

AL00033 Taylor, Christy Shute, Mihaly & Weinberger LLP 9/18/2001

AL00033-1

Comment:

I. LAWA and FAA Must Correct Significant Flaws in Both the Master Plan and Draft EIS/EIR and Should Reconsider Their Entire Approach to the Master Plan Process in Light of the Major Advantages Of, and Widespread Public Support for, A Regional Airport Planning Approach That Accommodates Future Airport Demand at Airports Other Than LAX.

Our comments below, and those contained in the attachments, document extensive flaws in the environmental documentation for the proposed LAX expansion. Although our comments are extensive, they in fact identify only the tip of the iceberg: we have called your attention to only the most glaring errors and omissions and legally inadequate aspects of the documents. The mountains of complex and technical materials produced by your agencies has required us to review and comment upon a large volume of documents. As detailed below, however, the quantity of your documents does not translate to adequate coverage of the issues.

Response:

Comment noted. Please see Responses to Comments AL00033-2 through AL00033-442 below.

AL00033-2

Comment:

Before detailing the technical and legal flaws of the documents, we wish to emphasize the existence of an alternative, environmentally superior, approach which LAWA and FAA have chosen to disregard. This, of course, is the regional approach, in which the projected regional demand for airport services is met through the expansion of numerous airports, other than LAX, in the Southern California airport system. As will be documented separately in additional comments submitted by the City of El Segundo, this approach has garnered widespread public support. Its feasibility and its economic benefits have been extensively documented. (See, e.g., Exhibits 2(A), 2(B), and 4.4(A), submitted with this comment letter.) The regional airport approach was, in fact, the preferred scenario selected by the Southern California Association of Governments ("SCAG") in its 2000 Regional Transportation Plan (RTP). Los Angeles Mayor James Hahn and the Board of Airport Commissioners have now committed to the regional approach. The EIS/EIR must be revised substantially to reflect this new commitment.

Response:

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 and Topical Response TR-RC-1 regarding the role of the LAX Master Plan in the regional approach to meeting demand.

AL00033-3

Comment:

Expanding LAX is economically inefficient, and inadvisable for numerous environmental and other policy reasons. LAX is an already overcrowded and overburdened facility, set within a densely developed area which feels intensely the impacts of airport operations.

Response:

Comment noted. 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 would modernize the facility, enhance security and safety at the airport, and significantly reduce environmental impacts from airport operations on the surrounding communities.

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AL00033-4

Comment:

Although the Draft EIS/EIR contains an extensive self-justifying explanation of the economic benefits of expanding LAX (e.g., Chapter 2), such self-justification fails when exposed to the light of reasoned analysis. As determined in the report commissioned by SCAG as part of its Regional Transportation Plan update, the economic benefits of the regional airport approach are comparable to the economic benefits of serving the regional demand by an expansion of LAX. (Exhibit 4.4(A).) Further, the costs of the LAX Master Plan are too high. Economic analysis shows expanding the capacity of LAX to meet regional needs is far less cost-effective than obtaining similar increases in capacity at airports in the less developed areas of the region such as Ontario, Norton, Palmdale, March, and El Toro.

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-MP-2 regarding the SCAG Regional Transportation Plan (RTP). It is important to note that Alternative D, which is now the LAWA staff preferred alternative, is consistent with the policy framework of the 2001 RTP, which calls for no expansion of LAX and increased emphasis on shifting growth in aviation activity to other regional airports.

AL00033-5

Comment:

Indeed, Tables 3-1 through 3-4 of the Draft EIS/EIR itself provide a powerful -- though apparently unintentional -- illustration of the cost ineffectiveness of LAWA's preferred Master Plan Alternative, Alternative C. That alternative would, according to the Draft EIS/EIR's estimates, cost approximately \$12 billion. Tables 3-1 and 3-2 indicate that this enormous investment would increase passenger capacity by 10.9 million annual passengers ("MAP") (from 78.7 MAP to 89.6 MAP) compared to the option not requiring that investment, the No Project Alternative. Likewise, the enormous expenditure would, according to the Draft EIS/EIR, increase cargo handling capacity to 4,172,000 million annual tons ("MAT"), as opposed to the 3,120,000 MAT capacity under the No Project Alternative. (Id.) The numbers of daily operations that could be accommodated at LAX would, according to the document, increase only slightly (from 2,279 to 2,319) under the Preferred Alternative, relative to the No Project Alternative. (Id.) Finally, Table 3-4 illustrates that the \$12 billion investment in building Alternative C will (in 2015) have bought only five more nominal aircraft gates than the 163 nominal aircraft gates that would be available at LAX under the far more cost effective No Project Alternative. As the foregoing makes abundantly clear, the Master Plan does not provide good return on investment.

Response:

Alternative C provides additional capacity, improves the level of service for passengers, visitors and employees of the airport as well as providing airfield safety enhancements and improving the surrounding roadway network. More importantly, it meets both economic and environmental goals of the Master Plan by preserving LAX as the region's international gateway and serving the passenger and cargo demand. Alternative D, the Enhanced Safety and Security Plan, evaluated in the Supplement to the Draft EIS/EIR, is now the LAWA staff preferred alternative, as was stated in Section 3.5, Preferred Alternative, of the Supplement to the Draft EIS/EIR.

AL00033-6

Comment:

We submit that the funds in question would be far better and more effectively invested at the other airports in the Southern California regional system.

Response:

Please see Response to Comment AL00033-4.

AL00033-7**Comment:**

Nor would the proposed expansion of LAX reduce delays. Tables 3-1 and 3-2 of the Draft EIS/EIR also illustrate that the Master Plan Build Alternatives would not alleviate flight delay problems at LAX. For example, if the Preferred Alternative (Alternative C) were ultimately implemented, flights at LAX would experience average delays of approximately 14 minutes. This delay is longer than the current level of delays (8.69 minutes) and longer than even the delay that would be experienced at LAX under the No Project Alternative (13.20 minutes). (Id. at 3-15.) The increased delay associated with the Preferred Alternative points to the inevitable conclusion that the "preferred" plan would not improve congested conditions at LAX. The increased delay also underscores the economic inefficiency of the Master Plan, which would pour billions of dollars into LAX, only to have delays increase above even what could be expected if that investment were not made (i.e., under the No Project Alternative).

Response:

Delays are projected to increase at LAX with all of the build alternatives. However, delays at LAX will also increase without development (the No Action/No Project Alternative). All of the Draft EIS/EIR alternatives are considered "constrained", which means that they do not have sufficient capacity to meet the forecast demand in 2015 without adjustments to air service patterns. For this reason, the Draft EIS/EIR identifies how much and what type of demand can be accommodated by each alternative, within the bounds of pre-defined maximum tolerable delays of 10 to 15 minutes per operation, on an annual all-weather average basis. The result is that delays in the year 2015 are very similar for all alternatives (10-15 minutes), but LAX is able to accommodate different levels of demand with each alternative. As summarized in the Draft LAX Master Plan, Chapter V, Section 3.3.3 and the Draft EIS/EIR, Section 2.1, The Purpose and Objectives of the Proposed Project, delay reduction is not the intended purpose and objective of the proposed project. Rather, the purpose is to satisfy regional demand for global air transport of passengers and cargo by adding new, and optimizing existing, facilities at LAX in a cost effective manner.

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 is addressed in the Supplement to the Draft EIS/EIR and the Draft LAX Master Plan Addendum. It should be noted that the annual all-weather average delay would be less under Alternative D (11.56 minutes) than the No Action/No Project Alternative (13.33 minutes). See Table S3-1 in Section 3.3, Description of Alternatives, of the Supplement to the Draft EIS/EIR.

AL00033-8**Comment:**

Any decision regarding the future of LAX must also be informed by a full and fair disclosure of the environmental impacts of LAX. LAX currently has terrible impacts, and expansion of its operations would worsen those impacts. Yet the Draft EIS/EIR fails to disclose the full extent of the current adverse impacts, and at the same time in many respects understates the impacts of future expansion. The document must be substantially revised to comply with legal requirements, and recirculated.

Response:

Please see the responses below to the more specific concerns raised in the comment letter.

AL00033-9**Comment:**

Finally, we have found the inadequacies of the analysis within the document are exacerbated by the format of the documents, the inaccessibility of certain necessary information, and an attitude that the purpose of public meetings was not to hear the concerns of members of the public but to explain to

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them why the preferred alternative was a good idea. We informed you this spring of numerous omissions in the documents, seeking both additional information and additional time for review. (See Exhibit 1(A).) Although Mayor Hahn overrode LAWA'S initial response and provided an extension of time to submit comments on the documents, the flaws in the documents have not been remedied. (See, e.g., Exhibit 1(B) (Excerpt from Draft EIS/EIR, provided on CD-ROM in reverse image).)

The expansion of LAX would be, in the view of the City of El Segundo, unnecessary, ill-advised, and environmentally disastrous. We urge your serious consideration of our comments.

Response:

The nature and format of the Draft EIS/EIR, as well the structure of, and approach to, the public meetings were designed to convey a substantial amount of information, sometimes technical in nature, to a wide audience. It is not possible to develop a document format or meeting approach that meets everyone's desires. The Draft EIS/EIR and associated public meetings are considered to provide reasonable and appropriate approaches for conveying information on the Draft Master Plan and Draft EIS/EIR. The review period for the Draft EIS/EIR was approximately 295 days (January 18, 2001 through November 9, 2001), which is well above and beyond the 45-day public review period requirements of NEPA and CEQA. Responses to specific concerns raised in the commentor's letter, and related attachments, are provided in the detailed written responses presented herein.

AL00033-10

Comment:

II. The Draft EIS/EIR Dramatically Understates the Adverse Environmental Impacts of the Proposed LAX Master Plan, Overstates the Potential Benefits, Disregards and Inappropriately Declines to Consider Reasonable and Feasible Alternatives and Mitigation Measures, and In Numerous Additional Ways Fails to Satisfy Legal Requirements for Environmental Review.

Review of the Master Plan and Draft EIS/EIR by this firm and the City's technical subconsultants has identified numerous fundamental flaws in both the plan and the environmental document. As you know, the proposal to expand LAX through the new Master Plan is of great concern to the public. In light of the importance of this proposal, the great magnitude of the environmental impacts of both existing and proposed operations at LAX, and the many millions of dollars that have been spent on the LAWA/FAA planning process, we were led to expect that the environmental documents would provide a clear and careful explanation of both the plan and its environmental impacts. Such expectations have not been met.

The Draft EIS/EIR fails to satisfy legal requirements that it disclose the impacts of the proposed development. As detailed below, the document is flawed in its basic design, its methodology, its analysis of impacts, and its approach to mitigation. It misstates impacts, inflates project benefits and generally appears to be intended as an advocacy document in support of the "Preferred Alternative". Such a document does not begin to meet the requirements of CEQA and NEPA.

Response:

Please see Response to Comment AL00033-9.

AL00033-11

Comment:

A. The Project Description & Alternatives Analysis Is Fundamentally Flawed (Draft EIS/EIR Chapter 3).

The Draft EIS/EIR'S description of the proposed project and the alternatives analyzed contains a number of inaccuracies and other problems. Although these errors are as diverse as they are numerous, it can generally be said of them that they tend to skew the Draft EIS/EIR'S analysis in favor of the identified preferred alternative, Alternative C. Such a skewed analysis presents a misleading picture to the public and decisionmakers.

Response:

Comment noted. Please see Responses to Comments AL00033-13 through AL00033-55 regarding specific comments on the project description. Alternative D, LAWA staff's new preferred alternative, was evaluated in the Supplement to the Draft EIS/EIR.

AL00033-12

Comment:

1. The Draft EIS/EIR'S Project Description Is Incomplete and Inadequate and Results In An Incomplete and Inadequate Disclosure of Impacts.

The fundamental shortcomings of the Draft EIS/EIR begin with the description of the "Preferred" Project. Numerous assumptions, omissions and inconsistencies in the description of the proposed project combine to result in significant misstatements regarding the scope, and thus the impacts of the proposed LAX expansion. These flaws are described below.

Response:

Please see Responses to Comments AL00033-13 through AL00033-31 below regarding each of the concerns raised.

AL00033-13

Comment:

a. The Environmental Analysis Fails To Disclose The Real Capacity of the Build Alternatives.

The project description and analysis in the Draft EIS/EIR stop abruptly at 2015. No consideration is given to how many more passengers and how much additional cargo might ultimately be accommodated at LAX beyond the 2015 planning horizon. The history of LAX has been one of continual, unconstrained growth and delayed environmental review of that growth. For example, prior to the current master planning process, the last complete, certified environmental review of LAX growth and operations was undertaken in a 1978 EIR, which assessed the environmental impacts of serving approximately 40 million annual passengers ("MAP") at LAX. Although LAX reached the planned-for passenger volume of the 40 MAP in 1986, no environmental review analyzing operations of more than 40 MAP has ever been certified. LAX's facilities and operations nonetheless continued to grow to their present level, serving 67 MAP.

In light of this history, one can reasonably expect that LAX will continue to grow after 2015 to levels of service and operations far in excess of those considered in the Draft EIS/EIR. In order to fully inform decisionmakers and the public about the Master Plan's complete scope and environmental impacts, the Draft EIS/EIR cannot simply stop with 2015 impacts. The environmental review must analyze reasonably foreseeable growth and environmental impacts beyond 2015. For example, under Alternatives A, B and C, cargo facilities at LAX would be expanded in a manner allowing LAX to accommodate the entire regional demand for cargo services. (Draft EIS/EIR at 3-15.) The Draft EIS/EIR acknowledges that this demand would be 4,172,000 tons in 2015 and purports to analyze the environmental impacts of that level of cargo activity. (Id.) Because the Draft EIS/EIR analysis stops at 2015, however, the public and decisionmakers are given no information regarding impacts associated with reasonably foreseeable cargo growth at LAX beyond 2015.

Response:

Please see Topical Response TR-GEN-3 regarding the planning history of LAX relative to activity levels, and the use of 2015 as a planning horizon. As described in Topical Response TR-GEN-3, 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

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design would move to, and be met by, other airports in the region or would be lost from the region completely.

AL00033-14

Comment:

b. Tables 3-3 and 3-4 Improperly Exclude Baseline Information.

Tables 3-1 through 3-4 are the Draft EIS/EIR'S principal vehicles for describing and permitting comparison between the Preferred Alternative, No Project Alternative and Alternatives A and B. Tables 3-3 and 3-4, however, fail to provide any baseline information. As such, they do not permit any comparison between baseline conditions at LAX and the conditions that would exist under the Master Plan Alternatives. For example, because Tables 3-3 and 3-4 contain no baseline information, it is impossible to compare the baseline parking situation to what would exist under the Preferred Alternative and the other Build Alternatives. Similarly, the Draft EIS/EIR does not expressly state how much cargo space was available at LAX in the baseline year for facilities (1997). (Id. at 3-19 to 3-20 (referring the reader to Table 3-3 for baseline information on "cargo building space and ramp areas") and Table 3-3 (providing no such baseline information).) FAA and LAWA must remedy this problem by adding a baseline conditions column to Tables 3-3 and 3-4.

Response:

Tables 3-3 and 3-4 in Section 3.2, Alternatives to Be Fully Evaluated, of the Draft EIS/EIR presented a summary of facilities under each build alternative for 2005 and 2015, respectively. The Supplement to the Draft EIS/EIR included a summary of facilities for 2015 in Table S3-2 in Chapter 3, Alternatives (subsection 3.3). This table provides baseline information, as well as information pertaining to the No Action/No Project Alternative and all four build alternatives.

AL00033-15

Comment:

c. The Draft EIS/EIR's Analysis and Description of the Proposed Project and the Other Build Alternatives Improperly Excludes LAWA's Proposed New Administration Facilities.

Notably missing from the Draft EIS/EIR's analysis of the Master Plan is any discussion or analysis of a major new administration facility being proposed by LAWA. Documentation describing the project is attached hereto as Exhibit 3(R). As presently proposed, the new administration facility would consist of a building of between 400,000 and 600,000 square feet located on the north side of LAX -- north of Westchester Parkway and between Sepulveda Westway and Emerson Avenue. LAWA expects this project to consist of a centralized campus-style administration facility that will include employee and executive offices, conference rooms, parking structures, restaurants and retail areas. The project would be designed to accommodate both current and future LAWA staff and would be constructed by LAWA at a cost of at least \$28 million. The project is currently in the design stage, has not yet been the subject of any environmental review and has not yet received any approvals.

As one of the many projects in the Master Plan study area under consideration as part of the ongoing effort to expand the capacity of LAX, the new administration facility project should be considered as part of the Master Plan process, and its impacts must be addressed in the Draft EIS/EIR. The Draft EIS/EIR does not acknowledge the omission of the new administration building and provides no explanation for why the new administration facility project has been excluded from consideration as part of the Master Plan. The Draft EIS/EIR must be revised to include a description of LAWA's proposed new administration facility project and an analysis of all of the potential impacts associated with that project. The revised Draft EIS/EIR must then be recirculated for further public review and comment.

We note that in connection with its request for proposals for "Design and Construction Administration Services for LAWA Administration Facilities at Los Angeles International Airport" (October 9, 2000), LAWA provided the following answers in response to questions posed by potential proposers¹: (1) "It has not been determined [whether an EIR will be required for the project]. However, it would be desirable for the consultant team to have the expertise to perform that task."; (2) "This project is not related to the Master Plan, and is considered a separate project."; (3) "The status of preliminary

environmental approvals [for the project] is undetermined at this time. A previous EIR was completed, however it is undetermined whether it will satisfy current requirements."; and (4) "The status of approvals to date is undetermined."

These answers, though vague and noncommittal, provide some indication that LAWA may intend to take the position that its administration facilities project can be approved without any environmental review at all. Such an approval would be wholly inappropriate. Although the administration facilities project is apparently proposed for an area previously slated for development in accordance with LAWA's 1980's Northside project, neither the Northside project approvals nor the outdated environmental review prepared for that project cover LAWA's new administration facilities project. To the contrary, under the long-ago-abandoned Northside project (see discussion below), the area in question was to have been developed with hotel and retail/restaurant uses, not airport-related office space as LAWA now proposes. (See Northside project documentation attached hereto as Exhibit 3(L).) LAWA is jeopardizing both the Master Plan process and its proposed administration facilities project by attempting to segment its proposed administration facilities project from its Master Plan and by disregarding its CEQA environmental review responsibilities for its proposed administration facilities. CEQA "mandates 'that environmental considerations do not become submerged by chopping a large project into many little ones -- each with a . . . potential impact on the environment -- which cumulatively may have disastrous consequences.'" (City of Santee v. County of San Diego, 214 Cal. App. 3d 1438, 1452 (1989).) By participating and/or acquiescing in LAWA's position vis a vis the proposed administration facilities project, the FAA is failing to satisfy its NEPA obligations. NEPA also prohibits segmentation: "[Connected actions which] are interdependent parts of a larger action and depend on the larger action for their justification" must be analyzed together in a single document. (40 C.F.R. § 1508.25(a)(1).)

1 The request for proposals (with addenda) is attached hereto as Exhibit 3(R).

Response:

The Draft EIS/EIR provides a program level of analysis for the LAX Master Plan which includes a multitude of improvements. As each improvement advances as an individual project, it will be examined in light of the EIS/EIR to determine what additional environmental analysis is required. If/as the new administration facility advances toward implementation, the appropriate project-level CEQA review will occur. This tiered approach of first looking at the overall impacts of a large, diverse development program, and then looking in more detail at the individual components of the program as each advances toward implementation, is consistent with the provisions of NEPA and CEQA.

Subsequent to publication of the Draft EIS/EIR, LAWA formulated a new alternative (Alternative D) to modernize the airport facilities, enhance safety and security, and provide a level of capacity comparable to that of the No Action/No Project Alternative. As described in the Supplement to the Draft EIS/EIR, the 340-acre LAX Northside Development would be developed under Alternative D. The Supplement specifically stated on page 3-48, in Section 3.4, Comparative Summary of Alternatives, "The precise square footage and allocation of land uses associated with LAX Northside under Alternative D have not been identified, but would include a mix of office park, hotel, retail/restaurant, and research/development (R/D) business park uses, similar to the original LAX Northside Development." Under all build alternatives, it is assumed that only the operational functions of LAWA and FAA would remain on-airport. Administrative functions would be accommodated in new facilities developed in Westchester Southside (Alternatives A, B, and C) or LAX Northside (Alternative D). Such administrative functions are consistent and compatible with the land use designations of the subject area. In fact, the zoning and tract map conditions for the LAX Northside project include over 1.5 MSF of office space. See Table 4.2-3 in Section 4.2, Land Use, of the Draft EIS/EIR. At this time, it is unclear how much space would be necessary to accommodate the administrative functions. Please see Response to Comment AL00033-18 for further information regarding administrative space requirements.

AL00033-16

Comment:

d. The Project Description Improperly Excludes Relocation of Many Existing Land Uses That Would Be Eliminated by Master Plan Development.

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The LAX Master Plan would displace a significant number of airport-serving and other uses to make room for expansion of the airport's facilities. Examples of displaced uses include rent-a-car facilities, freight forwarders and off-airport parking facilities. Some, but not all of these uses may be accommodated on the grounds of the newly expanded airport. Those not accommodated would presumably be forced to relocate into surrounding communities. Such relocation would result in potentially significant environmental impacts not addressed in the Draft EIS/EIR.

LAWA and FAA must revise the Draft EIS/EIR project description to include the foreseeable relocation of displaced uses and must analyze the impacts of such relocation. We caution that in their analysis of this issue, and in the Draft EIS/EIR generally, FAA and LAWA should take note of the fact that the extent of and acreage covered by off-site airport-serving uses has increased in recent years and that this changed circumstance must be addressed and current, accurate information provided.

Response:

Implementation of any of the proposed build alternatives would not result in the displacement of a significant number of airport-serving uses that are not accounted for in the proposed airport plan or could be otherwise relocated to Westchester Southside (Alternatives A, B, and C) or LAX Northside (Alternative D). By intent and design, the proposed consolidated rental car facility under each alternative would provide a central location for the numerous rental car facilities that are currently scattered about the edge of the airport. As was indicated in Table S3-2 in Section 3.3, Description of Alternatives, of the Supplement to the Draft EIS/EIR, which presented the summary of facilities for all alternatives in 2015, the total number of on- and off-airport parking spaces under each of the build alternatives would increase over that of existing conditions, notwithstanding that future increased demands for parking would be partially offset by the proposed improvements to public transit (i.e., improvements to, or near, the MTA Greenline). Other airport-related services such as freight-forwarders that may be displaced by proposed Master Plan improvements could relocate to newly developed space in nearby Westchester Southside/LAX Northside. In the event such uses desire a location more immediate to the airport, it is possible that existing non-aviation uses near the airport may convert to aviation uses. It is important to note that, with the exception of LAX Northside, most of the area surrounding the airport is already developed with industrial and commercial uses, and the gradual conversion, if any, of non-airport uses to airport-serving uses in such area would not represent a significant change in land use. On a related note, Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR accounted for changes in land use conditions at and near the airport between 1996 and 2000, and found no notable changes having a material effect on the analysis and conclusions of the Draft EIS/EIR.

AL00033-17

Comment:

e . The Project Description Improperly Ignores Off-Airport Rent-A-Car Facilities.

A careful review of the Draft EIS/EIR and its Tables 3-3 and 3-4 reveals that under the Master Plan, LAWA would displace nearly all of the existing off-airport rent-a-car facilities. Although, as mentioned above, Tables 3-3 and 3-4 do not contain important baseline information necessary for comparison, the Draft EIS/EIR elsewhere indicates that 56 acres of off-airport rent-a-car facilities existed in 1997. (Draft EIS/EIR at 3-19.) Tables 3-3 and 3-4 indicate that under Alternative C, LAWA would acquire all but 4 of those acres for Master Plan development. Because not all of the off-airport rent-a-car acres displaced under Alternative C would be accommodated on airport, the Draft EIS/EIR must consider the impacts associated with the relocation of that usage to other off-airport locations.

Response:

As was indicated on page 3-19 in Section 3.2, Alternatives to Be Fully Evaluated, of the Draft EIS/EIR, a total of 79 acres of on-airport and off-airport rental car area existed in 1997. As indicated in Table 3-4 of the Draft EIS/EIR, 78 acres of rental car area is proposed under Alternatives A, B, and C. Alternative D, proposed subsequent to publication of the Draft EIS/EIR, proposes 180 acres of rental car area. As such, there would be a net loss of one acre of rental car area under Alternatives A, B, and C, and there would be more than double the existing acreage under Alternative D. It should be noted that under all of the build alternatives, the rental car facilities, which are currently dispersed over a wide area, would be consolidated into one location. Being a consolidated facility located near the main terminal, there are certain space efficiencies gained over the existing dispersed arrangement, not the least of which

would be a substantial reduction in the need to store and operate numerous shuttle vans for each rental car company.

AL00033-18

Comment:

f. The Draft EIS/EIR Improperly Excludes Analysis of the Impacts of Displacing Airline Administration and Maintenance Facilities.

Table 3-4 indicates that the acreage at LAX devoted to airline administration and maintenance will be reduced dramatically under the Master Plan Build Alternatives. Under the No Project Alternative, 295 acres would be devoted to airline administration and maintenance uses, but only between 72 and 92 acres would be available for such uses under the Master Plan Build Alternatives. This reduction in acreage is particularly dramatic when one considers that the unconstrained demand for airline administration and maintenance facilities in 2015, at LAX, will apparently have increased to 415 acres. This disparity raises a number of questions that LAWA and FAA must address, among them the following:

- (1) Where in the region will the demand for airline administration and maintenance space be met?
- (2) Will the relocation of maintenance facilities result in environmental impacts at those facilities' new location(s)?
- (3) What will be the operational effect of not accommodating airline administration and maintenance facilities at LAX? (e.g., will airlines be able to service airplanes at LAX as needed? Will the lack of maintenance facilities at LAX cause and/or contribute to flight delays?)
- (4) What will be the economic and social impacts of relocating airline administration and maintenance facilities? (e.g., how many airline administration and maintenance jobs will be eliminated at LAX?)

As these questions reveal, the Draft EIS/EIR fails to include the relocation of airline administration and maintenance facilities in the project description and therefore fails to evaluate any of the impacts of such relocation. (See, *id.* at 3-56 (indicating simply that airline administration buildings would be "moved off-airport").) The Draft EIS/EIR must be revised to include an adequate description of this aspect of the build alternatives.

Response:

Each of the Master Plan build alternatives proposes a substantial reduction in the amount of airline administrative and maintenance area at LAX based on the fact that most major airlines now find it far more cost effective and efficient to have major servicing and maintenance of aircraft completed at remote facilities, such as at the Southern California Logistics Airport in Victorville, California. As this trend started several years ago and continues today, the proposed reduction in aircraft maintenance area is not expected to result in any lack of maintenance capabilities at LAX or the need for new aircraft maintenance space in the region. Similarly, changes over time in the need for, and approach to, airline administration have substantially reduced the amount of space requirements as well as the need to be located at a major airport such as LAX. This is especially true relative to recent advancements in electronic technology and communications in the workplace. Similar to above, the proposed reduction in the amount of airline administration area at LAX is not expected to result in any lack of administrative capabilities at LAX or the need for new airline administration space in the region.

AL00033-19

Comment:

g. The Project Description Appears to Improperly Exclude LAWA and FAA Uses.

Table 3-4 indicates that in 2015, under any of the Master Plan Build Alternatives, the land at LAX devoted to LAWA and FAA uses will total only 6-8 acres (depending on the Master Plan Build Alternative). That acreage is dramatically less than the 30 acres that would be devoted to LAWA and FAA uses under the No Project Alternative and also less than the unconstrained demand for such use, 43 acres. Given that most LAWA and FAA facilities presumably cannot be relocated far from LAX, we are puzzled by how the demand for such facilities will be met under the Master Plan. As discussed in detail above, we believe that at least part of the answer may be that LAWA intends to construct a new

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administration facility north of LAX, but has improperly excluded analysis of that project from the Master Plan and Draft EIS/EIR. LAWA and FAA must explain how the demand for LAWA and FAA facilities will be met under the Master Plan and what environmental and other impacts would result from meeting, and not meeting, that demand.

Response:

The differences in acreages reflect the fact that under the No Action/No Project Alternative, the LAWA and FAA administrative facilities are assumed to occur entirely on-airport and serve a future level of activity of 78.7 million annual passengers (MAP) and 3.1 million annual tons (MAT) of cargo, whereas under the unconstrained demand scenario the on-airport facilities would serve a future activity level of 98 MAP and 4.2 MAT. Under the proposed build alternatives, which range from 78.9 MAP and 3.1 MAT (Alternative D) to 89 MAP and 4.2 MAT (Alternative C) to 98 MAP and 4.2 MAT (Alternatives A and B), it is assumed that only the operational functions of LAWA and FAA would remain on-airport, but the administrative functions of LAWA and FAA would be accommodated in new facilities developed in Westchester Southside (Alternatives A, B, and C) or LAX Northside (Alternative D). Such administrative functions are consistent and compatible with the land use designations of the subject area, which, at a programmatic level of analysis, is the primary consideration within the EIS/EIR. As development proposals, such as the subject administrative facility, advance in the planning process, additional project details would be provided and further environmental review would be completed as required. This approach is consistent with the requirements of NEPA and CEQA. Also see Response to Comment AL00033-18 regarding the reduced need for administrative and maintenance areas at LAX.

AL00033-20

Comment:

h. The Description of the Master Plan Build Alternatives Improperly Excludes the Effects of Significant Property Acquisition.

Tables 3-3 and 3-4 and the accompanying text provide misleading information regarding Master Plan property acquisition. They do not reflect the fact that Manchester Square (122.5 acres/1,985 residences), Belford neighborhood (20 acres/583 residences) and Continental City site (28.5 acres) have been acquired as part of the Master Plan. (Id. at 4-83, 4-117.) The Draft EIS/EIR instead counts those property acquisitions only for the No Project Alternative.

The Draft EIS/EIR must disclose and analyze the above property acquisitions in its analysis of the Master Plan Build Alternatives -- not just the No Project Alternative -- because these acquisitions occurred during the period since 1996, the Master Plan baseline year, and will be used for purposes of LAX expansion. As presently drafted, the Draft EIS/EIR gives the false impression that the Master Plan will and has required less property acquisition than it actually has and will. Put another way, the Draft EIS/EIR cannot avoid acknowledgment and analysis of Master Plan property acquisition simply because that acquisition occurred prior to public release of the Draft EIS/EIR.

Moreover, because CEQA prohibits agencies from attempting to downplay environmental impacts by not acknowledging and analyzing the full extent of a large project, the Draft EIS/EIR's failure to acknowledge and analyze the impacts associated with acquisition of the above-listed properties as part of the Master Plan Build Alternatives constitutes illegal segmentation under CEQA. (City of Santee v. County of San Diego, 214 Cal. App. 3d 1438, 1452 (1989); see also McQueen v. Board of Directors, 202 Cal. App. 3d 1136, 1146 (1988) (open space district "impermissibly divided the project into segments which evade CEQA review"); Plan for Arcadia, Inc. v. Arcadia City Council, 42 Cal. App. 3d 712, 726 (1974) (shopping center and parking lot projects are related and should be regarded as a single project for CEQA purposes; CEQA Guidelines § 15378(a).)

Response:

Comment noted. As was clearly indicated in Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the acquisition of properties at Manchester Square, Belford, and Continental City is occurring through programs and actions that precede, and are separate from, the Master Plan. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR properly reflected the fact that such acquisitions would occur regardless of whether the Master Plan is approved.

AL00033-21

Comment:

- i. The Draft EIS/EIR Relies on Inconsistent and Unsupported Assumptions Regarding the Number of Passengers Per Departure.

Although the tables in Chapter 3 of the Draft EIS/EIR assume a constant number of passengers per departure for each alternative (i.e., the No Project Alternative and Alternatives A, B and C) in 2005 (115.96 passengers per departure), the tables inexplicably assume widely varying passengers per departure figures for the various alternatives in 2015. (Id. at 3-14 and 3-15.) Specifically, the Draft EIS/EIR assumes that in 2015, the No Project Alternative will serve the smallest number of passengers per departure (125.47), while Alternatives A and B serve somewhat more (133.09 passengers per departure), and Alternative C serves the most (145.09 passengers per departure). (Id. at 3-15.) The use of these varying passenger load numbers, like so many other things in the Draft EIS/EIR, skews the analysis in favor of Alternative C. Specifically, by assuming a greater number of passengers per departure under Alternative C, the Draft EIS/EIR can assume a smaller number of aircraft operations and therefore lower noise and air quality impacts. The Draft EIS/EIR's use of inconsistent assumptions regarding passengers per departure for the various Master Plan alternatives in 2015 lacks any supporting evidence. LAWA and FAA should explain and provide evidentiary support for the passenger per departure numbers assumed for each alternative in 2005 and 2015 and the differences between them.

Response:

Comment noted. Details regarding the passenger activity forecasts are provided in Chapter III of the Draft Master Plan and Section 3.1 of the Draft Master Plan Addendum. The additional runway would allow for only minor changes in air service (only a limited number of aircraft that would increase in size) to be needed to meet the passenger demand. For Alternatives A and B, the passengers per departure ratio is 133.09. Alternative C in 2015 is primarily constrained by its runway capacity because it maintains the existing four-runway operating system and is thus limited by the number of operations it can handle. To maximize the amount of demand that can be accommodated, Alternative C would have to assume an even greater number of air service modifications than Alternatives A and B. The overall fleet mix increases in size to the point where Alternative C maximizes the amount of passenger demand it can accommodate. Unlike Alternatives A and B, Alternative C cannot meet the unconstrained passenger demand even with a passenger per departure ratio of 145.09. While the commentor is correct in asserting that Alternative C has lower noise and air quality impacts, from an economic and air service standpoint, Alternative C cannot provide the facilities needed to accommodate the unconstrained passenger demand. For further information regarding fleet mix assumptions and passengers per departure, please see Topical Response TR-N-1, in particular Subtopical Response TR-N-1.5 regarding the accuracy of the forecast fleet mix, and Response to Comment AL00022-98.

AL00033-22

Comment:

The document's assumptions regarding passengers per departure are critical because they influence all subsequent analysis of environmental impacts in the document. Specifically, the number of passengers assumed per flight dictates additional assumptions regarding numbers of annual passengers the airport can serve, the number of operations necessary and resulting impacts on the environment including air quality and traffic. These critical assumptions must be fully documented and explained.

Response:

Detailed information regarding passenger assumptions and airport operations under each of the Master Plan alternatives is provided in Chapters I through IV of the Draft Master Plan and Chapters 2 and 3 of the Draft Master Plan Addendum. Please also see Response to Comment AL00033-21 above.

3. Comments and Responses

AL00033-23

Comment:

j. The Project Description Is Based on Faulty Assumptions Regarding Future Cargo Handling Efficiency.

In 2000, approximately 2 million tons of cargo were processed at LAX's cargo facilities. (See Exhibit 3(N).) According to information provided in the Draft EIS/EIR, the baseline amount of cargo facilities at LAX is approximately 2 million square feet.² As such, the present ratio of cargo tons processed to square footage is approximately 1:1. The trend in cargo processing has generally been towards greater efficiency (i.e., more tons processed per square foot) through automation and other similar advances. (See Attachment G (Wadell Engineering Report).) This increased efficiency can be seen, for example, in the Draft EIS/EIR's projections for the No Project Alternative, which would apparently be capable of processing 3,120,000 tons of cargo on just 2,342,052 square feet (a ratio of 1.33:1).³ (Draft at Table 3-4.)

Notwithstanding this clear industry trend toward greater efficiency, LAWA and FAA have assumed a very low ratio of tons processed per square foot in developing the Master Plan and analyzing its environmental impacts. Under Alternative C, for example, LAWA would increase LAX's cargo area to 4,903,000 square feet. Applying the efficiency ratio achieved under the No Project Alternative, we would expect Alternative C to be able to handle at least 6.5 million tons of cargo. The Draft EIS/EIR's analysis of this issue, however, indicates only that Alternative C would handle 4,172,000 tons in 2015, an efficiency ratio of 0.85 tons per square foot.

The foregoing leads to the following conclusions: (1) the Master Plan proposes to construct more cargo facilities than are needed; (2) the proposed facilities would be capable of processing far more cargo than the Draft EIS/EIR acknowledges; and

2 The Draft EIS/EIR does not directly indicate the baseline cargo capacity of LAX. (Draft EIS/EIR at 3-19 to 3-20 (referring the reader to Table 3-3 for information on "cargo building space and ramp areas") and Table 3-3 (providing no baseline information).) We derived the capacity by subtracting 431,300 square feet from the No Project Alternative's cargo capacity in accordance with information provided at Draft EIS/EIR 3-26.

3 Even the Draft Master Plan analysis acknowledges that cargo efficiency can be expected to increase in the future by five percent or more. (Draft Master Plan at IV-5.17 (assuming "a five percent reduction in building and ramp requirements . . . as a result of increased future efficiencies."))

Response:

Comment noted. Please see Topical Response TR-MP-1 regarding cargo handling. It is not possible to divide the square footage of existing or proposed cargo buildings by the existing or forecast volume of traffic to derive an average cargo sorting efficiency of a given airport's facilities. For example, as described in Section 3.3.4, Cargo Activity, of the Draft Master Plan Addendum, the space utilization rate calculated for Alternative D is 1.22 tons per square foot. It is the weighted average of the domestic and express cargo (approximately 2.09 tons per square foot) and international cargo (approximately 0.8 tons per square foot). Based on current cargo activity the split is 32 percent domestic and 68 percent international. The cargo space utilization rates for Alternative D and the No Action/No Project Alternative exceed both the industry benchmark rates and the high utilization rates already experienced at LAX. The cargo utilization rates would not be expected to be as high under Alternatives A, B, and C which are not as constrained as Alternative D.

The cargo tonnage volumes and total aircraft operations for the four alternatives are not strictly comparable. For 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 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 passenger and cargo activity

comparable to the No Action/No Project Alternative. 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.

AL00033-24

Comment:

(3) the Draft EIS/EIR dramatically understates cargo-related impacts, including as examples impacts on traffic, noise and air quality. Because a great deal of cargo-related traffic involves diesel vehicles, and in light of increasing public health concerns regarding diesel emissions, these are particularly important failures to disclose such impacts.

Response:

The traffic, noise, and air quality analyses within the Draft EIS/EIR and Supplement to the Draft EIS/EIR accounted for cargo truck traffic associated with each of the alternatives. Both the air quality analysis, presented in Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, and the human health risk assessment, presented in Section 4.24.1, Human Health Risk Assessment (CEQA), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR accounted for the effects of diesel emissions.

AL00033-25

Comment:

k. LAWA Inexplicably Changed its Assumptions Regarding LAX Capacity During the Master Plan Process.

During the development of the Master Plan and associated Draft EIS/EIR, LAWA abruptly and without explanation changed its estimates of the number of passengers and aircraft operations that could be served at LAX under the Master Plan Preferred Alternative and other Build Alternatives. As documents attached hereto as Exhibit 3(J) illustrate, as recently as November 1999, LAWA was taking the position that its Preferred Alternative would accommodate 92 million annual passengers ("MAP") and slightly more than 2,200 daily operations by 2015. One month later, however, LAWA was presenting an entirely different estimate of the Preferred Alternative's capacity, stating that it would allow LAX to accommodate 89 MAP, not 92, but in a greater number of operations (approximately 2,300 daily) by 2015. (See Exhibit 3(J) (printout of LAWA website from December 1999).) It is this latter estimate of capacity that the Draft EIS/EIR relies on. (See Draft EIS/EIR at Table 3-2.) There are similar inconsistencies between the Draft EIS/EIR's capacity estimates and those previously presented by LAWA for the other Build Alternatives.

The above-described changes in the estimated capacity of the Master Plan Build Alternatives cast considerable doubt on the validity of the capacity numbers relied on by the Draft EIS/EIR for its analysis. Particularly problematic is the fact that LAWA downgraded its Preferred Alternative's passenger capacity from 92 MAP to 89 MAP, while the operations capacity figures increased. These various LAWA and FAA must provide a full explanation and justification for why these various capacity estimates were changed between November and December of 1999.

Response:

The commentor is comparing a preliminary alternative (Alternative 4) developed during an early concept development task to Alternative C presented in the Draft EIS/EIR. Alternative C is a unique alternative that exhibits the characteristics analyzed and presented in the Draft EIS/EIR.

A new alternative has been added subsequently to publication of the Draft EIS/EIR. Known as Alternative D, this alternative is now the LAWA staff preferred alternative. Alternative D is designed to serve approximately the same level of future activity as the No Action/No Project Alternative.

3. Comments and Responses

AL00033-26

Comment:

I. The Draft EIS/EIR's Description of Project Phasing is Hopelessly Outdated.

In describing the proposed phasing of the Preferred Alternative and the other Build Alternatives, the Draft EIS/EIR assumes that the first phase of construction would be completed by 2005. (Draft EIS/EIR at 3-33, 3-47, 3-59.) Because Phase I is scheduled to last six (6) years, the 2005 completion date cited in the Draft EIS/EIR is now wholly unattainable and misleading. (Id.) In fact, even assuming the Master Plan were to win approval in 2002, according to the Draft EIS/EIR's timeline, Phase I could not be complete before 2008 and Phase II could not be complete before 2018. The Draft EIS/EIR must be revised to eliminate the above-described inaccuracies in its present descriptions of project phasing. Correcting the phasing problems will also necessitate corresponding changes throughout the Draft EIS/EIR's impact analysis.

Response:

The Draft EIS/EIR provided a program level of analysis for each of the alternatives considered for LAX Master Plan, based on general assumptions of the timing and phasing of individual improvements. As individual projects under the Master Plan would advance toward implementation, they would be examined in light of the environmental analysis presented in the Final EIS/EIR for the Master Plan. Variations or modifications to the proposed phasing plan may occur during the overall course of Master Plan implementation; however, to the extent such changes do not substantially alter the conclusions of the Final EIS/EIR, the impacts would have been addressed. Recognizing that approval of the Master Plan did not occur in 2002, as assumed in the construction phasing schedule used in the Draft EIS/EIR, a shorter construction period would be required to complete the Master Plan improvements. A reduced construction period would not necessarily change the means and methods of construction assumed in the Draft EIS/EIR, but would increase the intensity of construction activity. The most notable environmental disciplines affected by construction activities are air quality, noise, and traffic. Construction-related impacts pertaining to all three of these issue areas are identified in the Draft EIS/EIR as being significant and unavoidable. A reduction in the overall construction period for the three build alternatives addressed in the Draft EIS/EIR would increase the severity of those construction-related impacts, which have already been disclosed as being significant and unavoidable.

It should be noted that the nature and extent of improvement projects proposed under Alternative D, which was added subsequent to the publication and review of the Draft EIS/EIR, are substantially less than those of Alternative A, B, and C. Alternative D does not include several of the major projects, such as the LAX Expressway, the ring road, the west terminal, and additional cargo facilities, associated with the other build alternative, and, therefore, can be completed within a much smaller overall construction program. The construction schedule for Alternative D, as was addressed in the Supplement to the Draft EIS/EIR, assumes the start of construction in late-2004 and completion by 2015.

AL00033-27

Comment:

m. The Draft EIS/EIR Fails to Include Military Operations in Its Project Description.

Tables 3-1 and 3-2 do not provide any statistics reflecting with the number of LAX military aircraft operations existing at the baseline and expected in the future. We note that the documents attached hereto in Exhibit 3(N) illustrate that in the chosen baseline year (1996), LAX saw 3,262 military operations. Such statistics must be provided for each Master Plan Alternative.

Response:

Please see Chapter 3, Table 3.3-1 of the Draft LAX Master Plan Addendum for the number of annual military and general aviation operations for each Master Plan alternative.

AL00033-28**Comment:**

n. The Draft EIS/EIR's Discussion of Remote Gates Is Internally Inconsistent.

Tables 3-3 and 3-4 provide confusing information regarding the number of remote gates that would exist under the No Project Alternative. The tables indicate that the relevant number is 48/55.1, but do not indicate why these two different numbers have been provided. If this double number is intended convey the number of actual gates (48) and narrow body equivalent gates (55.1) under the alternative, the Draft EIS/EIR should so indicate. In addition, we note that the Draft EIS/EIR states on page 3-19 that the baseline condition number of remote gates existing at LAX is only 32, not the 48 (or 55.1) remote gates Tables 3-3 and 3-4 indicate would exist under the No Project Alternative. FAA and LAWA must explain how 16 (or more) additional remote gates would come to be built under the No Project Alternative in light of the fact that such construction has not been the subject of any environmental review and therefore could not legally go forward as part of the No Project Alternative.

Response:

The number of remote gates (48/55.1) listed in Table 3-3 of the Draft EIS/EIR represents the nominal and narrow body equivalent gates (NBEG) numbers for the No Action/No Project Alternative provided in the 2005 timeframe. The table will be amended to explain the two numbers.

The baseline conditions in 1997 included 32 remote nominal gate positions, as described in the Draft EIS/EIR in Section 3.2, Alternatives to Be Fully Evaluated, on page 3-19. Table 3-3 of the Draft EIS/EIR refers to the conditions in 2005, which includes the American Airlines commuter facility and the States West commuter facility, which were completed after the 1997 time frame for the baseline conditions and contained 11 gates and 5 gates respectively for a total of 48 commuter gates. The America Airlines facility was the subject of a separate environmental analysis.

AL00033-29**Comment:**

o. The Project Description Lacks Sufficient Detail and Is Unacceptably Vague in Its Description of Imperial Highway/Highway 105 Modifications.

The Draft EIS/EIR is unacceptably vague in its description of how Imperial Highway and Highway 105 would be modified to become part of the proposed ring road. The document lacks any clear visual depiction of what is proposed on this point. The Draft Master Plan and Draft EIS/EIR state in only a few paragraphs that Highway 105 would be extended to the East along Imperial Highway. (See Draft Master Plan at V-3.156 to V-3.157; Draft EIS/EIR at 3-55.) Neither document provides the necessary detailed description and depiction of what changes would be involved.

Information on the roadways provided in the Draft EIS/EIR and Draft Master Plan is misleading and confusing. Draft Master Plan Figure I-5.10 and Draft EIS/EIR Figure 3-15, showing Alternative C, label Imperial Avenue as Imperial Highway and are not detailed enough to illustrate how the modified Imperial Highway/Highway 105 would relate to other streets in the area (e.g., Main Street in El Segundo). In addition, because the drawings lack necessary detail, it is impossible to discern how the Imperial Strip would be impacted by the proposed roadway modifications.

LAWA and FAA must remedy the above-described problems with their project description by amending the Draft EIS/EIR to include sufficiently detailed maps and text describing the proposed location, width, elevation and other characteristics of the proposed Highway 105/Imperial Highway modifications. The descriptions should explain and illustrate, inter alia, how the proposed road would relate to other roads in El Segundo and other uses in the area (e.g., bike lanes, open space, residences, etc.).

Response:

The information requested is indeed an important consideration prior to final environmental approval of the I-105 extension; however that level of detail is beyond the scope of this Draft EIS/EIR. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR are "program level" environmental documents

3. Comments and Responses

intended to analyze the impacts of a 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.

AL00033-30

Comment:

p. The Project Description Fails to Provide Adequately Detailed Information about the Proposed Westchester Southside Project.

Under the Preferred Alternative as well as Alternatives A and B, LAWA would develop a 210-acre, 2.62 million square foot project north of the airport. (See Draft EIS/EIR at 3-33, 3-47, 3-56.) That project is described only as "a pedestrian-oriented community commercial 'village' area to benefit the residents of Westchester and to accommodate the retail, office, and educational uses displaced by the land acquisition program." (Id.) Although the Draft EIS/EIR gives a breakdown of proposed uses within the Westchester Southside Area (office, retail, restaurant, entertainment, light industrial, etc.) it does not indicate specifically where on the 210 acres the proposed new buildings would be located. This lack of detail stands in sharp contrast to on-airport development, for which individual buildings have been mapped and described in the Draft EIS/EIR.⁴

Because the Draft EIS/EIR's depiction and description of the Westchester Southside project is so vague, the public and decisionmakers reviewing the Draft EIS/EIR have no way to assess whether the project will or can serve its stated purposes (e.g., serving Westchester residents, accommodating displaced land uses). Similarly, because the Draft EIS/EIR lacks adequate detail in this regard, its analysis of the environmental impacts associated with the Westchester Southside project are highly suspect. Nor can the area's potential to accommodate relocation of displaced uses be fairly evaluated.

4 The Master Plan's description of the proposed Westchester Southside Development is similarly vague. (Draft Master Plan Chapter V Appendix Q.)

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR provided a program level of analysis for the LAX Master Plan which included a multitude of improvements and a land use plan proposal for Westchester Southside, although proposed land uses (by lot number) for the Westchester Southside Project were identified in Tables 4.2-15 and 4.2-16 of the Draft EIS/EIR. Additional project-level planning and environmental analysis would be required prior to implementation of Westchester Southside, including appropriate CEQA review. The proposed land use plan for Westchester Southside was included in the Draft EIS/EIR analysis to provide a comprehensive analysis of the overall impacts associated with the proposed airport improvements and the development of Westchester Southside, particularly as related to the combined impacts to traffic, air quality, utilities and services, land use compatibility, acquisition and relocation, etc. It was fully anticipated, however, that additional CEQA review specific to Westchester Southside at a project level would occur in the future. This tiered approach of first looking at the overall impacts of a large, diverse development program, and then looking in more detail at the key components of the program as each advances toward implementation, is consistent with the provisions of NEPA and CEQA.

AL00033-31

Comment:

q. The Draft EIS/EIR Must Be Clarified with Regard to Analysis of Technological and Procedural Improvements.

As illustrated by the FAA Airport Capacity Benchmark Report (2001) attached hereto as Exhibit 3(S), LAWA and FAA are apparently proposing to implement a number of capacity-enhancing "technology and procedural improvements" at LAX over the next decade. It is not clear from the text of the Draft EIS/EIR whether these improvements have been assumed and analyzed as part of the Master Plan. LAWA and FAA should clarify this point. (Compare Draft Master Plan at II-2.141.)

Response:

The Master Plan considered technology improvements in the determination of airport capacity (see Chapter II, Section 2.6 of the Master Plan). In general, most technology enhancements that are applicable at LAX have the potential to increase efficiency and safety, reduce controller workload, and/or reduce delays, but typically do not significantly improve sustainable hourly throughput. Some technology and procedural improvements may improve the ability of the controllers to manage bursts of activity but would not likely increase the overall hourly throughput of LAX. Therefore, the Master Plan does not anticipate that the airlines would increase operations in peak hours in response to technology enhancements.

Technology improvements in aviation continue to evolve. It is not known how many and/or which improvements will actually be implemented. For example, the Master Plan considered the application of the Departure Sequencing Program, but the application of this program at LAX has since been canceled by the FAA. In addition, the original FAA schedule for deployment of technology at U.S. airports has changed and implementation is likely to happen later rather than sooner. Because the benefits of technology enhancements are unknown and untested, the Master Plan did not assume increases in capacity from technology improvements.

However, the Master Plan did assume 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. The airside analysis in the Master Plan assumed the following:

- A dual Civet approach before it was implemented.
- Controllers would direct pilots of departing aircraft to taxi correct (use the south airfield runways if the aircraft is departing to a southern fix, use the north runways if the aircraft is departing to a northern fix) as opposed to taxi easy (depart from the runway closest to the gate) in order to maximize departure capacity.
- Controllers would have the flexibility to direct departing aircraft that are scheduled to use the Thermal fix (which is used by a disproportionate portion of departing traffic) to the under-used Dagget fix in order to balance north and south airfield departures and maximize runway capacity.
- The use of Simultaneous Offset Instrument Approaches (SOIA) for the alternatives with a fifth runway (Alternatives A and B) in order to maximize the capacity of the airport and to allow triple independent approaches to LAX in good weather.

