violates CEQA Guidelines .1509(d) and California Public Resources Code . 21081.6 in that it fails to set forth a program that monitors or reports on each mitigation measure. Although the Draft EIS/EIR cites some mitigation measures to combat the environmental impacts of the Project, it makes no mention of the .permit conditions, agreements, or other measures. (CEQA Guidelines . 15091(d)) which would ensure compliance with mitigation measures. In other words, it does not specify the steps necessary to ensure compliance, the responsible party to ensure compliance, or the resulting consequences should compliance not occur.

Response:

Please see Response to Comment AR00003-63 regarding the mitigation monitoring and reporting program.

AL00025-66

Comment:

VII. THE UNRELATED ISSUE OF SAFETY, SHOULD NOT BE USED AS A SMOKE SCREEN TO PUSH THE CAPACITY-DRIVEN DRAFT EIS/EIR FORWARD.

In recent public statements, the FAA and LAWA have introduced the notion that because of its high number of runway incursions, the Airport is unsafe, and that the Project.s improvements. are critical to remedying the adverse safety conditions.

Contrary to the FAA.s contention, however, runway incursions are largely a function of pilot or air traffic controller error, not airport layout and design.³⁰

In fact, the Airport can eliminate runway incursions only if it builds runways with no entrances and no exits. However, simple solutions such as enhanced marking and lighting for runways, increased awareness and training for pilots and controllers, improvements in communications and procedures, and resolving management issues at the FAA³¹ are all basic and available measures that should be implemented at the Airport. In addition, affordable incursion-reducing technologies currently available to the Airport such as the Airport Movement Area Safety System (presently in use at the San Francisco International Airport), which uses radar to alert controllers to potential collisions, would minimize the problem as well.³² In fact, even the FAA has even pressed the need for instituting technological improvements at airports to combat the runway incursion issue.³³

While recent incidents have made runway incursions a .hot button. in the eyes of the public, Congress, and aviation organizations, this recently surfaced safety. issue cannot serve as justification for a project which otherwise fails to meet environmental standards.

³⁰ A pilot might enter a runway without proper authorization or clearance; a pilot is unfamiliar with an airport, does not hear an instruction, or fails to acknowledge an instruction to hold short of an active

3. Comments and Responses

runway; a pilot, when approaching an active runway, crosses the hold line for that runway; a controller may clear an aircraft onto an active runway without ensuring that there are no other aircraft operating on that runway; the controller may fail to coordinate an aircraft crossing a runway with the controller who has the responsibility for approving all operations on that runway; a controller may clear an aircraft to cross a runway and the pilot may take an excessive amount of time crossing and may interfere with another aircraft; and the controller may fail to exercise the proper oversight of the operation and allow two aircraft to occupy an active runway resulting in a runway incursion.

31 Transportation Department Inspector General Kenneth M. Mead recently told a House subcommittee that the .FAA.s director of runway safety has little authority over FAA employees who work on runway safety projects. Result: Almost every FAA runway safety project runs years late at more than double the anticipated cost, often failing to meet original expectations.. The Washington Post Company, .Runway Alert., page A22, July 7, 2001.

32 .It.s the first surface detection equipment that really gives an alert to the controller and allows the controller to prevent a collision.. CNN, .Close Calls on Runways Alarm Aviation Experts., June 27, 2001.

33 The Director of the FAA.s Runway Safety Office, Mr. Bill Davis, expressed that .he needs additional authority to coordinate and speed up technological improvements.. The Washington Post Company, .Runway Alert., page A22, July 7, 2001.

Response:

The content of this comment is essentially the same as comment AR00003-65; please see Response to Comment AR00003-65.

AL00025-67

Comment:

VII. CONCLUSIONS.

Based on the above analyses, the SBCCOG concludes that the Draft EIS/EIR does not serve its most fundamental purpose as an .environmental alarm bell. to .alert the public and responsible officials to environmental changes before they have reached ecological points of no return.. (See, e.g., County of Inyo v. Yorty, 32 Cal.App.3d 795, 810 (1993).) Among other things, the varying baselines, selectively applied to areas of potential impact so as to artificially diminish the apparent impacts of the Project; the virtual absence of any analysis of impacts south of the Airport; and the lack of consideration of imminently reasonable alternatives, including air traffic alternatives, to the expenditure of billions of dollars in what are ultimately only marginally effective airfield improvements, require substantial analytic revisions to the Draft EIS/EIR. The SBCCOG further concludes that, after those revisions are made, significant new information. will emerge which will require that the Draft EIS/EIR be recirculated (Center Sensible Planning. Inc. v. Board of Supervisors, 122 Cal.App.3d 813, 822 (1981), so that the public, in general, and the SBCCOG and its members in particular, are not denied their statutorily mandated opportunity to test, assess and evaluate the new data and conclusions contained in the revised Draft EIS/EIR, and to make informed judgments as to their validity.

The SBCCOG thanks LAWA for this opportunity to comment.

Response:

Please see Responses to Comment Letter AR00003 for responses to each of the comments contained in the letter from the South Bay Cities Council of Governments.

AL00026 Murdock, Jody City of Rolling Hills 9/13/2001

AL00026-1

Comment:

The City of Rolling Hills hereby joins in the comments of the South Bay Cities Council of Governments dated September 4, 2001, pursuant to the requirements of the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.) and the National Environmental Policy Act (42 U.S.C. §§ 4321 et seq.) concerning the Draft Environmental Impact Statement/Environmental Impact Report for the Los Angeles International Airport Proposed Master Plan Improvements prepared jointly by the Federal Aviation Administration and the City of Los Angeles. Those comments are incorporated herein by reference as though set forth in full, and represent the City's comments on the above-referenced Statement/Report.

Response:

Comment noted. No comment letter from the South Bay Cities Council of Governments (SBCCOG) dated September 4, 2001 was submitted during the public comment period on the Draft EIS/EIR. However, please see the responses to comment letter AR00003 which contains comments on the Draft EIS/EIR from SBCCOG dated September 20, 2001.

AL00027 Brann, Don City of El Segundo 8/21/2001

AL00027-1

Comment:

In 1999, the City Council of the City of El Segundo appointed a seven (7) member LAX Master Plan Advisory Commission (LAXMAC) comprised of local residents to comment on the Draft LAX Master Plan EIR/EIS. The Commission's specific charge was to conduct a series of public hearings to receive testimony regarding the proposed airport expansion's impact on the "quality of life" in the El Segundo community. Toward that end, the Commission held public hearings and received testimony during the months of March and April 2001. The following is a summation of the information gathered during those hearings. Please note that the law firm of Shute, Mihaly & Weinberger will be preparing comments on behalf of the City Council of the City of El Segundo. It is anticipated that those comments will cover a vast array of issues. The primary purpose of this Commission is to communicate to the City of Los Angeles and the Los Angeles World Airports the impact of airport expansion on "quality of life" and "livability" standards in the community.

Response:

Comment noted.

AL00027-2

Comment:

General Deficiencies In Published Draft EIR/EIS document

LAXMAC has determined that the Draft EIR/EIS document distributed by Los Angeles World Airports (LAWA) is a superficial document that is deficient in a number of critical areas. For example, the report itself forces the reader to review appendices and technical reports in order to determine the intent and scope of the airport expansion project. However, to complicate matters further, many of the appendices are simply missing, or somehow unusable. One almost humorous example of the latter is one of the appendices in which all of the characters have been transposed and appear backward to the reader. The overall impact of such deficiencies is to cast doubt on the legitimacy and competency of the core document as a basis for airport expansion. The examples are numerous and will be pointed out elsewhere. As such, LAXMAC will not dwell further on that aspect of the document.

3. Comments and Responses

Response:

Please see Response to Comment AL00033-255.

AL00027-3

Comment:

LAXMAC seeks to point out as well that a primary basis for the Master Plan and Draft EIR/EIS is absent in that it is not premised on a comprehensive airspace traffic management study. It is the understanding of the Commission that such a study has been initiated by the Federal Aviation Administration (FAA). However, it has not been possible to determine the present status of that undertaking. As such, LAXMAC has concluded that the Draft EIR/EIS, in its current form, is a fundamentally flawed document that cannot be implemented without major revisions and additions.

Response:

Please see Response to Comment AL00036-30 regarding the FAA Benchmark Study.

AL00027-4

Comment:

With respect to the last point, LAXMAC believes also that the airport, absent a viable Master Plan and required Final EIR/EIS, seeks mainly to continue to grow incrementally, much as it has for the past twenty years. Accordingly, LAXMAC seeks minimally to cap LAX at 68 MAP. The members of the Commission will seek to initiate appropriate measures, including legislative remedies to ensure an enforceable limit on the number of travelers served by LAX.

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX, and Topical Response TR-GEN-4 regarding the legal limits on the ability to control activity levels at airports.

AL00027-5

Comment:

Draft EIR/EIS Inaccurate In its Estimates of Number of Passengers Utilizing LAX

The Draft EIR/EIS estimates that under the no action/no project scenario, LAX would serve 78.7 Million Annual Passengers (MAP). With 165 gates, that number equates to 477,000 passengers/year/gate on average. Currently, some gates at LAX serve over 800,000 passengers per year. If all current gates handled that passenger volume, LAX would serve 132 MAP. Granted, the existing roads, runways and support services may not be capable of handling 800,000 passengers/gate/year, and the terminals will not have the space to accommodate that volume.