Regarding the FAA Benchmark Study, this study served a different purpose than the Master Plan. As stated in the Benchmark Study:

- The FAA has developed capacity benchmarks for 31 of the nation's busiest airports to understand the relationship between airline demand and airport runway capacity and what we in the aviation community can do about it.
- Capacity benchmarks are defined as the maximum number of flights an airport can routinely handle in an hour.
- These benchmarks are estimates of a complex factor that varies widely with weather conditions, runway configurations, and the mix of aircraft types. Capacity benchmarks assume there are no constraints in the en route system or the airport terminal area. They are useful for broad policy discussions and the development of long-term strategies.

The intent of the Benchmark Study was to identify airports that currently have, or are projected to have, high delays and insufficient capacity. To that end, realistically optimistic assumptions regarding the impact of future technology were made in order to be conservative in the determination of future delays.

The capacity increases projected in the FAA Benchmark Study did not take into consideration the impact of fleet mix changes on capacity. All of the Master Plan alternatives assume an increase in aircraft size as compared to existing conditions and the unconstrained forecast (this is especially true for the No Action/No Project Alternative and Alternative C). A fleet mix made up of larger aircraft generally requires more separation between aircraft in the air and therefore reduces the number of arrivals and departures that can be served in an hour.

In addition, the Benchmark Study assumes there are no constraints in the en route system or the airport terminal area. In reality, there are, and will continue to be, constraints in the en route system and

3. Comments and Responses

terminal area due to Special Use Airspace, terrain, and other factors in the Los Angeles Basin that will constrain the capacity of LAX.

In summary, most technology enhancements that are applicable at LAX have the potential to increase efficiency and safety, reduce controller workload, and/or reduce delays but typically do not significantly improve sustainable hourly throughput. The Master Plan did assume that runway capacity would be maximized to the extent possible within the constraints of the airspace.

AL00033-32

Comment:

2. The Draft EIS/EIR Fails to Present an Adequate Range of Alternatives and Improperly Excludes a Number of Feasible Alternatives from Consideration.

At the heart of both CEQA and NEPA is the requirement that an EIS/EIR consider a reasonable range of alternatives to the proposed project. (Pub. Res. Code § 21002.1; CEQA Guidelines § 15126; 42 U.S.C. § 4332(2)(C)(iii); 40 C.F.R. § 1502.14.) For the reasons outlined below, we have concluded that the Draft EIS/EIR fails to analyze a legally adequate range of alternatives. Notably absent from full consideration in the Draft EIS/EIR analysis are: (1) the regional approach to serving air traffic demands, which would accommodate anticipated aviation demand throughout the region, rather than principally at LAX; and (2) an alternative involving development at LAX that would be less intensive than proposed under the preferred alternative, Alternative C.

The Draft EIS/EIR spends an inordinate number of pages describing the development of the Master Plan Build Alternatives. (See Draft EIS/EIR 3-4 through 3- 13.) This extended discussion is apparently intended to convince the reader that the choice of the Build Alternatives considered in detail in the Draft EIS/EIR resulted from a long, rational process. It is beyond dispute that the master planning process has been an extended affair, dating back to 1994. The purported rationality of the process, however, is belied by, among other things, the fact that Alternative C, the Preferred Alternative, emerged only at the very end of the process, apparently without any prior thought. (See Exhibit 3(T).) In any event, the three Build Alternatives fall far short of a reasonable range of alternatives.

Response:

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. 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. In addition, please see Topical Response TR-RC-1 regarding the role of the LAX Master Plan in the regional approach to meeting demand.

AL00033-33

Comment:

a. The Draft EIS/EIR's Alternatives Analysis Improperly Rejects the Regional Approach to Serving Demand.

One way in which the Draft EIS/EIR fails to analyze a legally adequate range of Master Plan alternatives is by rejecting, without justification, the regional approach to serving projected air passenger and cargo demand. As illustrated by the recently adopted 2000 SCAG RTP, and other documents attached hereto as Exhibits 2(A) and 4.2(A), the regional approach is not only feasible from the technical and economic standpoint, it is environmentally superior to the proposed Master Plan and preferred by communities throughout the region. In fact, twelve Southern California Members of Congress recently sent a letter to the United States Department of Transportation indicating their opposition to major LAX expansion and support for a regional approach to serving aviation demand. (See Exhibit 3(U) news articles.)

The Draft EIS/EIR's categorical rejection of the regional approach without a full environmental analysis is contrary to the requirements of both CEQA and NEPA. This failing undermines the adequacy and legitimacy of the entire Draft EIS/EIR as well as the Master Plan effort. Because the Draft EIS/EIR fails to analyze the alternative regional approach to serving demand for purpose of comparison with the Master Plan Build Alternatives, FAA and LAWA cannot legally rely on that analysis to select one of the Master Plan Build Alternatives. The Draft EIS/EIR must be revised to analyze the impacts and benefits of serving projected aviation demand at regional airports other than LAX. Although some modernization at LAX might be appropriate under such an approach, most expansion would be focused at other airports including Ontario, Palmdale and former military bases in the region (e.g., March, Norton and El Toro).

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 provides 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 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.

AL00033-34

Comment:

b. The Draft EIS/EIR Fails to Analyze Any Build Alternative Less Intensive Than Alternative C, the Preferred Alternative.

CEQA and NEPA contemplate that an EIS or EIR must provide the public and decisionmakers with information about available courses of action that would involve less severe environmental impacts than the proposed course of action. (See Pub. Res. Code §§ 21002, 21002.1; CEQA Guidelines § 15126.6.) In the case of the LAX Master Plan, Alternative C is both the proposed course of action and the least intensive (i.e., has the least identified adverse environmental effect) of the Build Alternatives addressed in the Draft EIS/EIR. This approach to conducting an alternatives analysis is, by definition, unacceptable and legally inadequate. It denies the public and decisionmakers information they need and are entitled to about alternatives that involve lesser environmental impacts. By denying readers needed information about true alternatives to the proposed course of action, the Draft EIS/EIR gives the false impression that there is no alternative that would reduce the adverse impacts of Alternative C.

The following discussion outlines some of the strategies that could be employed to improve LAX without expanding its capacity to the dramatic extent proposed. The Draft EIS/EIR should be amended to include an analysis of the benefits and environmental impacts of these approaches. Only then can the public and decisionmakers make an informed decision about the LAX Master Plan.

Response:

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. As indicated in the topical response, Alternative C was added after the EIS/EIR was initiated to provide an alternative with lesser impacts than the original alternatives identified in the Notice of Preparation. Responses to the subsequent discussion are provided below.

AL00033-35

Comment:

(1) The Draft EIS/EIR's Alternatives Analysis Improperly Fails to Include Master Plan Alternatives that Improve Safety and Traffic Congestion at LAX Without Expanding the Airport's Capacity.

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The Draft EIS/EIR provides no analysis of a Master Plan Alternative designed to improve the safety of LAX's facilities without increasing the airport's air passenger and/or air cargo capacity. Such an alternative, linked with a regional approach to serving projected demand increases, would satisfy the project goals identified by LAWA and FAA without further burdening the communities surrounding LAX, and therefore deserves full consideration in the Draft EIS/EIR.

Similarly, the Draft EIS/EIR provides no analysis of a Master Plan Alternative designed to alleviate traffic congestion at and around LAX without increasing the airport's air passenger and/or cargo capacity. Such an alternative, linked with a regional approach to serving projected demand increases, would satisfy the project goals identified by LAWA and improve conditions at LAX without further burdening the communities surrounding LAX, and therefore deserves full consideration in the Draft EIS/EIR.

Response:

As indicated above, 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 consistent with the policy framework of the SCAG 2001 RTP, and shifts the accommodation of future aviation demand to other airports in the region. Alternative D includes numerous ground transportation improvements, and would serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, while making the airport safer and more secure, convenient, and efficient.

AL00033-36

Comment:

(2) The Draft EIS/EIR's Alternatives Analysis Improperly Omits Consideration of an Alternative Involving Less Expansion of the Airport's Cargo Capacity.

Also noticeably absent from the Draft EIS/EIR is any discussion of a Master Plan Build Alternative that would modernize the airport's cargo facilities but not expand its cargo processing capacity. As discussed elsewhere in these comments, the expansion of cargo facilities at LAX will occasion a number of serious environmental impacts affecting surrounding communities. For example, additional cargo at LAX means additional diesel trucks on community streets, with the significant air quality and traffic impacts that those trucks occasion. Additional cargo processing also means additional late-night flights. (See Attachment G (Wadell Engineering).)

Even the Draft Master Plan acknowledges the viability of constraining cargo growth at LAX. Specifically, the Draft Master Plan states, "it is important to note that some of these [cargo] facilities could be provided off-airport if a decision is made to limit cargo facility development within the LAX boundaries. Because many of these functions could effectively be provided off-airport, the level of accommodation for regional cargo activity would not necessarily diminish if some functions are provided elsewhere. Therefore, the total facility requirements could decrease from that shown." (Draft Master Plan at IV-5.17.) Despite this conclusion, the Draft EIS/EIR makes no attempt to analyze the possibility of limiting cargo growth at LAX in favor of allowing other regional airports to meet future air cargo demand. Despite some variation in the number of acres devoted to cargo, each of the three Master Plan Build Alternatives involves precisely the same high level of cargo capacity: enough to handle 4,172,000 annual tons in 2015 and presumably more beyond that year. (See Draft EIS/EIR at 3-15 to 3-16.) If LAX's cargo capacity is allowed to expand in this fashion, it will allow the airport to accommodate the region's entire unconstrained demand for cargo processing. This massive expansion would effectively displace all other regional airports from the market.

The absence of a reduced cargo alternative is particularly noticeable in light of the fact that the Draft EIS/EIR includes Alternative C, which purports to constrain passenger growth at LAX. The absence of any reduced cargo alternative is also strong evidence that LAWA and FAA have not given adequate consideration to a truly regional approach to serving aviation demand. The Draft EIS/EIR must be revised to include analysis of at least one reduced cargo variation on Alternative C. (See Exhibit 2(A), including Table 7.)

Response:

Alternative D 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 - including cargo demand - to other airports in the region. Please also see Response to Comment PC00281-17 regarding cargo operations at LAX, Topical Response TR-MP-1 regarding air cargo activity/demand and Subtopical Response TR-N-5.4 regarding nighttime aircraft operations.

AL00033-37

Comment:

(3) The Draft EIS/EIR's Alternatives Analysis Improperly Rejects the Possibility of Targeted Shifting of Aviation Activity Away from LAX.

(a) The Optimum International Role Alternative.

The Draft EIS/EIR does not consider the alternative of optimizing LAX's role as an international airport while shifting other aviation demand and activities to other regional airports. This alternative is described more fully in Attachment G hereto, comments of Wadell Engineering Corporation. (See also Exhibit 2(A).) Generally speaking, this alternative would focus LAX operations on international passengers and cargo while allowing greater development at other regional airports to accommodate other aviation demand. This is a feasible alternative that should be analyzed in the Draft EIS/EIR.

Response:

Topical Response TR-ALT-1 discusses the role of outlying airports in accommodating projected regional demand. As indicated in the topical response, 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. In fact, under Alternative C, LAX's share of the regional market would decline from 75 percent in 1997 to 67 percent in 2015. The Draft EIS/EIR clearly indicates that the intent of the Master Plan is to focus on LAX's role as the region's primary international airport (see Chapter 1, Regional Context, of the Draft EIS/EIR, subsection 1.2.3, as well as the third stated objective in Chapter 2, Purpose and Need), while domestic O&D demand would be accommodated to a greater degree by regional airports. Alternative D, consistent with the policy framework of the SCAG 2001 RTP, would further shift the accommodation of future aviation demand to other airports in the region. As indicated in Chapter 3, Alternatives, of the Draft EIS/EIR (page 3-3), federal law limits the City of Los Angeles' authority to place restrictions on aircraft activity. This includes the measures suggested in Attachment G of the commentor's letter - namely, exclusion of all-cargo flights from LAX and serving domestic passengers only after all international passengers have been accommodated. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00033-38

Comment:

(b) Eliminating All-Cargo Flights from LAX.

The Draft EIS/EIR notes that all-cargo flights that would otherwise utilize LAX could be shifted to other regional airports "through mandatory or voluntary means," but fails adequately to pursue and analyze this option (Draft EIS/EIR at 3-3.) Shifting all such all-cargo flights away from LAX would help reduce the significance of various environmental impacts associated with the Master Plan Build Alternatives. For example, because all-cargo flights are frequently scheduled late at night and frequently utilize noisier aircraft (i.e., older aircraft), eliminating all-cargo flights from LAX would eliminate some of the operations that are most disruptive to surrounding communities. (See Attachment G (Wadell Engineering).) The Draft EIS/EIR improperly abandons the possibility of eliminating all-cargo flights without explanation or justification. LAWA and FAA must provide a full explanation of available mechanisms for eliminating all-cargo flights from LAX, and analyze and disclose how the elimination of all-cargo flights would affect environmental concerns (e.g., noise, traffic and air quality).

3. Comments and Responses

Response:

As indicated in Response to Comment AL00033-37, federal law limits the City of Los Angeles' authority to place restrictions on aircraft activity. These restrictions include restrictions on all-cargo operations. Please also see Response to Comment PC00281-17 regarding the diversion of cargo operations to other airports to relieve congestion at LAX.

AL00033-39

Comment:

(c) Limiting Commuter Operations at LAX.

Another alternative not adequately considered by the Draft EIS/EIR is shifting the majority of commuter operations from LAX to other regional airports. (See Draft EIS/EIR at 3-3.) Although the Draft EIS/EIR acknowledges that commuter flights could be diverted to other regional airports, it abandons that alternative because it concludes that would be impractical to divert all commuter operations because some commuter passengers connect with international and long-haul domestic operations at LAX. (Id.) It makes no sense to reject all relocation of commuter operations because some commuter passengers connect through LAX. The airlines could, through their reservation and ticketing procedures, divert most commuter operations to other regional airports, while ensuring that passengers connecting to flights at LAX are accommodated by appropriate means.

LAWA and FAA must provide the following information: (1) statistics on how many commuter flight passengers arriving at LAX actually connect to long-haul domestic or international flights; (2) statistics on how many commuter operations now occur and are expected to occur in 2005 and 2015 if such flights are not constrained; (3) data on how many of the existing and anticipated commuter flights could feasibly be diverted to other regional airports; (4) data on how many commuter flights could not feasibly be so diverted; (5) legal mechanisms by which LAWA and/or FAA can ensure that commuter operations are diverted to other regional airports.

Finally, we note that the Draft EIS/EIR takes the position that some shift of commuter operations is "predicted to occur unassisted as the airfield system reaches its practical capacity under the two four-runway alternatives (No Action and Alternative C)." (Id.) It is improper for the analysis in the Draft EIS/EIR to assume without supporting analysis that such a shift will take place unless LAWA and/or FAA will actually institute mandatory and enforceable measures to ensure that shift actually occurs. This is particularly true in light of the fact that the airlines have, to date, persisted in operating commuter aircraft at LAX despite its existing congestion problem. To the extent the Draft EIS/EIR's environmental analysis assumes that airlines will voluntarily shift their commuter operations to other regional airports, that analysis must be revised to indicate what the effect would be if such a shift does not occur.

Response:

As indicated in Chapter 3, Alternatives, of the Draft EIS/EIR (subsection 3.1.2), there are difficult legal issues involved with restricting airport use by class of aircraft, including commuter operations as suggested by the commentor. Moreover, much of the commuter traffic at LAX connects to international and long-haul domestic operations, making it impractical to divert all commuter operations. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It should also be noted that a shift in air service patterns that involves commuter aircraft operations moving to other regional airports is predicted to occur unassisted as the airfield system reaches its practical capacity under the No Action/No Project Alternative or Alternatives C or D.

AL00033-40

Comment:

c. The Draft EIS/EIR's Alternatives Analysis Improperly Rejects Congestion Pricing.

The Draft EIS/EIR's cursory discussion of pricing policies fails to address the use of congestion pricing as an alternative to expansion. Rather than consider the benefits that might be offered by a properly designed congestion pricing system, the Draft EIS/EIR offers an ill-conceived scheme that bears little resemblance to those advocated in the congestion pricing literature. It concludes, on the basis of this scheme's inadequacy, that all congestion pricing is likewise doomed to fail. Without analyzing the

potential of a more carefully designed system, however, the Draft EIS/EIR has no basis for drawing this pessimistic conclusion. (Draft EIS/EIR at 3-3.)

The premise of congestion pricing is simple. By increasing landing fees during peak arrival and departure times, an airport creates incentives to reduce congestion, forcing carriers to internalize the costs of crowding and delay which would otherwise be imposed on consumers and other airlines. (See Notice of Market-Based Actions to Relieve Airport Congestion and Delay, 66 Fed. Reg. 43947, 43948 (August 21, 2001).) If fees are raised sufficiently, airlines will adjust their flight schedules, use larger airplanes, or use alternative airports. This approach thus has the advantages of increasing capacity and generating additional revenue without requiring any costly infrastructure improvements.

Congestion pricing has earned growing support. A 1999 Transportation Research Board study included a call for congestion pricing, stating that "pricing the use of airways and airports is the most suitable approach to rationalizing (congestion management), and probably the only long-term solution to ensuring efficient use and supply of vital infrastructure." (Transportation Research Board, Entry and Competition in the U.S. Airline Industry: Issues and Opportunities 103 (1999), available at: http://www4.trb.org/trb/onlinepubs.nsf/web/trb_special_reports (attached hereto as Exhibit 3(V)).) Secretary of Transportation Norman Mineta recently indicated his support for the use of steep fees to alleviate congestion. (Ricardo Alonso-Zaldivar, "High Fees Good Way to Ease Airport Delays, Mineta Says," L.A. Times, March 14, 2001 (attached hereto as Exhibit 3(W)).) Both San Francisco and LaGuardia International Airports have seriously considered congestion pricing as a method of traffic management, (Charles River Associates, Reductions in Flight Operations as an Alternative to Runway Reconfiguration at San Francisco International Airport, April 2001, available at http://www.sfoairport.com/future/runway/btf_rdv_recdevel.asp; Notice of Alternative Policy Options for Managing Capacity at LaGuardia Airport and Proposed Extension of the Lottery Allocation, June 12, 2001, available at <http://api.hq.faa.gov/lga/>.) and modeling has suggested that Minneapolis-St. Paul Airport could achieve a 30% increase in capacity solely through the use of congestion pricing. (Joseph Daniel, Congestion Pricing and Capacity of Large Hub Airports: A Bottleneck Model with Stochastic Queues, 63 Econometrica 327 (1995) (attached hereto as Exhibit 3(X)).)

Despite this support, and the simplicity and economic benefits of this approach, the Draft EIS/EIR contains only a single paragraph dismissing congestion pricing. The dismissal is based upon a flawed understanding of congestion pricing. While congestion pricing schemes are based upon increasing landing prices for peak times, the proposal described in the Draft EIS/EIR would selectively and slightly decrease prices for off-peak times. Since one of the fundamental premises of congestion pricing is that landing prices are already artificially low and must be raised in order to create a realistic incentive structure, this proposed approach seems designed for failure. (See 66 Fed. Reg. 43948). Not surprisingly, the report concludes that its approach will cost the airport money without significantly affecting traffic. (Draft EIS/EIR at 3-3.) This conclusion may be accurate, but it does not indicate that a system designed to succeed would be similarly ineffective. Rather than this cursory dismissal, the Draft EIS/EIR should contain a complete analysis of realistic congestion pricing systems.

The dismissal is also based on the bare assertion, offered without factual support, that airlines are taking voluntary measures to reduce congestion. If these measures are indeed being taken, LAWA should offer a quantitative discussion of their scope and effectiveness. In the absence of such discussion, evaluating both the need for expansion and the relative benefits that could be offered by voluntary and pricing-based systems is impossible.

Response:

The discussion of pricing policies on page 3-3 of the Draft EIS/EIR does not question or dismiss the potential for congestion pricing to help shift some amount of aircraft operations away from congested periods. As stated in the Draft EIS/EIR, "The airlines at LAX are already taking steps to increase their ability to serve demand by voluntarily using larger aircraft with higher load factors and scheduling flights during less congested periods (peak spreading) in response to capacity constraints and increased competition. Pricing policies designed to encourage these practices are unlikely to produce significant additional benefits in terms of airport capacity, while setting fees to discourage operations would reduce airport income and lower the service available to the public." As an alternative to airport expansion, while still providing for improvements related to safety (i.e., incursions), security (i.e., airport security in a post-9/11 environment), and improved airport operations and passenger convenience, Alternative D was added subsequent to publication of the Draft EIS/EIR. As described in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR, Alternative D is specifically designed to serve a future (2015)

3. Comments and Responses

airport capacity comparable to that of the No Action/No Project Alternative, while providing the improvements noted above. Alternative D is considered to be more feasible, desirable, and effective as an alternative to expansion compared to congestion pricing.

AL00033-41

Comment:

3. The Draft EIS/EIR's Description and Analysis of the No Project Alternative Is Inaccurate.

As the examples and discussion below dramatize, the Draft EIS/EIR is fundamentally flawed in its characterization and analysis of the No Project Alternative. Generally speaking, LAWA's description and analysis of the No Project Alternative appear to have been carefully engineered to overstate the level of development at and near LAX (and the associated impacts) that would occur in the absence of an approved new LAX Master Plan. The Draft EIS/EIR appears to have inflated the No Project Alternative in this fashion in an effort to make the Build Alternatives look less problematic by comparison. This approach fails to satisfy CEQA's and NEPA's requirements of a no project analysis and amounts to a major legal flaw.

Under CEQA, an EIR's "no project" analysis must focus on existing conditions "as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." (CEQA Guidelines § 15126.6(e)(2).) The lead agency is directed, under CEQA's Guidelines to focus exclusively on "what would reasonably be expected to occur in the foreseeable future." (CEQA Guidelines § 15126.6(e)(3)(C).) NEPA, like CEQA, requires agencies to include in their environmental review documents an analysis of "the alternative of no action." (40 C.F.R. § 1502.14(d).) Artificially inflating the scope and environmental impacts of the "no project" alternatives as the Draft EIS/EIR has done runs contrary to the above-described requirements of NEPA and CEQA and is highly misleading to the public and decisionmakers who must rely on that document.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions.

AL00033-42

Comment:

a. No Project Alternative Capacity.

During the development of the Master Plan and associated Draft EIS/EIR, LAWA abruptly and without explanation increased its estimate of the number of passengers and amount of cargo that could be served at LAX under the No Project Alternative. As documents attached hereto as Exhibit 3(J) illustrate, as recently as November 1999, LAWA was taking the position that the No Project Alternative would "only allow for future annual passenger growth to 70 MAP by 2015 and the accommodation of only 2.5 MAT of cargo by 2015." One month later, however, LAWA was presenting an entirely different estimate of the No Project Alternative capacity, stating that the existing airport will "allow for future annual passenger growth to 79 million annual passengers (MAP) by 2015 and the accommodation of only 3.1 million annual tons (MAT) of cargo by 2015." (See Exhibit 3(J) (printout of LAWA website from December 1999).) It is this latter inflated estimate of capacity that the Draft EIS/EIR relies on. Increasing the purported capacity of the No Project Alternative has the direct effect of inflating the apparent environmental impacts of the No Project Alternative, incorrectly portraying the Master Plan's impacts as comparatively less significant than they are. This is a major flaw in the document.

In their response to comments, LAWA and FAA must provide a full explanation and justification for why the No Project Alternative capacity estimates were so dramatically increased between November and December of 1999. In addition, the Draft EIS/EIR should indicate for comparison purposes what the impacts of the No Project Alternative would be if it in fact would serve 70 MAP and 2.5 MAT of cargo as previously estimated by LAWA.

Response:

As outlined in Chapter 3, Alternatives, of the Draft EIS/EIR, the concept development phase of the LAX Master Plan began in early 1996 and extended until June, 1999. The initial description of the No Action/No Project Alternative was based on the CEQA Guidelines in effect at the time. The June, 1997 NOP identified the capacity of the No Action/No Project Alternative as ranging between 68 and 72 million annual passengers (NOP, page 12). Subsequent to the publication of the NOP, and as fully described in the Supplemental Notice (page 7), the No Action/No Project Alternative was refined to conform to changes in the rules governing the CEQA definition of the No Project Alternative. As indicated in the Supplemental Notice, the October 1998 revisions of the CEQA Guidelines further clarify that, where the project that is being evaluated by an EIR is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the No Project Alternative will be the continuation of the existing plan, policy, or operation into the future. In such situations, other projects initiated under the existing plan will typically continue while the new plan is developed. In the case of the LAX Master Plan, the project is being developed to amend or supersede the existing interim LAX Master Plan adopted in 1981. Accordingly, the No Action/No Project Alternative was redefined to include evaluation of additional projects and actions, consistent with the existing 1981 Master Plan, that would reasonably be expected to occur in the foreseeable future if the LAX Master Plan is not approved and/or that are predictable responses to increasing congestion at LAX that would be implemented without any FAA action. Such actions would include the increased use of remote hardstanding for aircraft parking and additional measures to reduce curbside congestion. The No Action/No Project Alternative also takes into account the airlines' likely continued response to increasingly restrictive LAX capacity limitations through adjustments in their air service such as introducing a greater proportion of wide-body aircraft. Although these changes were published in the Supplemental Notice in mid-1999, LAWA's website was not updated until December 1999.

AL00033-43

Comment:

b. Collateral Development.

The Draft EIS/EIR's No Project Alternative assumes significant collateral development by LAWA in two areas neighboring LAX: the LAX Northside Area and the Continental City site. (Draft EIS/EIR at 3-29.) For the reasons outlined below, the Draft EIS/EIR's inclusion of such development in the No Project Alternative is improper.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and the inclusion of collateral development in the No Action/No Project Alternative.

AL00033-44

Comment:

(1) Continental City Site

The property the Draft EIS/EIR refers to as the Continental City site is located at the far southeast corner of LAX, and is presently vacant. In the early 1980's Continental Development Corp. ("Continental"), not LAWA, applied for and received certain approvals from the City of Los Angeles relating to the development of a massive office, hotel and retail complex on the Continental City site (3 million square feet of office and hotel space and 100,000 square feet of retail space). This project was never built, however, and in 1996, LAWA acquired the site for possible aviation development in conjunction with the Master Plan now being considered.

The Draft EIS/EIR analysis assumes that LAWA could and would, by 2015, develop the 28.5 acre Continental City site according to the approvals earlier received by Continental, without conducting any further environmental review. (Draft EIS/EIR at Technical Report 1 at 41.) It does so by including development of the Continental City project as part of the Master Plan No Project Alternative. For the reasons outlined in detail below, including development of the Continental City site in the Draft EIS/EIR's No Project Alternative is wholly inappropriate.

3. Comments and Responses

The improper inclusion of Continental City site development in the No Project Alternative contributes significantly to the Draft EIS/EIR's general overstatement of the scope and environmental impacts of the No Project Alternative. By assuming development of the massive Continental City Project -- with its potentially enormous environmental impacts -- in the LAX Master Plan No Project Alternative, LAWA drives up the apparent environmental impacts of that alternative and gives the false impression that the impacts of the proposed Master Plan are favorable by comparison. This effect is apparent in every environmental impact area addressed in the Draft EIS/EIR.⁵

5 For example, LAWA's analysis of water usage assumes large quantities will be used at the Continental City site under the No Project Alternative (Draft EIS/EIR at Table 4.25.1-1) and relies on that fact to reach the inaccurate conclusion that any one of the Master Plan Build Alternatives would use less water than the No Project Alternative (Draft EIS/EIR at 4-1143.) LAWA's Draft EIS/EIR adopts the same flawed approach in its analysis of wastewater impacts. (Draft EIS/EIR at Table 4.25.2-2, Draft EIS/EIR at 4-1158.)

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and the inclusion of the Continental City development in the No Action/No Project Alternative. It should be noted that 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.

AL00033-45

Comment:

(a) LAWA Earlier Represented That Development of the Continental City Site Would Be Analyzed as Part of the Master Plan and Subject to Environmental Review.

LAWA's current characterization of non-aviation development on the Continental City site as a reasonably foreseeable component of the No Project Alternative is completely at odds with the position taken by that agency when it acquired the property in 1996. As Exhibit 3(B) attached hereto illustrates, in 1996 when LAWA submitted an Airport Improvement Program ("AIP") grant application to the FAA for funds to acquire the Continental City site, it made the following representations regarding future use of that site:

"The Department is purchasing the property known as the Continental City site (approximately 42.98 acres) and 7.12 acres in Westchester adjacent to the golf course. The property is being purchased for future airport development. The development of the property has not been determined and will be part of the Master Plan process in determining future use of the sites. The Department intends to maintain current utilization of the properties until the completion of the Master Plan and appropriate environmental review." (BOAC July 9, 1996 Agenda, Item 8.)

This 1996 statement illustrates that LAWA has already decided not to pursue development of the site for the commercial mixed-use development originally proposed by Continental 20 years ago. Additionally, LAWA clearly committed to determine and analyze the impacts of any future development by LAWA of the site through the Master Plan and associated EIS/EIR. It is also worth noting that, as Exhibit 3(G) attached hereto illustrates, it was also Continental's understanding in 1996 that LAWA was acquiring the Continental City site for possible airport uses, not for development according to the plans developed (but never pursued) by Continental.

LAWA's most recent Quarterly Project Status Report (attached hereto as Exhibit 3(K)), clearly shows that LAWA has plans immediately to pursue aviation-related development of the site (Parking Lot A: "additional long-term parking spaces at the former Continental City site") rather than any non-aviation development. Finally, because the Continental City site was apparently purchased by LAWA with AIP funds, we question whether LAWA could develop or permit development of the site for non-aviation purposes. If the site were so developed, would LAWA have to refund to the FAA the considerable federal monies the FAA provided for the purchase based on LAWA's representation that the site would be developed for aviation purposes? If LAWA cannot develop the site for non-aviation purposes because AIP funds were used for its purchase, the Draft EIS/EIR certainly cannot, as part of the No Project Alternative, assume the site will be subject to non-aviation development.

In short, in its acquisition of and planning for the Continental City site, LAWA has routinely and uniformly represented that the site would be developed for aviation uses, not the uses Continental proposed for the site. LAWA cannot now ignore that commitment. Development of the formerly proposed Continental City project, now that the site is owned by LAWA, is not reasonably foreseeable and should not be considered part of the No Project Alternative.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. Although LAWA purchased the Continental City property with the intent of using it as part of the LAX Master Plan, as indicated in the topical response, if the Master Plan were not approved, it is reasonable to assume that the property would be developed in accordance with its entitlements. The issue of whether or not LAWA would have to refund federal monies if the Continental City site is developed for non-aviation purposes is immaterial to its inclusion in the No Action/No Project Alternative.

AL00033-46

Comment:

(b) Because the Environmental Review Prepared for the Continental City Project Is Outdated, a Subsequent or Supplemental EIR Would Be Required Before That Project Could Be Implemented.

The City of Los Angeles, which was the lead agency for the Continental City project in the early 1980's, prepared and certified the EIR for Continental's proposed project more than sixteen years ago. (See Continental City Draft EIR and FEIR attached hereto as Exhibit 3(I).) In 1985, the year the Continental City project FEIR was certified, LAX accommodated approximately 38 million passengers and 784,064 tons of air freight. (Los Angeles Department of Airports, "LAX 2000 Draft EIR" (February 1988) at Table 8, attached hereto as Exhibit 3(C).) Since 1985, the number of passengers using LAX annually has increased approximately 76% (to approximately 67 million annual passengers in 2000) and the amount of air freight passing through LAX has increased approximately 155% (to 2,002,614 tons in 2000). (See statistics re: passenger and cargo levels at LAX attached hereto as Exhibit 3(N).) The significant increases in passenger and cargo levels at LAX have dramatically changed the environmental circumstances in the LAX area by, for example, increasing traffic congestion and air pollution. The 1985 Continental City project FEIR, could not have and did not consider the impacts of the project in light of these changed circumstances.

In light of the considerable time that has passed and the significant changes that have occurred in the LAX area since the preparation and certification of the Continental City project FEIR, LAWA cannot today legally rely on the original environmental review document for the project to proceed with necessary approvals and construction. Even if the Continental City project environmental review had been adequate in 1985, which it was not (see discussion below), its analysis and conclusions are no longer supported by substantial evidence. This is so because substantial new information has come to light and because substantial changed circumstances have developed since that FEIR was certified in 1985. Under NEPA and CEQA, an agency must prepare a subsequent or supplemental EIS or EIR if, inter alia, substantial changes occur with respect to circumstances under which the project would be undertaken that involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. (40 C.F.R. § 1502.9(c)(1); Pub. Res. Code § 21166; CEQA Guidelines §§ 15162(a)(1) and (2); 15163.) In light of all that has happened at LAX since 1985, there is no question that this requirement for preparation of a subsequent or supplemental EIR applies to the Continental City project. If LAWA wanted to proceed today with the Continental City project as originally approved, it would first have to prepare a thorough supplemental or subsequent EIR for the project. (CEQA Guidelines §§ 15162(a); 15163.) As such, LAWA cannot consider implementation of the Continental City project to be part of the No Project Alternative in its Master Plan EIS/EIR.

LAWA's expressed position (in its Master Plan Draft EIS/EIR) that it could and would rely on the 1985 FEIR for the Continental City project is made all the more outrageous by the fact that LAWA's own 1984 CEQA comment letter to the City of Los Angeles regarding Continental's project correctly pointed out that the project's traffic impacts would not be mitigated adequately. As Exhibit 3(D) attached hereto illustrates, LAWA objected to the Continental City project on the basis of its likely impact on LAX area traffic. Specifically, LAWA noted in its comment letter that "The estimated project related 40,350 daily vehicle trips would be a significant increase to daily traffic volumes in the already congested airport

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vicinity." (Letter from Maurice Z. Laham, City of Los Angeles Dept. of Airports to Ray Yoshida, Dept. of City Planning, dated August 29, 1984, attached hereto in Exhibit 3(D).) LAWA complained further that "The traffic improvements committed to in the EIR described on page 111-23 are not considered adequate to offset the level of impact identified" and suggested additional mitigation measures. (Id.) The City of Los Angeles responded to LAWA's comments by acknowledging that the Continental City project's traffic impacts would remain significant even after implementation of mitigation measures identified in the EIR. (City of Los Angeles Corrections and Additions to the Continental City Project EIR at 6-7, attached hereto in Exhibit 3(D).) The City noted LAWA's suggested mitigation measures, but effectively declined to adopt them as mandatory mitigation for the project. (Id.)

In light of LAWA's own contemporaneous recognition and acknowledgment that the 1985 FEIR for the Continental City project did not contain adequate mitigation, LAWA cannot now reasonably rely on that environmental review document as it is attempting to do. LAWA must remove the Continental City project from the scope of the No Project Alternative addressed in its Master Plan Draft EIS/EIR.

Finally, the Master Plan Draft EIS/EIR does not indicate whether LAWA has obtained from Continental any rights to use the architectural and other plans developed by I M Pei & Partners for the Continental City project. We request that LAWA provide this information. If LAWA has not obtained such rights, it would be legally unable to proceed with the Continental City project as analyzed in the 1985 FEIR and would clearly have to conduct further environmental review before proceeding with development of different plans for the Continental City site. Moreover, if LAWA has not obtained such rights, that fact provides further support for the conclusion (discussed above) that LAWA has already committed not to pursue development of the site with the non-aviation uses proposed by Continental. As noted above, because LAWA has committed to develop the Continental City site, if at all, in a manner different from that contemplated by Continental, development of the site for non-aviation uses is not reasonably foreseeable and cannot form the basis for LAWA's No Project Alternative analysis.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and the inclusion of the Continental City development in the No Action/No Project Alternative. The entitlements for the Continental City project allow development of a specified square footage of buildings with specific heights and land uses. The architectural designs prepared for the original development proposal are not relevant.

AL00033-47

Comment:

(c) LAWA's Claim That it Is Fully Entitled to Construct the Continental City Project Is Legally Suspect.

LAWA's claim of entitlement to construct the Continental City Project is legally highly suspect. In 1985, Continental obtained only tentative map approval for the Continental City project (Tentative Tract 36729), not final map approval. Tentative maps expire if they are not made final. (See Gov't Code § 66452.6.) The material attached hereto as Exhibit 3(H) consists of copies of relevant documents from the City of Los Angeles Planning Department file for Tentative Tract 36729, which we obtained pursuant to the California Public Records Act.⁶ This material illustrates that the tentative map approval for the Continental City Project has expired. It also shows that Tentative Tract 36729 was apparently never made final. This means that any entitlements originally granted to Continental for development of the Continental City site have lapsed. Thus the No Project Alternative analysis, which must account for current plans and approvals, cannot properly include this project. The material also illustrates that the Draft EIS/EIR seriously misrepresents the state of affairs with regard to the possible development of the Continental City site. The Draft EIS/EIR indicates that such development can and will go forward almost immediately if the LAX Master Plan is not approved (Draft EIS/EIR at 3-29), but our review of relevant City of Los Angeles documents shows that this simply is not true. This is a serious inaccuracy that undermines the whole of the Draft EIS/EIR's No Project Alternative analysis. To correct the error, LAWA and FAA must remove Continental City development from the No Project Alternative, revise that analysis and recirculate the Draft EIS/EIR.

If LAWA were to persist in its assertion that the Continental City project is fully vested to proceed as approved in the early 1980's it would have to supplement the Draft EIS/EIR with considerable analysis and information. For example, LAWA must answer the following question: by what mechanism(s) was

the effectiveness of Tentative Tract 36729 or other entitlement(s) extended so that they arguably remain in effect today? The Draft EIS/EIR must provide the citing references to all documents bearing on the answer to this question and must make those documents publicly available.

6 It is possible additional relevant documents exist but were not provided to us.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. It should be noted that the Tentative Tract Map for Continental City was recorded as Final Tract Map #36729 on September 29, 1988, and the City Council approved a Development Agreement for Continental City under Contract C-65716 signed by Mayor Bradley on October 29, 1986. Copies of these documents are provided in the Administrative Record for the LAX Master Plan project, as well as in the project's CEQA Reference library established pursuant to Section 15087(c)(5) of the CEQA Guidelines.

AL00033-48

Comment:

(2) LAX Northside Area

The property the Draft EIS/EIR refers to as the LAX Northside area is located directly north and along most of the length of the LAX northern perimeter. In the early 1980's LAWA received certain approvals from the City of Los Angeles relating to massive development of the area. With the exception of the Westchester Parkway, the project was never built. The Draft EIS/EIR analysis assumes that LAWA could and would, by 2015 develop the entire LAX Northside Project. (Id.) As with the Continental City Project discussed above, the Draft EIS/EIR improperly includes the Northside project in the No Project Alternative.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and the inclusion of the LAX Northside development in the No Action/No Project Alternative.

AL00033-49

Comment:

(a) Development of the Northside Project as Approved in the 1980's Is Not Reasonably Foreseeable Because LAWA Has Clearly Abandoned That Project Design.

Development of the Northside project as approved in the 1980's is not reasonably foreseeable because LAWA has clearly abandoned that project design. In the nearly 20 years since LAWA obtained its approvals for the Northside project, it has had more than adequate time and opportunity to undertake development of that project if that was its intent. Its decision not to undertake such development indicates that LAWA has abandoned the project as originally approved. That fact is made abundantly clear by the Master Plan itself, which calls for development in the Northside area in a manner that differs dramatically from the project proposed by LAWA in the 1980's. LAWA's true plans and desires for the Northside area appear to be those described in its Master Plan Build Alternatives (i.e., the Westchester Southside Project), not those developed in the 1980's.

Further evidence of LAWA's abandonment of its 1980's plans for the LAX Northside area can be found in the fact that LAWA is now actively pursuing development of a new administration facility on land previously designated for development as part of the Northside project. (See Exhibit 3(R) attached hereto.) In order to pursue such development on land previously earmarked for Northside project development, LAWA must have abandoned the Northside project.

In short, LAWA apparently has no intention of ever pursuing its long-abandoned Northside project as that project was approved in the 1980's. The inclusion of that project (and its significant environmental impacts) in the Draft EIS/EIR as part of the No Project Alternative is a transparent attempt to inflate the apparent environmental impacts of the No Project Alternative in order to make the Master Plan Build Alternatives look better by comparison. This approach to analysis of the No Project Alternative is

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inappropriate under both CEQA and NEPA and must be remedied. This problem is so fundamental (and its implications so far-reaching) that it cannot be remedied without correcting the analysis presented in nearly every section of the Draft EIS/EIR. LAWA and FAA should rewrite and recirculate the Draft EIS/EIR for further public review and comment.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and the inclusion of the LAX Northside development in the No Action/No Project Alternative.

AL00033-50

Comment:

(b) Because the Environmental Review Prepared for the Northside Project Is Outdated, a Subsequent or Supplemental EIR Would Be Required Before That Project Could Be Implemented.

As our previous discussion of the outdated nature of the Continental City Project FEIR makes clear, the environmental circumstances at and around LAX have changed dramatically since the mid- 1980's when the Northside project was analyzed. The FEIR for the Northside project could not and did not consider the impacts of that project in light of these changed circumstances. In 1983, the year the LAX Northside project FEIR was certified, LAX accommodated approximately 33.4 million passengers and 770,266 pounds of air freight. (Los Angeles Department of Airports, "LAX 2000 Draft EIR" (February 1988) at Table 8, attached hereto as Exhibit 3(C).) Since 1983, the number of passengers using LAX annually has increased approximately 100 percent (to approximately 67 million passengers in the 2000) and the amount of air freight passing through LAX has increased approximately 160 percent (to 2,002,614 tons in 2000). The significant increases in passenger and cargo levels at LAX have dramatically changed the environmental circumstances in the LAX area by, for example, increasing traffic congestion and air pollution.

In light of the considerable time that has passed and the significant changes that have occurred in the LAX area since the preparation and certification of the Northside project FEIR, LAWA could not today legally rely on the original environmental review document for the project to proceed with necessary approvals and construction. Even if the Northside project's environmental review had been adequate, which it was not (see e.g., discussion in section 4.9. below, regarding impacts to archaeological/cultural resources), changed circumstances have further caused its analysis and conclusions to be no longer supported by substantial evidence. This is so because substantial new information has come to light and because substantial changed circumstances have developed since that FEIR was certified in 1983.

Under NEPA and CEQA, an agency must prepare a subsequent or supplemental EIS or EIR if, inter alia, substantial changes occur with respect to circumstances under which the project would be undertaken that involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. (40 C.F.R. § 1502.9(c)(1); Pub. Res. Code § 21166; CEQA Guidelines §§ 15162(a)(1) and (2); 15163.) In light of all that has happened at LAX since 1983, there is no question that this requirement for preparation of a subsequent or supplemental EIS/EIR applies to the Northside project. If LAWA wanted to proceed today with the Northside project as originally approved, it would first have to prepare a thorough supplemental or subsequent EIS/EIR for the project. (Id.) As such, LAWA cannot consider implementation of the Northside project to be part of the No Project Alternative in its Master Plan EIR. The Northside project must be removed from the scope of the No Project Alternative addressed in its Master Plan Draft EIS/EIR.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and the inclusion of the LAX Northside development in the No Action/No Project Alternative.

AL00033-51

Comment:

c. Ongoing and Past Development.

(1) Century Cargo Complex

The Draft EIS/EIR's No Project Alternative is also inaccurate and overly ambitious because it assumes completion of the entire Century Cargo Complex Redevelopment Project, including components that have not yet legally been approved. The Draft EIS/EIR's treatment of the Century Cargo Complex Redevelopment Project is problematic because LAWA has never conducted any comprehensive environmental review of the redevelopment project or its components. (Id.) LAWA has instead segmented the project and improperly claimed that the elements undertaken to date were categorically exempt from CEQA. Moreover, LAWA has, to date, neither approved nor undertaken several of the elements of the redevelopment project. In light of these circumstances, LAWA cannot legally treat the Century Cargo Complex Redevelopment Project as part of the No Project Alternative. (40 C.F.R. § 1508.25(a)(1); *City of Santee v. County of San Diego*, 214 Cal. App. 3d 1438, 1452 (1989).) The whole of that project -- and certainly the elements that have not yet been approved and/or constructed -- must instead be analyzed in the Draft EIS/EIR as part of one or more of the LAX Master Plan Build Alternatives rather than in the No Project Alternative.

LAWA documents indicate that it has recently developed and begun implementing a major redevelopment project in the Century Cargo Complex.⁷ (See documents attached hereto as Exhibit 3(M).) Elements of the Century Cargo Complex Redevelopment Project include: (1) construction of a new 145,000 square foot cargo facility known as Cargo Building A; (2) construction of a new 150,000 square foot cargo facility known as Cargo Building B; (3) construction of roadway, drainage and utility infrastructure to support operations in the Century Cargo Complex; (4) renovation of various Century Cargo Complex air cargo facilities, including Air Freight Building 8, Air Freight Building 1, and the Mercury Air Group Facility; (5) demolition of various Century Cargo Complex buildings; (6) relocation of various air freight operations within the Century Cargo Complex; and (7) relocation of United States Postal Service retail operations from the Century Cargo Complex to a new facility. LAWA has taken steps to approve and implement some of these elements, but has never conducted any comprehensive environmental review for that project as required by CEQA.

Rather than conducting the required environmental review, LAWA has segmented the Century Cargo Complex Redevelopment Project and approved piece-meal implementation of segmented components outside of the Master Plan and in reliance on inapplicable CEQA exemptions.⁸ Because LAWA engaged in an illegal strategy of piece-mealing approval of the Century Cargo Complex Redevelopment Project and avoiding comprehensive environmental review for that project, it cannot now claim that the entirety of that project is part of the No Project Alternative for the LAX Master Plan. LAWA must instead analyze the Century Cargo Complex Redevelopment Project as part of the LAX Master Plan.

The impropriety of including the Century Cargo Complex Redevelopment Project as part of the No Project Alternative rather than the Preferred Alternative and other Build Alternatives is also apparent from Draft Master Plan's report on existing cargo conditions. That report describes existing cargo facilities as of March 1995 and lists the facility modifications that were then planned. (Draft Master Plan at II-4.20.) Because the Century Cargo Complex Redevelopment Project is not among the projects listed, there is no apparent justification for including it in the No Project Alternative. (Id.)

In addition, the LAX Master Plan Draft does not accurately represent proposed redevelopment of the Century Cargo Complex. Figure 3-6 of the Draft EIS/EIR, when compared to the drawings in Exhibit 3(E), indicates that the following structures would continue to exist in the Century Cargo Complex, despite the fact that LAWA's own planning and/or other portions of the Draft EIS/EIR indicate that the buildings are slated for demolition: Air Freight Building No. 3 (a.k.a. the American International (AIA) Building), the TWA Cargo Building, Air Freight Building No. 8, Air Freight Building No. 9 (present location of Air New Zealand) and the Training Building (located adjacent to the existing Mercury Air Cargo Group Facility).⁹ The effect of including these buildings in the depiction of the No Project Alternative is to significantly overstate the amount of cargo space that will be available in the Century Cargo Complex under the No Project Alternative. This overstatement contributes to the Draft EIS/EIR's overstatement of the environmental impacts of the No Project Alternative. LAWA must correct its depiction of the Century Cargo Complex under the No Project Alternative.

The fact that LAWA's depiction of the Century Cargo Complex under the No Project Alternative includes the above buildings is particularly troubling in light of the fact that LAWA has previously relied on the demolition of such structures as an "offset" to square footage increases associated with the recent construction of other new structures in the Century Cargo Complex. Specifically, LAWA earlier approved various components of the Century Cargo Complex Redevelopment Project, claiming they were categorically exempt from CEQA based in large part on the representation that the project would

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involve offsetting demolition and therefore not result in an overall increase in square footage available in the Century Cargo Complex. If LAWA were to retain any of the above structures, it would be doing so in violation of CEQA and in contravention of its earlier representation. Put another way, if LAWA proposes to retain any of the above-listed buildings, it cannot do so as part of its No Project Alternative, as that retention would not be in keeping with current plans for the complex.

It should also be noted that, the LAX Master Plan Draft EIS/EIR does not accurately represent the number of proposed aircraft parking spaces that would exist near the Century Cargo Complex under the No Project Alternative. In fact, Figure 3-6 of the Draft EIS/EIR fails to show any aircraft parking in the vicinity of the Century Cargo Complex. Figure 3-4, which depicts existing conditions, is similarly flawed. This is in stark contrast to Figures 3-7, 3-11 and 3-15, which depict extensive cargo aircraft parking for LAWA's proposed Build Alternatives. Exhibit 3(E) attached hereto consists of drawings of the Century Cargo Complex air cargo facilities existing in 1999, reproduced from LAWA's Final Initial Study prepared for the United Airlines Air Cargo Facility. These drawings, which show at least 17 aircraft parking spaces in the vicinity of the Century Cargo Complex, contradict the information now provided in the Draft EIS/EIR's Figures 3-4 and 3-6. The above-described omission contributes to the Draft EIS/EIR's systemic problem of misrepresenting existing conditions and the No Project Alternative and must be remedied.

7 The City of El Segundo presented and substantiated these allegations relating to the Century Cargo Complex Redevelopment Project in its 1999 Complaint and subsequent pleadings in its lawsuit against LAWA and other Los Angeles defendants (City of El Segundo v. Board of Airport Commissioners, et al., Superior Court, Los Angeles County - Case No. BC 220609, filed November 23, 1999.) The City's Complaint is attached hereto as Exhibit 3(F).

8 In approving implementation of segmented components based on inapplicable CEQA exemptions, LAWA has claimed that the project elements involve negligible or no expansion of airport operations beyond that previously existing or permitted and/or involve replacement of commercial or industrial structures with new structures of substantially the same size, purpose and capacity. Information presented in the Draft EIS/EIR makes clear that LAWA's earlier approval of elements of the Century Cargo Complex Redevelopment Project without environmental review violated CEQA. For example, LAWA acknowledges in the Draft EIS/EIR that renovation of existing cargo facilities (principally the ongoing Century Cargo Complex Redevelopment Project) will result in a "net gain of 431,300 square feet of building space beyond the 1997 inventory." (Draft EIS/EIR at 3-26.) This increase in cargo building square footage was never the subject of any environmental review. Similarly, LAWA's Draft EIS/EIR makes clear that the agency considers all redevelopment of the Century Cargo Complex (e.g., building construction, new roadways, taxiway improvements) to be a single, unified project. This acknowledgment provides further indication that the agency should not have approved any of the segmented elements of the Century Cargo Complex Redevelopment Project based on categorical exemptions, but should instead have conducted a comprehensive environmental review of the project.

9 This depiction of the Century Cargo Complex under the No Project Alternative is inconsistent with LAWA's written description of what is to occur in the Century Cargo Complex. The Draft EIS/EIR indicates that most of the listed buildings will be demolished. (Draft EIS/EIR at 3-26.)

Response:

TR-GEN-2 provides a discussion regarding the No Action/No Project Alternative assumptions. Information pertaining to specific points raised in this comment are provided herein.

As indicated in Topical Response TR-GEN-2, the LAX Master Plan is being developed to supersede the existing interim LAX Master Plan adopted in 1981. Accordingly, as described in Section 3.2.4 of the Draft Master Plan, the No Action/No Project Alternative was defined to include additional projects and actions, consistent with the existing 1981 Master Plan, that would reasonably be expected to occur in the foreseeable future if the LAX Master Plan is not approved and/or that are predictable responses to increasing congestion at LAX that would be implemented in the absence of FAA action. The State CEQA Guidelines permit the no project alternative to include projects that are in the planning stages, as long as such projects are consistent with the existing plan. Such projects are not required, under NEPA or CEQA, to have been previously approved in order to be considered reasonably foreseeable, nor is the status of the environmental review of such projects a determinative factor. However, projects included in the No Action/No Project Alternative that have not yet been approved would still be subject to environmental review prior to their implementation. The adequacy of past environmental reviews for

any projects already approved and/or undertaken at LAX that have been included in the No Action/No Project Alternative is not within the purview or scope of the LAX Master Plan EIS/EIR.

Prior to publication of the Draft EIS/EIR in January 2001 and the Draft Master Plan in November 2000, LAWA pursued various Capital Improvement Programs (CIP) to further enhance various aspects of service at LAX, including safety, security, efficiency and appeal to travelers, airlines, and other airport users. Among these long-standing improvements to the airport are improvements to the Century Cargo Complex. The Fiscal Years 2001 to 2003 CIP highlights several planned, but not necessarily implemented, improvements to the Century Cargo Complex. Portions of the CIP were carried out as planned while other projects have been delayed. Given the impact of the events of September 11, 2001 on the aviation industry, it is reasonable and understandable that projects planned prior to that date were suspended given the uncertainty facing airlines and airports at that time as well as the fiscal impacts to LAX and to its tenant airlines.

As described in Chapter 3, Alternatives (Section 3.2.4), of the Draft EIS/EIR, eight existing LAX cargo facilities were planned to be demolished while eight additional facilities were planned to be renovated or constructed. No portion of the Draft EIS/EIR states that all of this development was or is planned specifically for the Century Cargo Complex nor does any portion of the text state that the total square footage planned for construction would equal the total square footage of facilities planned for demolition. Further, this section of the Draft EIS/EIR is a summary of reasonably foreseeable improvements and does not reflect a commitment by LAWA to see to it that each of these projects is carried out as described or within a given time frame or as a collective and/or unified program.

It is not clear why the commentor believes that the discussion of the Century Cargo Complex improvements provided in the Draft EIS/EIR demonstrates that LAWA considers this development to be part of a "single, unified project." The Draft EIS/EIR merely identifies cargo projects planned for the Century Cargo Complex as well as projects planned in the other cargo complexes at LAX.

Regarding the statement that the Century Cargo Complex improvements were not listed on page II-4.20 of the Draft Master Plan, and therefore cannot be included in the No Action/No Project Alternative, the page cited by the commentor is part of the Existing Conditions Working Paper prepared in 1996. This working paper summarized the cargo operations as they existed in April 1995 and identified a number of modifications to cargo facilities that were then in the planning stages or underway. However, as noted above, the No Action/No Project Alternative includes facilities that are reasonably foreseeable to occur by the 2015 planning horizon in the absence of Master Plan approval. Moreover, the No Action/No Project Alternative was defined during the preparation of the Draft EIS/EIR, several years after the preparation of the Existing Conditions Working Paper.

As described in the Fiscal Years 2001 to 2003 CIP, LAWA made six commitments in redeveloping the Century Cargo Complex. For clarification, they are stated here: 1) maximize the use of airport property; 2) provide improved alignments of roadways, loading areas and building spaces; 3) consolidate land use for larger, more efficiently planned facilities; 4) improve airfield access and security; 5) relocate general employee parking and other activities which are incompatible with air cargo uses; and 6) improve overall truck access and circulation within the Century Cargo Complex. The improvements included in the No Action/No Project Alternative are consistent with these commitments.

Within the Century Cargo Complex, under the No Action/No Project Alternative, the construction of Cargo Building A and Cargo Building B was subject to environmental review and each project was determined categorically exempt under CEQA. Renovations to Air Freight Building #8, Air Freight Building #1, and the Mercury Air Group Facility were also subject to environmental review and determined categorically exempt under CEQA.

Under the No Action/No Project Alternative, Air Freight Building #3 would be demolished, as stated by the commentor. The TWA Cargo Building has already been demolished. Air Freight Building #8 has never been slated for demolition, but instead was determined categorically exempt under CEQA as a renovation project. As stated by the commentor, Air Freight Building #9 was demolished, but replaced by the United Airlines Cargo Building. The Training Building has also been demolished, as identified by the commentor, and was subject to environmental review.

The commentor states that the USPS would relocate retail operations from the Century Cargo Complex. Review of Exhibit 3(M) in the Fiscal Years 2001 to 2003 CIP, shows conflicting information. As

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described in the commentor's Exhibit 3(M), Fiscal Years 2001 to 2003 CIP, "the USPS will perform modifications to the retail portion of the USPS facility."

As noted above, the adequacy of past environmental reviews for any projects included in the No Action/No Project Alternative already approved and/or undertaken at LAX is not within the purview or scope of the LAX Master Plan EIS/EIR. Thus, comments raised on the adequacy of past environmental reviews completed by LAWA for the previously approved and constructed projects within the Century Cargo Complex are not within the scope of the LAX Master Plan EIS/EIR. However, projects that are included in the No Action/No Project Alternative that have not yet undergone environmental review and approval would be subject to environmental review prior to their implementation.

Figure 3-6 of the Draft Master Plan and its counterpart, Figure S3-2 of the Supplement to the Draft EIS/EIR, contain some inaccuracies in the graphical depictions of cargo facilities as highlighted by the commentor. The errors contained in these exhibits have been corrected in this Final EIS/EIR. However, the data relating to cargo facilities used in the environmental analysis contained within both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR remain correct and accurate, as does the resulting environmental analysis.

Neither the Draft EIS/EIR nor the Supplement to the Draft EIS/EIR make any effort to graphically depict specific aircraft parking positions at any of the existing cargo aprons. Figure 3-6 of the Draft EIS/EIR and Figure S3-2 of the Supplement to the Draft EIS/EIR illustrate an approximation of the whole of LAX airport and its facilities in 1997. Cargo aprons are considered to be controlled by the leaseholder and are part of the Airport Operations Area Non-Movement Area. LAWA is not responsible for, or in control of, how a given operator parks aircraft within its apron area as long as aircraft parking positions do not interfere with the safe operation of the airport or facilities adjacent to lease-holder's facility. Additionally, cargo facility apron areas are not always used for parking aircraft though there may be sufficient space. Cargo operators use apron for storing GSE equipment and preparation of cargo for delivery to aircraft parked at other locations on the airfield such as the terminal gates. The depiction of aircraft parked at cargo aprons in other figures within the Draft EIS/EIR or Supplement to the Draft EIS/EIR are shown strictly to aide the understanding of how a given proposed alternative would operate in the future. Specifically the depiction of aircraft should help readers grasp the scale of a given concept and which side of a given facility is the airside as opposed to the landside. The aircraft shown parked in the other various alternatives should not be construed as depicting capacity in terms of number of aircraft that would be able to be parked at a given cargo facility. The commentor's attached Exhibit 3(E) contains two illustrations of the Century Cargo Complex. Neither exhibit illustrates any aircraft parked at any cargo facility apron. The commentor highlights 17 parked aircraft depicted in one of the exhibits attached to the comment. However, each of the aircraft is parked on United Airlines' existing maintenance ramp, not on any portion of a cargo apron. The second attached exhibit illustrates the Century Cargo Complex in precisely the same manner as Exhibits 3-4 and 3-6 of the Draft Master Plan and Figure S3-2 of the Supplement to the Draft Master Plan, that is, without any parked aircraft.

AL00033-52

Comment:

(2) Commuter Terminals

The Draft EIS/EIR contains the following limited discussion of remote commuter aircraft parking under the No Project Alternative:

"Remote aircraft parking (hard standing) by commuter aircraft with busing to the terminals is projected to increase as passenger volume increases, thereby freeing up jet ways for larger air carrier aircraft." (Draft EIS/EIR at 3-25.)

This description is wholly inadequate and misleading. It fails to acknowledge that LAWA has already, since 1996-97, permitted the construction of the least three remote commuter terminals with associated aircraft parking: the American Eagle Terminal, the LAX Commuter Terminal (a.k.a. US Airways Express/Transtates Terminal), and the United Express Terminal. These projects were undertaken in furtherance of recommendations made in the Los Angeles International Airport Capacity Enhancement Tactical Initiative -- Commuter Gate Placement Design Study (January 1996), which is attached hereto as Exhibit 3(A).

As the City of El Segundo alleged and substantiated in its lawsuit against LAWA,¹⁰ LAWA illegally approved construction of the above-listed commuter terminals without the required environmental review. (See Exhibit 3(F).) Specifically, LAWA approved the commuter terminals based on the claim that they were categorically exempt from CEQA. LAWA now proposes to consider these projects to be part of the No Project Alternative. This is wholly inappropriate. Treating the terminals as part of the No Project Alternative without acknowledging that they have already (illegally) been constructed improperly indicates that significant expansion and increased capacity can and will occur at LAX under the No Project Alternative through the addition of these remote commuter terminals, when in fact, LAWA has already illegally increased the airport capacity by their addition.¹¹ The Draft EIS/EIR should acknowledge this fact. The above-described problem contributes further to one of the Draft EIS/EIR's recurring failings -- its overstatement of the capacity and environmental impacts of the No Project Alternative.

The Draft EIS/EIR's visual depiction of the No Project Alternative and existing conditions -- like the written description discussed above -- misrepresent the state of affairs with regard to remote commuter terminals. Most notably, Figures 3-4 and 3-5 fail to show the existing LAX Commuter Terminal (a.k.a. USAirways Express/Transtates Terminal). These visual depictions give the false impression that the No Project Alternative would involve significant growth in capacity at LAX as the result of the addition of additional commuter terminals when these terminals currently exist.

As the foregoing makes clear, LAWA has already implemented its plans to expand LAX capacity through the addition of three remote commuter terminals. Before LAWA could further increase LAX's capacity through the construction of additional commuter terminals, it must analyze those plans and their impacts in the Draft EIS/EIR. Such addition could, in no event, be considered part of the No Project Alternative because it has not been the subject of any environmental review, nor has it been approved by LAWA.

¹⁰ City of El Segundo V. Board of Airport Commissioners, et al., Superior Court, Los Angeles County - Case No. BC 220609.

¹¹ The Draft EIS/EIR effectively acknowledges that LAWA earlier violated CEQA by approving construction of the commuter terminals without environmental review. The Draft EIS/EIR acknowledges, for example, that construction of commuter terminals increases the volume of passengers (and therefore number of flights) LAX can accommodate. (Draft EIS/EIR at 3-25.) Projects of this sort require environmental review because they have the potential to cause significant environmental impacts in areas such as noise, traffic and air quality. They cannot legally be approved based on categorical exemptions. LAWA should explain why it earlier approved the commuter terminals without environmental review in light of the fact that it now acknowledges that such projects increase airport capacity.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. As indicated in the topical response, the No Action/No Project Alternative includes actions that would be reasonably be expected to occur in the foreseeable future in the absence of Master Plan approval. As described in the Draft EIS/EIR, and as quoted by the commentor, under the No Action/No Project Alternative, hard standing by commuter aircraft with busing to the terminals is projected to increase as passenger volume increases, thereby freeing up jet ways for larger air carrier aircraft.

This statement does not imply that the hard standing of commuter aircraft would increase airport capacity. In fact, both commuter aircraft and air carrier jet aircraft can be boarded at remote hardstand locations via stairs. The construction of the boarding facilities at the remote commuter terminals did not create new aircraft parking positions, but instead provided enhancements in passenger comfort and convenience primarily by providing a shelter for passengers to shield them from the weather between the time they exit a bus and board awaiting aircraft, and vice versa. Further, the airlines have always had two boarding areas, remote hard stands and terminal concourse gates. When commuter aircraft use gate facilities, air carrier aircraft are required to use remote hardstands. However, because commuter aircraft, specifically turboprop aircraft, are typically boarded via stairs and not jet bridges, it is not necessary that they park adjacent to terminal concourse structures. The passenger facility enhancements allowing for the relocation of commuter operations from areas adjacent to the existing terminal and concourse facilities within the CTA to remote apron locations does not increase capacity at

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LAX. Instead, the improvements make the airfield more efficient by making the terminal concourse gates accessible to air carrier aircraft that otherwise would be located at remote hardstand locations. This improves safety, efficiency, and passenger convenience.

As noted by the commentor, and as anticipated under the No Action/No Project Alternative, several remote commuter terminals have already been constructed at LAX. These projects were subject to environmental review independent of the Master Plan. The adequacy of past environmental review for any projects already approved and/or undertaken at LAX that have been included in the No Action/No Project Alternative is not within the purview or scope of the LAX Master Plan EIS/EIR.

The commentor states that Figures 3-4 and 3-5 fail to show the existing LAX Commuter Terminal. LAWA assumes the commentor's reference to Figure 3-5 was a typo and that the commentor meant to refer to Figure 3-4, Existing Conditions 1997, and Figure 3-6, No Action/No Project Alternative (2005/2015), of the Draft EIS/EIR. The temporary mobile structure originally intended for use as the Translates/LAX commuter terminal holdroom currently houses the LAX Emergency Response team and the LAX Bomb Squad. The temporary mobile structure has not been used as a passenger terminal and is illustrated in Figure F3-6 of the Final EIS/EIR as well as identified as Facility 220 on the Draft LAX Existing ALP.

The Board of Airport Commissioners approved the lease of a 5,760-square-foot modular building for use as the American Eagle commuter terminal. This is consistent with the Board's policy to move commuter aircraft out of the CTA in order to ease the operational congestion caused by commuter aircraft in this area of the airfield. United Express hardstands its commuter aircraft on apron area adjacent to the United Airlines maintenance area. The commuter terminal to which the commentor refers is a temporary, mobile structure located adjacent to the hard stands and provides shelter for passengers transferring between aircraft and buses, and vice versa. This is a similar arrangement to that of the LAX Commuter/Transtates terminal.

AL00033-53

Comment:

d. Future Development.

(1) Cargo Development Along Imperial Boulevard

Although the description of the No Project Alternative provided in Chapter 3 makes no mention of this issue, the Draft EIS/EIR elsewhere indicates that LAWA and FAA have assumed that additional cargo development can and will proceed along Imperial Boulevard as part of the No Project Alternative. (Draft EIS/EIR at 4-912; compare id. at 3-26.) The inclusion of such additional cargo development as part of the No Project Alternative is clearly inappropriate because such development has not been formally approved and has not been the subject of any of any environmental review. As such, the Draft EIS/EIR must be revised to remove such development from the description and analysis of the No Project Alternative. Failure to do so would improperly overstate the capacity and environmental impacts associated with the No Project Alternative.

Response:

As described in Chapter 3 of the Draft EIS/EIR (subsection 3.2.4), the No Action/No Project Alternative includes reconstruction of cargo facilities, including the facilities operated by Singapore Airlines, NCA and Qantas. Each of these facilities is located on Imperial Boulevard. Chapter II, Section 4.5, of the Draft Master Plan provides a detailed description of the facilities in question. As indicated in Topical Response TR-GEN-2, the No Action/No Project Alternative was defined to include, consistent with the provisions of NEPA and CEQA, all construction projects that are reasonably foreseeable and in the planning stages that would be implemented in the absence of Master Plan approval. As indicated in the topical response, environmental review for projects included in the No Action/No Project Alternative is individual to each project. For example, a Negative Declaration was prepared for the Singapore Airlines Cargo Building, and construction was completed in 1999. For any projects included in the No Action/No Project Alternative that have not yet been approved, environmental review pursuant to CEQA would be required prior to their implementation. It is reasonably foreseeable that LAWA would proceed with the improvements to cargo buildings along Imperial Boulevard as identified in the Draft EIS/EIR.

AL00033-54

Comment:

(2) Tom Bradley International Terminal ("TBIT")

The Draft EIS/EIR indicates that a significant renovation of the Tom Bradley International Terminal ("TBIT") is expected and assumed to occur under the No Project Alternative. (Id. at 3-26.) After reviewing LAWA's plans for the TBIT project, we have concluded that it should be analyzed as part of one or more of the Master Plan Build Alternatives, rather than as part of the No Project Alternative. This is true for a number of reasons. First, the timing of the TBIT project is ideally suited to consideration as part of the Master Plan. As illustrated by the documents attached hereto as Exhibit 3(P), LAWA is still in the design stage for this project, just as it is in the design stage for the Master Plan. In addition, it is improper to consider the TBIT project as part of the No Project Alternative because its potential environmental impacts (which stem from its capacity-enhancing character) have never been the subject of any environmental review. Finally, we note that characterizing the TBIT project as separate from the Master Plan amounts to illegal segmentation of LAWA's and FAA's complete development plans for LAX. The TBIT project's significant costs (approximately \$115,000,000 to \$160,000,000) (id.) and environmental impacts must be analyzed as part of the Master Plan. To do otherwise would be to understate the overall cost and impacts associated with the LAX Master Plan.

We note that the Draft EIS/EIR has, in an apparent attempt to justify the exclusion of the TBIT project from analysis as part of the Master Plan, characterized the TBIT project as a relatively insignificant remodel. (Draft EIS/EIR at 3-26.) We hereby formally request that the TBIT project plans be made part of the administrative record for the Master Plan, and note that they reveal that the project will substantially enhance the TBIT's capacity to accommodate passengers by modifying the ticketing lobby, the concourses, the baggage claim area, the meeters/greeters lobby, the bus holdroom used to shuttle passengers to remote gates, and other facilities. These modifications are expected to cost between \$115,000,000 and \$160,000,000 (See Exhibit 3(P).) An investment of this magnitude and modifications of this scope only make sense if the end result is to enhance the capacity of TBIT. Such enhancement must be considered as part of the Master Plan not the No Project scenario.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. Inclusion of the Tom Bradley International Terminal facility renovation project in the No Action/No Project Alternative is justified as these improvements are independent of the LAX Master Plan. The proposed improvements, including renovation and completion of airlines club rooms, remote hold room, an international bag claim area, FIS offices and various concessionaires, are intended to modernize the terminal facility and to accommodate baggage screening equipment mandated by the Transportation Security Agency following September 11, 2001. The improvements are the subject of a separate environmental analysis being prepared by LAWA in compliance with CEQA. The improvements would not be capacity enhancing. To the extent that additional improvements would occur at TBIT in conjunction with the Master Plan, beyond those proposed and evaluated in the environmental analysis currently underway, such improvements are included in the build alternatives and are properly analyzed in the LAX Master Plan Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00033-55

Comment:

(3) Taxiway EE Project

The Draft EIS/EIR assumes the following development can and will proceed as part of the No Project Alternative: "Taxiway EE will be constructed on the north airfield. It will be a high-speed exit taxiway off the end of Runway 24R to provide more efficient use of this runway by adding a third turn-off for widebody aircraft." (Draft EIS/EIR at 3-25.) As the foregoing description makes clear, the proposed Taxiway EE project would allow LAX to further increase its operations -- by increasing airfield efficiency -- and would therefore involve and contribute to potentially significant environmental impacts associated with increased airfield operations.

3. Comments and Responses

The Draft EIS/EIR's inclusion of the Taxiway EE project as part of the No Project Alternative is wholly improper and must be remedied. As the documents attached hereto as Exhibit 3(O) illustrate, the Taxiway EE project has not been approved for construction and has never been the subject of any environmental review. Moreover, the project is clearly linked to the Master Plan and cannot be pursued outside of that process. In light of the foregoing, FAA and LAWA must revise the Master Plan and Draft EIS/EIR to include the Taxiway EE project as part of the Master Plan Build Alternatives rather than the No Project Alternative.

Finally, we note that in LAWA's other documents describing the Taxiway EE project, the taxiway addition is described as linked to an extension of Runway 24R. (See Exhibit 3(O).) LAWA and FAA must clarify whether the Taxiway EE project described in Chapter 3 of the Draft EIS/EIR is also intended to include an extension of Runway 24R.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. Exhibit 3(O) referred to by the commentor is a copy of LAWA's Capital Improvement Program (CIP) for Fiscal Year 2001 through 2003. The Taxiway EE project is described in the CIP as including both a high-speed taxiway at the westerly end of Runway 24R and a 1,360-foot paved safety area for landing overruns or aborted takeoffs. LAWA is no longer considering construction of the paved safety area and, as such, the pavement area is not included in the description of the Taxiway EE project in Chapter 3, Alternatives, of the Draft EIS/EIR.

As indicated in Topical Response TR-GEN-2, the No Action/No Project Alternative includes actions that would reasonably be expected to occur in the foreseeable future in the absence of Master Plan approval. Such projects are not required, under NEPA or CEQA, to have been previously approved in order to be considered reasonably foreseeable, nor is the status of the environmental review of such projects a determinative factor. In the event that federal approval of the Master Plan is not granted, it is reasonably foreseeable that LAWA would consider implementing the Taxiway EE project to improve airfield safety and efficiency. At the time LAWA does consider moving forward with the construction of Taxiway EE, the proposed taxiway would be the subject of a separate environmental review pursuant to CEQA.

Improvements to airfield safety and efficiency do not always result in increased airfield operations. The primary function of this airfield improvement would be to aid in the ability of ground controllers to guide aircraft to their destination via more direct routing, thus allowing for the safer, more efficient flow of aircraft during peak periods. Additional access points to non-terminal, non-movement areas are not considered an increase in overall airfield operations and are typically carried out to improve airfield safety in areas where there are increased interactions between taxiing aircraft and parked aircraft, vehicles, ground crew, buildings, and other stationary objects.

It should be noted that Alternative D would include a 1,495-foot westerly extension of Runway 6L-24R in addition to other improvements to the north runway complex (see Figure F3-14 of this Final EIS/EIR). The proposed improvements to the north runway complex, including the westerly extension of Runway 6L-24R, are not related to the previously proposed Taxiway EE project.

AL00033-56

Comment:

B. The Draft EIS/EIR's Approach to Mitigation Violates CEQA and NEPA and Provides Inadequate Commitments To Enforceable Mitigation Measures.

The Draft EIS/EIR fails in several respects to comply with the mandates of CEQA and NEPA with regard to mitigation measures. Mitigation measures must be specific and enforceable. (CEQA Guidelines § 15126.4(a)(2); *Oro Fino Gold Mining Corp. v. County of El Dorado*, 225 Cal.App.3d 872, 884-885 (1990).) LAWA and FAA fail to formulate and recommend specific and enforceable mitigation measures. Further, they fail to commit to clear, enforceable performance standards against which the effectiveness of the mitigation measures can be measured.

As described in greater detail below in the context of comments on each section discussing environmental impacts, the approach of this Draft EIS/EIR to the mitigation of the significant

environmental impacts of LAX expansion is flawed in numerous regards. The Draft EIS/EIR presents a mix of measures referred to as "commitments" and others designated "mitigation." Yet the level of "commitment" by the agencies is insufficiently certain to satisfy legal requirements. In several instances, the Draft EIS/EIR provides a list of potential mitigation measures but improperly defers the selection of measures (e.g., with Water Quality) while at other points it fails altogether to describe mitigation measures, or provides only a confusing mixture of "commitments" and "mitigation" with no adequate analysis of the extent to which impacts would actually be lessened if these measures in fact were implemented.

In the area of environmental justice, the document makes no attempt to formulate mitigation measures, but simply defers the whole issue altogether until some later time. A "Program" will be developed, we are told, and no further information is provided regarding the extent to which LAWA and FAA are prepared to commit to any specific, effective, enforceable mitigation measures. This approach means that the Draft EIS/EIR is by definition incomplete, since it includes no analysis of mitigation for impacts that are clearly significant.

Response:

Please see Response to Comment AR00003-63. In addition, the proposed Environmental Justice Program for LAX Master Plan described in Section 4.4.3, Environmental Justice, of this Final EIS/EIR. Also see Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

AL00033-57

Comment:

C. The Impacts Analysis in Chapter 4 of the Draft EIS/EIR Is Inadequate in Numerous Respects.

Our comments below cover some of the many substantive flaws in the Draft EIS/EIR, Chapter 4. We have in this section of our letter followed the organization of Chapter 4 itself.

Response:

Comment noted. Please see Responses to Comments AL00033-58 through AL00033-243 below.

AL00033-58

Comment:

1. Noise: Chapter 4.1.

a. The Noise Generated By LAX Is Of Utmost Concern To The Public And Deserves A Very Careful Analysis.

Noise is one of the most obvious deleterious effects of LAX, yet the Draft EIS/EIR fails on several accounts to provide adequate information on this central issue. 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.

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. 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.

3. Comments and Responses

AL00033-59

Comment:

LAX poses an extraordinary noise burden on its neighbors. 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. (See "Aircraft Noise and Its Effects," prepared by Illingworth & Rodkin, attached as Exhibit 4.1(A).) 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. The City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the City. (Id.)

Response:

Information and analysis related to the noise impacts of each Master Plan alternative were provided in Section 4.1, Noise, and Section 4.24.2, Health Effects of Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR provided additional information and analysis specific to sleep disturbance and school disruption from single-event aircraft noise. In addition, please see Topical Response TR-N-5 regarding nighttime aircraft operations and TR-LU-4 regarding outdoor noise levels.

AL00033-60

Comment:

In 1996, LAWA's chosen baseline year for purposes of environmental analysis, approximately 80,000 people were exposed to noise levels of at least 65 dBA CNEL as a result of LAX's operations. (See Attachment A.)

Response:

This comment is derived from LAWA's quarterly report of noise conditions, which uses noise contours adjusted by noise measurement. This process results in noise contours larger than the unadjusted contours adopted for use in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Consequently, impact counts from the larger adjusted contours will result in greater numbers than the approximately 47,000 persons residing within the unadjusted contours. For additional information related to the difference between adjusted and modeled noise contours, please see Topical Response TR-N-1 regarding the noise modeling approach, and particularly Subtopical Responses TR-N-1.1 and TR-N-1.2.

AL00033-61

Comment:

In 1998, there were 760,000 annual aircraft operations. (See Exhibit 4.1(A).) This means that on average, communities under the LAX flight path experience almost 2,100 flights per day or 87 flights per hour. Between the sensitive hours of 11:00 p.m. and 7:00 a.m., there are at least 5 to 20 flights per hour. (Id.) Because some days, weeks and months have much greater air traffic, during busy periods aircraft overflights are even more frequent.

Response:

Comment noted. Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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 see Topical Response TR-N-3 regarding aircraft flight procedures and Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00033-62**Comment:**

The Master Plan will result in a substantial increase in aircraft activity and, of course, a substantial increase in noise levels on the surrounding community. Of particular concern is the increase in heavy jets (jets which have a weight greater than 300,000 lbs.) which is forecast to substantially increase over baseline conditions. Under Alternative C, the number of heavy jets will more than double, going from 351 daily operations under environmental baseline conditions to 814 in 2015. (Draft EIS/EIR, Table 4.1-7, at 4-38.) As explained below, heavier aircraft tend to be noisier.

Response:

The Average Annual Day Operations and Fleet Mix for all alternatives can be found in Appendix D, of the Draft EIS/EIR and in Appendix S-C of the Supplement to the Draft EIS/EIR. These forecasts are used in the noise modeling. Please see Response to Comment AL00027-24 regarding the analysis of noise impacts on surrounding communities. Additionally, please see Topical Response TR-N-6 regarding noise increase, in particular Subtopical Response TR-N-6.2.

AL00033-63**Comment:**

Given the severity of the existing noise problem and the significant increase in aircraft operations that will result from the proposed Master Plan, it is essential that the Draft EIS/EIR provide a complete and accurate picture of the project's impacts on noise levels in the surrounding community. Instead, as detailed below, the Draft EIS/EIR's analysis of noise impacts is flawed in several respects, with the result that the public and decision-makers cannot evaluate the severity or extent of the noise impact upon the affected community.

Response:

Comment noted. Please see Responses to Comments AL00033-64 through AL00033-81 below. In addition, please see Topical Response TR-N-6 regarding noise increase.

AL00033-64**Comment:**

For example, because the Draft EIS/EIR evaluates project impacts against an inappropriate baseline, it substantially understates the noise impact of the Master Plan. Moreover, it is not possible to determine whether the noise analysis accurately examines noise impacts because the existing 65 CNEL is not accurately identified. The Draft EIS/EIR also masks the project's noise impacts by focusing on the Master Plan's effect on average noise levels, rather than individual noise events.

Response:

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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. In addition, please see Topical Response TR-N-1 regarding the noise modeling approach, particularly Subtopical Response TR-N-1.3, Topical Response TR-N-2 regarding single event noise and CNEL differences, in particular Subtopical Response TR-N-2.1, and Topical Response TR-GEN-1 regarding baseline issues.

AL00033-65**Comment:**

Finally, the Draft EIS/EIR does not identify or analyze the aircraft noise impacts that would result during construction, while the Airport's existing runways are relocated or reconstructed as part of the Master

3. Comments and Responses

Plan. These and other deficiencies are described below and in the July 16, 2001 report prepared by Illingworth & Rodkin, submitted as Attachment A to this letter.

Response:

Responses to Comments AL00033-259 through AL00033-276 address each of the points raised in the Illingworth and Rodkin report. Please see Response to Comment PC00686-6 regarding changes in aircraft noise patterns during construction activities.

AL00033-66

Comment:

b. The Draft EIS/EIR Fails to Adequately Identify and Analyze the Noise Impacts Resulting from the Master Plan.

(1) The Draft EIS/EIR Substantially Understates the Noise Impact of the Master Plan Because it Evaluates Project Impacts Against an Inappropriate Baseline.

Critical to the adequacy of an environmental document is beginning the analysis with a complete and accurate description of the project setting. If impact analyses are based on an incomplete, out-dated or inaccurate project setting, the results of those analyses cannot be accurate.

Here, the Draft EIS/EIR uses the year 1996 as its baseline for determining whether the Master Plan would result in significant noise impacts. (Draft EIS/EIR at 4-30.) By relying on 1996 as the baseline for its environmental analysis, the Draft EIS/EIR understates the severity of the proposed Master Plan's noise impacts. Specifically, aircraft operations in 1996 were substantially noisier than they are today because in 1996 LAX had not yet completed the phase-out of Stage 2 aircraft as mandated pursuant to the Airport Noise and Capacity Act of 1990. Indeed, LAWA's quarterly reports confirm that since 1996, the size of the 65 CNEL contour has decreased. In 1996, the total acreage of land within 65 CNEL was approximately 2,200 acres whereas in the first quarter of 2000, the 65 CNEL contour had shrunk in size to 1,800 acres. (See Attachment A.) Thus, the "baseline" used in the Draft EIS/EIR overstates the existing noise impact of LAX on its neighbors by 14% over the four year period, as a result of the phase-out of Stage 2 operations.

By evaluating project impacts against what the community was experiencing in 1996 (i.e., a noisier environment), instead of what it is experiencing today (a quieter environment), the Draft EIS/EIR gives the false impression that noise levels from the Master Plan would be relatively benign.

Response:

Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.3, and Topical Response TR-GEN-1 regarding the environmental baseline used in the noise analysis. As discussed therein, the 1996 environmental baseline is the proper baseline for the environmental analysis under CEQA and does not "understate" the noise impacts.

The Supplement to the Draft EIS/EIR provides Year 2000 conditions for comparative purposes. Although Table S4.1-1 shows that more off-airport acres (0.15 percent) and dwellings (0.6 percent) are within the 1996 65 CNEL contour than the 2000 contour, there are fewer people and non-residential noise sensitive parcels within the 1996 65 CNEL contour than the 2000 contour. In this sense, using a 2000 baseline would underestimate the potential noise impacts on people and non-residential noise sensitive parcels. Moreover, 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.

AL00033-67

Comment:

This violates CEQA by failing to disclose the actual extent of the increase from existing noise levels that the project would cause. (See, *Save Our Peninsula Committee v. Monterey County Bd. Of Supervisors*, 87 Cal. App. 4th 99, 125 (2001) "the date for establishing a baseline cannot be a rigid one," and "(i)n some cases, conditions closer to the date the project is approved are more relevant to a determination

whether the project's impacts will be significant.") In a decision rendered just last month, the Court of Appeal addressed a similar situation. In *Berkeley Keep Jets over the Bay Comm. v. Board of Port Commissioners* (August 30, 2001) 01 C.D.O.S. 7700, the appellate court directed the airport to provide "a more accurate assessment of the existing noise levels around the airport" rather than using projections based on old data to determine whether noise impacts were significant. (01 C.D.O.S. at 7710.) The Draft EIS/EIR should be rewritten to include an analysis of noise impacts using existing conditions in 2000 (a complete Stage 3 Airport) as its baseline.

Response:

In *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal. App 4th 1344 ("Berkeley Jets"), the Court of Appeal ruled 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 noise analysis. The court's determination that the noise analysis contained in the EIR was inadequate, rendered other issues raised by petitioners moot. As a result of *Berkeley Jets*, Appendix S-C1, Supplemental Aircraft Noise Technical Report, Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR addressed nighttime awakenings and school disruption. 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. For further information regarding the environmental baseline, please see Response to Comment AL00033-66.

AL00033-68

Comment:

(2) The Draft EIS/EIR Does Not Contain an Adequate Noise Analysis Because the Existing 65 CNEL Contour is Not Accurately Identified.

The Draft EIS/EIR uses the community's exposure to 65 CNEL as its threshold for determining the Master Plan's significant noise impacts. As such, an accurate representation of the existing 65 CNEL contour is critical for determining project impacts. Here, the Draft EIS/EIR does not accurately reflect the community's existing exposure to the 65 CNEL and thus does not accurately identify and evaluate the project's significant noise impacts.

Under CEQA, a project would result in a significant increase in noise under either of the following two conditions:

- Noise-sensitive areas are newly exposed to 65 CNEL or greater.
- Noise-sensitive areas within the existing 65 CNEL contour experience an increase of 1.5 CNEL or greater.

(Draft EIS/EIR at 4-35.) The FAA uses as a threshold of significance an increase of 3dBA in areas exposed to levels less than 65 dBA CNEL, and an increase of 1.5 dBA in areas above a CNEL of 65. (Id.)

Response:

Noise-sensitive areas that would be newly exposed to 65 CNEL or greater, noise-sensitive areas within the existing 65 CNEL contour that would experience an increase of 1.5 CNEL or greater, and an increase of 3 dBA in areas that would be exposed to levels less than 65 dBA CNEL, are all included and addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, and the related appendices and technical reports, Appendix D, Appendix S-C1, Technical Report 1, and Technical Report S-1. 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. For information on modeling and analysis approach, please see Topical Response TR-N-1 regarding the noise modeling approach and Topical Response TR-N-2 regarding single event noise and CNEL differences.

3. Comments and Responses

AL00033-69

Comment:

Each quarter LAWA prepares a map indicating the noise exposure condition for the previous twelve months (hereinafter referred to as "Quarterly Reports.") (Draft EIS/EIR at 4-30.) The Draft EIS/EIR's noise analysis uses the Fourth Quarter 1996 Quarterly Report as the foundation for defining the environmental baseline. (Draft EIS/EIR at 4-30.) To determine the project's impact upon the 1996 65 CNEL contour, the Draft EIS/EIR authors modeled noise levels using the Integrated Noise Model ("INM"). (Draft EIS/EIR at 4-15.) When comparing the environmental baseline noise from the INM model to the Quarterly Report data, it becomes clear that the INM's depiction of environmental baseline noise is substantially different from the 1996 Fourth Quarterly Report. Specifically, at noise measurement locations surrounding LAX, on average the INM under-predicts noise levels by 1.1 decibels, with variations as low as an under-prediction of 2.9 decibels and as high as an over-prediction of 3.0 decibels. (Draft EIS/EIR, Appendix D, Noise Technical Report, Section 2.2, Table 6.) While the Draft EIS/EIR acknowledges the discrepancy between the results of the noise model and measured data (at 4-30), the measured data is not used to calibrate the INM. (See Attachment A.)

Response:

Please see Topical Response TR-N-1 regarding the noise modeling approach, particularly Subtopical Responses TR-N-1.1 and TR-N-1.2. In addition, please see Response to Comment AL0003-70.

AL00033-70

Comment:

Failure to calibrate the model with the existing noise exposure condition renders the use of the model so inaccurate that it is impossible to evaluate correctly the significance of project noise impacts. The uncalibrated INM may depict areas as lying outside the 65 CNEL contour when, in fact, they are exposed to 65 dBA or greater. Areas which are shown by the model to be exposed to a CNEL of less than 65 dBA but would actually be exposed to a CNEL above 65 dBA, will erroneously not be identified as significantly impacted unless they experience an increase of 3 dBA instead of an increase of 1.5 dBA.

While the noise model may be able to evaluate some predicted theoretical noise levels based on average flight conditions at LAX, actual noise measurements must be utilized in order to accurately represent the effect of noise attenuation or amplification of aircraft noise due to the effect of the built environment, land terrain, and atmospheric conditions actually experienced by the Airport's neighbors. The noise analysis must be redone, following proper calibration of the INM with available noise measurements in order to accurately depict the severity and extent of noise impacts.

Response:

Comment noted. Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.1 and Subtopical Response TR-N-1.2.

AL00033-71

Comment:

(3) By Relying on CNEL to Evaluate Noise Impacts, The Draft EIS/EIR Fails to Adequately Analyze the Full Extent of Noise Impacts of the Airport.

The CEQA Guidelines require an EIR to "identify and focus on the significant environmental effects of the proposed project." (CEQA Guidelines § 15126.2(a).) The EIR must contain "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." (Id. § 15151.) While an EIR need not be perfect, courts have insisted upon "adequacy, completeness, and a good faith effort at full disclosure." (Id.) The level of detail required in addressing particular impacts should be "in proportion to their severity and probability of occurrence." (Id. § 15143.)

Response:

Please see Topical Response TR-N-2 regarding single event noise and CNEL differences. The use of DNL (CNEL in California) is the standard metric used by the Federal government to assess the impact of aviation noise. Additionally, based on FAA Order 1050.1D Change 4, in 1992 the federal Interagency Committee on Noise evaluated the use of DNL/CNEL and concluded, "The review did not identify any new metrics or descriptors of sufficient scientific standing to replace the widely used DNL as the primary cumulative noise exposure metric." It should be clearly understood that just because noise exposure/impact is not identified as "significant" does not mean that there are no impacts below the level of significance. The relationship between DNL and community annoyance recognizes that some individuals will be highly annoyed at relatively low levels of exposure (down to 45 dB). Please see Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR regarding analysis of single-event noise impacts.

AL00033-72

Comment:

The Draft EIS/EIR in this case severely understates the project's noise impacts by relying on a noise level indicator that evaluates average noise levels. This noise indicator, referred to as Community Noise Equivalent Level or "CNEL," averages noise events over a 24 hour period. (Draft EIS/EIR at 4-11.) Although CNEL provides one way to measure noise, when it is used as the only measure of noise, CNEL does not provide a true or complete picture of what individuals will actually hear as a result of the Master Plan. People hear individual noise events; they do not hear noise averaged over a twenty-four hour period.

The 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.

Response:

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.

AL00033-73

Comment:

Research confirms that annoyance is often generated at average sound levels well below 65 dBA. (See Exhibit 4.1(a).) Studies of the Burbank and Orange County airports have shown 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. (Id.) Thus, people exposed to a CNEL of 60 dBA may be significantly disturbed by aircraft noise, sometimes for many hours a day. Yet, these people are ignored in the Draft EIS/EIR's analysis of aircraft noise because noise levels in their communities (at least according to the Draft EIS/EIR) fall below a CNEL of 65 dBA.

Response:

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. However, data are not available for Los Angeles International Airport that would provide comparable conclusions. 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 that have withstood the test of time in many similar studies and through many legal

3. Comments and Responses

challenges. For additional information related to this topic, please see Subtopical Response TR-N-2.2. Also see Response to Comment AL00017-259 regarding studies of aircraft noise at Burbank and Orange County airports.

AL00033-74

Comment:

The USEPA has confirmed these studies that demonstrate community annoyance is triggered at noise levels lower than a CNEL of 65 dBA. In the 1970's 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 half as much average noise as the 65 dBA level established by the FAA. (Id.)

Response:

Please see Response to Comment AL00033-73.

AL00033-75

Comment:

With the Build Alternatives, there will be a tremendous increase in heavy jets. (Draft EIS/EIR at 4-38.) While the Draft EIS/EIR acknowledges that the increase in the size of the aircraft would result in louder individual noise event levels, it concludes that all of the build alternatives would reduce single-event noise levels. (Id. at 4-1047.) The document arrives at this flawed conclusion because, once again, it assumes that the federal mandate to phase-out older, noisier jets has yet to occur. (Id. at 4-1039.) As discussed above, had the Draft EIS/EIR relied upon a current baseline, the noise analysis would reflect that the Master Plan would cause an increase in heavier and noisier aircraft and, thus, an increase in the number and decibel level of aircraft operations, compared to existing conditions. Aircraft noise levels from a Stage 3 B747 (a typical heavy passenger jet) can produce noise levels of 104 dBA at the homes below the airport flight path. (See Attachment A.) This noise level is 9 dBA higher, or almost twice as loud as the maximum level produced by smaller passenger aircraft such as the B767 or B737. (Id. (emphasis added).) Moreover, the Draft EIS/EIR admits that the highest existing peak single-event affecting residents closest to LAX is 109dBA along Imperial Avenue in El Segundo. (Draft EIS/EIR at 4-1044.) The Draft EIS/EIR does not disclose what the highest peak single-event affecting residents would be as a result of the use of the proposed heavy aircraft.

Response:

The differences between the Year 2000 noise exposure pattern and future alternatives were disclosed in detail in Section 4.1, Noise, and Appendix S-C1 of the Supplement to the Draft EIS/EIR. The commentor will find that noise levels under approach paths east of the airport actually increase above 1996 levels, while areas north and south of the airport that are primarily affected by departures will decrease substantially. While some heavier aircraft are indeed louder than lighter smaller aircraft, noise levels are not necessarily always greater by larger aircraft. Please see Subtopical Response TR-N-6.3 regarding relationship between aircraft size and noise levels. The commentor is correct in identifying that single event levels are provided in the Draft EIS/EIR. It is of particular importance that the aircraft that will produce the single event levels in the future were present in the fleet mix of 1996 and the fleet mix of 2000. While the older, louder Stage 2 aircraft were removed from the fleet in 1999, many loud aircraft that met Stage 3 requirements, such as the B-747, remain in the operating fleet. The contour changes anticipated in the future are a function of the numbers of aircraft at varying levels of loudness.

AL00033-76

Comment:

The Court of Appeal recently invalidated the Oakland Airport EIR for its failure to adequately analyze single-event noise levels. (Berkeley Keep Jets over the Bay Comm. v. Board of Port Commissioners, supra, 01 C.D.O.S. at 7708-7710.) The court held that a lead agency "cannot simply ignore the CEQA standard of significance for assessing noise, the credible expert opinion calling for further evaluation of the impact of single event noise, and public concern over the noise created by increased nighttime

flights." (Id. at 7710.) All aspects of single-event noise impacts from the LAX airport expansion must therefore be analyzed here.

Response:

In the Berkeley Jets, the Court left the definition of thresholds of significance and the degree of analysis conducted on single event effects up to the local airport sponsor. Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR contain a substantial new set of analyses of each of the various alternatives that address single event awakening effects and effects of single events and hourly Leq levels on classroom disruption. For additional information on these topics, please see Appendix S-C1.

AL00033-77

Comment:

In addition to the use of larger and louder aircraft, the Master Plan would also cause a tremendous increase in cargo flights. In 1994 (the Draft EIS/EIR's baseline year for evaluating cargo), LAX handled 1.7 million annual tons of cargo. (See Exhibit 4.1(A).) In 2015, LAX is forecast to handle 4.2 million annual tons. (Id.) While air cargo flights operate at all hours of the day and night, much of the peak cargo activity occurs in the middle of the night or first thing in the morning (id.), times of day when such noise is most irritating and disruptive to the residents below. Moreover, as pointed out in Attachment G, the actual extent of future cargo operations is understated in the Draft EIS/EIR. This further exacerbates the documents' inadequate disclosure of noise impacts.

Response:

All noise evaluations took the time of day for cargo operations into consideration during preparation of material related to each alternative action. Operations are scheduled to meet hub times and transport time sensitive cargo in a timely manner whether it is across the country or across the world.

The cargo operations are not underestimated. Cargo volume forecasts are based on future customer demand that will drive the type and number of aircraft operations necessary to accommodate that growth. Alternatives A, B, and C were forecast to meet the unconstrained level of cargo activity (4.2 million annual tons). The unconstrained level of cargo was based on LAWA records for the last 30 years, trends in the historic air cargo activity, and global projections by recognized authorities. The Alternative D cargo facilities would be sized to accommodate approximately 3.1 MAT, which is the total cargo volume forecast in the constrained No Action/No Project Alternative. The effective constraint on cargo activity in Alternative D would be the lack of sufficient cargo building space to process the unconstrained cargo activity forecast. For further discussion about the methodology used in developing the cargo forecast please see Chapter III, Forecasts of Aviation Demand (February 1996), Section 9.3 of the LAX Master Plan. In addition, please see Topical Response TR-MP-1 regarding air cargo activity/demand.

AL00033-78

Comment:

The Draft EIS/EIR pays lip service to assessing the health effects of aircraft noise. The document contains perfunctory sections on speech communication, sleep disturbance, learning effects, and work performance effects. But rather than attempt to undertake even a cursory analysis of these physiological and psychological health effects resulting from the proposed Master Plan's operations, it merely states that there is little reliable evidence on the relationship between noise exposure and mental health. (Id. at 4-1041.) Again, as demonstrated in Berkeley Keep Jets over The Bay, a cursory description of how noise affects a community without meaningful, quantitative and qualitative analysis of "the community reaction to aircraft noise, including sleep disturbance," renders an EIR inadequate. (Berkeley Keep Jets over The Bay at 7708-7710.) The appellate court expressly referred to Sound Exposure Level ("SEL") analysis as an appropriate method for measuring disturbance. (Id. at 7710.) The Draft EIS/EIR must be revised to adequately measure sleep and speech communication disturbance and to disclose the full impact, including health impacts, of single event disturbances.

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Response:

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school 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. In addition, please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

AL00033-79

Comment:

Contrary to the assertion in the Draft EIS/EIR, ample studies and reports exist documenting the health impact of aircraft noise. (See Exhibit 4.1(A) and "Flying Off Course; Environmental Impacts of America's Airports," Natural Resources Defense Council (October 1996), attached as Exhibit 4.1(B).) LAWA and FAA must analyze and disclose the impacts individuals living beneath the LAX flight paths will endure once the Master Plan is implemented. Such an analysis must focus on the single event noise levels, which are unrelenting and extraordinarily disruptive.

Response:

Please see Response to Comment AL00033-78 above.

AL00033-80

Comment:

(4) The Draft EIS/EIR Fails to Analyze the Noise Impacts Resulting from Shifted Aircraft Operations During Construction Pursuant to the Master Plan.

The Draft EIS/EIR does not identify or analyze the noise impacts from aircraft activities that would result from construction of new facilities contemplated in the proposed Master Plan. Alternative C includes extensive changes to runways 6L/24R, 6R/24L and 7R/25L. (Draft EIS/EIR at ES-9 and ES-10.) While any one of these runways is under construction, aircraft activity will shift to another runway location. The Draft EIS/EIR fails to specifically identify how runway operations would change during construction nor does it disclose how the reconfigured runway operations would affect the noise exposure pattern. An analysis of noise impacts resulting from shifted aircraft operations is especially important because some nighttime construction is expected to occur on the airfield. (Id. at 4-879.) The revised Draft EIS/EIR must provide an analysis so that members of the surrounding community have some understanding of what to expect during these extensive periods of runway reconstruction.

Response:

Please see Response to Comment PC00686-6 regarding changes in aircraft noise patterns during construction activities.

AL00033-81

Comment:

(5) The Draft EIS/EIR Fails To Discuss Noise Impacts On Fauna.

In another significant omission, the effects of noise on the fauna of the area of LAX are not considered at all. See the discussion in Attachment E.

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 listed flora and fauna.

AL00033-82**Comment:**

2. Land Use: Chapter 4.2.

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's analysis of land use.

- We question the accuracy of Table 4.2-5, which provides a comparison of existing and proposed land uses by acreage for the LAX baseline and under each of the Master Plan Alternatives (i.e., Build and No Project). (Draft EIS/EIR at 4-117.) That table provides only 1996 -- not present day -- figures for each land use type listed (e.g., runways/taxiways, terminal buildings, and cargo buildings). This approach does not accurately convey existing physical conditions at LAX. The 1996 baseline used in the Draft EIS/EIR is clearly inadequate because LAWA has, since 1996, constructed or permitted construction of a number of projects that have rendered the 1996 figures out of date. LAWA has since 1996 expanded LAX's capacity through the construction of facilities including three commuter terminals (USAirways Express/Transtates Terminal, United Express Terminal and American Eagle Terminal), several taxiways (Southside Taxiways, Taxiway C over Sepulveda, taxiways around commuter terminals) and numerous new cargo facilities (United Cargo Facility and other Century Cargo Complex buildings). In light of this significant construction, the Draft EIS/EIR's 1996 baseline figures do not and cannot tell the whole story regarding existing conditions at LAX, and Table 4.2-5 does not offer an accurate comparison between baseline and conditions under the Master Plan alternatives.

Response:

Please see Section 4.2, Land Use, (subsection 4.2.6.1), of the Supplement to the Draft EIS/EIR for an update to Table 4.2-5 which includes changes to on-airport land uses since 1996 baseline conditions. Airport facility changes since 1996, including those referenced by the commentor, are also described in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. These airport facility changes and other changes in environmental conditions that occurred between 1996 and 2000 have furthermore been considered in the impact analyses presented in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Supplement to the Draft EIS/EIR.

AL00033-83**Comment:**

- Because the Draft EIS/EIR was released before the Southern California Association of Governments ("SCAG") adopted its most recent Regional Transportation Plan ("RTP"), the Draft EIS/EIR refers to and is based on the prior (1998) SCAG RTP. (Id. at 4-118, 4-135.) As the documents attached hereto as Exhibit 4.2(A) illustrate, the most recent (2001) SCAG RTP was adopted in April 2001 and differs in a number of important respects from the 1998 SCAG RTP relied on by the Draft EIS/EIR. Specifically, in 2001, the SCAG Regional Council voted to adopt an RTP with an aviation element that constrains LAX to serving 78 MAP, with the remaining projected air passenger demand served at other regional airports. This aspect of the 2001 RTP differs significantly from the 1998 RTP relied on by the Draft EIS/EIR, which planned for LAX serving 94.2 MAP. The 2001 RTP clearly shows the feasibility of the regional approach to serving air cargo and passenger demand. As such, the Draft EIS/EIR must be revised to include a more complete analysis of that alternative.

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 provides 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

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alternative and would have the least negative impacts to the communities and the region. In addition, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan (RTP).

AL00033-84

Comment:

For purposes of the Draft EIS/EIR's land use section, LAWA and FAA must acknowledge that their Master Plan Build Alternatives are all inconsistent with SCAG's 2001 RTP, which constrains LAX to serving 78 MAP (i.e., the passenger level served by the Master Plan's No Project Alternative). This inconsistency evidences a significant environmental impact for purposes of CEQA and NEPA.

Response:

Please see Response to Comment AL00033-83 above.

AL00033-85

Comment:

- The Draft EIS/EIR's analysis of the No Project Alternative's land use impacts fails to analyze that Alternative's consistency with the City of El Segundo's General Plan and gives no explanation for that omission. (Draft EIS/EIR at 4-118 to 4-119, compare 4-139.) LAWA and FAA must provide such an analysis.