Response:

The Terminal 1 gates operated by Southwest Airlines are serving in excess of 800,000 annual passengers per gate. Southwest Airlines unique operating characteristics such as flying smaller passenger loads on shorter routes with unassigned seating allow it to achieve more efficient gate utilization than other airlines. In addition, the utilization rates of the gates at LAX is high even by Southwest standards. For comparison, the figures listed below are the number of passengers per gate achieved at airports in which Southwest Airlines has a major presence:

Dallas Love Field	514,000 annual passengers per gate
Burbank	325,000
San Jose	407,000
Phoenix	320,000

In comparing LAX against other major International Gateway airports yields the following numbers:

Miami	200,000 annual passengers per gate
JFK	168,700
San Francisco Int.	346,300
Atlanta	441,000
Dallas Forth Worth	310,000

Alternatives A, B, C, and D assume utilization rates of 492,000, 492,000, 533,000, and 509,000 annual passengers per gate respectively. Based upon LAX specific experience and current industry practice, the estimates of MAP for the No Action/No Project Alternative are based on conservative assumptions and are not likely to be exceeded.

AL00027-6

Comment:

However, in all other options, including the preferred "Option C" scenario, the terminal square footage doubles at least, and could run as high as 2.5 times the existing square footage. Therefore, it is logical to conclude that the concomitant construction of a ring road, remote terminals, better rail access, and new gates in larger modernized terminals, that LAX would serve 800,000 passengers/gate/year. Thus, the estimate by LAWA that, under Option C, only 89.6 MAP could or would use LAX is a gross understatement.

Response:

Please see Response to Comment AL00022-102 regarding the Master Plan's methodology for determining aircraft gate and terminal space requirements and the ability of the proposed terminal in Alternative C to serve more passengers. Alternative D, the Enhanced Safety and Security Plan Alternative, is now LAWA staff's preferred alternative. A description of terminal facilities for Alternative D is provided on page 3-45 of the Supplement to the Draft EIS/EIR and terminal space is listed in Table S3-2, page 3-22.

AL00027-7

Comment:

With no controls on the number of passengers served, LAX will soon exceed 89 MAP just as it exceeded the 40 MAP estimated in the 1978 EIR prepared prior to the last major expansion of the airport. LAX is currently accommodating approximately 50% more passengers than the 1978 estimate. If allowed to proceed with the construction of Option C (or A or B), it is, frankly, inevitable that LAX will soon be serving over 100 MAP. As such, the Draft EIR/EIS does not adequately address the transportation demands on the streets of El Segundo (and surrounding communities), or the levels of pollution that will affect the air, land and water surrounding the airport. It is worth noting that currently LAX is the second most prolific NOx emissions producer in the State. The expansion of the airport would serve only to exacerbate that situation. LAXMAC urges that LAWA revise the Draft EIR/EIS and utilize realistic estimates of the impacts stated above.

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX, and legal limits on the ability to control activity levels at airports. The basis for future activity levels at LAX under each of the build alternatives is described in Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. Water quality impacts were addressed in Section 4.7 of the Draft EIS/EIR and the

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Supplement to the Draft EIS/EIR, with supporting technical analysis provided in Technical Reports 6 and S-5.

AL00027-8

Comment:

Draft EIR/EIS is Deficient in its Assessment of Traffic Impact Impacts

With respect to traffic issues, the first concern noted by LAXMAC is that the Draft EIR/EIS does not adequately address the impact of the construction of an airport "ring road" on the quality of life enjoyed by those living and working in El Segundo. The planned closure of Pershing Drive to north/south traffic would have significant impact on other major north/south thoroughfares in the community, such as Sepulveda Boulevard, Vista Del Mar Drive and Aviation Avenue. The ring road would also present major and, heretofore, unexamined challenges to those trying to access El Segundo via Main Street. Currently, the only direct access to the residential western portion of the community is Main Street via Imperial Highway. It is not clear in the Draft EIR/EIS how the ring road will interact with Imperial Highway, and it is impossible to envision a scenario in which there will not be significant and permanent deleterious impacts on the residential portion of the community resulting from the construction of the ring road.

The Draft EIR/EIS discusses a 1.5 mile westward extension of the 105 freeway connector along Imperial Highway. The right-of-way would separate from the north, and a future roadway would replace Imperial Highway west from Sepulveda Boulevard. In addition, the document discusses the construction of a new interchange at Sepulveda Boulevard by 2004. Obviously, that plan would entail significant construction and traffic diversion efforts. However, there is no discussion on the impact of business and residential property during the construction, and it is not clear what property, either north or south of Imperial Highway, would need to be vacated to accommodate the construction of the ring road and the westward extension of the 105 Freeway. Since El Segundo borders the southern boundary of this particular aspect of the proposed LAX Master Plan expansion, LAXMAC remains concerned that the community of El Segundo would suffer a disproportionate share of the dislocation that might result. LAXMAC has concluded that the Draft EIR/EIS should be revised to include specific addenda discussing the unanswered details and impacts of the ring road construction, the 105 extension and elimination of Pershing Drive.

Response:

The access plan was specifically developed to eliminate the potential for cut-through traffic between the western terminal and Main Street in El Segundo, Pershing Drive in Playa del Rey, or Vista del Mar to the west of the airport. In accordance with a key access plan principal (to minimize impacts on neighborhoods), this was intended to minimize the impacts on the residential communities of El Segundo and Playa del Rey. However, full access would remain to and from the east for both Main Street and Pershing Drive. This is intended to continue providing full access to residents in these communities to and from Sepulveda Boulevard, I-405, and other major roadways to the east.

The section of the Ring Road on the south side of the Airport is designed to remain entirely north of the Imperial Highway right-of-way (ROW) border with El Segundo. Further, construction of the roadway segment would also be conducted without impacting any land uses south of the existing Imperial Highway ROW. Therefore, no land uses within El Segundo are expected to be impacted by the Ring Road construction. It should be noted that Alternative D does not include a Ring Road. The Supplement to the Draft EIS/EIR provided additional detail on construction-related traffic impacts of all alternatives. Please see Topical Response TR-ST-3 regarding construction traffic impacts.

AL00027-9

Comment:

The Draft EIR/EIS analyzed only 61 intersections, with an additional 15 selected for more detailed study. While LAXMAC has determined that number to be artificially low, the problem is compounded by the fact that only nine of the 76 total intersections studied are located south of LAX. The rationale for that decision, as cited in the Draft EIR/EIS, stated erroneously that "south of LAX, there is a higher percentage of LAX traffic on I-405 and a lower percentage on the arterials, indicating that airport traffic

is staying on the freeway as desired..." That assumption is supported by the equally specious statement that it is "more a result of the roadway network south of LAX. There are no alternative arterial routes that closely parallel I-405 south. In fact, south of LAX, all major arterial routes change to a north/south orientation, while I-405 south of Rosecrans Avenue, continues in a northwest/southeast direction."

Such assertions, frankly, serve only to undermine LAWA's credibility. To assert that travelers will sit in gridlock on the I-405, rather than exit the freeway to utilize Sepulveda Boulevard, Aviation Boulevard and/or other north/south thoroughfares is ludicrous. To set the record straight, LAXMAC offers the following:

- The I-405 is approximately 2.5 miles east of Sepulveda Boulevard at Artesia Boulevard. Artesia Boulevard is approximately 5 miles south of LAX. Accordingly, Sepulveda Boulevard, south of the freeway is an extremely viable alternative to northbound traffic headed toward LAX.

- More than 20% of travelers utilizing LAX live in Orange County. Virtually all of those individuals utilize the I-405, or alternative northbound routes such as Sepulveda and Aviation Boulevards, to access LAX. Therefore, LAXMAC has determined that LAWA's decision to study only nine intersections south of LAX in the Draft EIR/EIS is simply inadequate. LAXMAC requests that the Draft EIR/EIS be amended to include a more thorough examination of traffic impacts south of LAX.

Response:

The transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The referenced paragraph from page 4-284 of the Draft EIS/EIR regarding the diversion of South Bay trips from I-405 to arterial streets is making an observation about current airport trips that spend a portion of the trip on I-405, but exit the freeway early to use arterial streets to access the airport. This point is best illustrated in Attachment B to Technical Report 3b. The figure showing existing airport trips in this attachment shows relatively large volumes of airport trips on I-405 (in comparison to other roadways) both north of Howard Hughes Parkway and south of El Segundo Boulevard. However the volumes on I-405 between Howard Hughes Parkway and Century Boulevard drop significantly, while traffic volumes on Sepulveda Boulevard and La Tijera Boulevard grow by comparable amounts. The high volumes of airport trips on I-405 in the South Bay do not drop as much between El Segundo Boulevard and Century Boulevard, and the arterial streets of Sepulveda and Airport Boulevards do not show as significant an increase in volumes. Also, there are large volumes of traffic using the northbound off-ramp and southbound on-ramp at Century Boulevard, while the ramps connecting to the north have very little traffic. It is therefore concluded that more airport trips divert from I-405 to arterial streets north of LAX than in the South Bay. There may be other airport passengers who use arterial streets exclusively in accessing LAX, but these are not the subject of the paragraph referenced in this comment.