Response:

As indicated in subsection 4.2.2 of Section 4.2, Land Use, in the Draft EIS/EIR, the land use analysis is focused on the following two components: (1) the potential for land use incompatibility due to physical or functional impacts on study area land uses caused by the Master Plan alternatives; or (2) the potential for the Master Plan alternatives to result in physical impacts caused by inconsistencies with applicable land use plans, policies, or regulations. Also, as stated on page 4-80 of the Draft EIS/EIR, the Plan Consistency Evaluation focuses on potential conflicts with existing land use plans, policies, and regulations adopted to avoid or mitigate environmental effects. Although the No Action/No Project Alternative includes various features, such as the acquisition of Manchester Square and Belford residential neighborhoods, planned improvements to passenger terminal, cargo, and parking facilities; projected increases in aircraft and passenger activity; and development of the LAX Northside and Continental City projects, the No Action/No Project Alternative would not result in any conflicts with the City of El Segundo General Plan. The El Segundo General Plan is discussed in the Affected Environment/Existing Baseline on pages 4-111 and 4-112 of the Draft EIS/EIR. Since the discussion of impacts focuses on conflicts that would result from the implementation of an alternative, no discussion of consistency with the El Segundo General Plan for the No Action/No Project Alternative is warranted.

AL00033-86

Comment:

The Draft EIS/EIR's land use section analysis is based largely on the conclusions reached in the noise impact analysis section. A complete analysis and critique of the Draft EIS/EIR's noise impact analysis section is presented in section 4.1 of these comments and the incorporated reports, and will not be repeated here. We note, however, that the significant problems identified in section 4.1, above, undermine the Draft EIS/EIR's analysis of land use impacts.

Response:

Comment noted. Please see Responses to Comments AL00033-58 through AL00033-80.

AL00033-87

Comment:

- As discussed at length in our comments on Section 4.1 of the Draft EIS/EIR (Noise), the use of 1996 as the baseline for the noise impacts analysis is problematic because many of the noisiest aircraft have

been phased out since 1996, resulting in a reduction in the noise experienced by communities around LAX, despite offsetting increased operations since 1996. This baseline problem seriously undermines the analysis presented in Section 4.2 of the Draft EIS/EIR (Land Use). Specifically, because the Draft EIS/EIR's analysis compares noise conditions that would prevail under the Master Plan to conditions as they existed in 1996 -- not present noise conditions -- the analysis fails to capture the Master Plan's actual noise impacts on local land uses, and therefore seriously understates the Master Plan's land use impacts.

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 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.3, Topical Response TR-GEN-1 regarding baseline issues, and Subtopical Response TR-N-6.2 regarding relationship between traffic levels and noise levels. The Supplement to the Draft EIS/EIR analyzed and compared Year 2000 conditions with baseline conditions for all five alternatives in Section 4.1, Noise, and Section 4.2, Land Use.

AL00033-88

Comment:

- In discussing the No Project Alternative's consistency with the LAX Interim Plan, the Draft EIS/EIR indicates that "the ability to develop and implement policies to cohesively plan and provide for additional facilities . . . while ensuring land use compatibility and minimizing environmental impact, would not occur [under the No Project Alternative]. Increases in traffic congestion, passenger delays, and cargo capacity limitations would continue and projected demand would not be fully accommodated." (Id. at 4-119.) This analysis has little if anything to do with the No Project Alternative's consistency with the LAX Interim Plan. The Draft EIS/EIR fails to include an adequate consistency analysis. Moreover, the above statements are inaccurate because they imply, incorrectly, that LAWA cannot implement projects to reduce traffic congestion and other problems now plaguing LAX without an approved Master Plan for expanding the airport. As the documents attached hereto as Exhibit 4.2(B) illustrate, LAWA has in fact instituted programs to improve traffic problems at LAX outside of its master planning process. LAWA has, for example, moved ahead with creation of a Traffic Operations Center ("TOC") to help manage congestion at LAX through the use of "Intelligent Transportation Systems." (See Exhibit 4.2(B).) LAWA has also issued a request for proposals for the operation of remote check-in service facilities to reduce car trips to LAX. (See id.) Nothing prevents LAWA from pursuing additional programs of this type to modernize and improve conditions at LAX.

Response:

The referenced discussion on page 4-119 in Section 4.2, Land Use, of the Draft EIS/EIR does not imply that LAWA cannot and has not implemented programs to address such issues as traffic congestion and passenger delays, but rather makes the point that the No Action/No Project Alternative would not allow for development and implementation of policies to "cohesively plan" for and provide additional facilities. The constraints posed under the No Action/No Project Alternative were further described in Chapter 3, Alternatives (subsection 3.2.4), of the Draft EIS/EIR. In addressing consistency of the No Action/No Project Alternative, it is noted that there would be no change in land uses at the airport that would create inconsistencies and, the policies outlined in the Interim Plan would continue to be implemented by LAWA.

AL00033-89

Comment:

- Table 4.2-8, Figure 4.2-11 and the accompanying text provide misleading information because they do not reflect the following LAWA property acquisitions: Manchester Square (122.5 acres/1,985 residences), Belford neighborhood (20 acres/583 residences) and Continental City site (28.5 acres). (Id. at 4-83, 4-117.) The Draft EIS/EIR must disclose and analyze these property acquisitions in its analysis of the Master Plan Build Alternatives -- not just the No Project Alternative -- because these acquisitions occurred during the period since 1996, the Master Plan baseline year, and will be used for purposes of LAX expansion. As presently drafted, the Draft EIS/EIR gives the false impression that the Master Plan will and has required less property acquisition than it actually has and will. Put another way, the Draft

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EIS/EIR cannot avoid acknowledgment and analysis of Master Plan property acquisition simply because that acquisition occurred prior to public release of the Draft EIS/EIR.

Response:

The Continental City property was not acquired "during the period since 1996." As was indicated on page 4-93 in Section 4.2, Land Use, of the Draft EIS/EIR, the airport (i.e., LAWA) had approved subdivision entitlement at Continental City in 1985. Continental City is owned by LAWA and is vacant. As was stated in the Draft EIS/EIR, Section 4.2, Land Use, and subsection 4.4.2, Relocation of Residences and Businesses, Manchester Square and Belford are being acquired through an existing program instituted on a high level of interest from those who reside in the area which is subject to high noise levels. The program was instituted irrespective of the LAX Master Plan and has independent utility. This program is proceeding and will be completed with or without approval of the LAX Master Plan. As noted, the effects of this acquisition are assessed under the No Action/No Project Alternative. Furthermore, as noted in the Draft EIS/EIR, a Mitigated Negative Declaration was approved by the City of Los Angeles for the Manchester Square and Airport/Belford Voluntary Acquisition Program. In addition, please see Topical Response TR-MP-3 for further discussion of the Manchester Square and Belford Voluntary Acquisition/Relocation Program and Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions.

AL00033-90

Comment:

- We hereby request further explanation of the following items included in the Draft EIS/EIR on the list of changes to the City of Los Angeles General Plan that may occur as part of the Master Plan approval: "process for monitoring and updating Master Plan and zoning" and "approval process." (Id. at 4-131 to 4-132.) These items are neither self-explanatory nor adequately explained in the Draft EIS/EIR.

Response:

At the time of the completion and circulation of the Draft EIS/EIR, the process and entitlements as well as the approval process for the implementation of Alternatives A, B, and C were not entirely known. However, Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR described the approval process and entitlements in more detail. Please see page 4-165 in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR for a revised list of proposed entitlements under Alternative D. Regarding the process for monitoring and updating the Master Plan and zoning, to ensure that projects are monitored for consistency with the LAX Zone/LAX Specific Plan, the Executive Director of LAWA would determine if each project is consistent with the LAX Plan and LAX Zone/LAX Specific Plan and that each project has undergone adequate environmental review (either analyzed adequately in the Final EIS/EIR or a project-specific environmental analysis is conducted). Any future update to the LAX Plan or LAX Zone/LAX Specific Plan would be in accordance with standard City procedures. Such revision would include review and recommendation by City Planning Commission with a final decision by City Council or through a comprehensive plan update.

AL00033-91

Comment:

- The Draft EIS/EIR claims that the proposed Master Plan will "fulfill the purpose of the [Los Angeles International Airport] Interim Plan by addressing major policy issues regarding capacity, roadway access, land use compatibility, and measures to reduce other environmental impacts." (Id. at 4-136.) We have attached a copy of the Interim Plan hereto as Exhibit 4.2(C). We challenge LAWA and FAA to explain, with reference to that plan, how the new Master Plan is consistent. Specifically, the Interim Plan addresses a passenger service level of only 40 MAP, while the proposed Master Plan deals with significantly higher service levels and much expanded LAX facilities. It is entirely disingenuous for the Draft EIS/EIR to claim that the Interim Plan and proposed Master Plan are consistent. The proposed Master Plan is a dramatic departure from and expansion of the Interim Plan.

Response:

As stated in the Draft EIS/EIR on page 4-136 in Section 4.2, Land Use, the Interim Plan was adopted as a temporary plan in complete recognition that a long-term plan for LAX was required to address such

issues as capacity, roadway access, land use compatibility, and measures to reduce other environmental impacts. The proposed LAX Master Plan is that plan. It is acknowledged that on-going operations at LAX long-ago exceeded the 40 MAP figure. However, the Interim Plan contemplated the need for a long-range plan for LAX that would address among other things, capacity of the airport. Even though Alternatives A, B, and C would further increase the capacity of the airport over what can be provided with currently planned and approved facilities, the LAX Master Plan is intended to supersede the Interim Plan, therefore no conflict with the plan relative to capacity issues is identified. While the Draft EIS/EIR states that the alternatives are generally consistent with the land uses shown on the Interim Plan, no statement is made that the Master Plan is consistent with the Interim Plan relative to capacity. It should be noted that Alternative D, added subsequent to publication of the Draft EIS/EIR, would provide for extensive improvements at LAX; however, unlike the other build alternatives, Alternative D provides for a future (2015) passenger activity level that would be comparable to that of No Action/No Project. The impacts of Alternative D, including comparisons to the impacts of the other alternatives, were addressed in the Supplement to the Draft EIS/EIR.

AL00033-92

Comment:

- The Draft EIS/EIR acknowledges that development of the Continental City site for aviation uses (cargo, etc.) is contrary to the Los Angeles Citywide General Plan Framework Element directive that a Regional Center should be developed at that location. (Draft EIS/EIR at 4-163.) The Draft EIS/EIR concludes, however, that this inconsistency should not be considered significant in light of the Westchester Southside Project proposed for the other side of the airport. (Id.) We dispute the Draft EIS/EIR's claim that LAWA can satisfy the Los Angeles Citywide General Plan Framework Element directive of a Regional Center at the Continental City site (on the south side of LAX) with development on the north side of LAX. Given the distances involved and traffic congestion in the area of LAX, development on the south side of LAX cannot be considered the equivalent of development on the north side.

Response:

In addition to referencing Westchester Southside as helping to meet the Framework Element objective of the regional center at the Continental City site, Section 4.2, Land Use (subsection 4.2.6), of the Draft EIS/EIR also stated that the objective would be supported through the development of multi-modal transit through the MTA Green Line. Under Alternatives A, B, and C, the MTA Green Line would be extended to the West Terminal Area via the Imperial Highway corridor along the airport's southern boundary. The new rail connection would be in immediate proximity to an Automated People Mover and to airport Rent-A-Car facilities. This connection to the West Terminal Area would clearly support many key aspects of the Framework's objectives and policies for the Regional Center at the Continental City site, including (see Framework Policy 3.10.2) the accommodation and encouragement of development of multi-modal transportation centers, accessibility to the region, compatibility with adjacent uses, and reinforcement of existing regional centers. Furthermore, the significance of the inconsistency should be evaluated in the context of their potential to translate to physical impacts on the environment. As was described in Section 4.2, Land Use (subsection 4.2.6), on page 4-163 of the Draft EIS/EIR and as was further refined in subsection 4.2.6 of the Supplement to the Draft EIS/EIR, the proposed uses for the Continental City site would be subject to the performance and development standards that would be incorporated as part of the LAX Zone/LAX Specific Plan, and the overall building area, grading requirements, and trip generation would be reduced compared to what would be allowed under the current M2-1 zoning designation.

As was described in Section 4.2, Land Use (subsection 4.2.6), on pages 4-195 and 4-196 of the Supplement to the Draft EIS/EIR, under Alternative D the development of an Intermodal Transportation Center (ITC) at the Continental City site would also support Framework Policy 3.10.2 for a Regional Center by providing a pedestrian connection to the MTA Greenline Station at Aviation Boulevard with access to nearby hotels and retail uses along 98th Street and by functioning as a hub of regional transit both day and night through the Green Line connection, bus service, and automated people mover access to the Central Terminal Area (CTA), hotels, and other development along 98th Street. Similar to Alternatives A, B, and C, with key aspects of the Regional Center concept supported both directly and indirectly, this plan inconsistency is not considered significant and is not expected to translate to physical impacts on the environment. Under Alternative D, the proposed ITC would be subject to development and performance standards that would be incorporated as part of the LAX Zone/LAX

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Specific Plan and would be more restricted than those uses allowed under current M2-1 zoning designation and the overall building area, grading requirements, and trip generation would be reduced.

AL00033-93

Comment:

- Mitigation Measure LU-1 indicates that "LAWA shall expand and revise the existing Aircraft Noise Mitigation Program (ANMP) . . ." and provides a list of measures that may be incorporated into that revised ANMP. (Id. at 4-216.) It is impossible to discern from the description and list provided in Mitigation Measure LU-1 precisely what LAWA would be obligated to do under the measure. To remedy this problem, the Draft EIS/EIR must include a complete description of the existing ANMP, how the mitigation measure would change that plan and what the effects of those changes would be. LAWA and FAA must also eliminate the profound vagueness in Mitigation Measure LU-1, which does not appear to commit LAWA to actually adopting any of the listed possible ANMP measures. Because LAWA already has extensive experience with its existing ANMP, there is no apparent reason why the Draft EIS/EIR should not be able to be more precise with regard to specifying measures that will be incorporated into the ANMP as part of Mitigation Measure LU-1.

Response:

Please see Topical Response TR-LU-3 for a description of the existing ANMP and how approval of the LAX Master Plan would affect the ANMP. LAWA would be committed to the implementation of these measures through the adoption of a mitigation monitoring and reporting program, which is required as part of approval of the Final EIS/EIR. Furthermore, it should be noted that since publication of the Draft EIS/EIR, LAWA has already moved forward with actions specified in MM-LU-1, including accelerating the rate of land use mitigation with over 3,845 additional residential units having become compatible as of June 2002. Additionally, LAWA has entered into a Memorandum of Understanding with the City of Inglewood that includes a number of actions that are being pursued to address aircraft noise, including the suspension of requirements for aviation easements as described in pages 10 and 11 of Technical Report S-1 of the Supplement to the Draft EIS/EIR.

As was stated in Section 4.2, Land Use (subsection 4.2.8), of the Supplement to the Draft EIS/EIR, MM-LU-1 has been modified since publication of the Draft EIS/EIR to include those measures that are feasible for LAWA to implement under their current authority.

AL00033-94

Comment:

- Master Plan Commitment LU-3 is inadequate, unacceptably vague and unenforceable. (See Draft EIS/EIR at 4-115 to 4-116.) That "commitment" states that LAWA will "support" bicycle policies and plans and "promote" bikeways in the vicinity of LAX, but lacks sufficient detail in its description of how that "commitment" will be carried out and does not adequately mitigate the Master Plan's adverse impacts. (Id.) For example, the Draft EIS/EIR acknowledges that the proposed Master Plan would eliminate the existing bike lane and bike path along Imperial Highway, but concludes that Master Plan Commitment LU-3 will reduce the impacts of that elimination to a less than significant level. (Id. at 4-139, 4-167, 4-193 .) This conclusion is not supported by the text of Master Plan Commitment LU-3. Because LAWA proposes to expand Imperial Highway dramatically as part of the ring road, thereby increasing the volume and speed of automobile and truck traffic on that road, replacement bike facilities will have to be carefully designed to avoid significant potential safety issues raised by the increase in traffic volume and speed. Master Plan Commitment LU-3 does not adequately address this issue. The "commitment" contains no information regarding how this safety concern will be addressed, and, in fact, proposes to provide bike lanes rather than safer separate bike paths along Imperial Highway. (Id. at 4-116.) At the very least, Master Plan Commitment LU-3 must be revised to provide that LAWA will construct Class I bike paths rather than bike lanes.

Response:

Since publication of the Draft EIS/EIR, the language of Master Plan Commitment LU-3 has been revised to state "comply with" rather than "support" bicycle policies and plans, to further demonstrate LAWA's intent to provide replacement facilities that would be disrupted if Alternatives A, B, and C were implemented. As shown in the City's Bicycle Plan, bike lanes have been designated on Imperial

Highway. Regarding the concern that a bike lane along Imperial Highway with the ring road would not be safe, please note that with development of more specific plans, proposed bicycle facilities would be reviewed by the City of Los Angeles Department of Transportation to ensure that the development of a bike lane along Imperial Highway would provide safe bicycle circulation. Alternative D would not affect the bike facilities along Imperial Highway, since no ring road is proposed.

AL00033-95

Comment:

- The Draft EIS/EIR's discussion of the City of El Segundo's existing General Plan land use and zoning designations contains certain inaccuracies. The discussion should be rewritten as follows to be accurate:

Existing General Plan Land Use and Zoning Designations

The City of El Segundo General Plan circulation, housing, open space, and noise elements include policies and programs relevant to LAX, as described below. Within the study area the majority of land uses located west of Sepulveda Boulevard and north of El Segundo Boulevard are designated in the City of El Segundo General Plan as Residential (Single-family, Two-family, Multi-family, and Medium Density Residential). These residential uses have corresponding zoning designations of R1, R2, and R3, and MDR. East of Sepulveda Boulevard and north of El Segundo Boulevard areas are primarily designated Corporate Office and Urban Mixed-Use North with corresponding zoning of CO and MU-N. There is also a Multimedia Overlay Zone east of Sepulveda Boulevard.

Response:

Comment noted. As a modification to the description of the Existing General Plan Land Use and Zoning Designations provided on page 4-111 in Section 4.2, Land Use, of the Draft EIS/EIR, it is hereby acknowledged that the following additions are warranted: add "Medium Density Residential" to the second sentence; add "MDR" to the third sentence; add "-Use North" and "-N" to the fourth sentence; and add "There is also a Multimedia Overlay Zone east of Sepulveda Boulevard." to the end of the paragraph. These additions do not materially change the land use analysis and related conclusions contained in the Draft EIS/EIR or the Supplement to the Draft EIS/EIR, and are reflected in Section 4.2, Land Use of the Final EIS/EIR.

AL00033-96

Comment:

- The Draft EIS/EIR concludes without analysis or discussion that the "ring road would not have any effect on the Imperial Strip (designated as a passive open space corridor in the Open Space and Recreation Element [of the City of El Segundo General Plan]). (Draft EIS/EIR at 4-139.) This conclusion does not appear to be supported by substantial evidence.

Response:

The statement presented in Section 4.2, Land Use, of the Draft EIS/EIR that the ring road would not have an effect on the Imperial Strip is substantiated based on the following analysis contained throughout the Draft EIS/EIR. As was described in Section 3.2, Alternatives to Be Fully Evaluated, and Appendix K, no acquisition for construction of the ring road would occur in the City of El Segundo. As was stated in Section 4.8, Department of Transportation Act, Section 4(f) (subsection 4.8.6), no use or constructive use of park and recreational lands (including the Imperial Strip) would occur with implementation of Alternatives A, B, and C. As was concluded in Section 4.20, Construction Impacts (subsection 4.20.6.2), construction noise impacts would occur at Imperial Strip. However, Imperial Strip serves as a buffer between the airport and the City of El Segundo, it is currently a noisy environment, and much of its recreational use is for viewing aircraft. Furthermore, construction noise at Imperial Strip would be temporary. Therefore, construction noise impacts at Imperial Strip relative to park use are considered to be less than significant.

Note that under Alternative D no ring road is proposed; however, similar to the other build alternatives, construction noise impacts would also occur at Imperial Strip as described in Section 4.20, Construction Impacts (subsection 4.20.6.3) of the Supplement to the Draft EIS/EIR. As previously described for the

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other build alternatives, construction noise impacts under Alternative D would also be considered less than significant for the use of this park.

AL00033-97

Comment:

First, the expansion of Imperial Highway as part of the proposed ring road would lead to an increase in the volume and speed of traffic on that road, which would presumably lead to a potentially significant increase in noise levels in the neighboring Imperial Strip.

Response:

The extension of I-105 to the west would increase the volume and speed of traffic on that road. In fact, the resulting road noise will be significant in Alternatives A, B, and C. This was discussed in subsection 4.1.6.2 of the Supplement to the Draft EIS/EIR, where it disclosed that Noise Receivers R12 and R20, both along the south side of Imperial Highway, would be significantly impacted. To mitigate this impact, Mitigation Measure MM-N-6, Construct Noise Barrier (Soundwall) Adjacent to Areas Significantly Impacted by Road Traffic Noise (Alternatives A, B, and C), would be adopted. That measure was discussed in subsection 4.1.8.2 of the Supplement to the Draft EIS/EIR. Alternative D, which includes a Ground Transportation Center and Intermodal Transportation Center on the east side of the airport, would not extend I-105 to the west, nor would it result in any significant road noise impacts.

AL00033-98

Comment:

Second, although the Draft EIS/EIR does not provide specific design information for the proposed changes to Imperial Highway, those changes would apparently include elevated components and other structures, which would have potentially significant aesthetic and light/shadow impacts on the Imperial Strip, which impacts are not analyzed in the Draft EIS/EIR. (See Draft EIS/EIR at 4-915 to 4-916, 9-920, 4-923.) LAWA and FAA should revisit and further explain their conclusions regarding the ring road's potential impact on the Imperial Strip.

Response:

As was discussed in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Draft EIS/EIR, the Draft EIS/EIR and 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 issues in a more specific manner, as necessary and appropriate. However, the level of detail provided in support of the Draft EIS/EIR and Supplement to the Draft EIS/EIR aesthetics analysis is considered adequate to support the document's conclusion that aesthetic and visual impacts associated with the proposed Master Plan alternatives would be less than significant. As was described in Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Draft EIS/EIR beginning on page 4-912 and continuing throughout the Environmental Consequences (subsection 4.21.6) discussion under headings for "Southern Boundary," there are multiple factors that support this conclusion.

In basic terms, aesthetic impacts from the proposed changes to Imperial Highway are considered less than significant for the reasons listed below. All page references provided below refer to the Draft EIS/EIR.

- Imperial Strip and other areas along the northern edge of El Segundo are elevated and overlook LAX and Imperial Highway (pages 4-904, 4-916, 4-920); consequently, the view from Imperial Strip would not be impacted by changes to Imperial Highway;

- the location and height of proposed development would be similar to existing development in the area pursuant to the LAX Cargo Facility Design Guidelines (pages 4-915, 4-920);

- the ring-road in the vicinity of Imperial Strip is proposed at elevations similar to those of Imperial Highway under current conditions;

- Imperial Strip is intended as an airport buffer and is used and valued for its views of the airport and aircraft activity (pages 4-904, 4-1198); such views would be unaffected by the proposed changes;
- undeveloped areas along the southern edge of the airport are currently of low visual quality (pages 4-904, 4-905, 4-916, 4-920, 4-923);
- areas with existing development would have aging facilities and buildings replaced with new upgraded facilities that present a higher quality and more cohesive visual image (pages 4-915, 4-920); and
- new development would be subject to compliance with and provisions for Airport Buffer Areas in the LAX Street Frontage and Landscape Plan (or an updated or integrated set of similar design-related guidelines and plans, per Master Plan Commitment DA-2, Update and Integrate Design Plans and Guidelines (Alternatives A, B, C, and D)) and would also follow provisions for landscaping, lighting, and buffer areas set forth in Master Plan Commitment LU-4, Neighborhood Compatibility Program (Alternatives A, B, C, and D), and Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas (Alternatives A, B, C, and D) (pages 4-915, 4-916, 4-920, and in Chapter 5, Environmental Action Plan, pages 5-3 and 5-10).

AL00033-99

Comment:

3 . Surface Transportation: Chapter 4.3.

a. The Draft EIS/EIR Traffic Analysis Is Fundamentally Flawed.

The amount of traffic accessing LAX would almost double as a result of the Master Plan. Indeed, the Plan would result in an additional 10,000 trips in the peak hour alone. (Draft EIS/EIR at 4-294.) Yet the Draft EIS/EIR neither adequately identifies nor analyzes the effect that this traffic would have on the neighboring arterials and the region's freeways. Particularly in light of recently imposed security restrictions limiting access to LAX, traffic impacts on neighboring streets must be completely reassessed. Of critical concern is the document's failure to disclose the severity of traffic impacts because it assumes the completion of large-scale transportation projects that may not be implemented or constructed within the Master Plan horizon. The Southern California Association of Government's (SCAG's) recent action to remove the Arbor Vitae interchange from the Regional Transportation Plan, for example, calls into question the feasibility of the Arbor Vitae project and numerous other transportation infrastructure projects that rely on or connect with the Arbor Vitae interchange.

In addition, in violation of CEQA, the Draft EIS/EIR fails entirely to analyze project impacts. Indeed, the document fails to analyze numerous intersections in the City of El Segundo that would be affected by traffic from the Master Plan and also fails to provide any analysis of impacts on freeways in the region. Instead, buried in a technical appendix the Draft EIS/EIR merely states that the Master Plan would have no impact on the I-405 freeway in 2015. These deficiencies and numerous others are discussed below and in the July 16, 2001 report prepared by Tom Brohard, P.E., submitted as Attachment B.

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 assertion in this comment that a result of the Master Plan will be an additional 10,000 peak hour trips is incorrect and misleading. Table 4.3.2-4 in the Draft EIS/EIR indicates that the existing PM peak hour trip generation for the airport is about 14,000, and that it will grow to over 32,000 by 2015 under the No Action/No Project Alternative. The No Action/No Project Alternative is the most likely alternative if the LAX Master Plan is not approved, and it will have an increase of about 18,000 peak hour trips by the year 2015. The three project alternatives reduce PM peak hour trip generation from 32,000 to around 26,000, a reduction of about 8,000 trips. The correct result of the LAX Master Plan then is to reduce total peak hour airport trips, not to increase them. In spite of this finding, LAWA has defined the Adjusted Environmental Baseline in order to quantify the traffic impacts of all airport growth between 1996 and 2015, and to develop a plan to mitigate these impacts. It is the comparison of the project alternatives to this Adjusted Environmental Baseline that shows an increase of 10,000 to 12,000 peak hour airport trips. The impacts of these additional airport

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trips are fully disclosed in the Draft EIS/EIR as well as Technical Report 3c, as are recommended mitigation plans for Alternatives A, B, and C. The analysis of Alternative D includes a complete re-analysis of transportation impacts on neighboring streets and freeways and development of mitigation measures. This analysis is included in the Supplement to the Draft EIS/EIR.

The comment states that the Arbor Vitae Interchange has been removed from the RTP, thus calling into question the feasibility of the Arbor Vitae project and numerous other transportation infrastructure projects that rely on or connect to the Arbor Vitae Interchange. 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 reinstate the half-interchange. The reinstatement renders this concern moot.

The comment also states that the Draft EIS/EIR failed to analyze some intersections in El Segundo and failed to provide any analysis of impacts on freeways. Please see Subtopical Response TR-ST-2.1 for a discussion of the study area definition and identification of facilities analyzed. Freeway impacts are identified in Table 4.3.2-7 in the Draft EIS/EIR. A complete analysis of freeway impacts and possible mitigations is provided in Section 6.2 of Technical Report 3b, Off-Airport Ground Access Impacts and Mitigation Measures. This technical report, together with all of its attachments, is an integral part of the Draft EIS/EIR.

AL00033-100

Comment:

b. The Draft EIS/EIR Understates the Severity of Master Plan Traffic Impacts.

(1) Recent SCAG Action Relating to the I-405/Arbor Vitae Interchange from the RTP Renders the Traffic Analysis Completely Inaccurate.

The Draft EIS/EIR relies on three programs intended to reduce traffic congestion around the airport -- "Master Plan Commitments," an "Environmental Action Plan" or "EAP" and a "Congestion Relief Package" or "CRP." The EAP, of which the CRP is one component, is included in each Master Plan alternative. Some of the key components of the CRP combine to create a system for direct access between the area freeways and the airport. These key components include:

- On the north, an expressway to provide direct freeway access to LAX for motorists;
- From the east, a 1.5 mile extension of the Century Freeway; and
- A new ring road that would tie the expressway and the Century Freeway extension to the airport, including the new western terminal building.

(Draft EIS/EIR at 4-274.)

SCAG's April 12, 2001 action to remove the I-405/Arbor Vitae Interchange project from the Regional Transportation Plan ("RTP") appears to have far-reaching implications for the viability of several of the transportation projects identified in the Master Plan. Because the Draft EIS/EIR assumes the completion of this capacity-enhancing project in its analysis of Master Plan traffic impacts, and because this project is unlikely to be built within the Master Plan horizon, the Draft EIS/EIR does not accurately depict the severity or extent of traffic impacts that would occur as a result of the Master Plan.

The implications associated with the removal of the Arbor Vitae interchange from the RTP are monumental inasmuch as that interchange appears to be the lynchpin for several critical Master Plan projects. Specifically, the I-405/Arbor Vitae Street Interchange is a key link in developing the airport's ring road. (Draft Initial Study/Environmental Assessment for the Interstate 405/Arbor Vitae Interchange (hereinafter "Arbor Vitae Interchange IS/EA"), attached as Exhibit 4.3(A) at 2.) The ring road is intended to reduce traffic congestion on and off-airport and is designed to connect directly to I-405 at Arbor Vitae Street. (Draft EIS/EIR at 3-55 and 4-295.) The loss of the I-405/Arbor Vitae interchange will affect the design and operation of the ring road, if not the fundamental feasibility of building a ring road at all.

The loss of the Arbor Vitae interchange would also appear to undermine another fundamental component of the Master Plan-the proposed West Terminal Area ("WTA"). The WTA is intended to reduce curbside demand at the Central Terminal Area ("CTA") by relocating much of the air passenger demand from the CTA to the WTA. (Id. at 4-235.) The WTA would be designed to accommodate over one-half of the airport's traffic with direct access via the ring road linking the airport to the I-405 and the I-105. (Id.) The Draft EIS/EIR projects that peak hour trips would drop anywhere from 21 percent to 34 percent in the CTA, presumably as a result of the WTA and the ring road. Draft EIS/EIR at 235. The document then notes that without the project (i.e., all of the Master Plan improvements presumably including the ring road and the WTA), the number of peak hour trips into the CTA would increase by 22 percent. (Id.) Thus, it appears that the loss of the Arbor Vitae interchange will directly affect the feasibility of the ring road which, in turn, will directly affect the feasibility of the WTA and the passenger demand that could be accommodated at this new terminal. The end results appears to be a substantial increase in traffic at the CTA, which the Draft EIS/EIR fails to analyze and disclose.

The implications associated with the loss of the Arbor Vitae interchange extend beyond the ring road and the WTA. The Draft EIS/EIR notes that the LAX Expressway, a project consisting of four vehicle lanes added adjacent to I-405, beginning just south of the Sepulveda Boulevard overpass, extending to La Cienega Boulevard, would connect to the ring road at Arbor Vitae Street. (Id. at 4-295.) Moreover, the Draft EIS/EIR touts the direct freeway connection that the ring road would have to the airport for relieving a tremendous amount of congestion on the surrounding local and arterial roads including the freeways. (Id. at 4-283, 295-297.)

Thus, because the Draft EIS/EIR's traffic analysis assumes that the ring road, the LAX Expressway and the WTA would be implemented and because the Arbor Vitae connection appears to be a critical component of these projects, both directly and indirectly, SCAG's removal of the Arbor Vitae interchange from the RTP appears to invalidate the entire Master Plan traffic analysis. Key issues remain unresolved. What will be the effect on the Master Plan, in general, as a result of the loss of the Arbor Vitae interchange? What will be the effect on the ring road, the WTA and the LAX Expressway as a result of the loss of the Arbor Vitae project? What effect will the loss of the Vitae Arbor project have on other Master Plan projects including the proposed improvements along Westchester Parkway, the WTA access roads along Pershing Drive, and on the extension of the I-105 along Imperial Highway? What will be the effect on traffic in neighboring communities if all or some of the projects (e.g., the ring road, the WTA, the LAX Expressway) are not constructed? The Draft EIS/EIR must be revised to address these issues.

Response:

This comment is similar to comment AL00008-8. Please see Response to Comment AL00008-8.

AL00033-101

Comment:

(2) The Draft EIS/EIR Assumes the Implementation of Questionable Transportation Projects That Are Not Assured of Completion.

The implications associated with the loss of the Arbor Vitae interchange constitute only a fraction of the flaws in the Draft EIS/EIR's traffic analysis. The analysis understates the severity and extent of traffic impacts resulting from the Master Plan because it inappropriately assumes the construction and/or implementation of transportation projects, some of which may never actually be constructed. These transportation projects, if successfully implemented, would greatly increase highway capacity. Moreover, the Draft EIS/EIR assumes the implementation of large-scale transit systems that may not be constructed within the Master Plan horizon. If these highway, freeway and transit projects do not come to fruition during the life of the Master Plan, traffic impacts resulting from the increased aviation activity resulting from the Master Plan will be far more severe than disclosed in the Draft EIS/EIR. The Draft EIS/EIR itself admits that the traffic analysis evaluated all airport-related traffic impacts that remained after the inclusion of the projects contained within the CRP. (Id. at 2-274 and 2-276 (emphasis added).)

Response:

The methodology used to analyzed traffic impacts followed standard industry and legal guidelines, as explained in Topical Response TR-ST-2. The analysis accounted for those projects that were legally required to be accounted for, as discussed in the topical response. The future planned and

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programmed roadway projects that were included, including the Arbor Vitae interchange, were appropriate at the time of analysis.

AL00033-102

Comment:

As an example, the Draft EIS/EIR assumes the completion of the ring road and the LAX Expressway in its analysis of traffic impacts. In addition to the obvious implications resulting from the loss of the Arbor Vitae interchange on the LAX Expressway, construction of the Expressway may be infeasible because of other funding constraints or delays. In fact, the Draft EIS/EIR admits that funding for this project is not yet secured. (Id. at 4-295.) Yet, despite this acknowledgment, the Draft EIS/EIR's traffic analysis assumes the traffic relief that would occur if this major capital improvement project would be implemented. Such an assumption renders the analysis invalid.

Response:

The LAX Expressway is not dependent on the Arbor Vitae interchange. Also, please see Response to Comment AL00008-6 regarding funding.

AL00033-103

Comment:

The traffic analysis also assumes the implementation of High Occupancy Vehicle ("HOV") lanes on I-405 near the airport. (Id. at 4-279.) This project too, appears unlikely to be implemented within the Master Plan horizon inasmuch as funding for this project is also in jeopardy. Specifically, SCAG's long-range transportation plan does not meet the Clean Air Act's requirements, a problem that jeopardizes \$1.9 billion in highway funds scheduled to flow into southern California to relieve congested highways and freeways. (Douglas Shuit, "Flaws in Region's Transit Plan May Jeopardize Funds," LA Times, April 22, 2001, attached as Exhibit 4.3(B).) Among the projects threatened by lack of funds would be the HOV lanes on the I-405. (Id.)

Response:

The methodology used to analyze traffic impacts followed standard industry and legal guidelines, as explained in Topical Response TR-ST-2. Specifically, the implementation of the I-405 HOV lanes in question was required to be accounted for in the analysis.

AL00033-104

Comment:

The traffic analysis also assumes vehicular trip reductions associated with extension of the Green Line transit system from its current terminus at Aviation Boulevard directly to the West Terminal Area Complex by 2015. (Draft EIS/EIR at 4-266-267.) The document does not provide any evidence, however, that the extension of the Green Line will actually be constructed within the planning horizon of the Master Plan.

Response:

The extension of the Green Line from its current terminus to the West Terminal is a proposed component of Alternatives A, B, and C. Along with other project components, it would be the responsibility of LAWA to ensure that the proposed improvements are implemented in a timely manner, including provisions for securing the necessary funding, permits, and approvals, as appropriate. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology.

AL00033-105

Comment:

Finally, the Draft EIS/EIR assumes more than a hundred other freeway, surface streets and transit improvements in its analysis of Master Plan traffic impacts (at Draft EIS/EIR at Technical Report 3B,

Table 2.3), yet there is no evidence that these projects would be constructed by 2015. As regards freeway improvements in particular, the Draft EIS/EIR states that the projects were included because they are programmed in the State Transportation Improvement Program ("STIP"). (Id. Technical Report 3B at 2-16.) Yet mere inclusion in the STIP is no guarantee that the project will be constructed within the Master Plan horizon.

In sum, because the Draft EIS/EIR inappropriately assumes that major transportation projects will be implemented within the Master Plan horizon, the document fails to fulfill CEQA's and NEPA's principal mission -- the disclosure and analysis of project impacts. Had the Draft EIS/EIR included realistic assumptions in terms of the feasibility of large scale transportation projects, it would have concluded that the Master Plan would result in far more than six significant and unavoidable impacted intersections. (Id. at 4-274.) The Draft EIS/EIR must be revised to identify traffic impacts assuming completion of only those transportation projects that are certain of construction in the relevant time frame.

Response:

The methodology used to analyze traffic impacts followed standard industry and legal guidelines, as explained in Topical Response TR-ST-2. In addition, please see Response to Comment AL00033-101.

AL00033-106

Comment:

(3) The Draft EIS/EIR Understates the Severity of Traffic Impacts For Several Other Reasons.

The Draft EIS/EIR also underestimates the trip generation from the Master Plan because the traffic counts were not conducted at a time when LAX is the most congested. Instead of relying on traffic surveys and counts conducted during the holidays (e.g., Thanksgiving or Christmas), the Draft EIS/EIR's traffic counts were conducted in August. (Id. at 4-238.) While summer time traffic volumes may be higher than volumes at other times of the year, the Draft EIS/EIR should have relied on traffic counts taken during the winter holiday season as the basis for the traffic analysis. The Draft EIS/EIR should include a comparison of the airport trip generation rates in August to those during the winter holiday season. If winter holiday traffic rates are higher than August rates, the Draft EIS/EIR should include a separate analysis in order to fully disclose the effect of Master Plan traffic on congestion levels on and off-airport.

In addition, the transportation forecasts which depict the volume of vehicles accessing the airport, under existing conditions, 2005 and 2015 omit cargo related traffic. (Id. at 4-253, Table 4.3.1-4.) This is a major omission, as cargo activities at the airport not only generate numerous vehicle trips, but those vehicles are in large part diesel trucks, which are of particular concern as a source of air pollution. The revised Draft EIS/EIR must identify the cargo and ancillary trip generation and include these vehicular trips in the traffic analysis.

Response:

Prudent airport planning dictates that Peak Month/Average Day (PMAD) conditions be analyzed, not peak day of the year. Much like regional shopping centers, it would not be prudent to design an airport for the busiest two days each year and have the extra capacity remain unused for the rest of the year. Cargo traffic was indeed included in the analysis of future year conditions, as explained in Technical Reports 3b of the Draft EIS/EIR and S-2b of the Supplement to the Draft EIS/EIR. The tables referenced include traffic in the airport passenger areas, which excludes cargo trucks.

AL00033-107

Comment:

Finally, the Draft EIS/EIR assumes an increase in vehicle occupancy in 2015 (at 4-253), which if true, would decrease the number of vehicles entering the airport and would result in less curbfront congestion. Specifically, the document assumes that average vehicle occupancy would increase from 1.36 in 1996 to 1.44 in 2015. (Id. at 4-279.) Later in the Draft EIS/EIR's discussion of parking needs, the document assumes 1.50 passengers per private vehicle. (Id. at 4-241.) The Draft EIS/EIR fails to

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explain the discrepancy, nor is there any evidence supporting its vehicle occupancy rates. We are concerned that the inflated occupancy rates result in a further understating of traffic congestion.

Response:

The Draft EIS/EIR does include an increase in vehicle occupancy in both 2005 and 2015 as illustrated in Table 2.4-2 of Technical Report 3a, On-Airport Ground Transportation Technical Report. In addition to the relationship between CTA Curbfront Congestion and Vehicle Occupancy, the CTA Curbfront congestion is directly related to the number of Originating and Terminating Passengers at LAX which varies between scenarios. The variations in originating and terminating passengers by alternative can be seen in Tables 2.6.4-1, 2.6.4-2, 3.1-1, 3.1-2, 3.2.8-1, 3.2.8-2, 3.3.8-1, 3.3.8-2, 3.4.8-1 and 3.4.8-2. An increase in vehicle occupancy does not directly relate to a decrease in CTA Curbfront Traffic if there is a change in the flight schedule and resulting air passenger activity. The average vehicle occupancies highlighted on page 4-279 in Section 4.3, Surface Transportation, of the Draft EIS/EIR that increase from 1.36 in 1996 to 1.44 in 2015 represent the vehicle occupancy changes in airport employee vehicles. The vehicle occupancies discussed on page 4-241 of the Draft EIS/EIR represent the shifts in vehicle occupancies associated with air passengers, not employees.

The South Coast Air Quality Management District mandated the adoption of Regulation XV requiring all large employers in the South Coast basin to increase the Average Vehicle Ridership (AVR) of employees' vehicles from 1.45 to 1.55 throughout the period of the master plan. This region-wide emphasis on increasing vehicle occupancies has direct implications on all aspects of planning and traffic forecasting for the Los Angeles metropolitan area, including airport access. The analysis used in the LAX Master Plan Draft EIS/EIR studies was based on 1.50 occupants per vehicle in 2005 and 1.55 occupancy per vehicle in 2015 for air passengers in private autos, as shown in Table 2.4-3 of Technical Report 3a, On-Airport Ground Transportation Technical Report, of the Draft EIS/EIR.

AL00033-108

Comment:

c. The Draft EIS/EIR Fails to Analyze the Master Plan's Impacts Upon Freeways.

The Draft EIS/EIR fails to analyze the impacts from Master Plan traffic on freeways in the vicinity of the airport. Of particular concern is the document's failure to analyze impacts upon the I-405, despite the fact that this major north/south transportation artery is located less than a mile from the airport. Because the I-405 is the only north-south freeway west of downtown Los Angeles, the mobility of the Westside is dependent on this freeway. (Exhibit 4.3(A) at 2.) Moreover, the I-405 freeway is one of the most important freeway corridors serving the Los Angeles and Orange County areas inasmuch as the route serves numerous employment centers. (Id. at 5.) According to Caltrans, the 405 freeway is one of the most heavily traveled freeways in the state in terms of average daily traffic. (Id. at 2.) The freeway operates at "extremely congested conditions" which are expected to continue through at least the year 2020. (Id. at 8.) Even the Draft EIS/EIR admits that I-405 north of LAX is extremely congested and exhibits breakdown conditions consistently throughout the day. (Id. at 4-289.)

Given the severity of the traffic congestion on this freeway and the fact that the Master Plan would generate more than 10,000 new trips in the peak hour alone (Id. at 4-294), one would expect an extensive analysis of impacts upon this critical transportation corridor. Rather than provide this analysis, the Draft EIS/EIR merely states that such an analysis is not required since the Congestion Management Program ("CMP") fully analyzes these facilities. (Id. at 4-281.)

Relying on the CMP may be appropriate if the CMP summary, which is contained in the Draft EIS/EIR, actually provided an analysis of Master Plan traffic impacts on freeways. However, it does not. In search of any discussion of freeways, the CMP summary, which is buried in a technical report, only discusses generic impacts to freeway segments, and it does not even mention the 405 freeway. (See, e.g., Technical Report 3B, Tables 4.1 through 4.4 at 4-1 and 4-2.) For specific information about impacted freeways, it refers the reader to a series of charts depicting volume to capacity and level of service calculations for the Master Plan alternatives. The last chart simply states that the Master Plan would have no impact on the I-405 freeway in 2015. (Id. at Technical Report 3B.) (Draft EIS/EIR, Attachment E, no page number (emphasis added).)

An EIR must effectuate the fundamental purpose of CEQA: to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." (Laurel Heights Improvement Assn. v. Regents of the University of California, 6 Cal. App. 4th 1112, 1123 (1993) (emphasis added).) To do so, an EIR must contain facts and analysis, not just an agency's bare conclusions. (Citizens of Goleta Valley v. Board of Supervisors, 52 Cal. App. 3d 553, 568 (1990).) Thus, a conclusion regarding the significance of an environmental impact that is not based on an analysis of the relevant facts fails to fulfill CEQA's informational goal. The Draft EIS/EIR fails to fulfill this paramount purpose because its conclusion as regards impacts on freeways are based upon raw facts that remain unanalyzed. In this instance, the Draft EIS/EIR merely includes a series of charts that identify level of service and volume to capacity calculations. However, the Draft EIS/EIR completely fails to analyze the data in a manner that informs decisionmakers and the public of the significant environmental impacts the Master Plan will cause.

Clearly a detailed analysis of freeway impacts is warranted, especially since according to the Draft EIS/EIR, the Master Plan would significantly impact freeways if it would add 150 trips per direction to the freeway. (Draft EIS/EIR, Technical Report 3B at 2-19.) Here, the Master Plan would generate over 11,000 new trips in the P.M. peak hour alone. (Id. at 4-294.)

Equally disturbing, the table finds the Interstate 10 and the Interstate 105 freeways to be impacted. (Draft EIS/EIR, Attachment E, no page number.) Yet, there is absolutely no discussion, let alone analysis, of the severity or extent of those impacts. Because an EIR must contain sufficient detail for decisionmakers to decide whether to proceed with a project in light of its impacts (see CEQA Guidelines § 15151), a bare conclusion without analysis of the severity of the significant impact is inadequate. NEPA similarly requires that an EIS contain "detailed information concerning significant environmental impacts." (Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 349 (1989) (emphasis added).) Furthermore, the Draft EIS/EIR's failure to conduct such analysis means that it also fails to formulate appropriate mitigation for such impacts or propose alternatives that could alleviate them and deprives the public of a meaningful opportunity to understand and comment on those impacts.

Because the Draft EIS/EIR does not even hint at potential impacts, decisionmakers and members of the public are left in the dark as to the actual freeway impacts. The revised Draft EIS/EIR must include an accurate, complete and understandable traffic impact analysis for impacts to freeways.

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. Please see Topical Response TR-ST-4 regarding airport area traffic concerns. Attachment G of Technical Report 3b of the Draft EIS/EIR quantifies traffic volumes and levels of service in the year 2015 both with and without the project, and quantifies the severity of project impacts. This is sufficient detail for an analysis of project impacts at freeways.

AL00033-109

Comment:

d. The Draft EIS/EIR Fails to Support with Substantial Evidence Its Conclusion that Impacts During the Airport Peak Hour Would Be Insignificant.

The airport generates its highest traffic volumes during midday since cargo and ancillary vehicle activity peaks between 12:00 noon to 2:00 p.m. (hereinafter referred to as "airport peak traffic"). (Draft EIS/EIR at 4-290.) Given this fact, it is important that the Draft EIS/EIR identify and analyze impacts to study area intersections that would be affected by this airport peak traffic. The document did the first step - it analyzed intersections for all three peak hours (i.e., a.m., p.m., and the airport peak). (Id. at 4-275.) The analysis falls short, however, in its use of a different criterion for determining significant impacts depending on whether the impact occurs during the a.m. and p.m. peak and whether it occurs during the airport peak. Specifically, the Draft EIS/EIR states: "significant impacts were determined for the a.m. and p.m. commute peak hours; however, if total traffic on a facility was highest during the airport peak hour, significant impacts were also determined during that hour for that facility." (Id.) (emphasis added).

3. Comments and Responses

Thus, for no defensible reason, the Draft EIS/EIR holds facilities impacted during the airport peak hour to a different standard than facilities impacted during the a.m. and p.m. peak hours. Because the Draft EIS/EIR relies upon a different standard of significance, it fails to identify significant impacts upon intersections that occur during midday. For example, the intersections of Aviation/ El Segundo and Sepulveda / El Segundo deteriorate from LOS D to F, and the volume to capacity ("V/C") significantly deteriorates at Aviation/Rosecrans and Sepulveda/Rosecrans during the airport peak hour (Table 4.3.2.-16), yet the Draft EIS/EIR does not find this increased traffic congestion to be a significant impact. The end result is the document's failure to identify the impacts as significant, and to formulate mitigation for such impacts. There is no justification for this approach.

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. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, in particular Subtopical Response TR-ST-2.3. In addition, it should be noted that the refined intersection analysis of Alternative C re-defined the significance thresholds for the airport peak hour to be the same as for the AM and PM commute peak hours. This refined definition was also used for the analysis of Alternative D in the Supplement to the Draft EIS/EIR.

AL00033-110

Comment:

e . The Draft EIS/EIR Fails to Identify or Analyze Significant Impacts to El Segundo Intersections.

The Draft EIS/EIR omits an analysis of several intersections within the City of El Segundo that would likely be impacted by the proposed Master Plan. Specifically, the document fails to identify or analyze impacts at the following intersections:

Sepulveda/Grand
Grand/Vista Del Mar
Imperial/Nash
Imperial/Douglas
Imperial/Main
El Segundo/Douglas
El Segundo/Nash
Mariposa/Main
Grand/Main
El Segundo/Main
Rosecrans/Vista Del Mar
Nash/Mariposa
Douglas/Mariposa
Sepulveda/Maple
Sepulveda/Hughes

LAWA and FAA must provide an adequate analysis of the impacts on these intersections.

Response:

Please see Topical Response TR-ST-2 for a discussion of the study area definition and identification of facilities analyzed. The intersections of:

- Sepulveda/Grand
- El Segundo/Douglas
- El Segundo/Nash
- Mariposa/Main
- Grand/Main
- El Segundo/Main
- Nash/Mariposa
- Douglas/Mariposa
- Sepulveda/Maple
- Sepulveda/Hughes

were indeed excluded from the analysis of project impacts. As stated in Topical Response TR-ST-2, much like Union Station, LAX is not a typical traffic generator like a regional shopping mall. Rather, it is a transfer facility for ground-to-air trips. As a result, it was not the intent of the Draft EIS/EIR or Supplement to the Draft EIS/EIR to analyze every intersection that could be impacted.

AL00033-111

Comment:

f. The Draft EIS/EIR Includes Insufficient Detail As Regards the Master Plan Commitments.

The Draft EIS/EIR includes Master Plan Commitments, "in recognition of" potential Master Plan impacts. (Id. at 4-252.) The Draft EIS/EIR lists the On-Airport Surface Transportation Commitments but does not include sufficient information in order to determine the exact nature of the Commitments such as design, financial feasibility or schedule for construction or implementation. For example, Commitment ST-1 merely calls for the West Terminal surface transportation system to adequately accommodate all forecast vehicular activity through 2015. (Id. at 4-252.) The document does not, however, sufficiently describe the West Terminal surface transportation system. What little information is provided (Id. at 4-266) raises more questions than it answers since it states that only the east-side of the structure (which would accommodate southbound traffic) would be in place in 2005 but that the west-side of the structure which is intended to handle northbound traffic would not be constructed for another 10 years. The Draft EIS/EIR also alludes to a "separate bypass road" which may be a part of the West surface transportation system, but does not specify identify the location of the bypass road or provide any information as to how the roadway would be design or how it would operate. (Id.)

Finally, it is unclear whether these commitments are included as a part of the project or whether they are intended as mitigation for the Master Plan's impacts. They cannot properly be assumed to occur, because they lack the requisite certainty. Their inclusion simply adds to the confusion over traffic impacts.

Response:

The program-level Draft EIS/EIR and Supplement to the Draft EIS/EIR provided sufficient detail to determine the impacts of the Master Plan. It is acknowledged that further documentation may be required to address certain environmental issues in a more project specific manner, as necessary and appropriate. The commitments are included as part of the project. They are not intended as mitigation measures.

AL00033-112

Comment:

g. The Draft EIS/EIR's Analysis of Traffic Impacts Resulting From Construction of the Master Plan Projects is Inadequate.

The Draft EIS/EIR's purported analysis of traffic impacts resulting from the construction of the projects anticipated under the Master Plan is superficial and vague. Instead of providing a detailed construction plan that would delineate the location of specific projects, schedule of construction, specific construction trip generation rates (e.g., construction truck trips and construction worker trips), detail as to lane closures, roadway detours and the extent of degraded curbside conditions, the Draft EIS/EIR merely mentions that curb operations would be degraded and that lane closures would cause LOS deficiencies. (Id. at 4-269.) Remarkably, the only project that the document specifically identifies as causing a problem during Phase I construction is the south Sepulveda Boulevard Tunnel project. (Id. at 4-269.) As to Phase II of construction, the Draft EIS/EIR concludes, without any supporting analysis, that impacts would be minimal. (Id. at 4-270.) Clearly, projects such as a new terminal, a ring road, an LAX expressway, and massive runway reconfiguration would require a major amount of construction. LAWA cannot proceed with the implementation of the Master Plan until further environmental review, complete with a detailed construction plan, is undertaken.

The Draft EIS/EIR's deficient discussion of construction impacts extends beyond its failure to provide a detailed construction plan. The document also fails to identify meaningful criteria for determining significant construction impacts. Instead, it merely asserts that a significant impact would occur if the

3. Comments and Responses

project generates sufficient construction-related traffic to cause disruption to normal traffic flows. (Id. at 4-291.) Because terms such as "sufficient construction-related traffic," "disruption," and "normal traffic" are not defined, it is impossible to determine the severity and extent of construction impacts upon traffic levels.

Furthermore, the Draft EIS/EIR also appears to substantially understate the traffic impacts resulting from construction inasmuch as the document includes the Continental City and the LAX Northside projects in the No Action/No Project Alternative. (Id. at 4-317.) According to the Draft EIS/EIR, both of these projects would generate substantial numbers of heavy-duty truck trips and the large construction work force would also generate substantial traffic. (Id. at 4-317 to 4-318.) As we stated earlier, LAWA inappropriately includes these projects in the No Action/No Project alternative, and therefore understates the severity of environmental impacts attributable to the Master Plan.

Response:

The analysis appropriately addressed construction of the Continental City and LAX Northside projects in the No Action/No Project Alternative, since those projects are by definition part of the No Action/No Project Alternative. However, the significant impact determination is independent of the No Action/No Project Alternative. Significant impacts are determined by comparing the traffic conditions resulting from the projects to the conditions in the Adjusted Environmental Baseline Alternative, which does not include the Continental City and LAX Northside projects. The Supplement to the Draft EIS/EIR provided additional detail on construction-related traffic impacts of all alternatives in Section 4.3, Surface Transportation. In addition, please see Topical Response TR-ST-3 regarding construction traffic.

AL00033-113

Comment:

4. Social Impacts: Chapter 4.4.

a. In Chapter 4.4.1, the Draft EIS/EIR Overstates the Relative Economic Benefit to the Region Generated by Expansion of LAX Operations and Fails to Consider the Beneficial Impacts of Regional Airport Expansion.

The Draft EIS/EIR states that the economic growth of the Los Angeles region under the No Project Alternative would fall noticeably short of growth projected under Alternatives A, B, or C (Draft EIS/EIR at 4-352). This conclusion is not sound. It is refuted by expert economic analysis done in 2000 for the Southern California Association of Governments (SCAG) in the course of updating the Regional Transportation Plan for Southern California area. (See Exhibit 4.4(A), Southern California Aviation Industry Impact Analysis, July 11, 2000, prepared by CIC Research, Inc.) According to this comprehensive regional analysis, a regional aviation scenario in which LAX serves 94 MAP (designated "RTP Med" in the CIC report) in the year 2020 would generate regional economic activity of \$98,165,000, while a scenario in which LAX is constrained to 70 MAP (scenario "2C HSR") would generate \$96,718,000 of regional economic activity in 2020. (Id. at 34.) The difference in output between these two scenarios is negligible given that the total 2020 regional economy is projected to generate about \$1.7 trillion in output and 13,750,000 total jobs. (Id. at ii.) According to SCAG's analysis, the difference between the economic output generated under scenarios showing LAX at 70 MAP and 94 MAP represents less than one tenth of one percent of the regional economy in 2020.

Response:

Several key changes have taken place in the region since the publication of SCAG's 2001 Regional Transportation Plan (RTP) to further constrain total airport capacity. The voters of Orange County rejected the El Toro conversion to a civilian commercial airport in 2002. El Toro was planned to accommodate up to 30 million annual passengers (MAP) in the 2025 time frame. The cap on passengers at John Wayne Airport was raised from 8.4 MAP to over 10 MAP. Other facility pressures and operational limitations remain at Burbank Airport and Long Beach Airport. Therefore, a City of Los Angeles decision to expand LAX in a way that falls short of meeting the demand for air transportation in the region could result in a reduction in future economic activity, as discussed in Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, with supporting technical data provided in Technical Report 5 of the Draft EIS/EIR and Technical Report S-3 of the Supplement to the Draft EIS/EIR.

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.

AL00033-114

Comment:

In short, the purported regional economic benefits of the LAX Master Plan are illusory, especially given the serious economic harms due to adverse impacts of expanded operations at LAX, including overcrowded roads, displaced businesses and disrupted communities, air pollution, and damaged public health. As the SCAG study concluded, environmental and transportation congestion impacts (air and ground) appear to be more relevant than economic considerations in planning for the future of the region's aviation development, given the negligible economic differences as described above. (Id. at viii.)

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.

AL00033-115

Comment:

The Draft EIS/EIR asserts that if LAX does not expand, the lack of supporting aviation services would "hold back" economic activity in the region so much that employment "falls off" from the Environmental Baseline year. (Draft EIS/EIR at 4-352). A fundamental flaw in this analysis is that it assumes that if LAX does not grow, the region will "lose" that growth. This is of course not the case if, as contemplated by the 2001 RTP, the region's demand for airport services is met by a distribution of services at a range of available regional airports with LAX serving 78 MAP. The Draft EIS/EIR, by presenting only the economic advantages generated by development of LAX, presents the false impression that constraining LAX would cause the region to fail to meet its projected regional airport demand and simply "lose" the economic benefits generated by airport development.

Response:

Please see Response to Comment AL00033-113.

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AL00033-116

Comment:

In particular, Tables 4.4.1-3, 4.4.1-5, and 4.4.1-7 displaying the "Direct Economic Impact of LAX in the Los Angeles Economy" present only a partial and misleading picture of the regional economy. If LAX does not grow but other regional airports do grow, the direct economic benefits of development of those other airports will of course increase. Thus, to the extent that the Draft EIS/EIR attempts to establish that the expansion of LAX is necessary for the good of the regional economy, it is flawed in that it tells only part of the story. The regional economy will benefit from the regional approach endorsed by SCAG, in which the region's various commercial airports all make significant contributions to the region's economy. The only acknowledgment in the Draft EIS/EIR of this regional context is that in addressing cumulative impacts of the airport Master Plan Alternatives, the Draft EIS/EIR concedes that SCAG projections indicate over 2.8 million jobs will be created in the 5-county region between 1996 and 2015. (Id. at 4-366.) While the document characterizes this cumulative impact as "beneficial," it fails to acknowledge that the regional growth projected by SCAG is not dependent on LAX expanding. As such, the document provides self-justification for project development, at the expense of accurate economic disclosure.

Response:

Please see Response to Comment AL00033-113. Also see Topical Response TR-RC-1 regarding the role of the LAX Master Plan in the regional approach to meeting air transportation demand.

AL00033-117

Comment:

b. In Chapter 4.4.2, the Draft Fails to Disclose the Extent of the Adverse Impacts from Relocation of Existing Land Uses.

Alternatives A, B, and C all would require substantial land acquisition and relocation of existing residents and businesses. The true costs of the acquisition and relocation program, however, are not disclosed.

Response:

The costs associated with the acquisition and relocation of existing residences and businesses under Alternatives A, B, and C are considered construction costs/impacts and were discussed in Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and in more detail in Technical Report 5, Economic Impacts of Los Angeles International Airport and the LAX Master Plan Alternatives on the Los Angeles Regional Economy. Within Technical Report 5, Table 31, Table 36, and Table 38, indicate that the land acquisition and relocation costs would total approximately \$856 million for Alternative A, \$1,358 million for Alternative B, and \$828 million for Alternative C. The employment/socio-economic analysis within the Draft EIS/EIR went on to illustrate the economic benefits of Master Plan implementation in terms of construction and permanent employment, direct economic output, and "multiplier" effects such as indirect jobs, induced jobs, and indirect economic growth. Comparable data for Alternative D is provided in Table S7 in Technical Report S-3, Supplemental Economic Impacts Technical Report, and an analysis of associated economic benefits was provided in Section 4.4.1, Employment/Socio-Economics, of the Supplement to the Draft EIS/EIR.

AL00033-118

Comment:

A critical error in the Draft EIS/EIR is the use of outdated data in identifying the properties targeted for acquisition and relocation. The document uses 10-year-old information, from the 1990 census, and asserts that the 2000 census data is not available. (Id. at 4-371.) In addition, the Draft relies upon outdated SCAG materials, i.e. forecasts for the 1998 RTP rather than the current 2001 RTP. (Id.) LAWA and FAA must disclose to the public an updated analysis based on the more recent census data and SCAG forecasts. Use of the 1990 data does not suffice to give the public and decisionmakers full

disclosure of the impacts of the Alternatives. Rather, the document ought to have included at a minimum updated figures as available from the City of Los Angeles, SCAG, and Census Bureau annual updates, which were available even before the 2000 census figures.

Response:

As was stated within Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.2), of the Draft EIS/EIR, data from the 2000 U.S. Census of Population and Housing was not available at the time the Draft EIS/EIR was drafted. However, the Supplement to the Draft EIS/EIR contains updated baseline data where appropriate. As was discussed in Section 4.4.2, Relocation of Residences or Businesses (subsections 4.4.2.2 and 4.4.2.3), therein, the Southern California Association of Governments' (SCAG) 2001 Regional Transportation Plan (RTP) and, most notably, the 2000 Census became available following publication of the Draft EIS/EIR. The potential for changes in census data, including the evolving demographics of the study area, to affect the environmental conclusions provided in the Draft EIS/EIR was discussed in subsection 4.4.2.3 of the Supplement to the Draft EIS/EIR. However, the differences between the 1990 and 2000 Census data do not reflect substantial demographic changes that alter the analysis presented in the Draft EIS/EIR. Section 4.4.2, Relocation of Residences or Businesses, of the Supplement to the Draft EIS/EIR also addressed SCAG's revised RTP, which was updated in 2001 and incorporated revised population, housing, and employment growth projections due to acknowledged overestimates in the 1998 RTP. The differences between the RTP forecasts vary throughout the region and are not substantial for all geographic areas. (In certain geographic areas, the growth projections in the 1998 RTP were actually increased in the 2001 RTP.) Although growth resulting from Master Plan implementation could constitute a slightly larger proportion of growth projected in the 2001 RTP for certain geographic areas as compared with that projected in the 1998 RTP, the significance of growth inducing impacts identified in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), of the Draft EIS/EIR would not change.

AL00033-119

Comment:

Loss of property tax revenues (\$4.285 million for Alternative B) and business tax revenues (\$18 million for Alternative B, with \$13.5 million generated by businesses "with no identifiable relocation opportunity") is mentioned in the Draft EIS/EIR but whitewashed by unsupported assertions that this lost revenue will be made up by higher valuations under Proposition 13 and new businesses. (Id. at 4-387 to 4-388.)

Response:

As was discussed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, a loss in property and business tax revenue would occur immediately following property acquisition. In the long term, the extent to which tax revenues associated with acquired businesses with no identifiable relocation opportunity might be lost to the City of Los Angeles would depend on the relocation choices of affected property owners. However, under each of the build alternatives new tax revenues generated over the life of the Master Plan (2015) would more than compensate for those lost. Property and business taxes would be quickly recouped as LAWA collateral development proceeds (e.g., at LAX Northside/Westchester Southside) and as acquired businesses move to airport-owned property. Note that Alternative D, now considered LAWA staff's preferred alternative, involves substantially less property acquisition and business relocation, and therefore would result in substantially reduced potential losses in property and business tax revenues. For analysis of the economic benefits associated with the Master Plan, including employment growth, increased economic output (gross sales), and associated "multiplier effects," please see Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00033-120

Comment:

A single mitigation measure is proposed for all build alternatives: "phasing" for business relocations. (Mitigation Measure MM-RBR-1). In addition, the Draft EIS/EIR describes a "Residential and Business Relocation Program" that has not yet been prepared. (Id. at 4-392.) It is unclear why the "phasing" element is not included in the "commitment." In addition, as the "Relocation Program" is not yet drafted it is impossible to ascertain how effectively it will lessen the identified impacts on residents and

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businesses. The evaluations of significance of the impacts after mitigation at pages 4-392 through 4-394 are speculative and vague. Mitigation assumes relocation to on-airport locations (id. at 4-392), without any analysis of whether this would be an acceptable location for the displaced businesses, and without adequate documentation that space would be available.

Response:

Mitigation Measure MM-RBR-1, Phasing for Business Relocations (Alternatives A, B, C, and D), proposes to reschedule acquisition phasing and/or development phasing in order to maximize opportunities for airport/airport-dependent businesses and other businesses being acquired to relocate in proximity to their current sites. The analysis provided in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.9), of the Draft EIS/EIR presented various possibilities for delaying property acquisition and demolition in locations where no facilities are planned for construction during Phase 1. That analysis was based in part on information contained within Appendix P to Chapter V of the Draft LAX Master Plan, Preliminary Property Acquisition and Relocation Plan (Proposed Relocation Plan), including an identified acquisition sequence and prioritization of the acquisition areas. The Proposed Relocation Plan would provide as many businesses as possible the opportunity to relocate onto the airport or into the airport-owned developments. Changes in phasing could result in the availability of adequate relocation opportunities or much less substantial shortfalls for certain land uses and could, in some instances, fully mitigate significant business relocation impacts.

Master Plan Commitment RBR-1, Residential and Business Relocation Program (Alternatives A, B, C, and D), is also proposed as part of the Master Plan and would facilitate the timely relocation of displaced businesses to appropriate sites within the vicinity of LAX to the extent possible. This commitment ensures the preparation of a final Residential and Business Relocation Plan in compliance with applicable regulations prior to the commencement of acquisition, and defines the specific objectives of that plan. The Preliminary Relocation Plan is described in Appendix P to Chapter V of the Draft LAX Master Plan, and has been updated to reflect Alternative D in Chapters 2.7 and 2.8 of the Draft LAX Master Plan Addendum. As specified therein, the procedures for residential acquisition and relocation would be identical to those detailed within LAWA's Final Relocation Plan - Voluntary Residential Acquisition/Relocation Program for the Areas Manchester Square and Airport/Belford (Existing Relocation Plan), dated June 2000. Until the Proposed Relocation Plan is finalized, it is impossible to predict precisely which businesses will relocate to LAX Northside/Westchester Southside. However, those businesses that have been targeted for relocation on the airport or within LAX Northside/Westchester Southside, based on projected space availability, as well as those that are expected to be absorbed by the local market are identified in Table A-3, Table B-3, and Table C-3, in Appendix P to Chapter V of the Draft LAX Master Plan, and Table 2.7-2, in Chapter 2.7 of the Draft LAX Master Plan Addendum.

The Master Plan commitments contained within the Supplement to the Draft EIS/EIR, in addition to the proposed mitigation measures, are part of an environmental action plan intended to minimize the overall impacts of the Master Plan. The rationale behind the formulation of the Master Plan commitments is provided in the Introduction to Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of both the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The Master Plan commitments, as well as the mitigation measures, adopted as part of project approval will be incorporated into a comprehensive mitigation monitoring and reporting program, with provisions made to ensure that all measures are fully enforceable (i.e., through zoning conditions, conditions of approval, etc.).

In addition, following publication of the Draft EIS/EIR, new mitigation was identified to further address potential impacts related to business relocation. Mitigation Measure MM-RBR-2, Relocation Opportunities through Aircraft Noise Mitigation Program (Alternatives A, B, C, and D), was presented in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.8), of the Supplement to the Draft EIS/EIR. This new mitigation measure would serve to further reduce the extent of business relocation impacts for each of the build alternatives.

AL00033-121

Comment:

The Draft EIS/EIR analysis is fundamentally flawed in several other regards. First, the inventory of existing property uses is out of date. The document apparently relies on a survey of existing uses

performed in 1996. (Id. at 4-377.) Since that time, airport-related uses surrounding LAX have intensified and in fact much of the area surrounding LAX is dedicated to airport-supporting uses including long-term off-airport parking, rental car facilities, and air freight.

Response:

Appendix P to Chapter V of the Draft LAX Master Plan includes parcel-level detail for the properties proposed for acquisition under Master Plan Alternatives A, B, and C, including property information obtained from the Los Angeles County Tax Assessor's Office for use in the Draft EIS/EIR. The land acquisition data was updated within Chapters 2.7 and 2.8 of the Draft LAX Master Plan Addendum for use in the Supplement to the Draft EIS/EIR and reflected parcel data as of October 2002. Any land use changes that occurred following publication of the Draft EIS/EIR did not represent a material difference relative to the overall uses in the acquisition areas analyzed under Alternatives A, B, and C in the Draft EIS/EIR. Many of the businesses proposed for relocation consist of airport-related uses, including airport parking, rental car facilities, flight kitchens, and cargo uses, as evident in Table A-3, Table B-3, and Table C-3, in Appendix P to Chapter V of the Draft LAX Master Plan, and Table 2.7-2 in Chapter 2.7 of the Draft LAX Master Plan Addendum.

AL00033-122

Comment:

The Draft EIS/EIR acknowledges that with Alternatives B and C, there is a significant impact in that many businesses that are put out of business by LAWA's acquisition will be unable to find suitable relocation sites. (Id. at 4-385 to 4-391.) The true extent of this impact is far greater than disclosed, however, because many of these businesses currently provide airport support services. This means that displacing these airport-serving uses, in an environment where there is an acknowledged shortfall in relocation sites near the airport, will further exacerbate the adverse impacts of the airport expansion. The need for these airport-related uses will not disappear; indeed it will increase if the airport is expanded as proposed. The displaced businesses will be forced to relocate farther from LAX. The Draft EIS/EIR must identify where they will go, and must identify the adverse traffic and other impacts caused by the more remote relocation of airport-serving businesses. Failure to do so renders the Draft EIS/EIR inadequate. These impacts are directly caused by the proposed expansion of LAX and cannot be swept under the rug.

Response:

The business relocation analyses provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR were based on a worst case scenario in which all buildings to be acquired were assumed to be fully occupied and all occupant businesses were assumed to require relocation, as described in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.2), of the Draft EIS/EIR. As also detailed therein, LAX would have capacity to absorb airport-related uses such as rental car facilities, flight kitchens, off-site parking, and some cargo uses, and LAX Northside/Westchester Southside could absorb some of the displaced office, retail, hotel, and light industrial uses. The Preliminary Property Acquisition and Relocation Plan in Appendix P to Chapter V of the Draft LAX Master Plan (updated to include Alternative D in Chapters 2.7 and 2.8 of the Draft LAX Master Plan Addendum) provides as many businesses as possible the opportunity to relocate onto the airport or into the airport-owned developments. In general, Rent-A-Car uses, flight kitchens, and remote parking lots proposed for acquisition would be accommodated on the airport, and impacts on these businesses would be less than significant. As detailed in Section 4.4.2, Relocation of Residences or Businesses (subsections 4.4.2.6 and 4.4.2.9), of the Draft EIS/EIR, business relocation impacts associated with Master Plan Alternative B would be significant and unavoidable for light industrial uses, including air freight, as well as hotel uses; under Alternative C, impacts would be significant and unavoidable for air freight uses only. For those businesses requiring off-airport relocation, it is impossible to predict precisely where relocation will occur, or, therefore, to evaluate any associated indirect impacts that may result.

Since publication of the Draft EIS/EIR, additional mitigation has been identified to further address potential impacts related to business relocation. Mitigation Measure MM-RBR-2, Relocation Opportunities through Aircraft Noise Mitigation Program (Alternatives A, B, C, and D), is presented in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.8), of the Supplement to the Draft EIS/EIR. Although impacts after mitigation occurring under Alternatives B and C would remain significant and unavoidable, this new mitigation measure would serve to reduce the extent of business relocation impacts. The Supplement to the Draft EIS/EIR also analyzes a new Master Plan alternative,

3. Comments and Responses

Alternative D - Enhanced Safety and Security Plan, which involves the acquisition of 38 businesses, far fewer than the other build alternatives. As discussed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.9), of the Supplement to the Draft EIS/EIR, business relocation impacts after mitigation under Alternative D would be less than significant.

AL00033-123

Comment:

In addition, since the acquisition is slated to occur in phase 1 in 2005 (id. at 4-370) but on-airport sites do not become available until later development phases (id. at 4-371), it appears that the Master Plan and Draft EIS/EIR contemplate that certain businesses will simply not be replaced at all for a decade or more. This is simply not workable. The Master Plan and Draft EIS/EIR must identify how and where each of these essential services will be replaced, and include an evaluation of the impacts of that relocation and replacement. Failure to do so renders the documents legally inadequate.

Response:

Under Alternatives A, B, and C, it was acknowledged within Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.2), of the Draft EIS/EIR that Westchester Southside, which would have the capability to absorb displaced office, retail, hotel, and light industrial uses, would be developed to only 40 percent of its ultimate size by 2005, when all property acquisition is to have occurred. As such, Westchester Southside would be able to serve as a relocation site for only 250,000 square feet (SF) of office space, 70,000 SF of retail space, 340,000 SF of hotel space, and 388,000 SF of non-freight light industrial space. Additional information regarding the sequencing of acquisition is provided in the Preliminary Property Acquisition and Relocation Plan in Appendix P to Chapter V of the Draft LAX Master Plan. For those businesses that cannot be accommodated either at LAX or within Westchester Southside, the Draft EIS/EIR did not assume that affected business would temporarily cease operations until appropriate space becomes available. Rather, Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6), of the Draft EIS/EIR evaluated the amount and type of acquired uses that would need to relocate elsewhere in the surrounding area or else go out of business for Alternatives A, B, and C. Furthermore, Mitigation Measure MM-RBR-1, Phasing for Business Relocations (Alternatives A, B, C, and D), proposes to reschedule acquisition phasing and/or development phasing in order to maximize opportunities for airport/airport-dependent businesses and other businesses being acquired to relocate in proximity to their current sites. An analysis of various possibilities for delaying property acquisition and demolition in locations where no facilities are planned for construction during Phase 1 is provided in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.9), of the Draft EIS/EIR. As discussed therein, changes in phasing could result in the availability of adequate relocation opportunities or much less substantial shortfalls for certain land uses and could, in some instances, fully mitigate significant business relocation impacts. It should be noted that for those businesses requiring off-airport relocation, it is impossible to predict precisely where relocation will occur, or, therefore, to evaluate any associated indirect impacts that may result.

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. Alternative D involves the acquisition of 38 businesses, far fewer than the other build alternatives. Although similar to Westchester Southside under the other build alternatives LAX Northside would not be fully developed by the time acquisition is scheduled to be completed, as discussed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.9), of the Supplement to the Draft EIS/EIR, business relocation impacts after mitigation under Alternative D would be less than significant.

AL00033-124

Comment:

As an example of the flaws in the documents, the following data is displayed in Table 3-3 of the Draft EIS/EIR (id. at 3-16 to 3-17.) Under the No Action/No Project Alternative, the airport would have 23 acres of rental car spaces. In 2005, under Alternative C, there would be 64 acres of rental car spaces, or an increase of 41 acres. This might be considered an improvement, until one considers, as set forth in the same table, that LAWA contemplates acquiring 52 acres of off-airport rental car facilities to construct Alternative C. Alternative C, in other words, results in a net loss of 11 acres of rental car

spaces in 2005. How does LAWA intend to deal with this? Clearly the entire plan needs some serious rethinking.

Response:

It is anticipated that some of the area which the rental car companies would use in the No Action/No Project Alternative for long-term vehicle storage would be consolidated in Alternative C and, in some cases, relocated off-site, as discussed in Section 4.3.1, On-Airport Surface Transportation (subsection 4.3.1.6) of the Draft EIS/EIR. Under Alternative D, a much larger consolidated rental car facility is planned that would accommodate not only the ready/return demand but also the long-term storage demand. The environmental effects of this alternative were presented in the Supplement to the Draft EIS/EIR in Section 4.3.1, On-Airport Surface Transportation.

AL00033-125

Comment:

c. Environmental Justice: Chapter 4.4.3.

This section of the Draft EIS/EIR is flawed because it understates the adverse impacts of the proposed Master Plan Alternatives (as in the substantive analysis sections of the EIS/EIR) and, further, relies on future mitigation that is expressly not yet formulated. This results in insufficient disclosure of the adverse impacts of the Master Plan Alternatives on communities of concern, and, in addition, provides an inadequate factual basis to conclude that such impacts are mitigated.

Response:

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. This section contained new information and analyses, including demographics for Year 2000 conditions and an Environmental Justice Program and mitigation measures that have been further developed based on community input received at Environmental Justice Workshops and through public hearings and comments on the Draft EIS/EIR. The importance of this input in formulating an Environmental Justice Program that responds to the concerns and needs of the affected communities was noted in the Draft EIS/EIR. Full disclosure of the environmental effects of the Master Plan alternatives as they relate to environmental justice was provided in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, 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. See Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Final EIS/EIR, regarding findings on environmental justice that take into account the Environmental Justice Program developed through community outreach in minority and low-income communities. In addition, 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.

AL00033-126

Comment:

Although the document touts the large number of "outreach" meetings sponsored by LAWA regarding airport expansion plans, the quantity of meetings is no substitute for content. "Outreach" which consists of trying to convince community members of the benefits of a project is not helpful in addressing legitimate and substantial community concerns about the environmental impacts of LAX.

Response:

Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR states that the workshops provided graphic illustrations and/or written materials to inform attendees about the concept of environmental justice and potential environmental impacts associated with the proposed LAX Master Plan alternatives. Furthermore, the format at the last two workshops was revised based on public input to include group briefings on environmental justice with a question and answer session. 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.

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and Supplement to the Draft EIS/EIR. Also see Topical Response TR-EJ-2, regarding public outreach and how it helped form the Environmental Justice Program presented in Section 4.4.3, Environmental Justice, of the Final EIS/EIR.

AL00033-127

Comment:

The Draft EIS/EIR states that chronic respiratory illnesses such as asthma are more prevalent among certain minority populations, and may be more severe in children and low-income populations that lack good access to medical care. (Id. at 4-395 to 4-396.) It goes on to state however, that "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 populations cannot be quantified or fully analyzed." (Id. at 4-396.) This approach fails to satisfy CEQA. CEQA Guidelines section 15144 requires agencies in preparing EIRs to use their "best efforts to find out and disclose all that [they] reasonably can" regarding environmental impacts of a project under consideration. In the recent Oakland Airport case, the court found inadequate an EIR that simply labeled the health effects of hazardous air pollutants of an airport project as "unknown." (Berkeley Keep Jets Over the Bay Comm., supra, 01 C.D.O.S. at 7705-06.) This failure to identify impacts was not remedied by findings by the airport commissioners that the impact was "significant." (Id. at 7706.) CEQA requires a "thorough investigation" of impacts, which means the airport must make a meaningful attempt to quantify both the emissions and the health impacts of its project. (Ibid.) Nor does lack of an accepted methodology excuse the airport from the required investigation and analysis. (Ibid.)

Response:

The court decision on the Oakland Airport EIR did not specifically address environmental justice issues; rather, the decision indicated that the Oakland Airport EIR did not sufficiently analyze several critical issues, including health risks. This differs from the Draft EIS/EIR and Supplement to the Draft EIS/EIR, which provided a detailed evaluation of health risks (Section 4.24, Human Health and Safety (CEQA), Technical Report 14a, Human Health Risk Assessment, of the Draft EIS/EIR, and Technical Report S-9 of the Supplement to the Draft EIS/EIR).

This comment raises two issues: 1) the ability to evaluate the cumulative effects of groups of chemicals that have common mechanisms of toxicity, and 2) the ability to evaluate different potentials for health risks from environmental exposures within populations. Regarding the first issue, methods are still being developed to evaluate cumulative risks for chemicals sharing a common mechanism of toxicity. For example, EPA released a preliminary assessment of the cumulative risks of organophosphorus pesticides in December 2001. The preliminary assessment focused on methods to describe the risk. A revised document was subsequently released in June 2002; the revised risk assessment presents a range of risk estimates that reflect the variability inherent in an assessment of such scope (EPA, 2002).

Regarding the second issue, environmental justice policies recognize that environmental justice issues have been raised more in the context of low-income and minority communities. As stated in the California Air Resources Board (CARB) Neighborhood Assessment Program Work Plan (2000), representatives from some communities and environmental groups have for some time maintained that minority communities and communities of lower economic status are more impacted by environmental pollution than other communities.

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR provide detailed evaluations of health risks for populations that may be impacted by the LAX Master Plan, including adult and child residents, school children, and workers. Toxicity criteria used in the risk assessment incorporate conservative assumptions designed to protect even the most sensitive individuals, such as children and the elderly. In addition, the Supplement to the Draft EIS/EIR provides maps that quantify risk ranges by community boundaries or locations for each of the alternatives. However, the risk assessment does not quantitatively evaluate the effect of the LAX Master Plan on differential cumulative health risks among minority and low-income populations due to the technical difficulties associated with such a task. These difficulties have been noted by other agencies, such as the EPA and ARB. In ARB's Neighborhood Assessment Program Work Plan (2000), they recognize 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. These guidelines are scheduled to be presented to the Board for consideration by the end of 2003.

In addition, CARB 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.

Given the recognized difficulties with 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 and the Supplement to 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."

EPA. 2002. Organophosphate Pesticides: Revised OP Cumulative Risk Assessment. Web site URL: <http://www.epa.gov/pesticides/cumulative/rra-op/>

AL00033-128

Comment:

It is absurd to think that the people living closest to a major generator of toxic air contaminants are not disproportionately and directly affected; no lack of information prevents that conclusion. The Draft EIS/EIR fails to quantify the extent of those impacts; this failure must be remedied. (See also, id. at 4-425, [Draft EIS/EIR, while noting that "adverse health impacts in certain populations" may result from the air pollution generated by the airport, fails to disclose the extent of that impact].) Such avoidance of the issue is a violation of CEQA's requirement that impacts be fully disclosed. (See generally, Attachment C (analysis of air quality and public health).)

Response:

Please see Response to Comments AL00017-190 and AL00017-194. Particularly, Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR indicated that the health risks would increase at some locations and decrease for most locations near the airport. The health risks reduction are assumed to be the result of the implementation of the recommended mitigation measures, improved technology (i.e., converting ground support equipment to alternative fuels), dispersed activities at the airport, and transportation improvements such as the ring road.

AL00033-129

Comment:

The document acknowledges that the LAX Master Plan would have a disproportionate impact on minority and low-income communities east of LAX because of increased noise in particular. (See Draft EIS/EIR at 4-395.) Proposed mitigation is sound insulation. (Id.) Insulation, however, fails to address the severe quality of life impacts on people who are prevented by screaming overhead jets from utilizing outdoor space for recreation or other purposes. Additional proposed mitigation is relocating residents. (Id.) This would have a deleterious effect on communities by dispersing residents and failing to keep neighborhoods intact. The adverse impacts of the proposed mitigation must be fully disclosed.

Response:

NEPA and CEQA do not require or provide guidance for evaluating impacts on "Quality of Life;" the primary emphasis of the evaluations in the EIS/EIR are physical effects on the environment. Nonetheless, Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and supporting technical data and analysis provided in Technical Report 1 of the Draft EIS/EIR and Technical Report S-1 of the Supplement to the Draft EIS/EIR acknowledged effects associated with outdoor noise levels. As indicated in subsection 4.2.9 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, although increases in outdoor noise levels within the 65 to 75 CNEL contours would

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occur under the build alternatives, these increases would not exceed thresholds of significance. However, it is acknowledged that such increases may be perceptible and could affect outdoor speech and the quality of certain outdoor activities. Furthermore, the same discussion of level of significance after mitigation states that noise impacts would remain significant and unavoidable for certain residential properties and outdoor community areas exposed to noise levels of 75 dB CNEL or greater. Please see Topical Response TR-LU-4 regarding outdoor noise levels and Topical Response TR-LU-1 regarding impacts on quality of life.

Impacts associated with relocation were fully addressed in Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix P to Chapter V of the Draft LAX Master Plan and in Chapters 2.7 and 2.8 of the Draft LAX Master Plan Addendum. Effects on community disruption related to acquisition were addressed in Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. As stated on page 4-435 of the Draft EIS/EIR, the pattern of acquisition, which primarily expands the airport along its current boundary, would not divide or substantially disrupt nearby communities. Also, regarding the effects of acquisition on surrounding communities see Topical Response TR-LU-2. The relocation mitigation referenced from the Draft EIS/EIR does not address residential acquisition but focuses on maximizing on-airport relocation opportunities for acquired airport dependent businesses by changing or refining the phasing of acquisition and project implementation. The impacts of residential acquisition are less than significant and are addressed through compliance with the Uniform Relocation Action pursuant to a LAWA prepared Relocation Plan as detailed in Master Plan Commitment RBR-1 of the Supplement to the Draft EIS/EIR.

AL00033-130

Comment:

In addition, the implication that jobs and economic development would result from the expansion of LAX is (a) not a meaningful commitment that jobs would go to the persons adversely affected by the direct and deleterious effects of the airport and (b) not mitigation for the noise and other deleterious environmental impacts on these residents.

Response:

Please see Topical Response TR-EJ-2 regarding a detailed description of the environmental justice program, economic benefits, and employment opportunities for low income and/or minority communities. Noise impacts and mitigation measures are discussed in detail in Section 4.1, Noise, and on pages 4-395 and 4-411 through 4-423 in the Draft EIS/EIR and pages 4-315 and 4-318 through 4-329 in the Supplement to the Draft EIS/EIR. Also note that the benefits proposed to address disproportionately high and adverse effects on minority and low-income communities are proposed in addition to and after full consideration of all feasible mitigation measures that address significant environmental impacts in nearby communities. Please see Chapter 5, Environmental Action Plan of this Final EIS/EIR.

AL00033-131

Comment:

The discussion of noise in the environmental justice section suffers from the same fundamental flaws as in the substantive discussion of noise impacts in Section 4.1. The impact analysis for noise compares Master Plan impacts against noise levels in 1996. As pointed out above, use of 1996 levels as the "baseline" artificially reduces the impacts, because in 1996 many Stage II aircraft remained in the fleet and were then phased out in 1999. Use of the earlier base year results in an improper understating of impacts; the difference between the existing conditions and the conditions after project implementation will be greater than the document discloses. This and other biased assumptions combine to result in artificially low identified noise impacts from all the build alternatives.

Response:

Please see Response to Comment AL00033-66 for information on the 1996 environmental baseline.

AL00033-132**Comment:**

The environmental justice section, as with the acquisition and relocation section, relies on outdated census data. There is no indication of any attempt to update the information or obtain the current census data. Indeed, there are year 2000 figures included in a table in Appendix F to the Draft EIS/EIR, which indicate significant shifts in minority populations in the Los Angeles area, with increasing percentages of nonwhite residents. (Appendix F at 37.) Yet, these demographic trends are not acknowledged nor accounted for in the DEIR analysis. The resulting analysis is, accordingly, flawed.

Response:

As was stated in Section 4.4.3, Environmental Justice (subsection 4.4.3.2), of the Draft EIS/EIR, the U.S. Census was used to identify minority and low-income populations because it was deemed to be the most reliable and detailed data source of demographic information available at the time. The 2000 Census data was not available at the time the Draft EIS/EIR was being prepared. However, efforts were taken to review vendor data as reflected in footnote 145 on page 4-402. The demographic trends identified in the 2000 U.S. Census have since become available. Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR included a presentation and evaluation of 2000 U.S. Census data. As was stated in subsection 4.4.3.3, while there have been demographic changes in the area, the new demographic data does not show a material change in the findings presented in the Draft EIS/EIR.

AL00033-133**Comment:**

The Draft EIS/EIR contains inconsistent statements about the impacts of the noise of airport expansion on the surrounding minority communities. It acknowledges at one point that high outdoor noise levels may interfere with cultural and recreational uses of open air spaces. (Draft EIS/EIR at 4-423.) It states in addition, that parks within minority communities will be newly exposed to high noise levels to a substantially greater extent than other communities. (Id.) It describes these noise levels as being in the 65 to 75 CNEL range. (Id.) Yet the Draft EIS/EIR minimizes these noise impacts, concluding that they would not interfere with the "normal use" of these parks. This analysis defies reason. Noise at these high levels interferes with both active and passive uses of parks, as it is loud enough to prevent players on a field or in a ball park from hearing one another during a game, and it certainly prevents anyone from enjoying the peace and quiet of the outdoors. (See generally, Attachment A and Exhibit 4.1(A).)

Response:

The various statements regarding inconsistencies are taken out of context. For clarification of issues associated with outdoor noise levels, see Topical Response TR-LU-4. Also, please note that nearby parks and beaches currently exposed to such noise levels in the vicinity of LAX are frequently used for both active and passive recreation, and under future conditions, these uses would not be exposed to outdoor noise levels that are considered significant based on the thresholds and standards used in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, as set forth in Section 4.1, Noise, Section 4.2, Land Use, and Section 4.8, Department of Transportation Act, Section 4f.

AL00033-134**Comment:**

The discussion of environmental baseline in section 4.4.3.4 ignores baseline data on human health in the affected area. Since the whole concept of environmental justice is avoiding "adverse human health or environmental effects" among minority and low-income populations, more consideration of human health is required here. How can the potential impacts of the Master Plan alternatives on the health of residents of these communities not be considered?

The repeated assertions of the Draft EIS/EIR that airport planners simply lack available background data to analyze the project or cumulative health effects of airport expansion alternatives (Draft EIS/EIR at 4-426), is not helpful to concerned members of the public or decision makers. Indeed, in the absence

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of such important data, it would behoove LAWA and FAA, when evaluating the potential for significant public health risks caused by their project, to take particular care in avoiding a failure to disclose the potential dangers of the proposed expansion plans.

Response:

Please see Response to Comment AL00017-190.

AL00033-135

Comment:

Rather than address the environmental issues, the Draft EIS/EIR once again chooses to focus instead on the purported economic benefits of LAX, which it portrays as an "offset" to the devastating environmental, health, and quality of life impacts of the build alternatives. (Id. at 4-431.) Such "offsets" or inducements do not constitute mitigation of the environmental impacts of LAX expansion. There is, in any event, no documentation supporting a conclusion that any of the jobs programs listed in the Draft EIS/EIR have been effective in improving local communities.

Response:

In accordance with Section 86 of the FAA Airport Environmental Handbook and Section 15126.2(b) of the State CEQA Guidelines, an EIS/EIR must describe any impacts that would remain significant and unavoidable after the application of proposed mitigation measures. Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR described the potential environmental impacts of the LAX Master Plan alternatives, as well as mitigation measures recommended to reduce or avoid significant impacts to the extent feasible. A complete listing of all proposed mitigation measures, as well as project design features and Master Plan Commitments that would serve to avoid or reduce adverse effects, are provided in Chapter 5, Environmental Action Plan, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. With implementation of the proposed mitigation measures, most of the impacts associated with the build alternatives would be reduced to a less than significant level. The adverse impacts that cannot be avoided or mitigated to a level that is less than significant are described in Section 6.2, Significant and Unavoidable Environmental Effects, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Mitigation measures will be implemented after the project is approved. As previously indicated, the benefits being proposed under the Environmental Justice Program are in addition to implementation of all feasible mitigation measures. Also please see Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

AL00033-136

Comment:

Most egregiously, the Draft EIS/EIR violates CEQA and NEPA by its approach to mitigation. No mitigation is formulated in the document. LAWA is planning, we are told, to develop an Environmental Justice Program. (Id. at 4-431.) The Program may or may not mitigate impacts. As mitigation, the document asserts that 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." (Id. at 4-433.) Because LAWA has not completed this "cooperation" and has not formulated any mitigation program, the Draft EIS/EIR fails to identify the extent of the adverse impacts in this critical area of environmental justice. The level of significance is identified only as "pending," or "pending mitigation program development." (Id. at ES-6.) This deferral of the design of mitigation measures violates the fundamental precepts of CEQA. (See, e.g., *Sundstrom v. County of Mendocino*, 202 Cal. App. 3d 296, 306-307 (1988).) Future studies simply do not constitute mitigation. Without any information on what mitigation LAWA is proposing or is willing to commit to, without any information on the enforceability of such proposed mitigation measures, neither LAWA nor any other agency can make any finding that the environmental justice impacts of the proposed Master Plan expansion is mitigated. (Id.)

Response:

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. While mitigation measures were accounted for

and discussed in Section 4.4.3, of 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. 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 minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

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.

AL00033-137

Comment:

5. Induced Socio-Economic Impacts (Growth Inducement): Chapter 4.5.

This chapter is rife with more examples of the double-speak that permeates the document. LAWA seeks, on the one hand, to claim credit for major regional economic benefits which it attributes to the expansion of LAX. On the other hand, LAWA is adamant in asserting that none of the build alternatives would have growth inducing impacts. (Draft EIS/EIR at ES-46). The growth expected to be produced by the expansion of LAX would, apparently, be a special kind of growth that adds jobs and economic benefit, without leading to actual development, construction, and environmental impacts.

Response:

Induced socio-economic impacts were defined in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), of the Draft EIS/EIR as an induced need for development of substantial new land uses and/or associated public facilities or infrastructure resulting from directly or indirectly fostered population or economic growth, or the removal of obstacles to population growth or new development that would lead to significant physical impacts on the environment. It was acknowledged within Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), that implementation of Alternatives A, B, or C would generate new jobs, causing a population influx and consequently an increased demand for housing. However, given the largely built-out nature of the communities near LAX, it is expected that induced housing demand would be largely met through existing vacancies and currently planned housing projects (e.g., Playa Vista), would be spread throughout the surrounding areas, and would be accommodated through infill development where utilities and infrastructure are readily available. Undeveloped land capable of accommodating substantial new land uses and/or associated public facilities or infrastructure is extremely scarce within the Los Angeles region.

The population and household growth generated by the Master Plan would represent a maximum of 5 percent of growth within a 10-mile radius of LAX, as forecast by SCAG in its 1998 Regional Transportation Plan (RTP), and an even smaller percentage of growth forecast within a 20-mile radius and the five-county region as a whole. The employment-related demand for new housing units within a 10-mile radius represents less than 3 percent of the 95,334 unit increase in housing forecast within this area by 2015, while total on- and off-airport LAX employment throughout the five-county area would

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represent less than 1 percent of forecast growth. Additionally, Section 4.5, Induced Socio-Economic Impacts (Growth Inducement) (subsection 4.5.2), of the Supplement to the Draft EIS/EIR addressed SCAG's updated 2001 RTP and its revised population, housing, and employment growth projections. As discussed therein, the significance of growth inducing impacts identified in the Draft EIS/EIR would not change based on the new forecasts. Furthermore, all estimates of population and housing are considered to be high, as it was assumed for the analysis that all new employees would move into newly-constructed housing rather than existing housing, and that new jobs would not be filled by individuals who already live in the area.

In addition, as was discussed in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the anticipated increase in cargo processed through LAX under the build alternatives has the potential for growth-inducing effects for warehousing and industrial use in the surrounding area. Such increased demand could result in the redevelopment and intensification of existing industrial properties or the recycling of other existing uses. Much of this demand could be met in nearby areas targeted for expanded industrial development. To the extent that induced demand for industrial space in surrounding jurisdictions could exceed available supply of appropriately designated land, the conversion of non-industrial to industrial use would be subject to the discretionary review and approval of affected jurisdictions with a requirement for environmental review. The potential for project-induced demand for industrial development to result in impacts is, therefore, considered to be less than significant.

Please see Response to Comment SPHPD00004-7 regarding the analysis of induced socio-economic impacts associated with Alternative D, which was analyzed in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), of the Supplement to the Draft EIS/EIR.

AL00033-138

Comment:

As we have pointed out elsewhere, the document's assertions of economic benefit are inflated.

Response:

As was discussed in Section 4.4.1, Employment/Socio-Economics (subsection 4.4.1.2), Section 4.5, Induced Socio-Economic Impacts (Growth Inducement) (subsection 4.5.2), as well as in Technical Report 5, Economic Impacts Technical Report, of the Draft EIS/EIR, the economic impact analysis is based on computerized econometric models that account for the complexities of the economic interactions between LAX and the regional economy over time. Analysis using the models was supplemented with a wide range of data assembled from historical records, surveys, and interviews in order to establish statistical economic relationships.

AL00033-139

Comment:

Conversely, the Draft EIS/EIR fails to acknowledge the potential for negative impacts of the growth that would be induced under its build alternatives. As an example, as pointed out previously, the build alternatives will require acquisition and relocation of substantial existing airport-related and airport-serving businesses, while also increasing the demand for such uses because of the expansion in both cargo and passenger processing. This will cause significant impacts in communities around the airport, including intensification of industrial and other airport-serving uses, and new development in areas that have been outside the range of airport-serving land uses. Such impacts must be analyzed and disclosed, and appropriate mitigation formulated.

Response:

Impacts associated with the acquisition and relocation of local residences and businesses were addressed in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR and the Supplement to Draft EIS/EIR. Please refer to Response to Comment AL00033-122 regarding the ability of LAX and airport-owned developments to absorb affected businesses and mitigation designed to minimize relocation impacts. Certain economic effects which could be construed as negative, such as productivity increases (which in turn cause employment decline) are taken into account in the econometric modeling process. Other negative impacts, such as the need for relocation of local

residents and businesses and associated effects on employment and tax revenues, were addressed in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00033-140

Comment:

6. Air Quality: Chapter 4.6.

Our comments regarding the Draft EIS/EIR's air quality analysis were prepared by Phyllis Fox, Ph.D. Those comments are attached hereto as Attachment C.

Response:

Please see Responses to Comments AL00033-141 and AL00033-311 through AL00033-337 below.

AL00033-141

Comment:

As Dr. Fox's comments indicate, the Draft EIS/EIR does not contain an adequate analysis of air quality impacts. Criteria pollutant emissions are internally inconsistent and generally understated. Sulfate and PM10 impacts were not evaluated. The alternatives analysis does not include any alternative that would substantially lessen air quality impacts. The Draft EIS/EIR does not contain the conformity analysis as required by the Clean Air Act. Finally, the proposed mitigation program only requires that a small percentage of the very substantial increase in emissions be mitigated and fails to include all feasible mitigation measures. The air quality analysis, mitigation program and alternatives must be substantially revised, and the Draft EIS/EIR recirculated for public review.

Response:

The Supplement to the Draft EIS/EIR contains a detailed and thorough air quality analysis. This document includes corrections to any inconsistencies and includes impacts associated with implementation of Alternative D, which lessens the overall air quality impacts of the proposed project. The Supplement to the Draft EIS/EIR has been circulated for public review and comment.

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 publication of the Final EIS/EIR, that will be approved by the FAA. In addition, a Mitigation Monitoring and Reporting Plan has been prepared. It includes a more detailed analysis of the measures listed in the Supplement to the Draft EIS/EIR and includes all feasible mitigation measures for the project.

Regarding the portion of the comment related to sulfates and PM10, an emission inventory was developed for PM10 from both construction activities and on-airport activities. An emission inventory was also developed for sulfur dioxide (SO₂), a precursor for sulfates.

LAX's contribution to sulfate concentrations was qualitatively determined by assessing the emission inventories developed for SO₂, its precursor. Additional information can be found on Page 2 of Appendix S-E of the Supplement to the Draft EIS/EIR.

AL00033-142

Comment:

7. Hydrology and Water Quality: Chapter 4.7.

Our comments regarding the Draft EIS/EIR's hydrology and water quality analysis were prepared by Phyllis Fox, Ph.D. Those comments are attached hereto as Attachment D. Dr. Fox's resume is provided in Attachment C.

3. Comments and Responses

Response:

Please see Responses to Comments AL00033-143, AL00033-144, and AL00033-351 through AL00033-373 below.

AL00033-143

Comment:

As Dr. Fox's comments indicate, the Draft EIS/EIR's treatment of water quality impacts is inadequate and inaccurate. The Draft EIS/EIR relies on outdated data and underestimates pollutant loads, fails to account for the increased intensity of airport use, excludes numerous important pollutants, and fails to account for unexplained levels of toxicity in runoff. It also fails to require feasible mitigation measures and does not specify methods for evaluating the effectiveness of mitigation. Accordingly, the Draft EIS/EIR underestimates impacts to water quality and sets forth insufficient mitigation measures.

Response:

Please see page 4-413, in Section 4.7, Hydrology and Water Quality, of the Supplement to the Draft EIS/EIR for updated pollutant loadings associated with baseline conditions, the No Action/No Project Alternative, and Alternatives A, B, C and D. Also, please see Topical Response TR-HWQ-1 regarding model constituents and storm water pollutant load estimation method, and Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1. 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 regarding the mitigation monitoring and reporting program.

AL00033-144

Comment:

The Draft EIS/EIR's deferral of the selection of specific mitigation measures is in direct violation of CEQA. LAX must either develop site-specific mitigation measures or commit itself to a clear, enforceable performance standard, and it has done neither. (See *Sundstrom v. County of Mendocino*, 202 Cal. App. 3d 296, 306-07 (1988) (holding that approving a negative declaration on the basis of a requirement that mitigation measures be developed through a further engineering study was contrary to law); *Oro Fino Gold Mining Corp. v. County of El Dorado*, 225 Cal. App. 3d 872, 884-85 (1990).) As a result, the Draft EIS/EIR's discussion of the water quality mitigation measure is far too vague to allow LAX and FAA, much less the public, to determine whether mitigation will succeed. (See *Stanislaus Natural Heritage Society v. County of Stanislaus*, 48 Cal. App. 4th 182, 195 (1996).)

Rather than developing specific measures or performance standards, the Draft EIS/EIR provides a laundry list of possible measures that could be taken. None are customized to fit the specifics of LAX, and thus decisionmakers will have no basis, when evaluating the Draft EIS/EIR and approving mitigation measures, to assess whether those measures will actually work. Additionally, the descriptions are far too vague to be enforceable. The discussion provides, at most, a list of things LAWA might evaluate doing and a possible methodology for conducting this evaluation, but fails to commit LAWA to achieving any measurable outcome.

The Draft EIS/EIR also fails to develop adequate performance standards and instead states that future mitigation measures will "prevent flooding," "control peak flow discharges," "minimize the impact of airport operations," and "prevent a net increase to pollutant loads in surface water." For the reasons discussed in detail in Dr. Fox's comments, these general statements do not constitute adequate performance standards. They are too vague and open-ended and therefore cannot be relied on as adequate mitigation.