The comment stating that 20 percent of all travelers utilizing LAX live in Orange County is unsubstantiated and contradicted by the information provided in the Draft EIS/EIR. Tables 1-9 and 1-10 of the Draft EIS/EIR show that Orange County has a 1997 demand of 7 million annual domestic origin-destination (O&D) passengers, and that domestic O&D travel makes up about 85 percent of total O&D travel. From these numbers it can be estimated that the total O&D demand of Orange County residents is about 9 million annual passengers. In order for Orange County residents to account for 20 percent of all LAX O&D passengers, ALL of the Orange County residents would need to use LAX for all of their air travel. John Wayne Airport carries about 8 million annual passengers (see Table 1-2). Most Orange County residents use John Wayne Airport, and the remainder are distributed among Ontario, Long Beach, and other airports.

Please refer to the Topical Response TR-ST-2, Section 1, for a discussion on study area definition and identification of facilities analyzed.

AL00027-10

Comment:

LAXMAC notes also that since the release of the Draft EIR/EIS, the Arbor Vitae/I-405 project has been removed from the Regional Transportation Plan. Accordingly, it is logical to question the potential sources of funding for that project. Given that project's current non-status, it will not be eligible for

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Federal and State funds previously thought to be available. Therefore, LAXMAC questions the viability of the ring road concept if funding for a significant portion of that project (e.g. the Arbor Vitae/I-405 project) is not available. LAXMAC requests LAWA to amend the Draft EIR/EIS to reflect the potential that the ring road concept may never be realized.

Response:

Successful operation of the Ring Road is not dependent on any component of the Arbor Vitae/I-405 interchange, since the Expressway would be served by a new interchange with I-405 near Howard Hughes Parkway. Further, Alternative D, which does not include the Ring Road, is not dependent on the interchange either. Nonetheless, contrary to the commentor's assertion, the south side of the Arbor Vitae/I-405 interchange is included in SCAG's current (2001) RTIP. Also, FHWA has withdrawn its support for a half interchange at Arbor Vitae, and the proposed half interchange is not part of the LAX Master Plan. FHWA policy is to only consider proposed full interchanges, not partial ones.

AL00027-11

Comment:

From a more regional perspective, LAXMAC is also concerned that the Draft EIR/EIS fails to appropriately analyze regional traffic impacts of large planned developments, such the Playa Vista mixed-use project and the intended transition of Hawthorne Airport to a regional shopping center. The traffic impacts from the Playa Vista project alone will impact Sepulveda, Jefferson and Culver Boulevards in a significant manner. To simply not mention such projects is not acceptable. LAXMAC, in turn, requests LAWA to amend the Draft EIR/EIS to reasonably analyze the regional traffic impacts of the Playa Vista project and the planned transition of Hawthorne Airport to a retail use.

Response:

The methodology used in this analysis follows LADOT Traffic Study Policies and Procedures. Please see Topical Response TR-ST-2, for more information.

AL00027-12

Comment:

Draft EIR/EIS Does Not Establish Appropriate Baseline Years For Analysis

Upon review of the Draft EIR/EIS, LAXMAC has determined that the document utilizes a variety of baseline years for the analysis of separate aspects of the proposed Master Plan expansion project. For example, documentation in the environmental analysis describes existing conditions as of 1997. The "Technical Report on Surface Traffic" appears to pull a full year's data from 1996, and perhaps most troubling, LAWA cites 1994 and 1996 as the baseline years for noise analysis. In short, the use of multiple baseline years is troubling because it makes it all but impossible for the public to determine which year is being used for the different analyses. Even more disturbing to LAXMAC, however, is the appearance that the multiple baseline years were used for the purpose of manipulating the results of the various analyses in an effort to minimize the impacts of the proposed expansion of LAX.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues. As explained in the topical response, although data from other years is cited in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for informational purposes, the baseline year for all operational data, including data used in the traffic and noise analyses, is 1996. Please see Response to Comment AL00022-96, and Subtopical response TR-N-1.3 regarding the baseline year used in the noise analysis.

AL00027-13

Comment:

LAXMAC objects specifically to LAWA's decision to use 1994 and 1996 as the baseline years for analysis regarding the impacts of airport noise. The decision to use those years serves to artificially raise the baseline for analysis by incorporating the noise generated by the large number of Stage 2

aircraft used by commercial carriers at that time. Stage 2 aircraft were totally phased out of use by commercial carriers in the United States by the year 2000. Accordingly, it is not inappropriate to assume that the numbers of the noisier aircraft utilizing LAX decreased significantly every year between 1994 and 2000. Thus, LAXMAC has determined that 1994 and 1996 were selected purposely to present baseline data suggesting a noisy status quo and to make the argument that the impacts of airport expansion (with larger numbers of quieter planes) would not significantly influence the existing quality of life for El Segundo residents. LAXMAC, for the record, patently rejects the use of 1994 and 1996 as the baseline years for noise analysis and requests LAWA to revise the Draft EIR/EIS by conducting additional noise analysis using current and relevant data.

Response:

Please see Response to Comment AL00033-87. The year 1994 was not used as a baseline for the Draft EIS/EIR or the Supplement to the Draft EIS/EIR. For more information please see Topical Response TR-GEN-1 and Topical Response TR-N-1, particularly TR-N-1.3.

AL00027-14

Comment:

It should be noted also that members of LAXMAC have significant concerns regarding similar inconsistencies regarding the use of "baseline years" for analysis throughout the entirety of the Draft EIR/EIS. However, it is clear that other agencies, not the least of which being the City Council of the City of El Segundo, will comment extensively on that particular deficiency regarding LAWA's choice of methodologies in preparing the document. In the interest of brevity, LAXMAC's comments on such matters will be limited to that stated above.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues.

AL00027-15

Comment:

Draft EIR/EIS Fails To Properly Analyze Risks Posed by Hazardous Materials

The last comprehensive audit of hazardous waste production at LAX was completed in 1988. At that time, LAX was producing 278,000 gallons of hazardous waste annually. Because those findings are thirteen years old, it is impossible to utilize that data as a baseline to estimate waste generation at LAX in the year 2015. With fuel consumption of 169 million gallons per year, and increasing with every flight added to the current arrival and departure list, the fuel waste alone during the past thirteen years has increased exponentially. If one adds to those numbers the amounts of liquid and solid hazardous waste generated by facility maintenance operations and the increased aircraft servicing which would result from the proposed expansion, the issue of managing such materials becomes an enormous problem - a problem simply not addressed adequately by the Draft EIR/EIS.

Response:

The 1988 comprehensive audit is the most current data available for hazardous waste production at LAX. Due to the decrease of maintenance activities from the closure, reduction and relocation of several air carriers' maintenance operations and the increased requirements for reduction of solvent use with volatile organic compounds for degreasing operations, the total hazardous waste volume generated has likely decreased instead of increased. Nonetheless, an increase in volume of hazardous waste would be handled using the standard handling procedures as required by the federal Resource Conservation and Recovery Act (RCRA), the federal Toxic Substances Control Act (TSCA), the California Hazardous Waste Control Law (HWCL), as well as local requirements of the Los Angeles City Fire Department.

3. Comments and Responses

AL00027-16

Comment:

The potential for negative impacts to the environment resulting from a natural disaster, or "spill," remains extant.

Response:

Comment noted. The risk of a potential spill of fuel or other hazardous material was addressed in Section 4.23, Hazardous Materials, and Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Section 4.22, Earth/Geology, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed natural hazards such as an earthquake.

AL00027-17

Comment:

The plans to construct a new central utility plant, which would hold an additional 700 gallons of sulfuric acid beyond that which is currently being stored at LAX, only adds to such concerns.

Response:

The risk of upset associated with the construction of a second Central Utility Plant (CUP) under Alternatives A, B, and C was addressed in Section 4.24.3, Safety, of the Draft EIS/EIR. As was indicated in subsection 4.24.3.6 of the Draft EIS/EIR, the risk of upset characteristics of the new CUP, with respect to the low likelihood of an incident involving a substantial release of sulfuric acid and the associated potential downwind safety hazard, would be comparable to those of the existing CUP; no residences or sensitive uses would be affected. Alternative D does not include construction of a second CUP.

AL00027-18

Comment:

In addition, the Draft EIR/EIS fails to address properly a plan to construct an additional 5 million gallons of on-site fuel storage at the intersection of Sepulveda Boulevard and Imperial Avenue. The construction of such facilities at that location poses additional risks to the resident and business communities of El Segundo over and above the current situation in which 26 million gallons of fuel are stored at LAX. Granted, the concerns of LAXMAC are expressed from the perspective of a "worst case scenario" outlook. Nonetheless, the Commission maintains that it is valid point of view that should have been addressed in the Draft EIR/EIS.

Response:

Alternative A is the only build alternative that proposes a fuel farm west of Sepulveda Boulevard along Imperial Highway. The Draft EIS/EIR addressed the potential risk of upset of a new on-site fuel farm at the aforementioned location in Section 4.24.3, Safety, with supporting technical analyses provided in Technical Report 14c. As was discussed on page 4-1103 in Section 4.24.3 of the Draft EIS/EIR, fuel farm facilities are required to comply with several specific regulations and function accordingly to strict operating procedures in order to minimize the risk of release. The on-site fuel farm under Alternative A would comply with these regulations. Further, structures would meet all seismic safety requirements. Emergency fuel shutoff valves and high-level detectors would be in-place, and inspections would be performed regularly. In addition, the likelihood of a rupture and the fuel to subsequently ignite, resulting in a pool fire, would be low. In the unlikely event of a pool fire at the on-site fuel farm under Alternative A, no residences or other sensitive receptors would be affected. As was concluded in Section 4.24.3 of the Draft EIS/EIR, the risk of upset impact associated with the on-site fuel farm would be less than significant.