Response:

Please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and performance standards. Details concerning mitigation monitoring will be based upon the drainage plan to be developed as per Master Plan Commitment HWQ-1. Please see Response to Comment AR00003-63 regarding mitigation monitoring and reporting program.

AL00033-145

Comment:

8. In Chapter 4.8, the Draft EIS/EIR Fails to Adequately Analyze Impacts Upon Section 4(f) Resources.

Section 4(f) of the Department of Transportation Act of 1966 requires federal agencies to identify and avoid impacts to parklands, recreation areas, historic sites, and wildlife and waterfowl refuges. (49 U.S.C. § 303.) Section 4(f) permits uses of these resources only when the Secretary of Transportation has determined that there is no feasible and prudent alternative to such use and the project includes all possible planning to minimize harm to the property resulting from such use. (Id.; Draft EIS/EIR at 4-565.)

There are approximately 40 Section 4(f) resources within the Master Plan study area. (Draft EIS/EIR at 4-569.) Alternative C would impact numerous of these resources. Of particular concern are impacts to the Centinela Adobe and Randy's Donuts. While the Draft EIS/EIR admits that Alternative C, and in particular the LAX Expressway Split Viaduct alignment, would result in a use and constructive use of the Centinela Adobe and also result in a constructive use of Randy's Donuts (Id. 4-575), the document does not evaluate the project's impacts upon these resources. Instead, the document merely states that an option to Alternative C-the single viaduct alignment-would avoid these historic properties. (Id.) The fact that an alternative option exists to eliminate the 4(f) impacts does not release the FAA from its obligation of analyzing the 4(f) impacts on these resources, especially inasmuch as there is no evidence in the Draft EIS/EIR that LAWA and the FAA intend to adopt the single viaduct alignment-option. The impacts on these two historic properties appear to be significant. The revised Draft EIS/EIR should identify the impacts as such and identify appropriate mitigation measures.

Response:

Section 4.8, Department of Transportation Act, Section 4(f), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed the potential for the Master Plan build alternatives to result in a use or constructive use of public parks and recreation lands, wildlife and waterfowl refuges, and any historical sites, as defined by U.S. Department of Transportation Act, Section 4(f). Effects on historical properties, including the Centinela Adobe and Randy's Donuts, associated with the LAX Expressway are more fully described in Appendix K of the Draft EIS/EIR. In addition, please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

AL00033-146

Comment:

The Section 4(f) analysis is further flawed in that it appears to have failed to identify all of the historic sites that could be impacted by the Master Plan project. The document states that there could be additional use and constructive use at "other" historic sites but that the FAA's determination of historic properties and consultations with the California State Historic Preservation Officer and the FHWA is currently ongoing. (Id.) The Draft EIS/EIR suggests that the results of the consultation will be included in the Final EIS/EIR. (Id.) Given the amount of time that went into planning and design of the Master Plan and the preparation of the environmental documentation, we can see no valid reason why this critical determination did not occur prior to the release of the Draft EIS/EIR. The Draft EIS/EIR must be revised to comprehensively identify the historic (and other Section 4f) resources in the study area and analyze the effect of the Master Plan on these important resources.

Response:

The analysis for U.S. Department of Transportation (DOT) Act, Section 4(f), contained a list of all historic resources within the study area that are either on or have been identified as listed or eligible for listing on the National Register of Historic Places, as was presented in Table 4.8-2, in Section 4.8, Department of Transportation Act, Section 4(f), of the Draft EIS/EIR. That analysis was updated to reflect current conditions and LAWA staff's new preferred alternative, Alternative D, within Section 4.8, Department of Transportation Act, Section 4(f), of the Supplement to the Draft EIS/EIR, and Appendix S-F of the Supplement to the Draft EIS/EIR. As was stated therein, no additional Section 4(f) resources were identified or constructed in the study area following publication of the Draft EIS/EIR.

3. Comments and Responses

The referenced discussion of consultation with the California State Historic Preservation Officer (SHPO) and the Federal Highway Administration pertains to required coordination with all affected federal jurisdictions. The consultation was ongoing at the time the Draft EIS/EIR and Supplement to the Draft EIS/EIR were published. The statutory limits on when SHPO can concur or provide comment have since passed, and as stated within 36 CFR Part 800.3(c)(4), "if the SHPO/THPO fails to respond within 30 days of receipt of a request for review of a finding or determination, the agency official may either proceed to the next step in the process based on the finding or determination or consult with the Council in lieu of the SHPO/THPO." As no comments were received from SHPO and the 30 day review period has long since passed, concurrence by SHPO has been assumed that the Intermediate Terminal Complex, International Airport Industrial District, 1961 Air Traffic Control Tower, and Morningside Park Neighborhood are not eligible for the National Register of Historic Places, consistent with the assessment contained in Appendix I, Section 106 Report, of the Draft EIS/EIR and Appendix S-G, Supplemental Section 106 Report, of the Supplement to the Draft EIS/EIR. As such, the Section 4(f) analysis provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed all potential historic resources subject to DOT Act Section 4(f).

The Draft Section 4(f) evaluation presented in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, was publicly circulated and followed agency coordination, per the requirements of DOT Act Section 4(f). The final Section 4(f) evaluation is presented in Section 4.8, Department of Transportation Act, Section 4(f), of this Final EIS/EIR.

AL00033-147

Comment:

9. Historical and Archaeological: Chapter 4.9.

a. The Draft EIS/EIR's Description and Analysis of Impacts on Historical and Archaeological Resources Are Legally Flawed.

The Draft EIS/EIR's analysis of Historic/Architectural and Archaeological/Cultural Resources contains a number of inaccuracies and legal inadequacies that contribute to the Draft EIS/EIR's general understatement of the Master Plan's environmental impacts and the Draft EIS/EIR's failure to analyze adequately mitigation measures and alternatives. Most notably, the Draft EIS/EIR downplays LAWA's responsibility for the recent destruction of historic and archaeological resources, while at the same time relying on such destruction to conclude that the impacts of the proposed Master Plan expansion will be less significant and require less mitigation than if the destruction had not occurred.

Response:

The Draft EIS/EIR addressed historic resources in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources. In addition, please see Response Comment AL00033-148 below.

AL00033-148

Comment:

b. CA-LAN-1118.

The Draft EIS/EIR indicates that the significance and integrity of cultural resource CA-LAN-1118, a large archaeological site located north of LAX, was destroyed when the Westchester Parkway was constructed in the late 1980s "directly through the center of the site." (Draft EIS/EIR at 4-588.) What the Draft EIS/EIR does not make clear is that LAWA was responsible for the construction of the Westchester Parkway and therefore the destruction of CA-LAN-1118. The construction of the Westchester Parkway, which is part of the LAX Northside Development Project, was analyzed in an April 1983 Final EIR for that project. Relevant portions of that FEIR (attached hereto as Exhibit 4.9(A)) acknowledge the existence of this archaeological site, but conclude that the project's potentially significant impacts on the resource could be mitigated to a level of less than significant. The identified mitigation measures were as follows: avoidance of the site, in situ preservation, and possible excavation of archaeological resources for preservation and analysis.

The discussion of CA-LAN-1118 in LAWA's Draft EIS/EIR for Master Plan expansion of LAX fails to acknowledge LAWA's responsibility for damage done to CA-LAN-1118 and does not explain whether any of the 1983 mitigation measures were undertaken to protect that resource and, if so, why they failed. (Draft EIS/EIR at 4-588, 4-595, 4-596.) To the contrary, the Master Plan Draft EIS/EIR dismisses CA-LAN-1118 out of hand as lacking integrity due to construction of the Westchester Parkway. (Id.)

Response:

Archaeological resources were addressed in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR with supporting technical data and analyses provided in Appendix I of the Draft EIS/EIR and Appendix S-G of the Supplement to the Draft EIS/EIR. Archaeological site CA-LAN-1118 was documented in 1981. The Final EIR for the LAX Northside Development project prepared by LAWA in 1983, includes three mitigation options for this site. Although Westchester Parkway was constructed over the site it should not be assumed that CA-LAN-1118 was determined to be a significant site following test phase work or that the mitigation measures presented in the Final EIR for LAX Northside EIR were not properly implemented. In the event unanticipated archaeological discoveries are made with implementation of the LAX Master Plan, the mitigation measures presented in Section 4.9.1 (subsection 4.9.1.8) of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR would be implemented and enforced through a Mitigation Monitoring and Reporting Program.

AL00033-149

Comment:

The story of CA-LAN-1118 raises a number of important issues. First, LAWA's apparent failure to implement the archaeological resource mitigation measures outlined in the 1983 Northside Development Project EIR during its construction of the Westchester Parkway requires us to ask whether LAWA will, in a similar fashion, ignore mitigation measures outlined in its 2001 Master Plan EIR. LAWA should provide a full explanation of why CA-LAN-1118 was seriously harmed during construction of the Westchester Parkway and explain why identified mitigation measures were not followed.

Response:

Please see Response to Comment AL00033-148 above.

AL00033-150

Comment:

LAWA must also explain how it proposes to ensure that similar problems do not plague its implementation of the LAX Master Plan and associated mitigation for identified environmental impacts including, but not limited to, impacts to archaeological resources.

Response:

Archaeological resources were addressed in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR with supporting data and analyses provided in Appendix I of the Draft EIS/EIR and Appendix S-G of the Supplement to the Draft EIS/EIR. As described in subsection 4.9.1.8 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, mitigation measures are provided to ensure the protection and preservation of important archaeological resources which may be encountered during grading and excavation activities associated with the proposed project. In compliance with CEQA, implementation of these measures would be enforced through a Mitigation Monitoring and Reporting Plan.

AL00033-151

Comment:

In addition, the story of CA-LAN-1118 sharply undermines LAWA's assertion that it can legally proceed with construction of the Northside Development Project as part of the No Project Alternative without further CEQA review. In fact, as discussed above in our comments on Section 3.2.4, LAWA cannot legally rely on the 1983 FEIR for the Northside Development Project because it is outdated and

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inaccurate. Any proposed development of the Northside Area must be analyzed in the context of one or more of the LAX Master Plan proposed build alternatives. Such development cannot legally proceed under the No Project Alternative.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and the inclusion of the LAX Northside development in the No Action/No Project Alternative.

AL00033-152

Comment:

Finally, the Draft EIS/EIR relies heavily on the fact that someone (LAWA it turns out) earlier destroyed the significance of much of CA-LAN-1118 in order to justify not mitigating the Master Plan impacts that the Draft EIS/EIR acknowledges will occur at that site. (Id. at 4-595.) In effect, LAWA seeks to downplay the impacts of its Master Plan and reduce its mitigation obligations vis a vis CA-LAN-1118 by arguing that the resource is no longer worth protecting because LAWA itself earlier destroyed its integrity. This is wholly improper.¹² At the very least, LAWA must implement the mitigation measures described in the 1983 FEIR for the Northside Development Project (avoidance of the site, in situ preservation, and possible excavation for preservation/analysis).

¹² In fact, if LAWA violated the 1983 FEIR Mitigation Measures for CA-LAN-1118 or any other archaeological or historical resource, it would be estopped from arguing the baseline should be the current, degraded status of the site. The proper baseline would reflect the site's condition prior to LAWA's violations. (C.f. *Riverwatch v. County of San Diego*, 76 Cal. App. 4th 1428, 1452-1453 (1999).) Here, estoppel principles forbid LAWA from segmenting the effect of degrading CA-LAN-1118 from the effects of the rest of the proposed expansion. (See *Green v. Travelers Indem. Co.*, 185 Cal. App. 3d 544, 555-556 (1986).)

Response:

Please see Response to Comment AL00033-148 above. The commentor incorrectly states the holding of *Riverwater v. County of San Diego* (1999) 76 Cal. App.4th 1428. According to the Court of Appeal, "preparation of an EIR is not the appropriate forum for determining the nature and consequences of prior conduct of a project applicant." Furthermore, although records are not complete, there is no evidence to suggest that CA-LAN-1118 was determined to be a significant site following test phase work or that the mitigation measures presented in the LAX Northside EIR were not properly implemented.

AL00033-153

Comment:

In addition, the Master Plan Draft EIS/EIR must investigate additional mitigation that would protect what now remains of CA-LAN-1118.¹³

¹³ We have attached hereto as Exhibit 4.9(C) a recent news article describing archaeological work underway at Phoenix's Sky Harbor International Airport as part of a renovation project. (See Exhibit 4.9(C).) That article describes mitigation measures and precautions (e.g., pre-development archaeological diggings) superior to those described in the Draft EIS/EIR. Moreover, the article illustrates that airport development can be undertaken in a way that does not destroy archaeological resources, provided adequate staff and economic resources are available. LAWA and FAA should designate a staff archaeologist and budget adequate funds as Phoenix has done.

Response:

Comment noted.

AL00033-154

Comment:

c. 1961 Air Traffic Control Tower.

The Draft EIS/EIR's analysis of the 1961 Air Traffic Control Tower is inadequate for some of the same reasons as its analysis of CA-LAN-1118. The Draft EIS/EIR indicates that although the impacts on the 1961 Air Traffic Control Tower might otherwise have been considered to be an historically significant building, it lacks the requisite integrity because it has been extensively modified. (Id. at 4-590 to 4-591.) The Draft EIS/EIR does not indicate when this work was undertaken except to say that it was "recent." (Id.) Moreover the Draft EIS/EIR does not indicate what environmental review, if any, LAWA and/or the FAA undertook in connection with this recent destruction of the historic integrity and character defining features of the 1961 Air Traffic Control Tower. The Draft EIS/EIR must provide this critical missing information. In short, the Draft EIS/EIR should fully acknowledge any role played by the FAA and/or LAWA in the recent modifications to this historic structure. As with CA-LAN-1118, the Draft EIS/EIR cannot use recent changes to the 1961 Air Traffic Control Tower to justify proposed actions affecting the resource on the grounds that they will affect an historic structure that has already been significantly damaged.

Response:

Regarding CA-LAN-1118, please see Response to Comment AL00033-148. Regarding the 1961 Air Traffic Control Tower, please see Response to Comment SAL00015-71.

AL00033-155

Comment:

d. Intermediate Terminal Complex Double Arched Hangar.

The Draft EIS/EIR concludes, without adequate analysis or explanation, that the Intermediate Terminal Complex Double Arched Hangar, which LAWA proposes to demolish, is not a contributor to the Intermediate Terminal Complex. (Id. at 4-591,4-595.) The Draft EIS/EIR must do more than simply assert that the hangar is a non-contributor due to past modifications. The Draft EIS/EIR should, at the very least, include present day and historic photographs of the building, describe how modifications have harmed its integrity and explain when and by whom those modifications were undertaken and approved. Such information is particularly important in light of LAWA's apparent history (see above) of destroying the integrity of protected resources without proper analysis and mitigation. This analysis is also important because LAWA claims that the hangar can and will be demolished as part of the No Project Alternative. If the hangar, in fact, remains historically significant, LAWA will not be able to proceed with such demolition unless and until it has conducted adequate environmental review, and the No Project Alternative could not include such demolition.

Response:

The identification and survey of historic properties was addressed in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Draft EIS/EIR, specifically subsection 4.9.1.2. Additionally, substantial information, including photographs and discussion, is provided regarding the Intermediate Terminal Complex in Appendix I, Section 106 Report, of the Draft EIS/EIR. The historic resources surveys conducted as part of the Draft EIS/EIR were performed in accordance to the survey methodology prescribed by the California Office of Historic Preservation (OHP), utilizing National Register, California Register, and local jurisdiction criteria. It is important to note that while Section 4.9.1.3, Affected Environment/Environmental Baseline, in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Supplement to the Draft EIS/EIR states that consultation between FAA and SHPO on the determination of National Register eligibility for those historic/architectural and archaeological/cultural resources identified within the APE is currently ongoing, and that the results of the consultation will be incorporated into the Final EIS/EIR, the statutory limits on when SHPO can concur or provide comment have since passed. As stated within 36 CFR Part 800.3(c)(4), "if the SHPO/THPO fails to respond within 30 days of receipt of a request for review of a finding or determination, the agency official may either proceed to the next step in the Section 106 process based on the finding or determination or consult with the Advisory Council on Historic

3. Comments and Responses

Preservation in lieu of the SHPO/THPO." As no comments have been received from SHPO and the 30 day review period has long since passed, concurrence by SHPO is therefore assumed and consistent with the assessment contained in the Section 106 Report, that the Intermediate Terminal Complex along with its contributing and non-contributing properties, the International Airport Industrial District including its contributing and non-contributing properties, the 1961 Air Traffic Control Tower, and the Morningside Park Neighborhood are not eligible for the National Register. Nonetheless, impacts on resources not determined eligible for the National Register that have been determined as significant at the local and state levels have been identified and mitigation measures were provided to address these effects in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources (subsection 4.9.1.8), of the Supplement to the Draft EIS/EIR.

AL00033-156

Comment:

The Draft EIS/EIR's analysis of the potential impacts of demolition of the Double Arched Hangar in the Intermediate Terminal Complex is also flawed because it does not adequately assess the impact such demolition would have on the integrity of the Intermediate Terminal Complex as a whole. The need for such an analysis is specifically addressed by the Draft L. A. CEQA Thresholds Guide at M. 3-5 ("If a resource to be demolished is part of a district or grouping, also assess the impact to the listing or eligibility of the district or grouping.")

Response:

The double arched hangar has been determined to be a non-contributing element to the Intermediate Terminal Complex. Its demolition would not affect the characteristics of the complex that qualify it for eligibility as a City of Los Angeles Historic-Cultural Monument.

AL00033-157

Comment:

e . Demolition Alternatives.

The Draft EIS/EIR is notable and wholly inadequate for its complete lack of any analysis of the feasibility of rehabilitating, remodeling and reusing historic structures that LAWA proposes to demolish under its various Master Plan alternatives. (CEQA Guidelines § 15064.5(b)(4).) The Draft EIS/EIR must address this possibility for each of the proposed demolitions. LAWA should also develop and implement guidelines that ensure that all such rehabilitation, remodeling and reuse conforms to the standards for rehabilitation established by the Secretary of the Interior and the California Office of Historic Preservation. (See Draft L.A. CEQA Thresholds Guide at M. 3-6.)

Response:

Due to the nature of the scope of work related with the demolition of historic resources, specifically the Merle Norman Complex (Alternative B only), the Intermediate Terminal Complex, and the International Airport Industrial District, rehabilitation and reuse of these buildings under Alternatives A, B, and C is infeasible as it would conflict with the airport facilities proposed for these areas. Also note that Alternative D, LAWA staff's preferred alternative, would not affect any historic properties listed in or eligible for listing in the National Register of Historic Places. This Alternative would only have a significant impact on the International Airport Industrial District, a State and locally eligible historic resource. The impacts on the International Airport Industrial District are associated with demolition of approximately 11 properties within the district that would be required to accommodate right-of-way for an essential dual roadway system. Also see Response to Comment AL00033-158.

AL00033-158

Comment:

Rehabilitation and reuse of historic structures at LAX was clearly shown to be feasible by LAWA's adaptive reuse of Hanger #1. As the material attached hereto as Exhibit 4.9(B) illustrates, that structure was slated for demolition but was ultimately rehabilitated and listed on the National Register of Historic

Places. Similar reuse of historic structures must be pursued under the Master Plan. If, notwithstanding the foregoing, LAWA concludes that reuse of any of the buildings slated for demolition is not feasible, the Draft EIS/EIR must provide a detailed explanation of the reasons underlying that conclusion. Without such information, the public and decision-makers cannot fully assess the proposed project. The historical documentation and education mitigation measures presented in the Draft EIS/EIR are not adequate to mitigate the significant impacts associated with demolition of historic structures. (See League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland, 52 Cal, App. 4th 896, 909 (1997).) LAWA must pursue reuse of the structures to satisfy CEQA.

Response:

The potential for reuse of historic structures proposed for demolition under Alternatives A, B, and C has been assessed and determined infeasible. Please note that Alternative D, LAWA staff's new preferred alternative, would not affect any historic properties listed in or eligible for listing in the National Register of Historic Places. Approximately 11 properties within the state and locally eligible International Industrial District that would be demolished under Alternative D are located in the alignment of a dual roadway system and are therefore not considered feasible for reuse. Additionally, please see Response to Comment SAL00015-73.

AL00033-159

Comment:

f. Table 4.9.1-4.

The Draft EIS/EIR's Table 4.9.1-4 is misleading because it gives the false impression that the Intermediate Terminal Complex will suffer the same level of adverse impact under each of the Master Plan alternatives (three Build Alternatives and the No Project Alternative). Even the inflated No Project Alternative defined by LAWA would have a less significant impact on the Intermediate Terminal Complex than any of the build alternatives. This is so because each of the Build Alternatives would involve the complete demolition of the entire Intermediate Terminal Complex, whereas the No Project Alternative would involve demolition of only one element of the Intermediate Terminal Complex, the Intermediate Terminal Complex Double Arched Hangar. The Draft EIS/EIR's Table 4.9.1-4 must be amended to correct this problem.

Response:

The information in this table has been clarified in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Supplement to the Draft EIS/EIR (see Table S4.9.1-1). Although the double arched hangar, located within the Intermediate Terminal Complex, would be demolished under the No Action/No Project Alternative it is not considered a contributor to the complex. Therefore, no impact would occur under the No Action/No Project Alternative. This clarification did not alter the conclusions of the Draft EIS/EIR.

AL00033-160

Comment:

We note that Table 4.9.1-4 differs in one important respect from the otherwise identical table on page 4-577 of the Draft EIS/EIR. Whereas Table 4.9.1-4 indicates that Alternative C will directly or indirectly affect the Merle Norman Headquarters Complex, the table on page 4-577 of the Draft EIS/EIR does not acknowledge that impact. LAWA must correct this inaccuracy.

Response:

The typographical error is noted. In response, the relevant portions of the Final EIS/EIR have been revised to reflect the correct information.

3. Comments and Responses

AL00033-161

Comment:

The Draft EIS/EIR concludes that the No Project Alternative will not contribute to any cumulative impacts on historic resources because that alternative will not involve any individual impacts to historic resources. (Draft EIS/EIR at 4-599.) This conclusion is inconsistent, however, with the Draft EIS/EIR's acknowledgment in Table 4.9.1-4 that the No Project Alternative will affect the Intermediate Terminal Complex. LAWA must correct this inconsistency.

Response:

Please see Response to Comment AL00033-159.

AL00033-162

Comment:

g. Other Issues.

The Draft EIS/EIR correctly notes that the Area of Potential Effects ("APE") for historical resources should include resources that would be exposed to additional noise as the result of the LAX Master Plan. (Draft EIS/EIR at 4-580.) As we explained in the context of our comments on the Draft EIS/EIR's noise impact analysis, however, the Draft EIS/EIR systematically understates the noise impacts associated with the proposed Master Plan for LAX. This understatement has implications for the Draft EIS/EIR's analysis of impacts to historical resources. The Draft EIS/EIR should look beyond the APE identified, and assess the potential impacts on all historical resources impacted by the actual increased noise levels that would be produced by the Master Plan expansion.

Response:

The determination of the Area of Potential Effects (APE) and threshold for noise impacts were addressed in Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources, of the Draft EIS/EIR, with supporting data and analysis provided in Appendix I of the Draft EIS/EIR. The APE was determined by the FAA based on potential indirect and direct impacts of the proposed project which may affect historic/architectural and archaeological/cultural resources, including possible effects associated with aircraft noise. These effects were addressed in Section 4.9.1 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, including provisions set forth in Master Plan commitment HR-1. As reflected in Master Plan commitment HR-1, the primary concern relating to aircraft noise effects on historical resources is the potential for soundproofing efforts carried out under the Aircraft Noise Mitigation Program (ANMP) to result in the damage or loss of historic features through such means as inappropriate replacement of important window and door features. The APE was established in part to ensure that any newly exposed historic resources that could become eligible for soundproofing would be identified and soundproofed accordingly to retain and preserve their historic character and features.

AL00033-163

Comment:

The Draft EIS/EIR notes that the Section 106 consultation with the California State Historic Preservation Officer is currently ongoing and that a resolution of this consultation will only be made public in the FEIR. (Id. at 4-587.) This late publication will preclude adequate public review and comment and is therefore legally inadequate. To permit public comment on the results of this consultation, LAWA must recirculate the Draft EIS/EIR as revised to include such information.

Response:

Under 36 CFR Part 800.8, federal agencies are encouraged to coordinate compliance with Section 106 and the procedures outlined in this section to meet the requirements of NEPA. According to Section 800.8, an agency may use the process and documentation required for the preparation of an EIS to comply with Section 106 in lieu of the procedures set forth in Sections 800.3 through 800.6. Therefore,

FAA and LAWA have elected to proceed with the general principles outlined under 800.8. Also see Response to Comment SAL00015-72.

AL00033-164

Comment:

10. Biotic Communities: Chapter 4.10.

The Draft EIS/EIR scatters its discussion of biological issues over several chapters. Our comments regarding biological impacts were prepared by Land Protection Partners. The Land Protection Partners report is attached hereto as Attachment E, and incorporated by this reference.

Response:

Please see Responses to Comments AL00033-165 through AL00033-181 and AL00033-374 through AL00033-415 below.

AL00033-165

Comment:

It was prepared by Catherine Rich and Travis Longcore, Ph.D. (See resumes, included in Attachment E.) Both are experts in the ecology and natural history of the El Segundo dunes and Los Angeles Coastal Prairie, important natural communities which would be adversely impacted by the expansion of LAX. They have identified numerous fundamental and significant problems with the Draft EIS/EIR's treatment of impacts on biological and coastal resources. The following is a brief summary.

Response:

Comment noted. Please see response to comments below.

AL00033-166

Comment:

In addition to the shortcomings in the project description discussed at length above, the Draft EIS/EIR project description contains insufficient information regarding the disposition of certain areas within the Master Plan boundaries that are biologically significant. Descriptions provided on the maps of the Alternatives such as "airport related" do not provide sufficient information for a full evaluation and disclosure of impacts on biological resources.

Response:

The airport-related designation applies to LAX Northside, which is considered Collateral Development for the No Action/No Project Alternative and Alternative D. Airport-related land uses include various airlines and airport support services and do not require aircraft access to the site.

Potential impacts to biological resources resulting from LAX Northside were evaluated in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The biological description of "airport-related" property was depicted in Figure 4.10-1, Biotic Communities: Baseline Conditions, in Section 4.10, Biotic Communities, in the Draft EIS/EIR. Please refer to the seven figures in Section 4.10.6 of the Draft EIS/EIR for the illustration of impacts to plant communities under the No Action/No Project Alternative and Alternatives A, B, and C. Please refer to Figure S4.10-2 in Section 4.10.6 of the Supplement to the Draft EIS/EIR for the illustration of impacts to plant communities under Alternative D.

AL00033-167

Comment:

Among the significant omissions in the Draft EIS/EIR is the failure to identify the biological impacts of the proposed Westchester Southside Project. Each of the Build Alternatives is proposed to include a vaguely defined golf course/open space/resort hotel development on the northernmost 100 acres of the

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El Segundo dunes. As explained by Land Protection Partners, this proposed development would be catastrophic for the biological resources around LAX, and the document fails entirely to evaluate, or even acknowledge, these impacts.

Response:

Biological impacts resulting from the proposed Westchester Southside/LAX Northside Project are incorporated into the footprint of all proposed Master Plan improvements. Analysis of the No Action/No Project Alternative and the build alternatives includes the evaluation of impacts to biotic communities and/or sensitive species resulting from development of Westchester Southside/LAX Northside. Under each build alternative, the Westchester Southside/LAX Northside project would impact 300 mature trees, all of which would be mitigated. Mitigation for impacts to mature trees was addressed in mitigation measure MM-BC-3 of Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR.

The LAX Master Plan does not include any development of the 104.3 acres in the Dunes, with the exception of changes to FAA-required navigational aids and associated service roads currently located within the Dunes. No golf course, hotel resort, or any other type of development is proposed in the 104.3 acres as part of the Westchester Southside Project. Corrections to the references to a golf course and/or hotel resort in the Dunes originally included in Appendix J1 of the Draft EIS/EIR are provided in Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR.

AL00033-168

Comment:

The methodology used in Chapter 4.10 to assess the value of the existing sensitive vegetation and habitats of sensitive species is at odds with accepted methodology. In fact, the evaluation system used here (the "modified" HEP) looks at factors that are not relevant to the needs of sensitive species, and creates the notion of a "Habitat Unit" which is fundamentally at odds with the reality of the habitat needs of sensitive species. This results in a gross underestimation of the impacts on sensitive species that would be caused by the destruction of hundreds of acres of existing habitat.

Response:

Please see Topical Response TR-BC-1 regarding the modified HEP methodology and calculation of impacts.

AL00033-169

Comment:

The determination by the Draft EIS/EIR preparers that certain species were "determined absent" from the Master Plan boundaries is supported neither by the record, nor by good science. As an example, the technical report on one of the field surveys done stated that numerous moth specimens were collected, and that various sensitive species were probably present; but the Draft EIS/EIR summary chart indicates that the sensitive moth species were absent from the site. Such misrepresentations give members of the public little confidence that the document is providing an accurate disclosure of environmental impacts.

Response:

Please see Response to Comment AL00033-380 regarding potential impacts to sensitive moth species.

AL00033-170

Comment:

We can find no analysis, or even mention, of impacts on marine life. The Draft EIS/EIR provides an incomplete and inadequate discussion of the water pollution generated by the Master Plan (see Attachment D) and we believe the failure to acknowledge impacts on the ecosystem of Santa Monica Bay is another serious shortcoming of this document.

Response:

Potential impacts to the Santa Monica Bay and other nearby waters or water courses from water pollution were addressed in Section 4.7, Hydrology and Water Quality (subsections 4.7.2, 4.7.3, 4.7.6, and 4.7.7), of the Draft EIS/EIR. Mitigation measures are described in subsection 4.7.8 of the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00033-414 for additional information regarding water pollution impacts to biological resources.

AL00033-171

Comment:

The Draft EIS/EIR's approach is all the more troubling in light of the failure of LAWA previously to disclose the impacts of LAWA projects on the El Segundo Dunes. As an example, as described in Attachment E, in 1999, without environmental analysis and even without the required permits, LAWA initiated a "landscaping" program to plant non-native trees in an area of the El Segundo dunes. This project presented numerous environmental impacts on this sensitive ecosystem. Even after the City ordered LAWA to work with concerned residents to address these impacts, LAWA has continued to eschew careful scientific analysis of environmental impacts in favor of an approach which relies entirely on a vote among certain recipients of a mail survey asking how many residents were in favor of palm trees. (See correspondence provided in Exhibit 4.10(A).)

Response:

LAWA has made every effort to evaluate and disclose all possible impacts of the project. All build alternatives were evaluated with respect to (1) the goals of the California Coastal Act, (2) the Coastal Zone Management Act, and (3) CEQA guidelines. With regard to the landscaping in 1999 in an area of the Los Angeles/El Segundo Dunes, LAWA is currently working with the California Coastal Commission to rectify any issues due to the installation of Mexican fan palms. On April 10, 2002, the California Coastal Commission approved Coastal Development Permit No. 5-02-008, requested by LAWA and subject to special conditions, for development consisting of the following: "After the fact permit to plant 90 non-native *Washingtonia robusta* (Mexican fan palm), install irrigation, pedestrian path, and minor street, curb, and gutter realignment, and a permit to remove 30 of the palm trees previously planted, landscape with native plants, and replace an existing chain-link fence with a decorative fence." 1 Special conditions of the permit include, but are not limited to (1) submission of a plan for landscaping that is compatible with habitat restoration within the El Segundo Blue Butterfly Preserve, (2) submission of an assessment of existing native plants, (3) submission of a plan for public access signage, and (4) submission of fence plans. LAWA shall, to the greatest extent feasible, avoid impacts to the Los Angeles/El Segundo Dunes associated with landscaping. Please see Response to Comment AS00005-15 regarding landscaping adjacent to native dune and grassland communities.

1 Notice of Intent to Issue Permit (upon satisfaction of special conditions), May 9, 2002. Permit Application No. 5-02-008. California Coastal Commission, South Coast Area Office, P.O. Box 1450, 200 Ocean Gate 10th Floor, Long Beach, CA 90802-4325.

AL00033-172

Comment:

In addition, the cumulative impacts analysis is inadequate in that it fails recognize the impacts on many species, including songbirds and raptors, of the LAX Master Plan in combination with the extensive urbanization of the area. As stated in Attachment E, LAX is truly the end of the line for open space and these critical dune habitats. The Draft EIS/EIR must acknowledge the irreversible cumulative impacts of the proposed project in combination with the others mentioned.

Response:

Please see Response to Comment AL00033-404 regarding cumulative impacts.

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AL00033-173

Comment:

Finally, the proposed mitigation measures in this chapter, proposing minimal levels of habitat replacement, are based on a fundamentally flawed methodology and would not mitigate the true extent of the impacts.

Response:

As indicated in topical response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP), the methodology used in the Draft EIS/EIR and Supplement to the Draft EIS/EIR was sound and provided for adequate mitigation of potential impacts.

AL00033-174

Comment:

11. Endangered and Threatened Species of Flora and Fauna: Chapter 4.11.

Our comments on this section were, like those on the preceding chapter, prepared by Land Protection Partners and appear in Attachment E. As the Land Protection Partners analysis demonstrates, the Draft EIS/EIR's discussion of the impacts of LAX expansion on endangered and threatened species is fundamentally flawed and fails to provide an accurate disclosure of the extent of the adverse impacts.

Response:

Potential impacts to endangered and threatened species were addressed in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. In summary, nine federally- or state-listed species were determined to potentially occur within the Master Plan boundaries. Directed surveys were conducted for all nine species and only three species were determined to be present: cysts of Riverside fairy shrimp, El Segundo blue butterfly, and American peregrine falcon. Project impacts were analyzed and accurately disclosed for these species under the No Action/No Project Alternative and Alternatives A, B, and C in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and under Alternative D in the Supplement to Draft EIS/EIR. Cumulative impacts to endangered and threatened species were also analyzed and disclosed in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00033-175

Comment:

The Draft EIS/EIR begins its endangered species analysis from an incorrect foundation by misstating and understating the value of existing habitat and either ignoring the existence of endangered species on the site or inflating their current populations. From the faulty techniques utilized in conducting surveys of biological resources at LAX, to inconsistent terminology used for the 100 acre section of the El Segundo dunes that is the proposed site for a golf course resort, to specific unanswered questions previously posed by Dr. Longcore regarding the unusual methodology used by LAWA's consultant to calculate the population of the El Segundo blue butterfly, the document is seriously flawed. The calculations of butterfly population result in an overestimation of population by at least 400%.

Response:

Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly and discussion of the methodology used to calculate butterfly population size. In addition, as indicated in Response to Comment AL00033-167, there is no golf course, hotel resort, or any other type of development proposed in the Los Angeles/El Segundo dunes.

AL00033-176**Comment:**

As detailed in Attachment E, the Draft EIS/EIR understates impacts of habitat destruction on sensitive species, including but not limited to San Diego black-tailed jackrabbit, loggerhead shrike, burrowing owl, western spadefoot toad, and the Riverside fairy shrimp. This consistent understatement leads, in turn, to improper conclusions that such impacts can be mitigated to levels of insignificance. See Attachment E for a detailed critique of the impact analysis and proposed mitigation measures.

Response:

Please see Topical Response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP). For additional information, please see Response to Comment AS00005-17 regarding the San Diego black-tailed jackrabbit; Response to Comment AS00005-18 regarding loggerhead shrike; Response to Comment AL00033-393 regarding burrowing owl; Response to Comment AL00033-394 regarding the western spadefoot toad; and Topical Response TR-ET-2 regarding the Riverside fairy shrimp and vernal pool mitigation.

AL00033-177**Comment:**

The Draft EIS/EIR also fails to acknowledge the impacts of night lighting on birds, butterflies, bats, and possibly other species.

Response:

Impacts of light on sensitive and listed flora and fauna were addressed in 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. In addition, please see Response to Comment AF00003-10.

AL00033-178**Comment:**

It improperly minimizes the impacts of air pollution on the butterflies and other species.

Response:

Comment noted. Potential impacts to sensitive floral and fauna species from air emissions were addressed in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR. Potential impacts to the El Segundo blue butterfly and other federally- or state-listed species from air emissions were addressed in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR. Impacts to the El Segundo blue butterfly and other species from air emissions were determined using the most recent research and literature available including a study conducted on the Los Angeles/El Segundo Dunes.

AL00033-179**Comment:**

It fails to assess the detrimental effects of landscaping with exotic species and installing permanent irrigation systems. Finally, the Draft EIS/EIR fails even to consider the impacts of aircraft and traffic noise on the fauna in the project area. Attachment E summarizes some important research documenting the measurable effects of noise on wildlife.

Response:

The planting of mature trees as was described in MM-BC-3 on page 4-471 in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR, as well as all landscaping associated with future improvements, shall avoid establishing non-native vegetation where it could impact native dune or grassland communities. Locally native plants shall be used to the greatest extent feasible in the

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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; and only a temporary irrigation system would be utilized. The temporary irrigation system would provide water to native plantings to supplement seasonal moisture. Irrigation to support the new landscaping in winter months may be necessary if precipitation is substantially less than normal. Irrigation in the summer months following initial planting may also be necessary to assure plant establishment. At all times, use of temporary irrigation shall be limited to an amount sufficient to establish plantings in order to discourage the additional influx of non-native insect species, such as Argentine ants.

The Supplement to the Draft EIS/EIR analyzed the potential indirect impacts to sensitive species of flora and fauna from noise levels in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna.

AL00033-180

Comment:

The Draft EIS/EIR's failure to address these impacts means that it fails to assess the true scope of impacts on the biological resources, including endangered species, and therefore fails to formulate adequate mitigation measures, and fails yet again to provide the public and decisionmakers with information vital to making an informed decision on the proposed Master Plan.

Response:

The word "impacts" in this comment refers to lighting, air pollution, landscaping, and noise effects on biological resources. Please see Response to Comment AF00033-10 regarding light emissions, Response to Comment AL00033-178 regarding air pollution with respect to the El Segundo blue butterfly, and Response to Comment AL00033-179 regarding landscaping. The issues raised by the commentor were also 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.

AL00033-181

Comment:

12. Wetlands: Chapter 4.12.

A major problem with the wetlands analysis of the Draft EIS/EIR is its failure to acknowledge the existence of vernal pools on the site. As pointed out in Attachment E, the Draft EIS/EIR relies on a definition of vernal pools that is at odds with that used by the U.S. Fish and Wildlife Service. Further loss of vernal pools, even if those at the LAX site are currently degraded, would be a significant impact which is not disclosed in the document.

Response:

Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools.

AL00033-182

Comment:

13. Floodplains: Chapter 4.13.

The Draft EIS/EIR acknowledges that the proposed Master Plan development would encroach into a 13 acre parcel currently designated as a 100-year floodplain by the Federal Emergency Management Agency ("FEMA"). (Draft EIS/EIR at 4-743.) LAWA proposes to undertake significant construction in the designated floodplain (construction of roadways and a parking structure) despite applicable federal, state and local policies and regulations that are designed to restrict such development in order to protect floodplains from encroachment. (Id. at 4-744 to 4-746.) Notwithstanding these clear policies and regulations, the Draft EIS/EIR insists that the floodplain impacts will be less than significant for each of

its Master Plan build alternatives. (Id. at 4-743.) For the reasons outlined below, the Draft EIS/EIR has not properly analyzed the problems associated with its proposed floodplain encroachment.

Response:

As discussed in Section 4.13, Floodplains, of the Draft EIS/EIR, the 13-acre area in an undeveloped portion of LAX, located directly north of Imperial Highway, was designated as a Special Flood Hazard Area (SFHA) in the 1970s based on the topographic and drainage conditions at that time. Specifically, the subject area was not so much of a floodplain, as might be associated with a river, stream, or other water course, as it was an isolated pit with no natural or manmade drainage outlet, which would be inundated by a flood (i.e., storm event[s]) having a 1-percent chance of being equaled or exceeded in any given year (i.e., would be inundated during a 100-year storm). In September 2002, subsequent to publication of the Draft EIS/EIR, the Federal Emergency Management Agency (FEMA) issued a Letter of Map Revision (LOMR) declaring that the subject area has been removed from the SFHA. The area was reclassified by FEMA as being within Zone C, which is an area of minimal flooding outside the SFHA (i.e., an area not within a 100-year flood zone). The reason for the reclassification was that, subsequent to being mapped in the 1970s, the subject area had been filled and elevated using excess earthen material from the nearby grading for Pershing Drive, located approximately 1,200 feet to the west. As such, the area was no longer a depression that was subject to inundation. A copy of the LOMR from FEMA is provided in Appendix S-A, and other supporting documentation, specifically, the Application for Letter of Map Revision, is provided in Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR.

AL00033-183

Comment:

The Draft EIS/EIR justifies the proposed floodplain encroachment in part by arguing that during the time that has elapsed since the 13 acre parcel was designated as 100-year floodplain (in the 1970s), the site has been modified substantially in a manner that has changed its floodplain characteristics. (Id. at 4-743,4-745 to 4-746.) Specifically, the Draft EIS/EIR asserts that the relocation of Pershing Drive and installation of various on-site "improvements" have changed the hydrology of the 13 acre parcel to the point that the parcel should no longer be considered a 100-year floodplain. (Id.) The Draft EIS/EIR's analysis of these changes and their associated impacts on the flooding propensity of the parcel is, however, inadequate and unconvincing.

The Draft EIS/EIR fails adequately to explain how relocation of Pershing Drive -- which runs considerably to the west of the 13 acre parcel at issue -- affected the topography and/or hydrology of the site.¹⁴ The limited information provided in the Draft EIS/EIR regarding changes in the site's topography indicates that little change has actually occurred. (Id. at 4-745.) Specifically, the Draft EIS/EIR notes that a 1981 USGS topographic map shows elevation in the area ranging to as low as 85 feet above mean sea level ("msl"), which is, according to the Draft EIS/EIR, the same low point in elevation currently existing on the site. (Id.) Put another way, the Draft EIS/EIR's floodplain analysis relies on an assertion that the Pershing Drive relocation project significantly altered the characteristics of the 13 acre parcel, but fails to cite substantial evidence to support that conclusion. In fact, the Draft EIS/EIR indicates that the site retains at least some of its previous low elevations. The Draft EIS/EIR will remain inadequate unless it is revised to address these problems.

¹⁴ In fact, the Draft EIS/EIR fails to provide even the most basic information about the Pershing Drive relocation project. It gives no indication of who was responsible for the relocation, when that project was undertaken, or what engineering and environmental review was conducted. This information must be made available to the public for review and comment. The engineering and environmental review prepared for the Pershing Drive relocation project are of particular importance because those documents would presumably address the issue of how Pershing Drive relocation would impact the hydrology of surrounding areas including, presumably, the 13 acre parcel targeted for Master Plan development.

Response:

Please see Response to Comment AL00033-182 regarding the fact that FEMA has issued a Letter of Map Revision (LOMR) that removed the 13-acre area from the Special Flood Hazard Area designation and reclassifies it as being within Zone C, an area of minimal flooding (i.e., not within a 100-year flood zone). The LOMR reflects the fact that the subject area, which previously existed as an isolated pit in

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the 1970s, has been filled and elevated to the point that it is no longer subject to inundation by a 100-year flood. The Application for the LOMR, prepared and submitted by a Registered Professional Engineer licensed within the State of California, satisfied the information requirements of FEMA for issuance of the LOMR.

AL00033-184

Comment:

The Draft EIS/EIR also reports anecdotally -- without any supporting technical or quantitative data -- that following the installation of various "improvements" in the early 1980s (new storm drain, detention basin), flooding on the site has declined. (Id.) This sort of unsupported anecdotal reporting based on a very limited period of time (approximately 20 years) is wholly inadequate to demonstrate that the documented risk of flooding within a designated 100-year floodplain has been eliminated.¹⁵ LAWA, City of Los Angeles and FAA decisionmakers cannot, without further evidence (including quantitative data) reasonably conclude that flooding will not be a problem on the 13 acre parcel or that encroachment into that parcel would not involve significant environmental impacts.

As the foregoing makes clear, the Draft EIS/EIR fails to cite substantial evidence to support the assertion that the 13 acre parcel should no longer be considered a 100-year floodplain. As such, LAWA and FAA cannot properly assume, as they have in the Draft EIS/EIR, that flooding will not be a factor for the Master Plan development. LAWA and FAA must revise the Draft EIS/EIR's floodplain analysis to respond to the inadequacies identified above and then recirculate the document for further public review and comment.

¹⁵ The Draft EIS/EIR alludes to correspondence between LAWA (and/or the City of Los Angeles) and FEMA regarding possible redesignation of the 13 acre parcel as outside the 100 year floodplain, but is notable and inadequate for its failure to contain any of that correspondence. (Id. at 4-745 to 4-746.) The only document specifically included and identified in the Draft EIS/EIR is a one-page memorandum containing no substantive discussion of the issue. (Draft EIS/EIR Appendix C.) The Draft EIS/EIR must be revised to include references to all material relevant to possible redesignation of the 13 acre parcel, including application for a Letter of Map Revision ("LOMR") submitted by or for LAWA. We note that our efforts to learn more about LAWA's proposed LOMR revealed that as of August 24, 2001, LAWA had yet to submit any such application to FEMA. (Telephone conversation with Stuart Fricke, LAWA Engineering Department.) LAWA and FAA should explain why in the approximately 8 months since the Draft EIS/EIR was released, LAWA did not submit an LOMR and what LAWA's plans are with regard to that application. The public must be given an opportunity to review and comment on that material.

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. In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed potential flooding impacts associated with the LAX Master Plan 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.

AL00033-185

Comment:

In addition to claiming that the 13 acre floodplain parcel at issue is no longer subject to flooding (see above), the Draft EIS/EIR argues that even if the parcel retains its 100-year floodplain designation, the impacts of proposed encroachment will be less than significant. (id. at 4-749 to 4-750.) The Draft EIS/EIR's analysis in this regard is wholly inadequate and unsupported by substantial evidence. In fact, because Master Plan development would harm the "natural and beneficial values served by floodplains" and could adversely impact LAX operations, the floodplain impacts of Master Plan development must be considered significant.

The addition of proposed impermeable surfaces (roadways and a parking structure) within the 13 acre parcel will increase run-off and potentially increase the risk of flooding on and around the site, while reducing the parcel's beneficial values relating to natural moderation of floods, water quality

maintenance and groundwater recharge. (See *id.* at 4-749 (citing USDOT Order 5650.2).) The Draft EIS/EIR's separate analysis of hydrology and water quality (Draft EIS/EIR section 4.7) is general in nature and does not adequately address these site specific impacts. Moreover, the vague and generic mitigation prescribed by that section (Master Plan Commitment HWQ-1) does not adequately address the impacts. The Draft EIS/EIR must be revised to acknowledge, analyze and describe mitigation for the potential of Master Plan development to damage the 13 acre parcel's usefulness in terms of natural flood moderation, water quality maintenance and groundwater recharge.¹⁶

16 As we noted above, if LAWA claims that the relocation of Pershing Drive has eliminated the 13 acre parcel's usefulness as a natural floodplain, the Draft EIS/EIR must provide a full explanation of how that relocation came about. Specifically, it must identify the lead agency involved and describe the environmental review undertaken for the Pershing Drive relocation project (with special emphasis given to the floodplain impacts of the project). This information is critical because the public and decision-makers must be informed as to how any floodplain changes now relied on to justify Master Plan development came into being. We note that it would be improper for LAWA to argue that floodplain impacts are less than significant and need not be mitigated because another recent LAWA project effectively eliminated the natural floodplain characteristics of a site. If LAWA was the lead agency in the relocation project, it should state when it came into possession of the information it now uses to claim the hydrology has changed, as this is relevant to whether LAWA may now rely on this information. (See, e.g., *Bickel v. City of Piedmont*, 16 Cal.4th 1040, 1061 (1997) (Baxter, J., dissenting); *Cal. Cigarette Concessions v. City of Los Angeles*, 53 Cal.2d 865, 869-870 (1960).)

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. In addition, the Draft EIS/EIR and 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.

AL00033-186

Comment:

Finally, we note that the Draft EIS/EIR's analysis of potential damage to vital transportation facilities resulting from construction on the 13 acre floodplain is seriously flawed. The Draft EIS/EIR's analysis of that subject is limited to the following statement: "Encroachment within the 100-year floodplain would not result in a loss of human life or in substantial future damage to LAX." (Draft EIS/EIR at 4-749.) This statement is entirely conclusory and lacks supporting evidence and analysis. It is inadequate for purposes of NEPA and CEQA. (*National Parks & Conservation Ass'n v. Babbitt*, 241 F. 3d 722, 735 (9th Cir. 2001) (holding that speculative and conclusory statements constitute insufficient analysis under NEPA); *Laurel Heights Improvement Assn. v. Regents of University of California*, 6 Cal.4th 1112, 1124 (1994) (holding that conclusory statements unsupported by factual information will not suffice under CEQA).) The Draft EIS/EIR must be revised to include a full assessment of how operation of the surface transportation and parking systems serving LAX (a vital transportation facility) would be impacted in the event of flooding on the 13 acre parcel. Particular emphasis should be given to the issue of how flooding would impact use of the roadways and a parking structure LAWA proposes to construct in that designated 100-year floodplain. This revised analysis must then be recirculated for public review and comment.

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. In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed potential flooding impacts associated with the LAX Master Plan 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.

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AL00033-187

Comment:

14. Coastal Zone Management and Coastal Barriers: Chapter 4.14.

This section of the Draft EIR relies on conclusions of earlier chapters, including Sections 4.10 Biotic Communities and 4.11 Endangered and Threatened Species of Flora and Fauna. As explained previously in this comment letter and the attached expert consultant's report (Attachment E), the analysis of those chapters fails to disclose significant adverse environmental impacts of the airport's expansion plans on biotic resources of the rare coastal dunes ecosystem, including the El Segundo blue butterfly. Moreover, the Draft EIS/EIR contains no discussion of the effects of LAX expansion on marine biological resources. As pointed out in Attachment E, the Build Alternatives would be inconsistent with the California Coastal Act.

Response:

Please see Responses to Comments AL00033-165 through AL00033-180 and AL00033-374 through AL00033-415.

AL00033-188

Comment:

15. Energy Supply and Natural Resources: Chapter 4.17.

a. Energy Supply: Chapter 4.17.1.

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's analysis of energy supply.

- The Draft EIS/EIR's analysis and conclusions respecting energy supply predate much of the rapidly unfolding California energy crisis. LAWA and FAA should revise the Draft EIS/EIR to discuss the impact of the California energy crisis on the analysis and conclusions presented in section 4.17.1. For example, that section concludes that "Energy consumption would increase under all alternatives, compared to baseline conditions However, given available energy supplies, the increased energy consumption would be below the CEQA thresholds." (Draft EIS/EIR at 4-777.) Does the shortage of and increased cost of electricity and natural gas effect this conclusion in any way? LAWA and FAA should reassess whether adequate supplies of electricity will actually be available for Master Plan development in light of the recent crisis. Similarly, they should analyze the extent to which the shortage of and increased cost of electricity and natural gas might effect the feasibility of air quality and other Master Plan mitigation measures and commitments (e.g., electrification of ground service equipment and purchase of natural gas airport vehicles) that depend on electricity and natural gas being available and inexpensive.

Response:

Pertaining to the electricity shortage California experienced in 2000-2001, the rolling blackouts and insufficient generation capacity were only experienced by investor-owned utilities such as Southern California Edison and Pacific Gas and Electric. The City of Los Angeles Department of Water and Power (LADWP), which is a municipally-owned utility, did not experience any supply shortfalls, and, in fact, sold surplus energy supplies to the investor-owned utilities to supplement their deficits. It is anticipated that LADWP will expand any necessary energy infrastructure to meet increasing demand as the City continues to grow. As far as any foreseeable natural gas supply shortages, there have not been any significant production reductions, nor are there any apparent market conditions that could interrupt the supply or associated price of natural gas in California. The Southern California Gas Company has not indicated that any supply shortage or market volatility are imminent or reasonably foreseeable.

AL00033-189**Comment:**

- The Draft EIS/EIR admits that under LAWA's existing commitments and programs (i.e., under the No Project Alternative), all gates will be converted so that they are equipped with centralized power and preconditioned air (id. at 4-793), but also promises in a Master Plan Commitment to equip gates in this manner. (Id. at 4-778.) LAWA should not be able to "take credit" in its Master Plan and Draft EIS/EIR for making a "commitment" that it is, in fact, already obligated to fulfill. The Draft EIS/EIR should clearly acknowledge that LAWA is already obligated to undertake the above-described gate conversions. The same analysis holds true for the conversion of ground service equipment to electric from traditional fossil fuels. (Id. at 4-793 and 4-778.)

Response:

Conversion of GSE to alternative fuels is part of an ongoing program at LAX and will continue under the No Action/No Project Alternative. The Master Plan provides an opportunity to accelerate the conversion. 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. The Supplement to the Draft EIS/EIR provides 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. Please also see Response to Comment AL00046-56.

AL00033-190**Comment:**

- We note that the Draft EIS/EIR does not indicate any commitment by LAWA to purchase and/or generate electricity from renewable and environmentally preferable sources (e.g., solar and wind). The Master Plan should be revised to include a commitment to purchase and/or generate electricity from renewable and environmentally preferable sources.

Response:

While still derived from non-renewable petroleum resources, alternative fuels to be used on-site per the Master Plan are intended to reduce air pollutant emissions and increase energy efficiency; "alternative fuels" are not necessarily "renewable" energy sources. Pages 4-778 and 4-782 of the Draft EIS/EIR describe how LAWA will participate in the Green Power for a Green LA program through a Green Power agreement with LADWP. Under the agreement, LAWA agrees to purchase electricity exclusively from LADWP, while LADWP agrees to promote green power by purchasing electricity generated from renewable natural resources, including wind energy, solar energy and, potentially, biomass. In addition, Table S4.6-18, Recommended Mitigation Measure Components, of the Supplement to the Draft EIS/EIR includes a measure to install solar panels on parking structure rooftops, where feasible, to supply electricity or hot water to airport facilities.

AL00033-191**Comment:**

- The Draft EIS/EIR clearly states that 100 percent of all gates would be equipped with centralized power and preconditioned air under the No Project Alternative (Id. at 4-793), but provides only the vague statement that "the amount of electrified GSE [ground service equipment] use would increase" under that alternative. (Id.) The Draft EIS/EIR should be revised to indicate what percent of GSE will be electrified under the No Project Alternative.

Response:

Gate electrification and electrification of GSE are two separate endeavors: the fact that 100 percent of gates would be electrified under the No Action/No Project Alternative has no bearing on the percentage of GSE that would be electrified. Section 4.6, Air Quality (subsection 4.6.2.2), of the Final EIS/EIR has been revised to identify the assumptions pertaining to electrified GSE under the No Action/No Project Alternative.

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AL00033-192

Comment:

- The numbers provided on Table 4.17.1-2 for energy consumption associated with the Continental City development (assuming it were to proceed as approved in the 1980s) differ dramatically from the numbers that were actually included in and relied on for the environmental analysis undertaken when that project was approved. For example, the Continental City EIR showed electricity usage for the project at 107.4 MKWH/yr, rather than the 40,205 MWH/yr shown on Table 4.17.1-2. (Continental City DEIR, attached hereto as Exhibit 3(I), at Table 15.) Similarly, the Continental City EIR showed natural gas usage for the project of 150 mcf/yr rather than the 75 mcf/yr figure used in the Master Plan Draft EIS/EIR. (Id. at Table 16.) The Draft EIS/EIR must either eliminate or explain these inconsistencies.

Response:

The inconsistencies between the original environmental documents and the Master Plan EIS/EIR relative to electricity and natural gas consumption are due to differences in the energy consumption factors used in the two analyses. The LAX Master Plan EIS/EIR used electricity and natural gas consumption factors developed by the SCAQMD for the purpose of conducting environmental impact analyses per CEQA (SCAQMD, "CEQA Air Quality Handbook, April 1993). It is likely that the differences in energy consumption factors are due to improvements in technology and higher energy efficiency standards. In short, given the same intensity of development, energy consumption is considerably less today than during the 1980s.

AL00033-193

Comment:

b. Natural Resources: Chapter 4.17.2.

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's analysis of natural resources.

- The Draft EIS/EIR acknowledges that construction of the Master Plan build alternatives would require massive amounts of aggregate. (Draft EIS/EIR at 4-814 to 4-816.) The Draft EIS/EIR also acknowledges that because the sources of aggregate closest to LAX are rapidly being depleted, aggregate for the construction of the LAX Master Plan would have to be hauled considerable distances (as far as 50 miles). (Id. at 4-809 to 4-810.) LAWA should expressly indicate whether the pollution created, vehicle miles traveled, and fuel required for such extensive long distance hauling of aggregate has been considered in the Draft EIS/EIR's analysis of air quality, traffic and energy supply impacts.

Response:

All construction-related truck trips, including trips associated with aggregate hauling, were included in the traffic, air quality and energy analyses of the Draft EIS/EIR and Supplement to the Draft EIS/EIR (see Technical Report 4, Air Quality Technical Report, particularly Attachment E). As a result, vehicle miles traveled, fuel consumption, and air pollution associated with aggregate hauling were accounted for.

AL00033-194

Comment:

- The Draft EIS/EIR repeatedly states that Master Plan construction would involve the use of an unknown amount of timber. (Id. at 4-814, 4-815.) The Draft EIS/EIR's claim that it is unable to estimate the use of timber under the Master Plan at this time and level of planning is unconvincing. The Draft EIS/EIR should, at this point, provide the best available estimate of Master Plan timber demand. In addition, FAA and LAWA must revisit the issue of natural resource impacts (timber demand) at a later planning stage, when further design information is available (i.e., at the "project level"). This will mean preparing a subsequent environmental review document for each Master Plan structure LAWA proposes to construct before any construction is approved.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR acknowledged that timber resources would be used during construction of Master Plan facilities. As indicated in the Draft EIS/EIR, the proposed improvements are not unique and would use timber in quantities typical of urban development. Adequate timber is expected to be available to support project construction. As a result, no impacts to timber supplies would result.

AL00033-195

Comment:

16. Light Emissions: Chapter 4.18.

Regarding the impacts of lighting from LAX on biotic communities, please see our comments above and at Attachment E.

Response:

Comment noted. Please see Responses to Comments AL00033-177 above, and AL00033-196, AL00033-197, and AL00033-397 below.

AL00033-196

Comment:

Master Plan "Commitment" LI-1 would provide a minimum 20-foot setback to residential properties. There is no evidence in the document that this would sufficiently protect residents from intense lighting. As elsewhere in the document, the "Commitment" is insufficiently defined and the eventual design is left for later, following additional analysis. This causes problems of enforcement and accountability.

Response:

As described in Section 4.18, Light Emissions, of the Supplement to the Draft EIS/EIR, Master Plan Commitment LI-1, Ring Road Landscaping (Alternative B), pertains specifically to ring road buffers and landscaping under Alternative B, which would provide a minimum 20-foot landscaped setback adjacent to residences on Morely Street. Master Plan Commitment LI-1 also stated the following:

"[Final plans] will also locate and direct lighting to avoid direct glare or light spillover effects on the residential properties. Baseline measurements of ambient lighting will be made prior to construction of the ring road. The baseline data will be used to estimate potential change in ambient lighting conditions with development of the ring road. Plantings within the setback shall include dense evergreen trees and other vegetation selected and located so that roadway lighting is sufficiently screened to ensure that lighting intensity does not increase by more than 2 footcandles over existing levels at the property lines of affected residential uses."

Thus, implementation of this Master Plan commitment, with noted performance standards, will ensure that any increase in lighting experienced as a result of the ring road would not exceed the threshold of significance defined in the Draft EIS/EIR. In the absence of precise development and lighting plans at this point in the planning process it is difficult, if not impossible, to address light emissions in a more project-specific manner until approval of one of the Master Plan alternatives. Please see Response to Comment AR00003-63 regarding the "program level" analyses provided within the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the intention of the Master Plan commitments, and the enforceability of the Master Plan commitments in the mitigation monitoring and reporting program.

AL00033-197

Comment:

Even more egregious, Mitigation Measure MM-LI-1 provides not for defined mitigation measures, but for future studies. If LAWA and FAA intend to put off such analysis for the future, so be it, but the future analysis should come as part of a full project-level environmental analysis. The details of project design

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and mitigation cannot legally be piece-mealed, and must be viewed as a whole (Sundstrom, 202 Cal. App. 3d 296, 306-307). Moreover, a conclusion that lighting impacts will be mitigated simply is not supported by a record which defers not only project design but also an assessment of lighting impacts and design of appropriate mitigation. The conclusion that these impacts have been mitigated to levels of less than significant is premature at best, and cannot be supported by the record.

Response:

Please see Response to Comment AR00003-63 regarding the "program level" analyses provided within the Draft EIS/EIR and Supplement to the Draft EIS/EIR and the need for further environmental documentation. As with the LAX Master Plan, a number of design alternatives for the LAX Expressway have been proposed, and it is difficult if not impossible to address light emissions in a more project-specific manner until approval of one of the alternatives, due to the absence of precise design and lighting plans at this point in the planning process. Mitigation Measure MM-LI-1, LAX Expressway Lighting Assessment (Alternatives A, B, and C), has been structured so as to ensure that any increase in lighting intensity over baseline conditions which may affect residential uses does not exceed the defined threshold of significance, or 2 footcandles. As was indicated within the text of MM-LI-1 in Section 4.18, Light Emissions, of the Supplement to the Draft EIS/EIR, a number of methods for reducing light spillover have been identified, including landscaped buffers, setbacks, and lighting design.

As also was discussed in Section 4.18, Light Emissions, of the Draft EIS/EIR, the provision of adequate lighting is a critical safety requirement in the design of the airport and its associated roadways. New LAX facilities would be designed in compliance with professional standards intended to focus lighting, reduce light spillover and glare, and ensure that proposed lighting would not interfere with aviation activities. Additionally, the Master Plan improvements, including the LAX Expressway, would be required to meet all other applicable regulations, such as the City's Municipal Code requirements regulating light spillover in residential areas (Section 91.6205 M and Section 93.0117).

AL00033-198

Comment:

17. Solid Waste: Chapter 4.19.

We have identified the following problems with and notable issues raised by the DEIR's analysis of solid waste.

Response:

Please see Responses to Comments AL00033-199 through AL00033-209.

AL00033-199

Comment:

- Master Plan Commitment SW-2 lacks sufficient specificity and enforceability. It indicates in only the vaguest terms that "LAWA will require that contractors use a specified minimum percentage of recycled materials during construction of LAX Master Plan improvements." (Draft EIS/EIR at 4-849.) The Draft EIS/EIR does not specify a minimum percentage for any construction materials, but instead leaves that issue entirely for the construction bid stage. (Id.) This is an entirely unenforceable and non-specific pledge, and is therefore a meaningless commitment. (See *San Franciscans for Reasonable Growth v. City & County of San Francisco*, 151 Cal. App. 3d 61 (1984) (holding that an agency may not rely on an indeterminate commitment to reduce a project's environmental impact).) In order to make this commitment real, LAWA should, at the very least, do the following: (1) for each material listed in Commitment SW-2 (asphalt, drywall, steel, aluminum, ceramic tile, cellulose insulation, and composite engineered wood products), identify what percentage of recycled content is now available on the market; (2) require that construction materials with at least those identified percentages of recycled content will be used in LAX Master Plan construction; (3) review specified recycled content requirements periodically and increase those requirements if products with higher recycled material content become available; and (4) include in all LAWA lease agreements the requirement that all construction undertaken by LAWA tenants conform to LAWA's recycled material content requirements.

Response:

Master Plan Commitment SW-2 is not a mitigation measure for a potentially significant impact. Instead, this commitment is a good practice to conserve virgin resources and to support the recycled materials market. As was indicated in the Introduction to Chapter 4 of the Draft EIS/EIR, provisions will be made to ensure that Master Plan commitments are enforceable via zoning conditions, conditions of approval, or similar mechanisms. In addition, an MMRP will be adopted that will include performance standards, where feasible and applicable, for project-related Master Plan commitments and mitigation measures. Moreover, future environmental reviews conducted for individual Master Plan components would afford the opportunity, where appropriate, to provide a greater level of detail regarding the provisions included in Master Plan Commitment SW-2, including consideration of performance standards.

Due to fluctuations in availability of recycled "raw" materials for incorporation in manufacturing of building materials, the content of recycled material may vary depending on market conditions. As such, the comment that LAWA should specify a minimum recycled content for various building materials to be used in construction may not be practical. Because of these potential fluctuations, LAWA has committed to using recycled-content-containing materials in construction, but has not set any quantified limits, or standards, for content. Nevertheless, the commitment provides sufficient detail to determine the level of significance of impacts associated with project-related solid waste generation.

AL00033-200

Comment:

- Like Master Plan Commitment SW-2, Master Plan Commitment SW-3 lacks sufficient specificity and enforceability. Master Plan Commitment SW-3 states, for example, that "LAWA will require that contractors recycle a specified minimum percentage of waste materials generated during construction demolition," but leaves the specification of that percentage for the construction bid stage. (Draft EIS/EIR at 4-849.) This is an entirely unenforceable and non-specific pledge, and is therefore meaningless as a commitment. In order to make this commitment real, LAWA should, at the very least, do the following: (1) determine and specify what percentage of diversion (by weight and/or volume) is now practical for each type of construction activities proposed under the Master Plan (e.g., demolition and construction of airport structures and facilities); (2) require its contractors and tenants to achieve the highest identified diversion rate for all construction activities undertaken; (3) establish penalties for contractors and tenants not satisfying applicable diversion requirements (e.g., by forfeiture of a bond); and (4) review the identified diversion rates periodically and increase those rates if available diversion technology and/or practices have improved so as to make greater diversion possible.

Response:

Mitigation for waste materials generated during construction is not required. As indicated in Section 4.19, Solid Waste, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, inert disposal capacity is anticipated to be available well beyond the 2015 planning horizon. Therefore, impacts with respect to construction and demolition solid waste associated with the Master Plan would be less than significant. Nevertheless, Master Plan Commitment SW-3 addresses construction and demolition waste. As indicated in the Draft EIS/EIR, neither the City of Los Angeles nor the State of California tracks the generation, disposal or diversion of construction and demolition waste. Anecdotal evidence indicates that recycling of waste from asphalt and concrete demolition (such as the removal of roadways or parking structures), commercial structures (such as terminals), and residential structures can reach 80 percent, 25 percent, and 5 percent, respectively. The requirement for contractors to recycle a minimum percentage will be applied at the time of construction contract bidding. At the Master Plan level, it is not possible to accurately estimate the specific percentage of recycled material for each type of construction activity proposed, based on the variation in structural engineering and building design that exists on-site and that is proposed under the various Master Plan alternatives. As such, LAWA cannot set minimum requirements at this stage, since the composition of various structures that would be demolished as part of project component development has not been determined, and actual amounts that could be diverted is not known. In future planning stages, where material estimates for structures to be demolished, as well as specific design and engineering plans for new structures, are developed, it may be possible for LAWA to establish appropriate minimum recycling rates for waste materials. LAWA would require contractors to adhere to the requirements as part of the construction contract, and could effectively maximize the diversion of construction waste materials from landfills. For purposes of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the commitment provides sufficient detail to

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determine the level of significance of impacts associated with project-related solid waste generation. Please see Response to Comment AL00033-199 regarding the enforceability of Master Plan commitments and the establishment of performance standards.

AL00033-201

Comment:

- Table 4.19-2 indicates that solid waste generation at the LAX Northside Project would be 5,389 tons per year in 2015. We question the accuracy and source of this figure in light of the fact that the EIR prepared for the LAX Northside Project concluded the project would generate only 4.8 to 17.7 thousand pounds per day of solid waste (876-3,230 tons/yr.). (Exhibit 3(L), LAX Northside EIR at IV-125.)

Response:

The Draft EIR for LAX Northside was prepared in 1983. Since that time, solid waste generation factors were developed by the City of Los Angeles for the purpose of conducting environmental impact analyses. The LAX Master Plan EIS/EIR used these solid waste generation factors. These factors were applied to all land uses within the Master Plan boundaries, including the LAX Northside development under the No Action/No Project Alternative and Alternative D.

AL00033-202

Comment:

- Similarly, the solid waste figure provided on Table 4.19-2 for Continental City (2,964 tons/yr. in 2015) is inconsistent with the estimate in the Continental City EIR (46,500 pounds/day=8,486 tons/yr.). (Exhibit 3(I), Continental City EIR at III 38-39.) LAWA and FAA must explain and eliminate these inconsistencies.

Response:

The Draft EIR for Continental City was prepared in 1985. Since that time, solid waste generation factors were developed by the City of Los Angeles for the purpose of conducting environmental impact analyses. The LAX Master Plan EIS/EIR used these solid waste generation factors. These factors were applied to all land uses within the Master Plan boundaries, including the Continental City development under the No Action/No Project Alternative.

AL00033-203

Comment:

- Table 4.19-3 provides C & D debris solid waste generation figures for each of the Master Plan alternatives, but gives no indication of how much (if any) of that material would be diverted from landfill disposal under each alternative. In fact, despite LAWA's "commitment" to require diversion of C & D debris (Master Plan Commitment SW-3), it has apparently made no effort to determine what the effects of that commitment would be. The Draft EIS/EIR states only in the vaguest terms that the commitment would "reduce the amount of demolition and construction waste requiring disposal." (Draft EIS/EIR at 4-852.) Because C & D debris is such a large component of the total waste stream anticipated for LAX during Master Plan implementation, the Draft EIS/EIR's failure to indicate what percentage of that material can and will be diverted undermines the Draft EIS/EIR's assertion that the Master Plan will not interfere with attainment of AB939 diversion requirements. The Draft EIS/EIR's assertion that half or more of LAX's solid waste will be diverted from landfill disposal is not supported by substantial evidence as required by CEQA. (Laurel Heights Improvement Ass'n v. Regents of University of California, 47 Cal. 3d 376, 407 (1988).) As a result, the Draft EIS/EIR improperly fails to disclose potentially significant impacts on AB939 attainment.

Response:

As discussed in Section 3.3.2, Recycling at LAX, in Technical Report 10 of the Draft EIS/EIR, LAX has implemented many source reduction and recycling programs intended to meet the diversion goals of AB 939. In 2000, LAX achieved an overall solid waste diversion of 58.5 percent, or 64,291 tons. Such a diversion rate exceeds the City diversion goal of 50 percent by year 2000, which is consistent with the

requirements of AB 939. It is anticipated that, regardless of the Master Plan alternative selected, the City, and LAWA as a City agency, will continue to implement and improve existing diversion programs to meet or exceed future diversion goals, including the City's goal of 70 percent diversion by 2020. Implementation of the Master Plan would generate construction and demolition waste, a substantial portion of which would be recycled or otherwise diverted from landfill disposal. As was indicated in the Draft EIS/EIR, neither the City of Los Angeles or the State of California tracks the generation, disposal or diversion of construction and demolition waste. Anecdotal evidence indicates that recycling of waste from asphalt and concrete demolition (such as the removal of roadways or parking structures), commercial structures (such as terminals), and residential structures can reach 80 percent, 25 percent, and 5 percent, respectively. Under the LAX Master Plan, such materials would be recycled, and the aforementioned programs at LAX would continue to be implemented, to achieve the City's overall diversion goals. As such, the Master Plan, inclusive of all of the build alternatives, would not result in solid waste generation that would conflict with applicable diversion goals, policies, or requirements.

AL00033-204

Comment:

- The Draft EIS/EIR acknowledges that the LAX Master Plan entails potentially significant cumulative solid waste impacts arising from the fact that available landfill space in the relevant region is limited and solid waste generation in that region is projected to increase. (Draft EIS/EIR at 4-855.) The Draft EIS/EIR offers only one mitigation measure for this impact: development of new landfill capacity. (Id.) With that, LAWA ends its analysis of LAX's contribution to this cumulative impact, because LAWA attributes responsibility for this mitigation measures to other governmental agencies. The Draft EIS/EIR ignores entirely an obvious and important mitigation measure for which LAWA can and should be responsible: further reducing the volume of solid waste that is generated at LAX and disposed of at a landfill. For the reasons discussed above, the Master Plan Commitments relating to solid waste are wholly inadequate mechanisms for ensuring solid waste reductions. LAWA should implement the above-suggested changes to those commitments, identify additional means of reducing solid waste generation at LAX while increasing diversion, and make all of those diversion mechanisms elements of enforceable mitigation measures. If LAWA fails to do so, it will have failed to mitigate an identified significant impact in violation of CEQA. Pub. Res. Code §§ 21002, 21002.1; CEQA Guidelines § 15126.4.

Response:

It is beyond LAWA's power to require, or otherwise secure, additional landfill capacity. In fact, given the projected regional landfill capacity shortfall for the Los Angeles metropolitan area, ANY contribution to solid waste disposal would create a significant cumulative solid waste impact. Accordingly, LAWA's existing Master Plan commitments to maximize, to the extent practicable, diversion and recycling of construction/demolition and other solid waste is ultimately the maximal extent of its ability to avoid solid waste impacts. It is the responsibility of various City jurisdictions, as well as the Sanitation Districts of the County of Los Angeles, to permit, construct, and operate new or expanded solid waste disposal facilities. LAWA has already committed, as much as is feasible at this stage of planning, to reducing the amount of materials requiring disposal at landfills to ensure that the solid waste policies and objectives of AB 939 are met. As such, implementation of the Master Plan will ensure the appropriate level of enforceable diversion of wastes from regional landfills.

AL00033-205

Comment:

- The Draft EIS/EIR notes that LAWA has previously developed a plan to achieve AB939 goals, but provides insufficient information regarding the implementation, content and effectiveness of that plan. (Draft EIS/EIR at 4-848.) To begin with, the Draft EIS/EIR should be supplemented to include a complete citation to the plan and that plan should be made available for public review. The Draft EIS/EIR should also describe how each of the major elements of the plan (source reduction, recycling, food waste composting, etc.) have been implemented at LAX. That description should indicate the level of solid waste reduction attributable to each such element. The Draft EIS/EIR should also explain why LAWA has fallen short of its planned 58 percent diversion rate. Finally, the Draft EIS/EIR should explain what is meant by the term "terminal recycling program," a term used in Master Plan Commitment SW-1.

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The Draft EIS/EIR should indicate why this program, if effective, has apparently not been implemented in each of the LAX terminals to date.

Response:

The existing programs for solid waste diversion at LAX have resulted in an overall diversion rate of 58.5 percent in 2000. Such programs are summarized in the LAWA discussion in the City of Los Angeles AB939 2000 Report, including all elements intended to meet the diversion goals of AB939. These programs are also discussed in detail in the references cited in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR ("LAX Waste Audit and Recovery Program Update," Recycling by Nature, June 1995; "LAX Waste Characterization & Quantification Study Final Report," Los Angeles World Airports, January 2002), and are summarized in Technical Report 10, Section 3.3.2, of the Draft EIS/EIR. The term "terminal recycling program" refers to the waste diversion program aimed at the specific waste stream generated within the LAX terminals, which is composed largely of tenant-generated waste (i.e., food, paper, plastics), as opposed to LAWA-generated waste (i.e., tires, tools, machinery, furniture, concrete/asphalt). Accordingly, the program is intended to reduce the terminal-specific wastes sent to landfills, which is composed of substantially higher percentages of paper, food, and plastic wastes associated with retail and food services within the terminal areas.

AL00033-206

Comment:

- Our review of the Draft EIS/EIR indicates that the most recent information regarding the level and types of solid waste actually generated at LAX apparently dates back to 1991 (with a 1994 update). (Draft EIS/EIR at 4-841.) LAWA and FAA should provide more recent data. Because circumstances surrounding solid waste generation and handling have changed dramatically in the past decade, the figures relied on for the Draft EIS/EIR may not be accurate. This issue is of particular importance because, according to the Draft EIS/EIR's discussion of methodology, all of the Draft EIS/EIR's estimates of solid waste generation (i.e., for the description and analysis of the baseline and Master Plan alternatives) are based on the 1991 study figures. If the 1991 data is no longer accurate, all of the Draft EIS/EIR's solid waste analysis is undermined. (Id.)

Response:

The Draft EIS/EIR relied upon the most current information about solid waste generation at LAX available at that time, namely the 1994 "LAX Waste Audit and Recovery Program Update," published in June 1995. The Supplement to the Draft EIS/EIR included data from the January 2002 "LAX Waste Characterization & Quantification Study Final Report," which reports data from the Year 2000. As was indicated in Section 4.19, Solid Waste, and Technical Report S-7 of the Supplement to the Draft EIS/EIR, in 2000, solid waste disposal by cargo-related activities was the same as that forecasted in the Draft EIS/EIR (2.8 pounds of waste per ton of cargo per year). Passenger-related solid waste disposal in 2000 was 431 tons per million annual passengers (MAP); the Draft EIS/EIR forecasted that disposal rates in 2000 would be 387 tons/MAP. Nevertheless, the disposal rate forecasted in the Draft EIS/EIR was used to project disposal rates in 2015, because solid waste disposal is anticipated to decrease, and diversion is expected to increase, at LAX due to the continued implementation of the solid waste recovery efforts at LAX.

AL00033-207

Comment:

- An October 2000 request for proposals ("RFP") issued by LAWA for assistance in recycling implementation underscores the fact that the Draft EIS/EIR does not contain adequate information regarding solid waste and recyclables generation at LAX. (See excerpts of RFP attached hereto as Exhibit 4.19(B).) In that RFP, LAWA seeks assistance in a number of areas including quantification of solid waste and recyclable material generated at LAX. LAWA has properly taken steps to study the LAX waste stream, but should have taken those steps earlier so that the results could have been reviewed by the public as part of the Master Plan process. In their response to comments, LAWA and FAA should provide a full explanation of what has taken place following LAWA's issuance of the RFP, including the results of any study undertaken.

Response:

LAWA has a program, independent of the Master Plan, to characterize the waste stream at LAX and to identify measures to meet its diversion goals. The first such study was undertaken at LAX in 1991 (Prepared by Recycling by Nature, "Waste Audit and Recovery Program", 1992). This study was updated in 1994 (Prepared by Recycling By Nature, "LAX Waste Audit and Recovery Program Update", 1995) and again in 2000 (Los Angeles World Airports, "LAX Waste Characterization & Quantification Study Final Report", 2002). The results of these studies were incorporated into both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, and are available to the public for their review.

AL00033-208

Comment:

- Table 4.19-2 appears to provide only data regarding the generation of solid waste at LAX and disposed of at a landfill. It provides no information regarding the amount of recyclable material generated at LAX under the various Master Plan alternatives that will be diverted to processing facilities. This information should be provided on Table 4.19-2 or a similar table and compared to available capacities of relevant processing facilities to determine whether those capacities may be exceeded. Such an excess could result in the landfilling of recyclable materials, which would lead to problems with satisfying applicable waste diversion requirements. Alternatively, such an excess could lead to the construction of additional processing facilities, which may have additional significant impacts.

Response:

AB 939 mandated that local jurisdictions, including the City of Los Angeles, reach a 50 percent diversion rate by Year 2000. This could be accomplished through recycling, source reduction, and reuse. Reuse and source reduction do not require processing facilities; however, local municipalities and private entities have responded to AB 939 by developing processing facilities. The City of Los Angeles has prepared solid waste management plans which project future diversion quantities and, therefore, the need for additional processing facilities. It is anticipated that solid waste diverted from LAX could be accommodated by existing and proposed processing facilities. It would be speculative to assume that increased solid waste diversion at LAX would exceed the capacity of these processing facilities or require the construction of new facilities.

Processing facilities, including but not necessarily limited to, transfer stations, recycling facilities, and materials recovery facilities (MRFs) can be supplied relatively flexibly and easily in response to increased demand from more public and private development, including a revamped LAX. These processing facilities are relatively small, and are located at many sites in the City of Los Angeles and the Los Angeles region. They generally occupy from a few acres to about 20 acres each, and are located in areas zoned for any type of manufacturing. The capital costs for each of these facilities is not high, and many firms, including small businesses, medium-size regional firms, and a few national companies, are already in the solid waste processing sector in this region.

The commentor states that the environmental impacts of processing facilities must be analyzed in the EIS/EIR for the LAX Master Plan. A California appellate court rejected a similar argument in *National Parks and Conservation Association v. County of Riverside* (1996) 42 Cal. App. 4th 1505. In that case, the County approved a major solid waste landfill project, and the plaintiffs argued that the County's EIR was deficient because it failed to analyze the environmental impacts of the MRFs that would process the solid waste to remove recyclables before sending the rest of the waste stream to the landfill for disposal. The appellate court rejected the plaintiff's argument, reasoning that because their numbers and were not known, CEQA did not require the landfill project proponent to make the MRFs part of its project or analyze their environmental impact in its EIR.

Because the exact locations of the solid waste processing stations that may handle future solid waste from LAX are not known at this time, specific land use conditions at and impacts of these facilities cannot be addressed. Undertaking any such analysis at present for the LAX Master Plan would involve substantial speculation and conjecture. The government agencies in which such future processing facilities are proposed to be located will be responsible for the land use approvals of those facilities. Those agencies will consider the potential for incompatibility of those processing facilities with the land uses at their proposed future locations, and the potential for other environmental impacts, at the time of the project approvals for each such facility.

3. Comments and Responses

AL00033-209

Comment:

- As the LAWA news release attached hereto as Exhibit 4.19(A) indicates, LAWA can feasibly divert large quantities of food waste from the landfill (by recycling it to generate electricity) and has undertaken a pilot program to do so. Our review of this news release leads us to question why the Draft EIS/EIR does not mention, much less analyze, the potential benefits and environmental impacts of this diversion method. We are also puzzled by why LAWA has not committed, as part of the Master Plan, to pursue this or any other similar program for the diversion of food waste. LAWA and FAA should address these concerns in their response to comments.

Response:

As part of its commitment to reducing solid waste to meet the requirements of AB 939, LAWA implemented an Integrated Materials Recovery and Source Reduction Plan in 1991. This plan identified a number of methods for reducing or recycling solid waste generated at LAX and proposed a phased implementation process. LAWA is continually seeking ways to further reduce solid waste generation and disposal at its airports. The pilot program to produce energy from food waste at LAX is one such example. The purpose of the pilot was to evaluate the technical feasibility of a food waste recycling program. Although the pilot was successful, the events of September 11, 2001 resulted in serious financial impacts to LAWA. As a result of these impacts, the pilot was not expanded into a larger program. It is possible that LAWA will undertake a food waste recycling program in the future. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR project that existing and future diversion programs -- which may include food waste recycling -- will reduce the solid waste disposal rate at LAX over time.

AL00033-210

Comment:

18. Construction Impacts: Chapter 4.20.

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's analysis of construction impacts. As noted in the Draft EIS/EIR, its discussion of construction impacts is mostly a summary of the analyses presented in the Draft EIS/EIR's other sections, which cover specific environmental impact areas (e.g., noise, traffic). We have commented on the adequacy of these various environmental impact area analyses elsewhere in this comment letter and will not repeat those comments here. The comments presented below are directed to particular problems specifically identified in the construction impacts section.

- If the history of construction projects at LAX is any guide for the future of LAX construction projects -- and we think it is -- the Draft EIS/EIR's construction schedule appears to be wildly optimistic. Recent airfield and other construction projects at LAX have been plagued by delay and budget overruns. As the documents attached hereto as Exhibit 4.20(A) illustrate, LAWA's Taxiway C Project was originally scheduled to be complete by September 2000 at a cost of approximately \$33.25 million. LAWA's most recent Project Status Report shows the Taxiway C Project is expected to be complete one year behind schedule and approximately \$20 million over budget (i.e., at a total project cost of \$53,000,000). (Id.) Similarly, as the documents attached hereto as Exhibit 4.20(B) illustrate, LAWA's recently completed Southside Taxiways Project took more than 9 years to complete, much longer than originally anticipated. In their response to comments, LAWA and FAA should indicate whether the analysis of scheduling presented in the Draft EIS/EIR takes into account the tendency of LAX projects to take much longer than anticipated. Given LAWA's history of project delays and cost overruns with the relatively minor projects described above, it would seem impossible that LAWA could meet the tight 2005 and 2015 schedule discussed in the Master Plan and Draft EIS/EIR. As the documents attached hereto as Exhibit 4.20(C) illustrate, delay was also a major issue during LAWA's construction of the Westchester Parkway. In their response to comments, LAWA and FAA should explain whether they expect delay similar to that described above and if not, why not. The agencies should also indicate how they expect LAWA will deal with delay if it arises. The analysis of likely construction delays is critical because such delay could lead directly to additional environmental and community impacts. For example, the Draft EIS/EIR must provide clear indication of how much nighttime construction is anticipated for each of the Master Plan built alternatives and how much would be permitted if construction falls behind schedule.

LAWA and FAA should also clearly indicate what would happen if, in 2015, LAX Master Plan construction is not complete. What would such a construction delay mean for subsequent master planning? Finally, LAWA and FAA should indicate the date by which construction must begin if it is to have any hope of being completed by 2005 and 2015.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR provide a program level of analysis for each of the alternatives considered for LAX Master Plan, including LAWA staff's preferred alternative (Alternative D), based on general assumptions of the timing and phasing of individual improvements. Accordingly, the construction schedule for alternatives presented in the Draft EIS/EIR and Supplement to the Draft EIS/EIR reflect conceptual construction phasing and timing, based on general information and assumptions available at this time. As individual projects under the Master Plan advance toward implementation, more details regarding the nature, design, and construction approach of the individual projects would be developed and provide the basis for establishing a more definitive construction schedule and cost estimate. That assessment would take into account the specific requirements and complexity of the necessary construction activities, the site-specific characteristics of the construction area relative to the potential to encounter conditions resulting in delay or additional costs, and the relationship of the project relative to other airport improvements that are planned or underway. It is not necessary or appropriate for the EIS/EIR to automatically assume that the costs and construction duration requirements for the proposed improvements will be substantially greater than currently anticipated. Similarly, it would be speculative for the EIS/EIR to identify and address, at a programmatic level, what delays are likely to occur and how LAWA proposes to deal with those delays.

Please also see Response to Comment AL00033-26 regarding the construction phasing for Alternatives A, B, and C as related to meeting the horizon year of 2015, and also as related to the fact that the construction requirements and duration for Alternative D would be less than those of the other build alternatives.

AL00033-211

Comment:

- Important information regarding the impacts associated with the No Project Alternative is omitted from the Draft EIS/EIR's construction impacts analysis at a number of critical points including the following: Table 4.20-1, Table 4.20-3, Table 4.20-4 and Table 4.20-5. In addition, the construction impacts analysis section does not provide a construction schedule for the No Project Alternative. (See Draft EIS/EIR at 4-859.) The Draft EIS/EIR must be amended to remedy these problems and otherwise provide a complete analysis of the construction impacts of the No Project Alternative.

Response:

While such information was developed for Alternatives A, B, and C, primarily for the purpose of calculating construction-related air pollutant emissions during Phase I and Phase II of Master Plan development, the approach used in calculating air pollutant emissions for the No Action/No Project Alternative did not require such information. As such, the information requested in the comment is not available. The absence of such information does not, however, materially affect the construction impacts analysis presented in the Draft EIS/EIR.

As described in Section 3.0, Methods, of both the "Technical Memorandum: Construction Emissions Analysis - No Action and Alternative 3," November 1998, PCR Services Corp. and the "Technical Memorandum: Air Emissions Analysis of Construction Activities," March 1998; PCR Services Corp., referenced on page 4-497 of the Draft EIS/EIR, the calculation of emissions for the No Action/No Project Alternative was conducted by rationing the development area for each project component between Alternative C (then referred to as Alternative 3) and the other development scenarios (i.e., No Action/No Project). These development area ratios were multiplied by the quarterly emissions generated in Alternative C, resulting in scaled emissions for each component of the alternative.

Section 4.20, Construction Impacts (subsection 4.20.6.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided sufficient qualitative information regarding the general construction-related impacts of the No Action/No Project Alternative, as can be considered relative to the subsequent discussion of construction impacts for Alternatives A, B, C, and D. Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided quantitative information regarding the

3. Comments and Responses

construction-related air pollutant emissions of the No Action/No Project Alternative; as well as for each of the subject build alternatives.

This approach to, and level of, information related to construction impacts is sufficient for the programmatic level of analysis presented in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00033-212

Comment:

- The Draft EIS/EIR's analysis of earthwork aggregate quantities assumes that "the existing concrete and asphalt from airfield and roadways would be recycled, and that 75 percent of the recycled material would be reusable aggregate for airfield Portland cement concrete (PCC) and roadway sub-base. The remaining 25 percent would be recycled as general fill material." (Id. at 4-867; see also id. at 4-885.) We note that such reuse and recycling is a laudable goal, but that LAWA has not actually committed to meet it. The Master Plan Commitments discussed in the Draft EIS/EIR's solid waste section do not commit LAWA to do nearly as much as the Draft EIS/EIR's analysis of earthwork aggregate assumes it will do. As a result, the disclosure of construction impacts is not accurate. The Draft EIS/EIR must be revised to eliminate this inconsistency. Specifically, the Master Plan Commitments discussed in the Draft EIS/EIR's solid waste section should be revised to require at least the level and type of reuse and recycling described in the Draft EIS/EIR's construction impacts section.

Response:

The assumptions cited in the Draft EIS/EIR were used to conduct preliminary engineering calculations for the purpose of estimating the potential impacts of the Master Plan Alternatives A, B, and C. These assumptions are based on reasonable expectations for the recycling of concrete and asphalt based on current practices in the industry and currently in use at LAX.

AL00033-213

Comment:

- The Draft EIS/EIR's analysis of water used during construction is totally inadequate. The analysis gives no estimate of the amount of water that will be used during construction (e.g., for dust suppression and concrete mixing) and provides no commitment regarding the use of reclaimed water for this purpose. (Id. at 4-888.) In light of this incomplete information and the absence of any commitment to use reclaimed water, the Draft EIS/EIR's finding of no significance impact from construction water usage is unsupported by substantial evidence.

Response:

Typically, especially with projects as large in scope as the Master Plan development, long-term operational water consumption (potable and reclaimed) is vastly more than construction-related water consumption. For example, under the build alternatives, operational water use would range from 2,053,307 to 1,874,759 gallons per day, depending upon the alternative. Construction-related water use could range from 5,000 gallons to as high as 20,000 gallons per day per 10 acres of construction, depending on time of year and site soil types. As illustrated in this example, water use associated with project construction would be negligible in light of projected long-term quantities. Nevertheless, in order to minimize the use of potable water during construction, Master Plan Commitment W-1 has been revised to include the use of reclaimed water in construction, based on availability and feasibility of use.

At this level of planning, it is not possible to reasonably quantify construction-related water use, given the multitude of factors that affect the volume of water required to carry out the construction of various airport facilities. When more detailed plans are prepared for individual Master Plan components, it may be feasible to evaluate construction-related water consumption. LADWP has determined that projected water supplies are sufficient to serve the Master Plan (see Appendix C of the Draft EIS/EIR and Appendix S-A of the Supplement to the Draft EIS/EIR), during construction and operation.

AL00033-214

Comment:

19. Design, Art and Architecture Application/Aesthetics: Chapter 4.21.

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's analysis of design, art and architecture application/aesthetics.

- In describing the No Project Alternative's impacts along the LAX southern boundary, the Draft EIS/EIR indicates that "[n]ew and replacement cargo facilities proposed north of Imperial Highway and west of Sepulveda Boulevard would somewhat intensify development in this area." (Draft EIS/EIR at 4-912.) The Draft EIS/EIR does not provide any specifics regarding this anticipated development. FAA and LAWA must explain what level and type of cargo development is expected along Imperial Highway (i.e., number of new and remodeled buildings proposed and square footage of each). The agencies' responses must also indicate, by means of a map, precisely where that No Project Alternative development is expected. Additionally, the agencies should explain why such development has been included in the No Project Alternative rather than one or more of the Build Alternatives in the LAX Master Plan. As explained in our comments on section 3.2.4 of the Draft EIS/EIR, it is inappropriate to assume development is part of the No Project Alternative unless it has previously been the subject of necessary environmental review and obtained necessary approvals. Nothing in the record indicates that additional cargo development along Imperial Boulevard meets these criteria. As such, this new development appears to have been improperly included in the No Project Alternative.

Response:

Section 3.2.4, No Action/No Project Alternative, of the Draft EIS/EIR, provided a description of the No Action/No Project Alternative. Per CEQA and NEPA requirements, the No Action/No Project Alternative represents the continuation of the existing land use and regulatory plans, policies, and operations at LAX, as well as the future consequences of foregoing the federal action (i.e., implementation of one of the four Master Plan build alternatives). Development included as part of the No Action/No Project Alternative consists of other development projects initiated under the existing plan. Cargo development is necessary under the No Action/No Project Alternative in order to replace and expand existing older and functionally obsolete cargo facilities. A list of those facilities to be removed and those proposed, along with associated floor areas, was provided on page 3-26 in Chapter 3, Alternatives, of the Draft EIS/EIR. A map indicating the location of new facilities was provided therein in Figure 3-6, No Action/No Project Alternative (2005/2015). Several proposed cargo facilities are located near the northwest corner of Imperial Highway and Sepulveda Boulevard, as indicated by the orange-brown color provided in the figure legend. These facilities were incorrectly labeled on the map as "EC" for existing cargo facility and should be labeled as "PC" for proposed cargo facility. This error has been corrected in Chapter 3, Alternatives, of the Final EIS/EIR.

AL00033-215

Comment:

- Master Plan Commitment DA-1 indicates that landscaped buffer areas will be provided and maintained along the north and south boundaries of LAX. (Id. at 4-911.) This "commitment" is unacceptably vague because the Draft EIS/EIR does not provide any map or drawing showing existing and proposed landscape buffer areas. Such visual depictions should be added to the Draft EIS/EIR. Providing such maps and drawings is critical both to evaluating impacts and to ensuring that LAWA fulfills its commitment; without such visuals, it will in the future be difficult, if not impossible, to judge the extent to which LAWA has actually complied with the commitment by providing new buffers and maintaining existing ones.

Response:

As was discussed in Section 4, Affected Environment, Consequences, and Mitigation Measures, of the Draft EIS/EIR, the Draft EIS/EIR and Supplement to the Draft EIS/EIR were "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 issues in a more specific manner, as necessary and appropriate. Although the scale of the figures, or maps, of the Alternatives

3. Comments and Responses

in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, such as Figure 3-15, Alternative C - 2015, No Additional Runway Alternative, did not convey a specific understanding of how proposed landscape buffer areas would be designed, these figures did include legend symbols for "Open Space/Landscape Buffers" and such areas were depicted along the southern and northern boundaries of the airport. The Master Plan commitments were designed as procedures, plans, policies, and/or activities to be implemented as part of the Master Plan in an effort to reduce or avoid potential impacts. Additionally, as was also discussed in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, LAWA will specify the enforcing agencies for and guarantee the enforceability of the Master Plan commitments in the mitigation monitoring and reporting program.

The text of Master Plan Commitment DA-1, Provide and Maintain Airport Buffer Areas (Alternatives A, B, C, and D), was provided on page 4-572 of Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Supplement to the Draft EIS/EIR and stated that the landscaped buffers, which will include a greenbelt of trees and landscaping, will screen views of the airport from adjacent residences and other view-sensitive uses. As such, landscaped buffers can be expected along those portions of the northerly and southerly airport property boundaries which abut residential uses or view-sensitive uses. View-sensitive uses were identified as designated scenic highways, corridors, or parkways; Vista del Mar has been designated by the City of Los Angeles as a Scenic Highway. In addition, as was discussed on page 4-903 of Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Draft EIS/EIR, the aesthetics and views analysis was based upon the assumption that LAWA will maintain and continue to adhere to relevant provisions within applicable plans or will implement equivalent or more stringent provisions as part of the Master Plan. Applicable plans include the FAA Requirements for Design, Art, and Architecture; City of Los Angeles Scenic Highways Plan; LAX Street Frontage and Landscape Development Plan; LAX Beautification Enhancements Program; LAX Northside Design Plan and Development Guidelines; and the LAX Zone/LAX Specific Plan for LAX Northside/Westchester Southside, which would incorporate the [Q] zoning conditions for the LAX Northside property (as described in Section 4.2, Land Use (subsection 4.2.5), of the Supplement to the Draft EIS/EIR).

For example, existing provisions within the LAX Street Frontage and Landscape Development Plan require a variety of landscape treatments such as trees, shrubs, ground cover, sidewalks, earth berms, and/or architecturally-treated block walls adjacent to residential uses along the northerly and southerly property boundaries. Setbacks in these areas are permitted to range from 15 to 50 feet, but are required to be a minimum of 20 feet along major highways. Accordingly, portions of the northern boundary of the LAX Northside/Westchester Southside property that abut residential uses currently include a 50-foot setback from 88th Street with 20-foot high buffers (12-foot masonry walls on top of eight-foot landscaped berms), as was described in Section 4.21, Design, Art and Architecture Application/Aesthetics (subsection 4.21.3), of the Draft EIS/EIR. With implementation of Master Plan Commitment DA-1, comparable interface treatments would be expected under the Master Plan. Additionally, please refer to Master Plan Commitment LU-4, Neighborhood Compatibility Program (Alternatives A, B, C, and D), which also relates to views and buffer areas.

AL00033-216

Comment:

- Master Plan Commitment DA-3 indicates that in conjunction with roadway/right-of-way improvement projects, existing overhead utility lines will be placed underground wherever feasible. (Id.) Because this statement is exceedingly vague, it is impossible to determine what, if anything, LAWA has actually committed to do. In order to clarify this point, the Draft EIS/EIR must indicate who will determine feasibility and what standards, if any, they will apply (e.g., economic, engineering). For example, with respect to development along the south side of LAX, the Draft EIS/EIR fails to give any indication of whether undergrounding existing wood and steel utility poles and lines is considered "feasible." (Id. at 4-909, 4-923.) Because the Draft EIS/EIR fails to take a position regarding the feasibility of such possible undergrounding or provide any standards for that assessment, its undergrounding "commitment" is essentially meaningless. (See *San Franciscans for Reasonable Growth v. City & County of San Francisco*, 151 Cal. App. 3d 61 (1984) (holding that an agency may not rely on an indeterminate commitment to reduce a project's environmental impact).) If LAWA and FAA take the position that feasibility of such undergrounding cannot now be determined, they should expressly indicate when and based on what standards that determination will be made for each of the Master Plan build alternatives.

Response:

As was stated in the Draft EIS/EIR on page 4-8 in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, the Master Plan commitments are used in lieu of mitigation measures 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. In this particular instance, the utility poles along Imperial Highway and other corridors are part of the existing visual conditions, and Master Plan Commitment DA-3, Undergrounding of Utility Lines (Alternatives A, B, C, and D), only serves to promote sensitive planning and treatment of areas visible from adjacent off-airport land uses. A determination that certain undergrounding of existing utility poles is infeasible would not result in any additional environmental impacts from the project. Factors influencing a determination of feasibility include: the existence of underground easements and facilities of other utilities; design of roadway and sidewalk improvements; type and use of overhead power lines; timing of planned utility and roadway/right-of-way maintenance, improvement, and upgrade projects; and cost considerations. Master Plan Commitment DA-3 establishes the undergrounding of utilities as a goal of all applicable right-of-way improvement projects and ensures that such undergrounding will be given serious consideration at the design stage of every such project.

AL00033-217

Comment:

- The Draft EIS/EIR indicates that under Alternative B, use of the Scattergood Power Generation Facility site as an off-site fuel farm "may obstruct or diminish ocean views from four residential structures in El Segundo on the west side of Loma Vista, south of Grand Avenue." (Draft EIS/EIR at 4-922.) In their response to comments, LAWA and FAA should identify these residences by address and indicate whether their owners have been specifically notified of this potential impact.

Response:

As was stated on page 4-922 in Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Draft EIS/EIR, the residences potentially affected by the option under Alternative B to relocate the fuel farm to the Scattergood Power Generating Facility would include the first four residential structures on the west side of the 200 block of Loma Vista, south of Grand Avenue. Encroachment upon the ocean views currently available from these residences would depend upon the ultimate site configuration of the off-site fuel farm, several alternatives for which are included in Appendix D to Chapter V of the Draft LAX Master Plan. LAWA has complied with all applicable notification procedures, including providing special notice to those requesting such notice. Although such procedures are designed to notify all interested parties of the potential impacts of the project, LAWA does not verify which interested parties have been notified of which potential impacts and does not provide specific notice of particular potential impacts. 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. Alternative D is currently considered LAWA staff's preferred alternative. Alternative D would not involve the relocation of the LAX fuel farm to an off-site location, and thus would not impact views of residences on Loma Vista in El Segundo.

AL00033-218

Comment:

- The Draft EIS/EIR on page 4-921 identifies the Scattergood Power Generating Facility as located west of Vista Del Mar. Although information on the precise location of that potential off-site fuel farm site is sparse in the Draft EIS/EIR, we believe it would be east, not west of Vista Del Mar. Please clarify.

Response:

The statement on page 4-921 in Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Draft EIS/EIR, indicating that the Scattergood Power Generating Facility is located west of Vista del Mar is incorrect. The correct location of Scattergood is east of Vista del Mar. The subject correction has been incorporated into Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Final EIS/EIR. Please also see Appendix D to Chapter V of the Draft LAX Master Plan, Scattergood Fuel Farm Relocation Feasibility Study, for a detailed discussion of the Scattergood fuel farm relocation site, including site configuration alternatives.

3. Comments and Responses

AL00033-219

Comment:

20. Earth/Geology: Chapter 4.22.

In this chapter much verbiage is provided but little helpful content. No mention is made of the impacts of a major earthquake on the fuel distribution system for LAX, in particular the underground pipes. In addition, despite the statement that "[e]xisting artificial fill has generally not been considered a suitable foundation material in any portion of LAX by previous investigators," (Draft EIS/EIR at 4-932), much of the new proposed facilities under the build alternatives would be constructed on existing fill. Yet, without adequate explanation, the Draft EIS/EIR concludes that the impacts of constructing on such old fill would be less than significant.

Response:

Impacts associated with earthquakes were evaluated in Section 4.22, Earth/Geology, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Table 4.22-1, Matrix of Potential Earth/Geologic Considerations for Major Master Plan Facilities, of the Draft EIS/EIR included a line item under Alternatives A, B, and C related to fuel farm improvements, including the potential susceptibility of such improvements to ground shaking. As indicated in Section 4.22, new facilities associated with the Master Plan would be designed, engineered, and constructed in accordance with applicable safety requirements, including seismic safety requirements. This would include consideration of local geologic and soil conditions such as the suitability of existing fill material. Compliance with current safety requirements provides an acceptable level of safety from potential hazards such as earthquakes.