AL00027-19**Comment:**

Finally, with respect to the hazardous waste situation at LAX, it should be noted more than thirty different sites at LAX have been contaminated by hazardous materials releases. Eleven of those releases "may have" resulted in groundwater contamination. The Draft EIR/EIS establishes no projections of possible contamination or public exposure because LAWA has never undertaken a study of hazardous materials releases at LAX. In turn, LAXMAC has concluded that prior to expanding LAX, it would be prudent for LAWA to plan fully for issues that may arise from the hazardous materials currently generated and stored at LAX.

Response:

Table S4.23-1 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR provided updated information of known past and present hazardous materials releases at LAX. In addition, a more detailed description of individual releases is included within Technical Report 13 of the Draft EIS/EIR and Technical Report S-8 of the Supplement to the Draft EIS/EIR. The information presented was gathered during years of study at LAX by LAWA and its tenants, as well as from a review of various agency databases. These portions of the Draft EIS/EIR and Supplement to the Draft EIS/EIR discussed the nature and extent of known contamination and/or the status of the assessment if contamination is suspected but not yet confirmed or fully defined. As was indicated on page 4-594 of the Supplement to the Draft EIS/EIR, there are 31 sites at LAX where hazardous materials releases have resulted, or may have resulted, in contamination. However, as was indicated on page 4-594 and in Table S4.23-1, many of the 31 sites identified are closed (i.e., the regulatory agency responsible for overseeing the contamination and remediation, if any, determines that no additional activity or monitoring is required). As was described, contamination and potential public exposure of such is addressed under the supervision of governmental regulatory agencies such as the Los Angeles City Fire Department (LAFD), Department of Toxic Substances Control (DTSC), and/or the Los Angeles Regional Water Quality Control Board (RWQCB).

LAWA and the LAX tenants currently have programs in place to address issues that may arise from the hazardous materials currently generated and stored at LAX. Tenants of LAX that use and store hazardous materials above certain quantities must comply with the Emergency Planning and Community Right-to-Know Act of 1986 as well as state legislation, which requires reporting and hazardous materials plans for submittal to federal, state and local emergency planning and response agencies. In addition, LAWA developed the UTAHS Program to both prevent releases of hazardous materials by ensuring that all LAWA and tenant facilities are in compliance with all applicable environmental regulations and to identify and correct past releases which may have occurred.

As was indicated in Section 4.23, Hazardous Materials, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the overall increase over baseline conditions in activity levels at LAX that would occur under any alternative would increase the use of hazardous materials within the Master Plan boundaries. Such increases would be greater under Alternatives A, B, and C than under the No Action/No Project Alternative and Alternative D due to comparatively higher activity levels. Continued compliance with the many federal, state, and local requirements pertaining to the handling of hazardous materials/wastes would maintain acceptable levels of health and safety. These regulatory requirements are specifically designed to reduce the likelihood of unauthorized and uncontrolled releases of hazardous materials to the environments and minimize the effects in the event of a release, protect workers that may be exposed to hazardous materials/wastes, as well as provide a level of safety for the general public.

AL00027-20**Comment:**

Draft EIR/EIS Utilizes Flawed Air Quality Modeling Data and Emissions Profiles

The Draft EIR/EIS air quality modeling data and emissions profiles are flawed. The flaws are due to assumptions that underestimate the levels of pollutants generated through construction and day-to-day transportation. An examination of the data shows that liberal assumptions were made when a slightly more conservative approach would have provided a more realistic picture of the associated emissions.

3. Comments and Responses

Response:

Please see Response to Comment AL00034-42 regarding assumptions used in the air quality analysis.

AL00027-21

Comment:

For example, the construction related emissions excluded solvent emissions from asphalt cut-back. The models assumed a new solvent-free asphalt cut-back would be utilized during all construction phases of the proposed expansion. However, neither cost nor availability analyses were performed to determine if this type of cut-back would be available in the quantities that would be required upon implementation of the plan. Similarly, there was no discussion of the cost-efficiencies having to purchase what might prove to be scarce materials. A more realistic approach would have assumed that the standard asphalt cut-back, representing current industry standards, would be utilized in the proposed construction. Accordingly, LAXMAC requests that such supporting data be amended to include the emissions that would result from that more reasonable assumption.

Response:

The Supplement to the Draft EIS/EIR assumed the use of hot-mix asphalt, which does not contain solvent diluents. Because it does not contain solvent diluents, and its organic components have high molecular weights and low vapor pressures, hot-mix asphalt has negligible VOC emissions. Hot-mix asphalt is readily available. (Reference: Asphalt Paving, Prepared by Eastern Research Group for the Emission Inventory Improvement Program and Charles Mann of U.S. Environmental Protection Agency's Air Pollution Prevention and Control Division, January 2001.)

AL00027-22

Comment:

Another example of flawed modeling data can be seen in the transportation model assumptions. The overall average speed for vehicles assumed by the transportation models is 30 MPH. LAXMAC has concluded that such a number is unreasonably high, especially when current data indicates that average traveling speeds on the I-405 are expected to drop to 12-18 MPH by the year 2015. Additionally, LAXMAC feels that the tenuous viability of the "ring road" also serves to undermine such average speed estimates and that congestion at the existing east terminal is expected to continue as the volume of passengers increases. The overall effect of such trends, of course, is the reduction of average speeds, and lower average speeds would have the effect of increasing the amount of emissions generated by the vehicles on the roads supporting LAX. Accordingly, LAXMAC has concluded that the modeling data should be amended to include this likely reduction in average vehicle travel speeds.

Response:

For the CO hotspot dispersion modeling analysis, speeds for each intersection and freeway segment modeled were determined on an intersection-by-intersection basis and on a peak AM and peak PM traffic bases. For the regional emission inventory calculations, vehicle-miles-traveled (VMT) and vehicle-hours-traveled (VHT) were presented in categories by speed (0 to 10 mph, 10 to 20 mph, and so on). Emissions were calculated for the average speed in each speed group (5 mph, 15 mph, etc). An average speed of 30 mph was not used. VMT and VHT data can be found in Technical Report S-4 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-ST-2 for additional information concerning surface transportation analysis and impacts. Please see Appendix G of the Draft EIS/EIR and Appendix S-E of the Supplement to the Draft EIS/EIR which address the CO hotspot analysis methodology.

AL00027-23

Comment:

In addition, reliable air toxics studies have not been performed in and around LAX. Without such accurate real time data, all of the models are forced to make general assumptions regarding the existing

condition of the air quality. The perceived increase in air pollutants and their potential impact on the environment is based completely upon assumption and computer modeling. There is no corresponding feedback from physical studies conducted in the area which would verify the models as being realistic. In turn, LAXMAC requests that such modeling data be reconfigured to include validation from air toxics studies conducted in and around LAX.

Until the computer generated air pollution models are given realistic assumptions and validated by physical data gathered in the field, the Commission places no confidence in the results of the models used in the Draft EIR/EIS.

Response:

Approved methodologies and the most recently available data and models were used for the air quality impact analyses as was detailed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Topical Response TR-AQ-2 concerning model calibration.

AL00027-24

Comment:

Draft EIR/EIS Fails to Properly Analyze Noise Impacts

During the public hearings conducted by LAXMAC in March and April 2001, several residents of El Segundo complained that the increase of single noise occurrences (usually in the early morning hours) resulting from specific aircraft operations were more detrimental to the quality of life in surrounding communities than the overall increase of noise resulting from the increased number of aircraft operations occurring at LAX. In light of those concerns, LAXMAC noted that the Draft EIR/EIS analyzed only average noise levels and concluded that the construction of Alternative C " would reduce the total number of people exposed to aircraft noise above 65 CNEL compared to current conditions. . . "

Response:

Please see Topical Response TR-N-2 regarding single event noise and Topical Response TR-LU-1 regarding impacts on quality of life. The commentor is incorrect in identifying that only CNEL levels were identified in the Draft EIS/EIR. Appendix D, Aircraft Noise Technical Report, Section 5 - Location Impact Analysis, of the Draft EIS/EIR identifies Maximum Noise Level (Lmax), Day Night Level (DNL) and Time Above (TA) noise metrics for the No Action/No Project Alternative and Alternatives A, B, and C. The aircraft noise analysis estimated that in 2015 three of the Master Plan alternatives, Alternatives A, C, and D, would reduce the total number of people exposed to aircraft noise above 65 CNEL compared to current conditions as represented by the environmental baseline year. Although aircraft flight operations would increase, the reduction in noise exposure is the result of a federally mandated phase out of older, noisier Stage 2 jets. In comparison to the Year 2000 conditions, Alternatives A, C, and D would reduce the total population exposed to noise above 65 CNEL by between approximately 5,900 and 7,300 people. Alternatives A and C are roughly equivalent to the No Action/No Project Alternative (Alternative A exposes 100 less people to 65 CNEL and Alternative C exposes 300 less people). Whereas, Alternative D exposes 1,300 less people to 65 CNEL. Single-event noise levels and the related land use information with its impact on El Segundo for all alternatives, including Alternative D, were fully described in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR as well as the related appendices, S-C1, Supplemental Aircraft Noise Technical Report, and S-1, Supplemental Land Use Technical Report.

AL00027-25

Comment:

In addition to the concerns stated earlier with regard to the use of inappropriate baseline years, LAXMAC has determined simply that an increase in aircraft operations resulting from any expansion of the airport will lead to an increase in single noise events that significantly exceed the 65 CNEL threshold. In an effort to obtain an accurate account of true noise impacts that adversely affect the residents of El Segundo, LAXMAC requests that the Draft EIR/EIS be amended to reflect all noise impacts resulting from increased airport operations, and not an analysis of average noise levels occurring throughout the day, LAXMAC has concluded that, in fact, current conditions indicate an increased number of people exposed to periodic noise levels exceeding 65 CNEL.

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Response:

Appendix D, Aircraft Noise Technical Report, Section - 5 Location Impact Analysis, of the Draft EIS/EIR identifies Maximum Noise Level (Lmax), Day Night Level (DNL) and Time Above (TA) noise metrics for all alternatives. Please see Appendix S-C, Supplemental Aircraft Noise Technical Report, and Appendix S-1, Supplemental Land Use Technical Report of the Supplement to the Draft EIS/EIR regarding analysis of single-event noise impacts. Additionally, please see Topical Response(s) TR-N-2 and TR-N-6.

AL00027-26

Comment:

Perhaps more troubling to the members of LAXMAC was LAWA's failure to address appropriately noise issues specific to children living in communities adjacent to LAX. Beginning in 1980, studies of children who attend schools in the vicinity of LAX demonstrated several disturbing facts. For example, UC Irvine researchers found that children attending schools in the vicinity of LAX experienced higher-than-normal levels of hypertension and loss of motivation. That study showed that children attending schools impacted adversely by airplane noise failed to complete exercises appropriate to their ages and cognitive skill levels more often than similar children who attended schools in quieter neighborhoods. The members of LAXMAC feel that such studies demonstrate that while short term impacts of aircraft noise may be difficult to measure and address, it is clear that there are negative impacts to long-term exposure to aircraft noise. Accordingly, LAXMAC requests that LAWA amend the Draft EIR/EIS and include appropriate analysis and mitigation measures aimed at addressing the long-term psychological and physiological impacts on children attending schools in communities adjacent to LAX.

Response:

Please see Responses to Comments AL00017-52 regarding the health effects of aircraft noise, AL00038-11 regarding the impact of high noise levels on children, and AL00017-246 regarding the fact that existing and future noise levels at and around LAX are projected to be well below the OSHA and CalOSHA standards that serve to protect against hearing loss. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

AL00027-27

Comment:

Additional Deficiencies Noted In Draft EIR/EIS

The members of LAXMAC were troubled by the fact that the Draft EIR/EIS failed to discuss a number of viable issues surrounding the operation of LAX. Those omissions range from a failure to examine current technologies improving operations at the airport to the failure to discuss a regional approach in meeting the air traffic demands of the Southern California region to the failure to adequately address the handling of air cargo entering the region.

Response:

Comment noted. Chapter 1 of the Draft EIS/EIR discussed the regional context of the proposed LAX Master Plan, including growth in regional aviation demand, the roles of, and plans for, other airports in the region, and various means of meeting the demand for transportation in the region. Various technologies were considered in that discussion. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. Please see also Topical Responses TR-RC-1 regarding the role of the LAX Master Plan in meeting regional aviation demand, and TR-MP-1 regarding air cargo activity and demand.

AL00027-28**Comment:**

With respect to the first issue, LAXMAC has determined that the Final EIR/EIS developed by LAWA must include a viable consideration of remote baggage handling and ticketing for passengers utilizing LAX. As discussed previously, the Draft EIR/EIS is egregiously deficient in its discussion of the current traffic issues in the areas surrounding LAX, let alone analysis of future traffic impacts resulting from the proposed expansion. It is the Commission's point of view that any objective analysis of traffic issues would lead logically to the implementation of an offsite remote ticketing and baggage handling system for travelers utilizing LAX, and an effective method of moving people from the remote site to LAX, such as an "automated people moving" system.

LAXMAC recommends specifically that LAWA examine the potential of establishing remote passenger check-in, ticketing and baggage handling facilities next to the 405 Freeway, Continental City and Manchester Square with ample parking to accommodate up to 15,000 automobiles, rental car facilities and hotel shuttles. That concept is in keeping with the commitment of the Federal Aviation Administration (FAA) to promote such facilities, as demonstrated by the significant grant money being made available by that agency for remote facilities serving airport passengers. Currently, the Commission is aware of a \$2 million grant to create the software needed to manage remote passenger handling.

Response:

The Draft EIS/EIR analyzed the environmental impacts associated with the proposed alternatives. While the environmental baseline, No Action/No Project Alternative, and Adjusted Environmental Baseline alternatives are addressed, the emphasis of the Draft EIS/EIR was on determining the impacts of the project alternative compared to these other scenarios. The concept the commentor refers to is very similar to a new alternative that was added subsequent to the publication of the Draft EIS/EIR to add to the range of alternatives in the current Master Plan process. The Enhanced Safety and Security Plan Alternative, Alternative D, is a new concept that was fully analyzed in the Supplement to the Draft EIS/EIR. Also, an expanded FlyAway system is a part of each alternative, but is a notable component of Alternative D.

AL00027-29**Comment:**

LAXMAC also recommends strongly that the Draft EIR/EIS be amended to include discussion of a regional airport approach in Southern California. This issue should be very familiar to LAWA, since it has been a cornerstone of the City of El Segundo's opposition to the current LAX Master Plan approach for airport expansion. As such, the Commission will not dwell on issues that have been and will be articulated more completely by the El Segundo City Council. Nonetheless, the Commission does request formally that the final EIR/EIS document include a credible analysis regarding the utilization of existing airport facilities in El Toro, Palmdale, Ontario, Long Beach, Point Mugu, Riverside, Orange County, Palm Springs and San Bernardino. Frankly, the Commission is bewildered by the seeming intransigence of LAWA in forcing the burgeoning populations living north, south and east of LAX to utilize the I-405, one of the most congested traffic arteries in the world, to use an already crowded airport located at the extreme western edge of the region. That attitude is inexplicable when one considers the availability of functioning airport facilities throughout the region that could accommodate large portions of the anticipated demand for air travel.

Response:

Please see Topical Response TR-RC-1 that discusses the roles and responsibilities of LAWA, the City of Los Angeles, SCAG, and SCRAA in meeting regional demand. The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale, and Van Nuys Airports. The decision to develop any airport is the responsibility of local government. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015)

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airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan.

AL00027-30

Comment:

With respect to those concerns, LAXMAC recommends specifically that Draft EIR/EIS be amended to consider the beneficial impacts of shifting cargo operations to Ontario International Airport. That concept would serve to mitigate many of the concerns stated by LAXMAC and it would protect LAWA's share of revenues derived from cargo operations utilizing their facilities. LAXMAC has concluded that warehousing and transportation facilities required for increased cargo operations at ONT are currently in place, and that the Draft EIR/EIS will remain significantly deficient until that option is analyzed adequately.

Response:

LAX will continue to serve as the region's predominant airport for international passenger and cargo activity, due to the specialized facilities that have been developed over time to serve the international demand. There is a perception among many observers and commentor's that air cargo and passenger aircraft can be easily "split" between or among airports in a multi-airport market. Freight forwarders rely extensively on the passenger airlines, as almost half of all air cargo is carried in the bellies of passenger aircraft. This cargo cannot simply be moved to another airport, especially where the destination is a foreign country. Also please refer to Topical Response TR-RC-5 regarding shifting cargo service operations to regional airports.

AL00027-31

Comment:

Additionally, LAXMAC recommends that the Draft EIR/EIS be amended to examine the beneficial impacts of instituting an increase in "peak hour" landing fees in an effort to provide incentives to airlines to utilize Ontario Airport and other regional facilities, especially for cargo operations. That option has been espoused by the Secretary of Transportation and is supported fully by LAXMAC.

Response:

The landing fees and terminal rentals at a given airport typically represent between 4 and 6 percent of an airline's cost to operate at that airport. Differential pricing between airports in a region would be a minor factor among the many that an airline would consider when deciding whether to provide service to a given airport. On a number of occasions since deregulation, airport operators have sought to implement more economically-based pricing models with mixed success including:

Massport - In 1988, the Massachusetts Port Authority ("Massport") proposed to replace traditional weight-based landing fees (i.e., average cost pricing) at Logan International Airport with fees assessed primarily on a per landing basis. Massport argued peak period pricing theory in defense of its actions. The Department of Transportation rejected the plan based on a faulty cost-allocation methodology. However, the Department of Transportation noted that peak period pricing was theoretically possible if (1) there was an actual shortage of runway capacity, and (2) if the opportunity costs associated with that lack of capacity were rationally allocated. Massport dropped its plan but remains committed to seeking a peak-hour pricing model.

PANYNJ - In 2000, the Port Authority of NY & NJ, in collaboration with the FAA, was successful in promulgating a "congestion pricing" recommendation through the FAA's Notice to Proposed Rule Making ("NPRM"). Given the events of September 11th and the current downturn in aviation activity, consideration of the NPRM has been largely shelved. However, the PANYNJ maintains that in order to better "manage" demand at LaGuardia Airport in particular, new pricing and administrative mechanisms are required to solve the congestion issue.

In the FAA's current Rule on Rates and Charges, under the principle of "Prohibition of Unjust Discrimination" it states:

"A properly structured peak pricing system that allocates limited resources using price during periods of congestion will not be considered to be unjustly discriminatory. An airport proprietor may, consistent with the policies expressed in this policy statement, establish fees that enhance the efficient utilization of the airport."

This rule would not seem to permit peak pricing in order to force aircraft operators to use another airport. In fact, the Department of Transportation discussed its sensitivity to the possibility of abuse of peak hour pricing:

"The Department does not intend the policy statement to function as a blanket authorization for peak pricing. In reviewing a peak pricing system, the Department would scrutinize it carefully to determine first whether the airport in fact suffers from congestion, and whether the peak-pricing system is an appropriate response."

Please also see Topical Response TR-RC-2 regarding airport pricing models.

AL00027-32

Comment:

Additionally, LAXMAC requests that LAWA discuss realistically the longstanding bromide that airports have no control over the numbers of planes that seek to land in their facilities. While it is true that deregulation has resulted in limited control over how much access commercial carriers have to airport facilities, there is limited credence to LAWA's view that it cannot stop them from coming. It is certain that LAWA has the power to create economic incentives for airlines to utilize its other facilities in the region - namely Ontario and Palmdale.

Response:

Palmdale's remote location and limited local passenger market have made it difficult for airlines to maintain air service at the airport despite past subsidies by LAWA. Palmdale's only air service in the past consisted of commuter operations into LAX. About 19,000 passengers used the airport in 1997. In early 1998, the sole airline providing service at Palmdale ceased operations. Currently, Palmdale has no scheduled air service. Please see Topical Response TR-RC-5 that discusses multi-airport markets, airline economics and passenger choice. Please also see Topical Response TR-RC-2 regarding airport pricing models.

AL00027-33

Comment:

Draft EIR/EIS Seeks To Promote Plan And Not Analyze Alternatives

Finally, the members of LAXMAC have concluded that the Draft EIR/EIS is a document which seeks to promote the ambitions of LAWA with respect to the expansion of LAX, as opposed to being a true study of the alternatives available for handling the Southern California region's air traffic needs. As indicated previously, the Draft EIR/EIS contains little or no study of the regional airport approach promulgated by more than 100 cities and local governmental agencies, increased peak hour landing fees or remote passenger check-in and ticketing centers located away from the airport. As such, LAXMAC has determined that the study is, at best, incomplete, and, at worst, not germane to LAWA's ambitions regarding LAX. The members of LAXMAC in this comment letter have requested several additional areas of study that must be addressed in the Final EIR/EIS issued by LAWA. However, it appears to this Commission, that such issues shall never see the light of day. LAXMAC believes strongly that the Draft EIR/EIS was never intended to be a document that will guide the future development of LAX.

Response:

The Draft EIS/EIR evaluated several alternatives for the proposed LAX Master Plan, ranging from the No Action/No Project Alternative to the three build alternatives - Alternatives A, B, and C, that would increase the future (2015) passenger activity to approximately 89 - 98 million annual passengers.

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Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. Alternative D provides for a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see also Topical Response TR-RC-1 regarding the role of the LAX Master Plan in meeting regional aviation demand. Regarding remote check-in, LAWA is coordinating with federal security representatives to evaluate how remote check-in could occur as part of the Fly Away program, while providing for necessary and appropriate security precautions for LAX.

AL00027-34

Comment:

Instead, the Commission believes that LAWA will ultimately release an equally flawed Final EIR/EIS pertaining to the expansion of LAX, and that it will be litigated, criticized by its many opponents and, in the end, never implemented. And, while that issue is being determined during a lengthy legal and political process, LAX will continue to expand incrementally under the guise of "modernization." It should be clear, however, that LAXMAC will be among many interested observers working diligently to ensure that LAX does not continue to expand without complying with California Environmental Quality Act (CEQA) and National Environmental Protection Act (NEPA) requirements.

Response:

Comment noted. As indicated previously, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The environmental impacts specific to Alternative D are fully addressed in the Supplement to the Draft EIS/EIR.

AL00028

Guidi, Lawrence

City of Hawthorne

9/29/2001

AL00028-1

Comment:

The City of Hawthorne has reviewed the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) and concurs with the comments that are being submitted under separate cover by the South Bay Cities Council (SBCCOG) of Governments. Accordingly, the City of Hawthorne has adopted the attached Resolution No. 6677 that formally adopts the comments prepared by the SBCCOG as its own.

The City of Hawthorne believes that Los Angeles World Airports should find the Draft EIS/EIR document inadequate for certification and should as a minimum recirculate the document after addressing the deficiencies identified in Resolution No. 6677 and the extensive technical comments that are appended thereto as Exhibit A. We look forward to your response to these comments and concerns.

Response:

The "Exhibit A" referenced in the comment was not attached to this comment letter. However, please see responses to comment letter AL00025, also from the City of Hawthorne, which contains a copy of the South Bay Cities Council of Governments comments on the Draft EIS/EIR dated July 18, 2001.

AL00028-2

Comment:

RESOLUTION NO. 6677

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
HAWTHORNE, CALIFORNIA, FINDING THAT THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL
IMPACT REPORT FOR THE PROPOSED LAX MASTER PLAN

IS INADEQUATE AND TRANSMITTING THE OFFICIAL CITY RESPONSE.

WHEREAS, the City of Los Angeles Department of Airports has developed a draft Master Plan for Los Angeles International Airport (LAX) which incorporates capacity enhancements to enable the expansion of passenger activity from a current 60 million passengers per year up to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year through the year 2015; and,

WHEREAS, LAX airport is in close proximity to the City of Hawthorne and the impacts of its operation are of critical interest to the citizens of Hawthorne; and,

WHEREAS, the Los Angeles World Airports (LAWA) and the FAA have prepared a joint Draft EIS/EIR to address the potential environmental impacts caused by the proposed LAX expansion; and,

WHEREAS, on January 18, 2001, the Draft EIS/EIR was released for public review and comment; and,

WHEREAS, the Draft EIS/EIR analyzes four project alternatives, 1) No Action /No Project; 2) Alternative A, Additional runway to the north airfield, 3) Alternative B, an additional runway to the south airfield, and 4) Alternative C, no additional runways but reconfiguration of existing runways including either lengthening, widening, and relocating; and,

WHEREAS, a team of consultants hired by the South Bay Cities Council of Governments has conducted an evaluation and prepared extensive comments on the adequacy of the Draft EIS/EIR as an informational document in addressing potential impacts to the City of Hawthorne and other cities of the South Bay; and,

WHEREAS, the City of Hawthorne considered the Draft EIS/EIR at a public meeting on August 27, 2001.

NOW, THEREFORE, the City Council of the City of Hawthorne, California, DOES HEREBY RESOLVE as follows:

SECTION1. Pursuant to the foregoing recitations, the following findings are hereby made:

1. The LAX Draft EIS/EIR inadequately and/or inaccurately addresses the environmental impacts potentially affecting the City of Hawthorne. The LAX Draft EIS/EIR is inadequate and/or inaccurate as an informational document based upon but not limited to the following listed issues:

a. Improper Baseline Designation: The draft EIS/EIR does not properly designate the baseline for analysis in that the draft base year, among other deficiencies, does not reflect the physical conditions on the project area at the time of the publication of its Notice of Preparation.

b. Failure to fully analyze the project's off-airport surface traffic impacts: Among numerous other inadequacies the draft EIS/EIR gives little consideration to surface traffic impacts on the City of Hawthorne and other South Bay Communities other than impacts on streets and intersections directly proximate to the airport.

c. Noise Impacts are understated: The draft EIS/EIR does not designate the proper baseline for its noise analysis, fails to disclose the project's overflight noise impacts, and it fails to analyze the noise effects of additional new routes over noise-sensitive areas within the City of Hawthorne and the other South Bay communities.

d. Air Quality Analysis is inadequate: The draft EIS/EIR fails to appropriately estimate the baseline for air quality analysis, fails to appropriately estimate the future background pollutant concentrations, and fails to include or adequately analyze additional sources of air pollution such as reverse thrust emissions from aircraft, construction equipment, offroad equipment and ground support equipment.

e. Mitigation Measures are not adequately specified: The draft EIS/EIR does not adequately specify mitigation measures or methods to enforce them in that it fails to disclose the full list of mitigation measures until the final EIS/EIR and it fails to include a draft mitigation monitoring program.

3. Comments and Responses

Response:

Comment noted. Please see responses to comment letter AL00025.

AL00028-3

Comment:

f. Regional Context is not adequately addressed: The Draft EIS/EIR presumes that a vast majority of the region's growth in air passenger and air cargo demand will be directed to LAX. A number of commercially viable airports in the Southern California area currently exist and are underutilized relative to their capacity and a fully regional solution to this air passenger and air cargo capacity has not been adequately addressed in the Draft EIS/EIR.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00028-4

Comment:

2. Additional comments, which reflect the above listed issues and other concerns, in greater detail, are attached hereto as "Exhibit A" of this Resolution.

SECTION 2. Pursuant to the foregoing recitation and findings, the City Council of the City of Hawthorne, California, hereby:

1. Determines that the Draft EIS/EIR is inadequate and/or inaccurate and requests the LAX Draft EIS/EIR include a complete and accurate analysis of potential environmental impacts to the City of Hawthorne from the airport expansion. This would constitute significant new information that would require recirculation of the Draft EIS/EIR, Master Plan, Technical Reports and Appendices.

2. Establishes that this Resolution, including attached Exhibit "A" (Comments of the South Bay Cities Council of Governments), constitutes the City of Hawthorne's formal position on the proposed expansion of LAX and its comments on the Draft EIS/EIR prepared by LAWA and the FAA.

3. Directs and authorizes Staff to transmit the position and comments of the City of Hawthorne on the Draft EIS/EIR to the Los Angeles World Airports and Federal Aviation Administration.

Response:

Comment noted. Please see responses to comment letter AL00025.

AL00029

Herbertson, Charles City of Hawthorne

9/20/2001

AL00029-1

Comment:

RESOLUTION NO. 6677

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HAWTHORNE, CALIFORNIA, FINDING THAT THE DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED LAX MASTER PLAN IS INADEQUATE AND TRANSMITTING THE OFFICIAL CITY RESPONSE.

WHEREAS, the City of Los Angeles Department of Airports has developed a draft Master Plan for Los Angeles International Airport (LAX) which incorporates capacity enhancements to enable the expansion of passenger activity from a current 60 million passengers per year up to an expected 98 million passengers per year and its cargo activity from its current 1.7 million tons per year to an expected 4.2 million tons per year through the year 2015; and,

WHEREAS, LAX airport is in close proximity to the City of Hawthorne and the impacts of its operation are of critical interest to the citizens of Hawthorne; and,

WHEREAS, the Los Angeles World Airports (LAWA) and the FAA have prepared a joint Draft EIS/EIR to address the potential environmental impacts caused by the proposed LAX expansion; and,

WHEREAS, on January 18, 2001, the Draft EIS/EIR was released for public review and comment; and,

WHEREAS, the Draft EIS/EIR analyzes four project alternatives, 1) No Action /No Project; 2) Alternative A, Additional runway to the north airfield, 3) Alternative B, an additional runway to the south airfield, and 4) Alternative C, no additional runways but reconfiguration of existing runways including either lengthening, widening, and relocating; and,

WHEREAS, a team of consultants hired by the South Bay Cities Council of Governments has conducted an evaluation and prepared extensive comments on the adequacy of the Draft EIS/EIR as an informational document in addressing potential impacts to the City of Hawthorne and other cities of the South Bay; and,

WHEREAS, the City of Hawthorne considered the Draft EIS/EIR at a public meeting on August 27, 2001.

NOW, THEREFORE, the City Council of the City of Hawthorne, California, DOES HEREBY RESOLVE as follows:

SECTION1. Pursuant to the foregoing recitations, the following findings are hereby made:

Response:

Comment noted.

AL00029-2

Comment:

1. The LAX Draft EIS/EIR inadequately and/or inaccurately addresses the environmental impacts potentially affecting the City of Hawthorne. The LAX Draft EIS/EIR is inadequate and/or inaccurate as an informational document based upon but not limited to the following listed issues:

a. Improper Baseline Designation: The draft EIS/EIR does not properly designate the baseline for analysis in that the draft base year, among other deficiencies, does not reflect the physical conditions on the project area at the time of the publication of its Notice of Preparation.

b. Failure to fully analyze the project's off-airport surface traffic impacts: Among numerous other inadequacies the draft EIS/EIR gives little consideration to surface traffic impacts on the City of Hawthorne and other South Bay Communities other than impacts on streets and intersections directly proximate to the airport.

c. Noise Impacts are understated: The draft EIS/EIR does not designate the proper baseline for its noise analysis, fails to disclose the project's overflight noise impacts, and it fails to analyze the noise

3. Comments and Responses

effects of additional new routes over noise-sensitive areas within the City of Hawthorne and the other South Bay communities.

d. Air Quality Analysis is inadequate: The draft EIS/EIR fails to appropriately estimate the baseline for air quality analysis, fails to appropriately estimate the future background pollutant concentrations, and fails to include or adequately analyze additional sources of air pollution such as reverse thrust emissions from aircraft, construction equipment, offroad equipment and ground support equipment.

e. Mitigation Measures are not adequately specified: The draft EIS/EIR does not adequately specify mitigation measures or methods to enforce them in that it fails to disclose the full list of mitigation measures until the final EIS/EIR and it fails to include a draft mitigation monitoring program.

Response:

Comment noted. Please see responses to comment letter AL00025.

AL00029-3

Comment:

f. Regional Context is not adequately addressed: The Draft EIS/EIR presumes that a vast majority of the region's growth in air passenger and air cargo demand will be directed to LAX. A number of commercially viable airports in the Southern California area currently exist and are underutilized relative to their capacity and a fully regional solution to this air passenger and air cargo capacity has not been adequately addressed in the Draft EIS/EIR.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00029-4

Comment:

2. Additional comments, which reflect the above listed issues and other concerns, in greater detail, are attached hereto as "Exhibit A" of this Resolution.

SECTION 2. Pursuant to the foregoing recitation and findings, the City Council of the City of Hawthorne, California, hereby:

1. Determines that the Draft EIS/EIR is inadequate and/or inaccurate and requests the LAX Draft EIS/EIR include a complete and accurate analysis of potential environmental impacts to the City of Hawthorne from the airport expansion. This would constitute significant new information that would require recirculation of the Draft EIS/EIR, Master Plan, Technical Reports and Appendices.

2. Establishes that this Resolution, including attached Exhibit "A" (Comments of the South Bay Cities Council of Governments), constitutes the City of Hawthorne's formal position on the proposed expansion of LAX and its comments on the Draft EIS/EIR prepared by LAWA and the FAA.

3. Directs and authorizes Staff to transmit the position and comments of the City of Hawthorne on the Draft EIS/EIR to the Los Angeles World Airports and Federal Aviation Administration.

Response:

Comment noted. Please see responses to comment letter AL00025.

AL00029-5

The attachment included as part of this comment letter is identical to the attachment to comment letter AL00025; please refer to Responses to Comments AL00025-3 through AL00025-67.

AL00030 Arguello, Daniel City of Alhambra 9/20/2001

AL00030-1

Comment:

The City of Alhambra strongly supports regional airport development and urges the City of Los Angeles to explore this alternative approach.

Response:

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00030-2

Comment:

Current expansion scenarios under consideration in the LAX Master Plan would lead to greater strain on LAX's already overburdened airport infrastructure. This facility produces more noise and NOX emissions than any other in Southern California. It is plagued by severe operational inefficiencies and contributes to the severe traffic congestion problems of local communities. The City of Alhambra, which is located near the 10 and 605/710 freeways, is especially concerned about increased air and vehicular traffic, modifications to current flight patterns and the effects of additional air and noise pollutants if this plan is put into effect.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; air quality in Section 4.6, Air Quality; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. In addition, please see Topical Response TR-N-3 regarding aircraft flight procedures and Topical Response TR-SAF-1 regarding aviation safety.

3. Comments and Responses

AL00030-3

Comment:

There is no doubt that action must be taken to accommodate increased demand for air travel. Over the next two decades, it is projected that Southern California's population will grow by 40%-with even greater increases in employment. But, in evaluating patterns of projected growth, research indicates that the highest concentration of change will occur in the outlying regions of Southern California-not even close to LAX.

Response:

Comment noted.

AL00030-4

Comment:

These projections justify the need for regional airport expansion where each county is delegated the responsibility to provide for the air travel needs of its own residents-which is currently estimated at a fraction of the cost of expanding infrastructure at LAX.

Response:

Please see Response to Comment AL00030-1.

AL00030-5

Comment:

The City of Alhambra hopes you will look further into this alternative before committing to one of the approaches noted in the LAX Master Plan.

Response:

Please see Response to Comment AL00030-1 above.

AL00031	Bowler, John	City of Hermosa Beach	9/20/2001
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AL00031-1

Comment:

The City of Hermosa Beach, by unanimous consent of the City Council of Hermosa Beach, concurs with the comments of the South Bay Cities Council of Governments as set forth in the attached letter from Barbara Lichman, Consultant. The City of Hermosa Beach concurs with the entirety of the comments and with all the issues raised, which fall into the following general categories:

Response:

The attachment referenced in the comment was not attached to this comment letter. However, please see responses to comment letter AR00003 which contains comments on the Draft EIS/EIR by the South Bay Cities Council of Governments dated September 20, 2001.

AL00031-2

Comment:

- The baseline data used in the Draft EIS/EIR, against which the various environmental impacts of the proposed Master Plan Improvements are compared, is not properly designated.

Response:

Comment noted. Inasmuch as the introduction to the comment letter references the comments of Barbara Lichman, Consultant, and those comments may pertain to the issue above, please see responses to comment letter AR00003. Please see also Topical Response TR-GEN-1 regarding the environmental baseline.

AL00031-3

Comment:

- The noise impacts of the Project are inadequately and incompletely addressed and noise impacts are not fully disclosed.

Response:

Comment noted. Inasmuch as the introduction to the comment letter references the comments of Barbara Lichman, Consultant, and those comments may pertain to the issue above, please see responses to comment letter AR00003. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, with supporting technical data and analyses provided in Appendix D and Appendix S-C.

AL00031-4

Comment:

- The potential air quality impacts of the Project are inadequately and incompletely addressed and not fully disclosed.

Response:

Comment noted. Inasmuch as the introduction to the comment letter references the comments of Barbara Lichman, Consultant, and those comments may pertain to the issue above, please see responses to comment letter AR00003.

AL00031-5

Comment:

- The Project surface traffic impacts are not fully analyzed, and lack adequate consideration of the impacts on South Bay communities.

Response:

Comment noted. Inasmuch as the introduction to the comment letter references the comments of Barbara Lichman, Consultant, and those comments may pertain to the issue above, please see responses to comment letter AR00003. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Technical Reports 2, 3, and S-2.

AL00031-6

Comment:

- The Draft EIS/EIR does not explore all reasonable alternatives, and thus paves the way for its ultimate conclusion that the expansion of the airport is the sole way to meet future demand.

Response:

Comment noted. Inasmuch as the introduction to the comment letter references the comments of Barbara Lichman, Consultant, and those comments may pertain to the issue above, please see responses to comment letter AR00003. In addition, please note that the No Action/No Project Alternative and Alternative D are alternatives to expansion.

3. Comments and Responses

AL00031-7

Comment:

- The Draft EIS/EIR fails to adequately specify mitigation measures or methods to enforce them.

Response:

Comment noted. Inasmuch as the introduction to the comment letter references the comments of Barbara Lichman, Consultant, and those comments may pertain to the issue above, please see responses to comment letter AR00003. Please see the Supplement to the Draft EIS/EIR for updated mitigation measures.

AL00031-8

Comment:

The City of Hermosa Beach concurs with the entirety of the comments of South Bay Council of Government, which are by no means limited to these general categories.

Response:

Comment noted. Please see responses to comment letter AR00003 regarding the comments on the Draft EIS/EIR submitted by the South Bay Cities Council of Governments.

AL00032	de la Loza, James	Metropolitan Transportation Authority	9/24/2001
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AL00032-1

Comment:

This letter conveys observations and comments concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project. These issues include: 1) Metro Rail Green Line extension, 2) LAX City Bus Center, 3) Intermodal Transportation Center, 4) Roadway Construction Impacts and Mitigation, and 5) Transportation Mitigation Strategies.

Response:

Please see Responses to Comments below.

AL00032-2

Comment:

1. Metro Rail Green Line Extension

The adopted MTA "Long Range Transportation Plan" (LRTP) does not include any funding for the proposed extension of the Metro Rail Green Line into LAX. In fact, the LRTP assumes that the Metro Rail Green Line extension would be built with non-MTA funding. Therefore, it will be important that the Metro Rail Green Line extension programming, budgeting and implementation phasing be addressed as part of the LAX Master Plan expansion alternatives.

Sections 4.3.1 and 4.3.2 (On-Airport Surface Transportation and Off-Airport Surface Transportation, respectively) should contain detailed descriptions of the Green Line extension route alignment and how it interfaces with other current and planned transportation modes; and should contain detailed data on the project programming and budgeting scenarios including a construction implementation schedule in the alternatives analysis. MTA would like to see a discussion on the role of the Passenger Facility Charge (PFC) for possible funding of the Green Line.

Response:

Please see Response to Comment AL00008-6 regarding funding. The Draft EIS/EIR and Supplement to the Draft EIS/EIR are "program level" environmental documents intended to analyze the impacts of the Master Plan. It is acknowledged that further documentation may be required to address certain environmental issues in a more specific manner, as necessary and appropriate. Hence, detailed information on the exact alignment and interface for the Green Line extension may be prepared at a later date. Note that Alternative D does not include an extension of the Green Line.

AL00032-3

Comment:

Employees of LAX, LAX-related companies, and adjacent commercial establishments may continue to constitute a majority of passengers on the Green Line extension either with or without the LAX expansion. (This is currently the case and is supported by the current passenger profile of passengers who embark and disembark at the Aviation station).

The destinations of these employees are currently located or are proposed to be relocated to the north and east of LAX property. While we agree with the DEIS / DEIR the extension of the Green Line to the new west terminal will likely increase Green Line patronage and result in an increased share of airport passengers, we still believe that the majority of users will be oriented to the east. Therefore the DEIS / DEIR needs to consider alignments towards and along the airport's eastern end for both future patronage and cost-effectiveness.

Response:

Comment noted. Airport employees would be able to alight from the Metro Green Line not only at the west terminal, but also at the existing station at Aviation. Employee shuttles from those stations to job sites can be set-up if sufficient demand warrants them. It is difficult to assess if sufficient patronage could be generated in those new employment locations on the eastern end of the airport to warrant the great expense associated with another urban rail extension. Please see Topical Response TR-ST-5 (see Subtopical Response TR-ST-5.3 on Transit) for more information.

AL00032-4

Comment:

2. LAX City Bus Center

A relocation site for the LAX City Bus Center is not identified in the Draft EIS / EIR. An exact relocation site needs to be identified as part of the Final EIS / EIR so that bus circulation, passenger ingress/egress issues, and intermodal issues can be addressed. All transit operators would experience at least some change in operating cost no matter what alternative is selected.

3. Intermodal Transportation Center

An Intermodal Transportation Center (incorporating the relocation of the LAX City Bus Center) where all transit modes could seamlessly interface in one convenient location (bus, light rail, and Automated People Mover) has not been identified in the DEIS / DEIR and should be an integral part of the Master Plan. The Intermodal Transportation Center provides the critical interface between local transit operators with regional and international connections via LAX. This would serve to increase the percentage of airport passengers arriving at LAX via public transportation (thereby mitigating congestion on the area roadway system). The new center could be located close to the vicinity of the current Parking Lot B or C. A multi-modal location study completed in 1993 by the MTA, supported by an interagency task force including the City of Los Angeles departments of Airports and Transportation, indicated feasible sites existed within parking lots B and C. The DEIS/DEIR should evaluate alternative sites where the various transit modes including the Metro Rail Green Line, Bus and APM can interface.

Response:

The LAX Transit Center is assumed to be relocated to the eastside of the airport complex under Master Plan Alternatives A, B, and C. Under these alternatives, provisions would be made to allow bus passengers to transfer to airport shuttles. Bus passengers would also be able to transfer to the Metro

3. Comments and Responses

Green Line, which is extended to the new west terminal. Under Alternative D, the functions of the Transit Center would take place in the Intermodal Transportation Center. Please see Topical Response TR-ST-5 for more information.

AL00032-5

Comment:

An alignment for the Automated People Mover (APM) should be considered that would provide a circulator loop from an Intermodal Transportation Center oriented to the eastern side of LAX connecting the Airport Hotels along Century Blvd and the Car Parking and Central Terminal Areas. The Metro Rail Green Line could then be extended north from Metro Rail Aviation Station to the new Intermodal Center. The extension of Metro Rail Green Line could consider utilizing the MTA- owned Harbor Subdivision right-of- way (ROW) which runs along the west side of Aviation Boulevard.

Response:

This suggested concept is very similar to the new Enhanced Safety and Security Plan alternative, Alternative D, which was analyzed in detail in the Supplement to the Draft EIS/EIR.

AL00032-6

Comment:

4. Roadway Construction Impacts and Mitigation

The scope of construction associated with the extension of the Century Fwy. (I-105), the LAX ring roadway, and other related projects will result in a very significant increase in traffic and Vehicle Miles Traveled (VMT) in the LAX area.

Transit services may need to be detoured around construction areas, creating an adverse impact on vehicular traffic, transit passengers and transit operating costs. A construction committee similar to that used by the Alameda Corridor project, consisting of representatives from the MTA, other municipal transit operators, City of Los Angeles DOT and Caltrans for example, is essential so that adverse effects due to construction of the mitigation measures may be minimized.

Response:

While there would be additional traffic associated with construction, this impact would be mitigated as much as possible, even though construction would result in a significant and unavoidable impact. Please see Topical Response TR-ST-5 regarding the rail/transit plan and Topical Response TR-ST-3 regarding construction traffic.

AL00032-7

Comment:

5. Transportation Mitigation Strategies

The DEIS / DEIR identifies significant road improvements necessary as for traffic mitigation in the adjacent communities (i.e. the Airport Ring Road and Expressway). The DEIS / DEIR should further clarify the anticipated cost of these projects as well as anticipated revenues to fund these projects. It is not clear whether LAWA anticipates MTA funding for these projects. This should be clarified as these projects are not included in the constrained plan assumptions of MTA's adopted Long Range Transportation Plan.

Response:

Please see Response to Comment AL00008-6 regarding funding.

AL00032-8**Comment:**

In addition, the DEIS / DEIR should provide more quantifiable performance indicators for each alternative, including effects on Level of Service (LOS) standards; a cost-benefit analysis of capital, operating and maintenance costs; and analysis of air quality benefits.

Response:

The traffic impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Section 4.3.2 of the Draft EIS/EIR provided 57 pages of analysis of effects on LOS for Alternatives A, B, and C, while Technical Report 3b of the Draft EIS/EIR provided another 18 pages plus hundreds of pages in its appendices addressing the same topic. Section 4.3.2 of the Supplement to the Draft EIS/EIR provided an analysis of effects on LOS for Alternative D, with supporting technical analyses and data in Technical Report S-2. Detailed information regarding project costs and a cost-benefit analysis are beyond the scope of an EIS/EIR, but would be performed prior to project implementation. The air quality analysis was presented in detail in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00032-9**Comment:**

Furthermore, in addition to capital-intensive roadway improvements, the DEIS / DEIR should also include low-cost Transportation Demand Management (TDM) and Transportation Systems Management (TSM) improvements to relieve traffic congestion, including signal synchronization and application of Intelligent Transportation Systems (ITS) technologies.

Response:

Many TDM and TSM improvements are anticipated to be implemented by LAWA and the LADOT even without the Master Plan's implementation. These improvements were accounted for in the No Action/No Project Alternative and Adjusted Environmental Baseline. The proposed alternatives and their mitigation plans also incorporate various TDM and TSM improvements, where it was deemed appropriate. The final mitigation plans were presented in subsection 4.3.2.9 of the Draft EIS/EIR and in subsection 4.3.2.8 of the Supplement to the Draft EIS/EIR.

3. Comments and Responses

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