Impacts associated with hazardous materials spills and releases were addressed in Section 4.23, Hazardous Materials, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. As was indicated on page 4-984 of the Draft EIS/EIR, "the handling and storage of hazardous substances, including the transport of substances by pipeline, is stringently regulated.... Releases of hazardous materials are subject to stringent regulations, including emergency response and cleanup procedures.... These regulations and provisions are in place so potential spills and releases would not create a hazard to the public or the environment, and would not result in contamination of soil or groundwater." Please see Response to Comment PC01269-1 regarding potential impacts from underground fuel pipelines specifically associated with the off-site fuel farm under Alternative B.

Potential impacts associated with construction of proposed facilities on artificial fill were addressed in Section 4.22, Earth/Geology, of the Draft EIS/EIR (see pages 4-950 and 4-953, Non-Seismic Settlement). These sections provide a detailed explanation of the various methods for ensuring that potential impacts associated with construction on fill are reduced to a less than significant level.

AL00033-220

Comment:

Another impact that is ignored is the potential for sand to blow from the dunes onto airport property by strong winds, which could cause damage to vehicles and other airport property. This should be addressed given that the main terminal and parking structure are proposed for this area.

Response:

The Draft EIS/EIR addressed wind blown sand in Section 4.22, Earth/Geology (subsection 4.22.3).

AL00033-221

Comment:

Of particular concern is the lack of clarity in this section regarding the need for additional analysis prior to construction. Elsewhere in the Draft EIS/EIR, representations are made that it is a program level document. (Id. at Preface-2.) That would mean that additional environmental documentation is required before construction of any of the contemplated improvements. Indeed, the extremely general level of

review contained in this chapter on geological issues would not provide an adequate basis to allow construction to go forward. There are numerous geophysical constraints associated with seismic safety and liquefaction that would need to be thoroughly considered before designs are completed and construction could be approved. These issues would be appropriately addressed at the design phase when specific recommendations can be made for identified structures. Until such specific recommendations are made, the blanket conclusions that all impacts will be "less than significant" is not supported by adequate analysis or evidence in the record. At the least, the Draft EIS/EIR must make it clear that the current general level of analysis is intended to guide the agencies' determinations only as to the programmatic Master Plan approval, and that additional documentation will be required under CEQA and NEPA before any construction occurs. Construction-level, project environmental documents will be required to address such issues as the amount of grading and fill, and specific design features and other measures to mitigate and prevent potential adverse impacts.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR were program level documents. If it is determined to be necessary, LAWA will prepare additional documentation regarding geological constraints prior to construction. The Draft EIS/EIR addressed the need for additional analyses prior to construction in the Preface. In addition, the need for additional analysis was presented in Section 4.22 (subsection 4.22.6) of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00033-222

Comment:

21. Hazardous Materials: Chapter 4.23.

Our comments regarding the Draft EIS/EIR's analysis of hazardous materials impacts were prepared by Phyllis Fox, Ph.D. Those comments are attached hereto as Attachment F.

Response:

Please see Responses to Comments AL00033-223 and AL00033-416 through AL00033-437 below.

AL00033-223

Comment:

As Dr. Fox's comments indicate, there are a number of contaminated properties in the area of LAX that would be disturbed by construction of the proposed Master Plan projects. The Draft EIS/EIR acknowledges that this contamination could result in significant impacts and recommends two Master Plan commitments to mitigate these impacts. However, the Draft EIS/EIR fails to discuss all of the impacts of this contamination. Further, the two mitigation measures discussed are not adequate to mitigate the impacts to a less than significant level.

Response:

The content of this comment is a general conclusion made from the comments by Dr. Fox. As it is worded, the comment is not specific as to impacts of contamination that the commentor would like addressed or to the reasons the two Master Plan commitments are not adequate to mitigate the impacts to a less than significant level. Section 4.23, Hazardous Materials (subsection 4.23.5), of the Supplement to the Draft EIS/EIR described the two commitments to complete soil and groundwater remediation disrupted by Master Plan construction to the levels acceptable by the appropriate agency with jurisdiction and to appropriately handle contaminated materials encountered during construction. In cases where remediation will be temporarily disrupted due to construction, temporary measures will be taken to stop the migration and/or increased monitoring to evaluate the effects of the disrupted remediation. In addition, LAWA will obtain approval to initiate construction from the agency with jurisdiction to ensure that the public health and the environment are protected. All impacts of contamination as a result to disruption of remediation will be addressed and therefore, the measures are adequate to reduce the impacts of construction to less than a significant level.

3. Comments and Responses

AL00033-224

Comment:

22. Human Health and Safety: Chapter 4.24.

a. Human Health Risk Assessment (Chapter 4.24.1)

Our comments regarding the Draft EIS/EIR's analysis of human health and safety were prepared by Phyllis Fox, Ph.D. Those comments are included at the end of the report attached hereto as Attachment C.

Response:

Please see Responses to Comments AL00033-225 through AL00033-228 and AL00033-338 through AL00033-350 below.

AL00033-225

Comment:

As Dr. Fox's comments indicate, the Draft EIS/EIR does not contain an adequate human health analysis. Public health impacts were artificially reduced by using an unusually high significance threshold for chronic impacts.

Response:

The content of this comment is essentially the same as comment AF00001-40; please refer to Response to Comment AF00001-40.

AL00033-226

Comment:

The document inappropriately excludes acute health impacts, impacts to passengers, and impacts due to construction. The Draft EIS/EIR also underestimates toxic air pollutant emissions by ignoring the influence of engine power settings on emissions rates and improperly assesses lead and acrolein emissions.

Response:

An evaluation of acute health impacts was provided in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. Regarding impacts to passengers, please see Response to Comment AL00033-348. The air quality modeling included estimation of emissions associated with construction (i.e., construction vehicles, construction activities). For more information, please see Technical Report 4, Air Quality Technical Report, of the Draft EIS/EIR. In addition, please refer to Response to Comment AL00033-346.

Aircraft toxic air pollutant emissions were calculated based on five aircraft operational modes: approach, taxi, queue, idle, takeoff, and climbout. Airport-specific times-in-mode were used in the modeling effort. Regarding evaluation of lead impacts, please see Response to Comment AL00033-345.

Regarding evaluation of acrolein emissions, acrolein emissions for aircraft were estimated from four U.S. Air Force/Battelle reports (Spicer, et al. 1984; Spicer, et al. 1987; Spicer, et al. 1988; Spicer, et al. 1990) that provided speciated total hydrocarbon (THC) emissions from 10 different aircraft. The acrolein THC mass fractions from these reports were averaged for each operating mode (takeoff, climbout, approach, and taxi/idle/queue). The acrolein mass fraction was multiplied by the aircraft THC mass emissions calculated for each mode in each alternative and year analyzed. Acrolein from on-road mobile sources was developed from emission factor data provided to CDM by the California Air Resources Board between November 12, 1999 and December 8, 1999. The acrolein mass fractions for mobile off-road vehicles were obtained from the California Air Toxic Emission Factor database and U.S. EPA memorandums (Cook 1997 and Brodowicz 1996).

AL00033-227**Comment:**

The proposed mitigation program only requires that a small percentage of the very substantial increase in emissions be mitigated and fails to impose all feasible mitigation measures.

Response:

The content of this comment is essentially the same as comment AL00022-38; please refer to Response to Comment AL00022-38.

AL00033-228**Comment:**

Additionally, the proposed mitigation program fails to recognize the differences in approaches that are required to mitigate air quality versus human health impacts. The flaws in the human health and safety analysis are so severe that the Draft EIS/EIR must be substantially revised and recirculated for public review.

Response:

The content of this comment is essentially the same as comment AL00022-38; please refer to Response to Comment AL00022-38.

AL00033-229**Comment:**

b. Safety (Chapter 4.24.3)

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's treatment of safety issues at Chapter 4.24.3.

Response:

Please see Responses to Comments AL00033-230 through AL00033-233.

AL00033-230**Comment:**

- The Draft EIS/EIR offers many charts and graphs apparently intended to assure the flying public that airplane travel is safer than ever. The information presented is outdated and incomplete and fails to provide an accurate assessment of safety issues. The most recent year included in the analysis is 1996, making the document 5 years out of date. Numerous "runway incursions" or near collision incidents on the runways at LAX have been documented and reported in the press and elsewhere, in the years since 1996, with LAX leading the nation in 1998 and 1999 in near collisions involving aircraft on its runways. This information must be included in the environmental documents, and in planning for the future of LAX, the most current available information on safety must be utilized.

Response:

The Draft EIS/EIR provided U.S. aviation accident and incident information from the FAA's Bureau of Transportation Statistics (BTS), the National Transportation Safety Board (NTSB), and the Airline Transportation Association (ATA) for the years 1982 through 1999 in Section 4.24.3, Safety, and Attachment A of Technical Report 14c, Safety Technical Report. Information from FAA and NTSB on the aircraft incident and accident history at LAX for the years 1982 through 1996, and 1962 through 1999, was also provided in Section 4.24.3, Safety, and Attachment A of Technical Report 14c, Safety Technical Report, respectively, of the Draft EIS/EIR. Section 4.24.3, Safety, and Technical Report S-9b, Supplemental Safety Technical Report, of the Supplement to the Draft EIS/EIR, provided updated national and local aviation accident and incident information through the Year 2000, the most "normal"

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year for aviation activity, in light of the events of September 11, 2001, for which a complete dataset was available. In addition, please see Topical Response TR-SAF-1 regarding runway incursions at LAX. As indicated in Topical Response TR-SAF-1, the primary purpose for modifying the airfield under each of the Master Plan build alternatives is to develop a physical solution that will greatly reduce the risk of runway incursions.

AL00033-231

Comment:

- In Table 4.24.3-4, the 1986 Cerritos crash of an Aeromexico DC-9 en route to LAX, one of the most notorious local airplane accidents, is completely omitted. The document attempts to justify the omission by characterizing the accident as unrelated to LAX. The accident is, however, related to the extent of congestion in the skies, and air traffic patterns in the airspace over LAX. As such this accident should be included in the Draft EIS/EIR safety analysis.

Response:

A discussion of the 1986 mid-air collision over Cerritos was included on pages 4-1088 and 4-1089 in Section 4.24.3, Safety, of the Draft EIS/EIR. As indicated therein, this accident was attributed to inadequate FAA procedures and inadequate visual lookout by both pilots, as well as radar issues. The only connection between the Cerritos accident and LAX is that the Aeromexico flight was enroute to LAX. As a result of this accident, the FAA instituted several procedures to enhance aviation safety at LAX and other airports, as was described on page 4-1089 of the Draft EIS/EIR. In addition to the procedural changes noted on page 4-1089, the FAA has modified procedures pertaining to the Visual Flight Rules (VFR) Flyway in the immediate vicinity of LAX to reduce the potential for a mid-air collision. Please see Topical Response TR-SAF-1 for further discussion regarding aviation safety, including a discussion regarding airspace capacity.

AL00033-232

Comment:

- LAWA and FAA must explain to the public how numerous additional operations to the skies above LAX will affect the risk of accidents. The conclusory statements in the document that congestion in the skies above LAX has no statistical correlation to increased safety risks, are counter-intuitive and lack any adequate explanation. They also are contradicted by public statements made by the air traffic controllers' union, which blamed "excessive airplane arrival rates" for the high number of "runway incursions." (See newspaper reports submitted herewith at (Exhibit 4.24(A).) The Draft EIS/EIR should discuss, in addition, how the congestion in the airspace around LAX compares with that around the other airports in the region. This should be a consideration in planning comprehensively for serving the future demand for air travel in Southern California, yet the document contains no discussion of this issue.

Response:

Please see Topical Response TR-SAF-1 regarding aviation safety. As described in TR-SAF-1, proposed improvements under each of the build alternatives would increase runway and taxiway separations for larger aircraft by adding parallel taxiways between runways, and by increasing safety areas to meet FAA standards. Section 2, Airside System, in Chapter II of the Draft LAX Master Plan provides detailed information regarding the regional airspace environment, including as related to other airports in the region. As described in Topical Response TR-SAF-1, the National Airspace System is a comprehensive system that provides the highest level of safety to persons and property in the air and on the ground. This system applies the appropriate resources to safely manage air travel within very active airspace areas, such as that of Southern California and other large metropolitan areas. The proposed improvements would reduce controller workload and the associated risk of runway incursions.

AL00033-233

Comment:

- The Draft EIS/EIR should be updated to include information about the new security procedures that are to be imposed on air transportation at LAX and elsewhere, and any impacts on air safety that such procedures may have.

Response:

A description of the new security procedures that have been implemented at LAX in response to the events of September 11, 2001, was included in Section 4.24.3, Safety, of the Supplement to the Draft EIS/EIR. These security procedures, as well as any new federal security requirements that would be incorporated as part of any of the Master Plan alternatives, would increase security and aviation safety at LAX. In addition, Alternative D, the Enhanced Safety and Security Plan, has been added since publication of the Draft EIS/EIR in light of the events of September 11, 2001, and is specifically designed to protect airport users and crucial airport infrastructure, and to incorporate federal security recommendations as they are developed to the greatest extent possible.

AL00033-234

Comment:

23. Public Utilities: Chapter 4.25.

a. Water Use: Chapter 4.25.1.

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's analysis of water use issues.

- The analysis vividly illustrates one of the problems with the Draft EIS/EIR's improper assumption that LAX Northside and Continental City will be developed as part of the Master Plan's No Project Alternative. As discussed at length in our comments on Section 3.2.4, above, LAWA and FAA have made the legally suspect decision to define the No Project Alternative as including substantial ancillary development (LAX Northside and Continental City) that received some approvals approximately twenty years ago but was never undertaken. The Draft EIS/EIR's analysis of water use illustrates quite clearly that including such substantial ancillary development in the No Project Alternative improperly inflates the apparent environmental impact of that option while making the Master Plan build alternatives appear environmentally superior by comparison. Specifically, the Draft EIS/EIR asserts that the No Project Alternative would result in a potable water use increase of 44 percent, which is more than twice the increase in potable water use attributed to any of the Master Plan Build Alternatives. (Draft EIS/EIR at 4-1129.) Elsewhere, the Draft EIS/EIR acknowledges that the majority of the increase in potable water usage projected for the No Project Alternative is directly attributable to the Draft EIS/EIR's (improper) assumption that LAX Northside and Continental City development will proceed. (Id. at 4-1138.) The improper assumption thus renders the impacts analysis inadequate in numerous aspects. The Draft EIS/EIR is misleading to the public and decisionmakers regarding numerous issues, among them the relative water use impacts of the available Master Plan alternatives (i.e., build and no project).

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. As indicated in the topical response, the environmental impacts of the build alternatives, including impacts pertaining to water consumption, are compared to 1996 baseline conditions for purposes of determining significance under CEQA. The comparison of impacts of the build alternatives to the No Action/No Project Alternative under NEPA is provided for disclosure purposes only.

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AL00033-235

Comment:

- Table 4.25.1-1 indicates that construction of the Continental City project would result in an increase over baseline potable water use of 513 acre-feet per year ("AF-yr"). We question the accuracy and source of this figure in light of the fact that the EIR prepared for that project concluded at the initial study stage that that project's demand for water would not be significant. (See Continental City Draft EIR attached hereto as Exhibit 3(I), at III-35.)

Response:

Water consumption factors for the LAX Master Plan Draft EIS/EIR were based on data developed by the City of Los Angeles Department of Public Works. Similar to the Draft EIR prepared for Continental City, the LAX Master Plan Draft EIS/EIR concluded that water consumption would not be significant.

AL00033-236

Comment:

- Similarly, Table 4.25.1-1 indicates that construction of the LAX Northside Project would result in an increase over baseline potable water use of 869 AF-yr. We question the accuracy and source of this figure in light of the fact that the EIR prepared for that project concluded that increased water use, although expected to be substantial, could not be determined accurately. (LAX Northside FEIR at IV-113 (attached hereto as Exhibit 3(L)).) LAWA and FAA should explain how they managed to produce water use estimates for the Master Plan Draft EIS/EIR when such estimates could not accurately be produced for the LAX Northside Project FEIR. We believe the true explanation is likely to be one or both of the following: (1) The LAX Master Plan DEIR estimates are not accurate, but have been included to inflate the apparent environmental impacts of the No Project Alternative; (2) the fact that the FEIR for the LAX Northside lacks water use estimates evidences its deficiency and further supports the conclusion that it is outdated and cannot now be relied on to justify development of the LAX Northside Project or any of its elements.

Response:

The Draft EIR for LAX Northside was prepared in 1983. Since that time, water consumption factors have been developed by the City of Los Angeles Department of Public Works. These water consumption factors were used to estimate total water consumption under all of the LAX Master Plan alternatives, including the No Action/No Project Alternative. These factors were applied to all land uses within the Master Plan boundaries, including the LAX Northside development under the No Action/No Project Alternative and Alternative D.

AL00033-237

Comment:

- Draft EIS/EIR Table 4.25.1-2 does not provide any baseline data for landscape-related reclaimed water use. Such baseline figures are important to any assessment of the Master Plan Alternatives (i.e., Build and No Project) relative to baseline conditions and are required by CEQA. (CEQA Guidelines § 15125.)

Response:

Baseline reclaimed water use was included in Section 4.25.1, Water Use (subsection 4.25.1.3), of the Draft EIS/EIR. As indicated in the Draft EIS/EIR, 1996 baseline reclaimed water use was calculated to be 233 acre-feet per year, using a factor for reclaimed water use per acre of landscaping from the City's "Administrative Draft Citywide Thresholds Technical Guide" (December 1995). Updated information obtained for the Supplement to the Draft EIS/EIR indicated that during 2002, 131 acre-feet of reclaimed water were delivered to LAX through the Westside Water Recycling Project (see page 4-724 in Section 4.25.1, Water Use, of the Supplement to the Draft EIS/EIR).

AL00033-238

Comment:

- The Draft EIS/EIR's description of "Master Plan Commitments" for water use lack sufficient detail and certainty. For example, LAWA "commits" in a general fashion to improve water conservation at LAX, but does not provide enough specific information regarding how this goal will be achieved and/or what conservation performance standards will be met. (Draft EIS/EIR at 4-1137; see *Sundstrom v. County of Mendocino*, 202 Cal. App. 3d 296 (1988); *Sacramento Old City Association v. City Council of Sacramento*, 229 Cal. App. 3d 1011 (1991).) Put another way, the Draft EIS/EIR is notable for its failure to provide any indication of how much water LAWA can and will conserve as part of its water conservation commitment. As such, the "commitment" to conserve water is essentially meaningless and unenforceable.

Response:

The Draft EIS/EIR addressed water conservation measures, included as Master Plan commitments, in Section 4.25.1, Water Use. These measures, given the lack of detailed design at the Master Plan level of analysis, are described generally to indicate the measures and components that would be implemented, to the maximum extent feasible, as part of construction of individual component projects during Master Plan implementation. The degree to which such measures would be integrated into project construction of Master Plan components cannot be determined at this level of planning. As such, it is not possible to reasonably quantify the projected conservation due to such measures. Nevertheless, the commitment provides sufficient detail to determine the level of significance of impacts associated with project-related water use. Moreover, while LAWA has committed to the implementation of water conservation measures at LAX under the Master Plan, neither the Draft EIS/EIR or the Supplement to the Draft EIS/EIR took credit for any reduction in water consumption. LADWP has determined that, even without conservation, water supplies would be sufficient to serve the Master Plan alternatives (see Appendix C of the Draft EIS/EIR and Appendix S-A of the Supplement to the Draft EIS/EIR).

AL00033-239

Comment:

- One of the Draft EIS/EIR's "Master Plan Commitments" is to "maximize the use of reclaimed water in Master Plan-related facilities and landscaping." (Draft EIS/EIR at 4-1137.) The use of reclaimed water is, of course, laudable, but we are concerned that LAWA's commitment in this regard is too narrow, vague and non-committal. The "commitment" is too narrow because it apparently applies only to new facilities and landscaping (i.e., it requires no retrofit of existing facilities and landscaping.) In light of the dramatic 17% increase in water use projected under LAWA's Master Plan (id. at 4-1129), it would be more appropriate for LAWA to make a broader commitment to use reclaimed water by committing to retrofit existing facilities and landscaping. The commitment is also unacceptably vague because it permits LAWA to escape all responsibility for double plumbing terminals if that would not "be practical." (Id. at 4-1137.) This vague commitment is devoid of any standard indicating what would be considered "practical" and is therefore essentially meaningless. Put another way, LAWA could apparently escape from the commitment by itself concluding that double plumbing would be too costly. This is no real commitment and should not be treated as one for purposes of the Draft EIS/EIR's analysis. Finally, it is unclear how LAWA would be held accountable under this commitment, like so many others in the Draft EIS/EIR.

Response:

LAWA currently uses reclaimed water at LAX. Under Master Plan Commitment W-1, LAWA would extend the use of reclaimed water to new facilities and landscaping.

While LAWA has committed to the use of reclaimed water at LAX under the Master Plan, neither the Draft EIS/EIR or the Supplement to the Draft EIS/EIR took credit for any reduction in potable water consumption. Moreover, LADWP has determined that, even without the use of reclaimed water, water supplies would be sufficient to serve the Master Plan alternatives (see Appendix C of the Draft EIS/EIR and Appendix S-A of the Supplement to the Draft EIS/EIR). As indicated in the Introduction to Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Supplement to the Draft

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EIS/EIR, provisions will be made to ensure that Master Plan commitments are fully enforceable (zoning conditions, conditions of approval, etc.).

AL00033-240

Comment:

b. Wastewater: Chapter 4.25.2.

We have identified the following problems with and notable issues raised by the Draft EIS/EIR's analysis of wastewater issues.

- The Draft EIS/EIR's analysis of wastewater, like its analysis of water use, is skewed by LAWA's and FAA's improper decision to define its Master Plan No Project Alternative as including substantial ancillary development (LAX Northside and Continental City) because the inclusion of that ancillary development has allowed LAWA and FAA artificially to inflate the amount of wastewater that would be produced under the No Project Alternative to the point where the Draft EIS/EIR concludes that all three Master Plan build alternatives would involve less wastewater generation than in the No Project Alternative. This characterization of the relative impacts of the Master Plan Build and No Project Alternatives is misleading to the public and decisionmakers and must be remedied.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. As indicated in the topical response, the environmental impacts of the build alternatives, including impacts pertaining to wastewater generation, are compared to 1996 baseline conditions for purposes of determining significance under CEQA. The comparison of impacts of the build alternatives and the No Action/No Project Alternative under NEPA is provided for disclosure purposes only.

AL00033-241

Comment:

- We note that the number provided on Table 4.25.2-2 for wastewater generation associated with the Continental City development (assuming it were to proceed as approved in the 1980s) differs somewhat from the figure that was included and relied on for the environmental analysis undertaken when that project was approved. Specifically, the Continental City EIR shows sewage generation of 610,000 gallons per day (see Continental City Draft EIR, attached hereto as Exhibit 3(I), at III-36), while the LAX Master Plan Draft EIS/EIR shows sewage generation of 458,000 gallons per day. The Draft EIS/EIR must either eliminate or explain these inconsistencies.

Response:

The Draft EIR for Continental City was prepared in 1985. Wastewater generation factors have been revised since that time due to the fact that efficiencies (specifically toilets and faucets/shower heads) have generally improved, resulting in an overall reduction in per capita wastewater generation. Wastewater generation factors used in the LAX Master Plan EIS/EIR analysis were developed by the City of Los Angeles Department of Public Works.

AL00033-242

Comment:

- Similarly, Table 4.25.2-2 indicates the Northside Project would generate 717,400 gpd of wastewater, assuming that project were to proceed as approved in the 1980s. That estimate differs somewhat from the figures given in the FEIR for the LAX Northside Project, which indicated wastewater production of between 746,000 and 2,240,000 gpd. (LAX Northside Project FEIR at IV-125 (attached hereto as Exhibit 3(L)).) LAWA and FAA must either eliminate or explain this inconsistency.

Response:

The Draft EIR for LAX Northside was prepared in 1983. Wastewater generation factors have been revised since that time due to the fact that efficiencies (specifically toilets and faucets/shower heads)

have generally improved, resulting in an overall reduction in per capita wastewater generation. Wastewater generation factors used in the LAX Master Plan EIS/EIR analysis were developed by the City of Los Angeles Department of Public Works.

AL00033-243

Comment:

- The Draft EIS/EIR's "Master Plan Commitment" to avoid impacts to subsurface utilities lacks sufficient detail and certainty. LAWA will not be able to proceed with subsurface construction without first satisfying its "Master Plan Commitment" for wastewater and conducting further environmental review of its efficacy and potential environmental impacts. The Draft EIS/EIR "commits" LAWA -- in vague terms to develop -- at some undetermined future date -- a utilities relocation program to address the potential adverse impacts that subsurface LAX Master Plan development might have on existing utilities, including wastewater infrastructure. (Draft EIS/EIR at 4-1154.) Although such a program may be advisable, it has apparently not yet been developed, so it is impossible to assess its efficacy, much less its potential environmental impacts, as required by CEQA. (CEQA Guidelines § 15126.6(d); County of Inyo v. City of Los Angeles, 124 Cal. App. 3d 1 (1981).) LAWA cannot discharge its duties under CEQA by simply "committing" to engage in such a program without adequately defining it. If LAWA cannot (or will not) develop and implement this Master Plan commitment now, it must revisit this issue as part of "project level" environmental review prepared for any Master Plan development that could impact existing utilities, including wastewater infrastructure. LAWA will at that point presumably have prepared its utilities relocation program and will be able to conduct a full assessment of its efficacy and potential environmental impacts. Put another way, even if the vague "Master Plan Commitment" for wastewater discussed in the Draft EIS/EIR is adequate at the "program level" Draft EIS/EIR, greater detail and analysis will be necessary before LAWA can approve and undertake any Master Plan subsurface construction that might impact existing wastewater utilities. Please note that this comment applies to every instance in which the Draft EIS/EIR relies on Master Plan Commitment PU-1. (See, e.g., Water Use section (Draft EIS/EIR at 4-1130); Energy Supply section (Draft EIS/EIR at 4-792).)

Response:

The Draft EIS/EIR identified relevant Master Plan commitments in Section 4.25.1, Wastewater (CEQA). These measures, given the lack of detailed design at the Master Plan level of analysis, are described generally to indicate the measures and components that would be implemented, to the maximum extent feasible, as part of construction of individual component projects during Master Plan implementation. The degree to which such measures would be integrated into project construction of Master Plan components cannot be determined at this level of planning. Nevertheless, the commitment provides sufficient detail to determine the level of significance of impacts associated with utilities relocation. If it is determined to be necessary at subsequent levels of planning, additional environmental analysis will be conducted pursuant to CEQA.

AL00033-244

Comment:

D. Additional Comments.

1. The Draft EIS/EIR's Analysis of the Off-Site Fuel Farm Component of Alternative B Contains a Number of Deficiencies.

The Draft EIS/EIR's description of Alternative B indicates that it would involve relocation of the LAX fuel farm to one of two possible off-site locations in or near the City of El Segundo: (1) the Scattergood Generation Station; or (2) Chevron Refinery. (Draft EIS/EIR at 3-44.) We offer the following comments on the description and analysis of the off-site fuel farm proposal provided in the Draft Master Plan and Draft EIS/EIR.

- The Draft EIS/EIR's description and analysis of the proposed off-site fuel farm is extremely vague and limited. (See e.g., id. at 3-44 (Draft EIS/EIR's description of Alternative B refers the reader to the Draft Master Plan for a description of the off-site fuel farm proposal.) In fact, the Draft EIS/EIR fails to provide any usable map or drawing of the off-site fuel farm facilities. (See e.g., id. Figure 4.21-1 (Draft EIS/EIR aesthetics section photo location map lacking adequate detail).) The Draft EIS/EIR must be revised to

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include a more complete description of the off-site fuel farm proposal as well as maps and drawing similar to those found in Master Plan Appendix D, Appendix E and Appendix K. Without such information in the Draft EIS/EIR, it is impossible for the public and decisionmakers to understand the full scope of Alternative B.¹⁷

- Although the documents incorporated in the Draft Master Plan as Appendix D, Appendix E and Appendix K provide some information about the proposed off-site fuel farms, those documents are technical feasibility studies, not environmental review documents. As such, they do not satisfy the requirement of CEQA and NEPA. All potentially significant environmental impacts associated with construction and operation of the potential off-site fuel farm facilities must be analyzed in the Draft EIS/EIR.

17 In addition, we note that although the Draft EIS/EIR indicates that Table 3-4 should provide information regarding the acreage of the proposed off-site fuel farm sites, Table 3-4 provides no such information, indicating instead only that for Alternative B, the fuel farm acreage would be "off-site." (Id. at Table 3-4, 3-44.)

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR provided a program level of analysis of each of the alternatives considered for the LAX Master Plan. The level of information and analysis provided for the off-site fuel farm options considered for Alternative B are sufficient for a program level EIS/EIR. The Draft LAX Master Plan and associated technical appendices are incorporated by reference as part of the Draft EIS/EIR, and were made available at libraries, the LAX Master Plan Reading Room, and on the LAX Master Plan website (www.laxmasterplan.org) for review and use during the 295-day public review period for the Draft EIS/EIR. If Alternative B were to be approved and advanced, more detailed project-level planning, design, engineering, and environmental review would be completed to select a preferred option for the off-site fuel farm. The environmental review process associated with the detailed planning and refinement of this component of Alternative B would include public review and input as appropriate.

AL00033-245

Comment:

- The Draft EIS/EIR does not adequately explain why two distinct sites are still under consideration (the Scattergood Generation Station and Chevron Refinery). Moreover, it does not provide an adequate basis for evaluating which is environmentally superior, discuss which is the preferred alternative, or describe when and on what basis LAWA would choose between those two sites. CEQA requires that an EIR consider "all phases" of a project. (CEQA Guidelines § 15126.) The decision that selects which of the sites LAWA will use is one such phase that must therefore be described in the Draft EIS/EIR, including the criteria that LAWA will utilize in making its decision. The absence of this information results in an unacceptable lack of specificity in the description and analysis of Alternative B.

Response:

Please see Response to Comment AL00033-244 above regarding the off-site fuel farm.

AL00033-246

Comment:

- In their response to comments, LAWA and FAA must clarify precisely which of the several possible fuel farm locations at the Chevron site is (or are) being considered. At present, the Draft EIS/EIR and Draft Master Plan are unclear in this regard. (See Draft Master Plan Chapter V Appendix E (identifying three possible locations in addition to the preferred location) and Appendix K (describing only the preferred location).) This clarification is particularly relevant to the Draft EIS/EIR's visual impacts analysis. Because it is unclear which of the four possible Chevron Refinery locations is (or are) still being considered, it is impossible to assess the adequacy and accuracy of the Draft EIS/EIR's visual impacts analysis. We note that each of the four possible Chevron Refinery locations would have different visual impacts due to varying topography.

Response:

As stated on page V-E.6-1 of the Draft Master Plan, Alternative 1 at the Chevron Refinery was selected as the preferred site. The Draft EIS/EIR analysis of Alternative B assumed that site accordingly. Also, please see Response to Comment AL00033-244 above regarding the fact that the Draft EIS/EIR provided a program level of evaluation. If Alternative B were to be selected, additional project-level analysis, including with regard to the off-site fuel farm, would be conducted.

AL00033-247

Comment:

- In discussing permit and regulatory requirements for the possible off-site fuel farm at the Chevron facility in El Segundo, Master Plan Appendix E states that "Specific City of El Segundo permit requirements have not yet been determined; however, it is anticipated that the Chevron Fuel Farm may be able to be constructed and operated under existing permits for the Chevron Refinery from the City of El Segundo." (Draft Master Plan Chapter V Appendix E at V-E.3-2.) We note that LAWA would have to obtain Building Permits from the City of El Segundo for any construction of new facilities on Chevron Property. We also note that LAWA would have to obtain Encroachment Permits from City of El Segundo for all pipeline and related work in the public right-of-way on Vista Del Mar south of Grand Avenue (i.e., for either proposed off-site fuel farm).

Response:

All permitting and regulatory requirements for the relocation of the Fuel Farm would be coordinated with the appropriate authorities, including the City of El Segundo, for any construction and operation of such a facility within city limits or within public right of ways.

AL00033-248

Comment:

- In light of the Draft EIS/EIR's sparse and inadequate description of the possible off-site fuel farms, we have the following questions: (1) How many new pipelines would need to be constructed from LAX to each of the off-site fuel farm facilities? (2) Could or would the existing Chevron pipeline to LAX along Virginia Street in the City of El Segundo be abandoned following the construction of an off-site farm facility? (3) What would become of the existing uses of the Chevron site (e.g., tanker truck fueling station) and Scattergood site (e.g., three 175,000-gallon tanks and one 200,000-gallon aboveground storage tank) if the off-site fuel farm is constructed and what would be the impacts if those existing uses are relocated?

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR were 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.

There are currently four pipelines that feed the LAX fuel farm. One is 12 inches in diameter and the other three are eight inches in diameter. In the event that the fuel farm is located off-airport, it is envisioned that there would be at least three pipelines to feed the fuel farm facility. It is envisioned that the pipeline along Virginia in the City of El Segundo would be abandoned if the fuel farm were to be relocated off-site in Alternative C. The existing tanker truck refueling station at Chevron would be reconfigured within the site area. The tanks at the Scattergood site area would be removed and replaced with new state of the art storage tank facilities.

As indicated on page 3-47 of the Supplement to the Draft EIS/EIR, the overall site footprint of the fuel farm under Alternative D would be reduced, but the fuel farm would retain its existing capacity and remain in its existing location.

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AL00033-249

Comment:

- In its description of existing contamination relevant to the Master Plan, the Draft EIS/EIR acknowledges that "[t]here is also known soil contamination at the oil refinery fuel farm site." (Draft EIS/EIR at 4-968.) This statement fails to convey that LAWA and FAA have made no effort as part of the Draft EIS/EIR process to investigate contamination of that portion of the Chevron Site targeted for development as an off-site fuel farm. Because the agencies have not investigated existing contamination, they cannot know its extent or analyze its impacts on the Master Plan. Master Plan Exhibit E contains the following discussion of potential contamination at the Chevron site: "Phase I Environmental Site Assessments (ESA) have not been performed for any of the alternative fuel farm sites at the Chevron Refinery. As such, specifics about possible soil and groundwater contamination at each of the Chevron alternative sites are not currently available. Due to historic operations on the Chevron Refinery site, hydrocarbon contamination of groundwater and soil is widespread on the Chevron Refinery site. Due to the likely presence of soil and groundwater hydrocarbon contamination, a Phase I ESA and further investigation, including soil and groundwater sampling and analysis, should be considered prior to property transfer or leasing arrangement. Prior to construction of the fuel farm the appropriate soil and groundwater remediation activities will be undertaken. Under existing abatement orders, Chevron has responsibility for all hydrocarbon removal from under their refinery and surrounding areas." (Draft Master Plan Chapter V Appendix E at V-E.5-9.) In light of the foregoing, LAWA should, at the very least, have conducted a Phase I Environmental Site Assessment of the Chevron site in connection with the Draft EIS/EIR to evaluate potential soil contamination and mitigation measures. Its failure to do so renders the Draft EIS/EIR's hazardous materials analysis flawed and inadequate.¹⁸

18 Most of the discussion in the Draft EIS/EIR of the potential hazardous materials problems associated with the off-site fuel farm proposal component of Alternative B relates to potential impacts to extraction and monitoring wells. (Id. at 4-993.)

Response:

Environmental assessments have been previously completed for both prospective off-airport fuel farm sites including a Phase I ESA for the Scattergood site. The nature and extent of existing soil and groundwater contamination were discussed within Section 4.23.3, Affected Environment/Environmental Baseline, Known Contamination at the Off-Airport Fuel Farm Sites (pages 4-968 and 4-977), and additionally in Technical Report 13, Hazardous Materials Technical Report, of the Draft EIS/EIR. Potential soil contamination, including total petroleum hydrocarbons and metals from refinery activities, has been identified in the Draft EIS/EIR. The assessments were sufficient to assess the potential impacts associated with development of a fuel farm at either of the two sites.

Recommendation within the Draft LAX Master Plan document for a Phase I ESA, including soil and groundwater sampling and analysis prior to property transfer or leasing arrangement of the fuel farm sites, is appropriate and is common practice with real estate arrangements for protection of environmental liability. Completion of a Phase I ESA for the oil refinery fuel farm site is not required or necessary for evaluation of the impacts of any of the Master Plan alternatives.

AL00033-250

Comment:

- Master Plan Exhibit D indicates that a Phase I Environmental Site Assessment for the Scattergood Site indicated the presence of "soil and groundwater hydrocarbon contamination, as well as the potential presence of asbestos and additional soil and groundwater contamination." (Draft Master Plan Chapter V Appendix D at 5-5.) The Draft EIS/EIR's hazardous materials analysis contains some acknowledgment of these problems, but as with its discussion of the potential Chevron site, fails adequately to analyze for purposes of CEQA and NEPA how the contamination would relate to the proposed off-site fuel farm construction at the Scattergood Site. (Draft EIS/EIR at 4-968, 4-979; see generally Attachment F.)

Response:

Draft Master Plan Exhibit D indicated the presence of petroleum hydrocarbons at the Scattergood Generation Station that has migrated from the neighboring oil refinery. There was a release of fuel oil from one of the facility storage tanks and a small portion of the fuel oil flowed beyond the containment area. Cleanup of the spill was performed under the Los Angeles County Department of Health Services. Only a small stockpile of contaminated soil remains, which would be removed prior to transfer of the property to a potential buyer. The environmental status of the Scattergood fuel farm site was adequately and accurately described within Section 4.23, Hazardous Materials (subsection 4.23.3), of the Draft EIS/EIR.

The Draft EIS/EIR adequately analyzed for the purposes of CEQA and NEPA how the contamination would relate to the proposed off-site fuel farm construction at the Scattergood site. Section 4.23, Hazardous Materials (subsection 4.23.6.3), described the need for destruction and replacement of monitoring wells at the Scattergood Generation Station should the facility be selected for the proposed fuel farm. Well replacement would be required based on the known contamination. As described within Master Plan Commitment HM-2 (see 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. In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR identified the CEQA Thresholds of Significance (subsection 4.23.4.1) used to evaluate hazardous materials impacts.

AL00033-251**Comment:**

- We note that in addition to the potential underground utility conflicts identified in the Master Plan feasibility studies, reclaimed water pipelines operated by West Basin Municipal Water District represent a significant pipeline constraint for the proposed route under Grand Avenue and Vista Del Mar (Draft Master Plan Chapter V Appendix E V.E.6-2 (Section 6.1.1).)

Response:

Comment noted.

AL00033-252**Comment:**

2. The Draft EIS/EIR's Cumulative Impacts Analysis Must Consider Construction and Operation of the El Segundo Corporate Campus ("ESCC").

The cumulative impacts analyses throughout the Draft EIS/EIR are flawed because they do not appear to take into consideration the construction and operation of the El Segundo Corporate Campus ("ESCC"). Attached hereto as Exhibit 5(A) is the City of El Segundo's Notice of Preparation ("NOP") of an EIR for the ESCC project as well as its environmental checklists for that project. These documents describe the potential environmental impacts of the approximately 2,550,000 square foot mixed-use development proposed for a 46.5 acre site in the Northeast portion of El Segundo, approximately one-half mile south of LAX. The LAX Master Plan Draft EIS/EIR's environmental analyses do not appear to consider the cumulative and other impacts that could result from construction and operation of the ESCC project in El Segundo during the same general time period as the proposed LAX Master Plan. The Draft EIS/EIR considers a smaller (approximately 1.5 million square feet) project previously proposed for the site. (Draft EIS/EIR at 2-16.)

The exclusion of the ESCC project from the Draft EIS/EIR's analysis is particularly problematic in impact areas such as traffic, noise (including construction noise), and public utilities. In their response to comments, LAWA and FAA must indicate whether and to what extent the ESCC project was considered in the Draft EIS/EIR's cumulative impacts analysis. If, as we suspect, the Draft EIS/EIR did not consider the cumulative impact of the LAX Master Plan in light of the ESCC project, the Draft EIS/EIR must be a revised and re-circulated to remedy that defect.

3. Comments and Responses

Response:

As was indicated on page 4-273 in Section 4.3.2, Off-Airport Surface Transportation, of the Supplement to the Draft EIS/EIR, the updated traffic analysis includes consideration of the El Segundo Corporate Campus (ESCC). In addition, the air quality impacts analysis for mobile sources is based on the data from the updated traffic analysis, which includes the additional projects such as the ESCC. As was indicated on page 4-77 in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR, the ESCC is considered in the cumulative road traffic noise impacts analysis. The cumulative impacts analysis for utilities is based on the growth reflected in adopted regional plans. Regarding cumulative impacts related to noise, no significant impacts are expected to occur. As indicated in the comment, the ESCC project is located approximately one-half mile south of LAX. Significant construction noise impacts associated with the LAX Master Plan project would occur within approximately 600 feet of the construction activity. The occurrence of construction from activities at the ESCC site located approximately 2,640 feet away, with numerous intervening buildings/structures is not expected to result in significant noise impacts. Also, it should be noted that much of the intervening area consists of business and industrial uses that are not noise sensitive.

AL00033-253

Comment:

3. The Regulatory Actions Taken In Response to the Events of September 11, 2001 Must Be Taken Into Account in a Revised Draft EIS/EIR and In Comprehensive Airport Planning for Southern California.

In the aftermath of the hijackings of September 11, 2001, the regulatory response of the FAA and other agencies will include the imposition of numerous new airport security procedures. These measures have not yet been fully identified, but these changed conditions must be accounted for and taken into consideration in planning for the future of air transportation at LAX and in the nation. The new security measures will affect some of the most basic assumptions made in this Draft EIS/EIR regarding airport operations. This is significant new information that must be added to the Draft EIS/EIR, analyzed and circulated.

For instance, new security procedures have increased the amount of time required to clear passengers for flights, affecting the airport's capacity for hourly operations. New restrictions on belly cargo, and other cargo regulations, limit the airport's ability to process and transport cargo. These and other new restrictions must be taken into account in updating calculations regarding the airport's capacity for serving passengers and cargo. In addition, new parking restrictions limiting the number of available parking spaces at LAX will affect both parking and traffic at and around the airport. Additional security measures may affect other fundamental assumptions of the Draft EIS/EIR. These assumptions must be updated, and the analysis of potential environmental impacts revised, to take into account the new airport procedures.

We know that your agencies are now giving renewed consideration to the protection of the safety and security of aviation and the traveling public. El Segundo has previously expressed its full support of improved safety at LAX and in the skies above it. Now, as your agencies and the nation seek broader solutions to the threat of terrorist activities, we urge you to consider all options as they may relate to the future of LAX. In particular, newer and smaller airport facilities in less densely developed areas may offer important security advantages over aging and overcrowded facilities in intensely urbanized areas. We hope that in future airport planning, as you take into account issues of security that have been raised so recently and tragically, you will not be hasty in seeking an ill-advised expansion of LAX.

Response:

Alternative D, Enhanced Safety and Security Plan, is designed to protect airport users and critical airport infrastructure in response to the increased risk of terrorism aimed at aviation and commercial assets. The plan is designed with the flexibility to incorporate evolving federal airport security requirements, as described in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. Airport improvements envisioned for Alternative D would include increasing passenger convenience by replacing existing remote gates with contact gates and improving roadway access to curbside and parking areas by decentralizing ground access points. These changes were addressed in the evaluation of surface transportation for Alternative D provided in Section 4.3, Surface Transportation, and Technical Report S-2 of the Supplement to the Draft EIS/EIR.

Surface transportation analyses for Alternatives A, B, C and the No Action/No Project Alternative provided in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR did not include revised assumptions for "capacity-limiting" security measures. Those measures do not limit curbside access to the airport and are largely focused on activities within the terminals. This does not substantially change traffic circulation patterns.

Aviation forecasts used for the analyses presented in the Supplement to the Draft EIS/EIS take into account trends in air transportation after September 11, 2001, the general downturn in the economy that has occurred over the past several years and the SARS incident in Asian Pacific countries. That revised forecast was provided in the Draft LAX Master Plan Addendum and summarized in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR.

Regarding the regionalization issue, the events of September 11, 2001 and the economic slowdown are analyzed in Appendix S-B of the Supplement to the Draft EIS/EIR. The conclusions reached in the analysis confirm the need to plan for and build an expanding air-transportation regional network of airports to support the future growth of the Los Angeles basin. The role of an alternative at LAX in meeting this need was presented in Section 1.3, Meeting the Demand for Transportation in the Region, of the Draft EIS/EIR. The analysis confirms that Alternative D, while responding to safety concerns, would allow LAX to continue as the gateway airport onto the Los Angeles community particularly serving international travelers but its proportional share would diminish through the forecast period of 2015. Alternative D has been created to respond to the needed improvements without expanding LAX. Master Plans are underway at LAWA's other two air carrier airports, Ontario and Palmdale.

AL00033-254

Comment:

III. The Draft EIS/EIR Must Be Rewritten and Recirculated To Meet CEQA's Requirements of Adequate Disclosure of Impacts and Adequate Opportunity For Public Review.

A. The Numerous Fundamental Flaws in the Draft EIS/EIR Require Extensive Rewriting and Circulation for Public Review and Comment.

Our comments have documented legal inadequacies and problems in the Draft EIS/EIR in areas ranging from inaccurate descriptions of the alternatives to major omissions of vital technical information. The Draft EIS/EIR understates and disregards noise impacts, air quality impacts, biological impacts, public health impacts, and traffic impacts, to name a few. Moreover, it fails to provide adequate mitigation for the myriad significant impacts that would result from the proposed Master Plan. The document is legally inadequate. New analysis must be prepared which meets legal standards and requirements, and the analysis must be circulated for public review and comment.

3. Comments and Responses

Response:

Please see Responses to Comment Letter AL00033 for responses to the individual concerns raised by the commentor. The Draft EIS/EIR meets the requirements of NEPA and CEQA. Subsequent to the publication and public review of the Draft EIS/EIR, a new alternative - Alternative D, was formulated. A Supplement to the Draft EIS/EIR was completed and circulated for public review and comment. The subject document addressed the environmental effects of Alternative D and provides other information to supplement that which is provided in the Draft EIS/EIR.

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.

AL00033-255

Comment:

B. LAWA's and the FAA's Approach to Public Review Has Thwarted Informed Public Participation and This Must Also Be Remedied To Provide Adequate Opportunity for Public Review and Comment.

The magnitude of the environmental impacts resulting from the proposed Master Plan and the complexity of the environmental issues warrant detailed public review and analysis of the Master Plan and the Draft EIS/EIR. Indeed, the substantive mandate of CEQA is achieved, in large part, through public participation and informational avenues. Comments on environmental documents are provided for the benefit of the lead agency in making its determination of how to best protect the environment as mandated by CEQA. It is the agency's duty to foster an atmosphere conducive to public comment. NEPA similarly recognizes and assigns "great importance to NEPA's review and comment procedures for obtaining and incorporating opposing viewpoints into the final EIS, and thus into the heart of the decision process." (*Sierra Club v. Foehlke*, 816 F. 2d 205, 212 (5th Cir. 1987), disapproved on other grounds, *Marsh v. Oregon Natural Resources Council*, 490 U.S. 360, 377 (1989).) The manner of LAWA's and the FAA's consideration of the proposed Master Plan and these agencies' approach to environmental review represents a gross dereliction of this duty.

As a result of the utterly inappropriate and prohibitive cost for a hard copy of the Master Plan and the Draft EIS/EIR (\$3,300), countless members of the public have been forced to review the document in the far less accessible CD-ROM format. Yet the very members of the public that would likely be the most severely impacted by the proposed Master Plan, may not even have access to a computer or may not have access to a computer with CD-ROM capability.

Thus, there is some segment of the population, and quite possibly a large proportion, that have not had adequate access to the environmental document. Nor can the agencies assume that merely making copies of the Draft EIS/EIR available in public libraries somehow compensates for the inaccessibility of the document. The sheer volume of the document makes it amazingly difficult to digest at a single, or even multiple, library visits. Twelve thousand pages of material is a far cry from CEQA's suggested limit of 300 pages. (CEQA Guidelines § 15141.) NEPA similarly requires EIS preparers to provide succinct descriptions and to avoid useless bulk or verbose descriptions. (40 C.F.R. § 1502.15).

For those fortunate enough to have a computer, review of the documentation in its electronic format has also been unduly cumbersome. Beyond the overarching frustration of having to scroll through 12,000 pages and cross-reference analysis and facts, the electronic version was fraught with technical errors. For example, opening certain reports and appendices repeatedly caused our consultants' computer systems to crash (e.g., Technical Report 1, Land Use and Technical Report 14, Human Health Risk Assessment). Moreover, certain of the technical reports and appendices have been scanned into the computer in a reverse image, thus making them impossible to read in an electronic or hard copy format (See, e.g., Exhibit 1(B)). In addition, numerous charts and tables set forth in the technical reports and

appendices are illegible inasmuch as they appear to be produced in 3 point type. Given the extraordinary difficulty in maneuvering through the electronic (or paper) version of the document, it is unlikely that the average citizen understands the severity or extent of the environmental impacts resulting from the Master Plan.

Response:

FAA and LAWA were very mindful of the importance of public review of the Draft Master Plan, Draft EIS/EIR, and Supplement to the Draft EIS/EIR. Publication and distribution of the Draft EIS/EIR and Supplement to the Draft EIS/EIR were conducted in accordance with NEPA and CEQA requirements. (See 40 C.F.R. 1506.6(f); CEQA Guidelines, § 15087(g)). In addition to the distribution of copies to numerous federal, state, and local agencies, copies of the Draft EIS/EIR and Supplement to the Draft EIS/EIR were distributed to libraries within the greater Los Angeles region and libraries located within the affected communities. Copies of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and materials referenced therein were made available at public reading rooms staffed during business hours throughout the duration of the 295-day and 120-day long public comment periods for the Draft EIS/EIR and Supplement to the Draft EIS/EIR, respectively. Computers were available at the reading room to afford the public the opportunity to view the documents electronically. A photocopy machine was available for those wishing to copy selected pages of the document. The documents also were available for those with Internet access at www.laxmasterplan.org. For those wishing to view the documents electronically without using the Internet, CD-ROMs were available for purchase for \$61.00. As specifically noted by the commentor, copies of the Draft EIS/EIR also were available for purchase. NEPA and CEQA allow for a document reproduction fee to be charged, not to exceed the actual costs of reproducing the documents. (See 40 C.F.R. 1506.6(f); CEQA Guidelines § 15045(b)).

Due to the complexity and scope of the LAX Master Plan, it was necessary for the Draft EIS/EIR and Supplement to the Draft EIS/EIR to exceed the recommended 300-page limit. (It should be noted that the 12,000 pages cited by the commentor includes both the Draft EIS/EIR and the Draft Master Plan.) The Draft EIS/EIR and Supplement to the Draft EIS/EIR, however, were organized and written in as clear and easily comprehensible fashion as the technical nature of such documents allow. The Preface to the Draft EIS/EIR addressed the document's organization (see page 10 of the Preface of the Draft EIS/EIR), whereas Section 1.3, Structure and Content of the Supplement to the Draft EIS/EIR provided an overview of the organization and content of the Supplement to the Draft EIS/EIR.

In both the Draft EIS/EIR and Supplement to the Draft EIS/EIR, various environmental impact categories (noise, air quality, wetlands, etc.) were presented in separate sections of Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of each respective document to limit the length and enhance the readability of the document. Each section identified the specific potential benefits and adverse impacts associated with the alternatives, addresses cumulative impacts, and recommends Master Plan commitments and mitigation measures to reduce adverse environmental impacts. Cross-references are provided to assist the reader. Each section in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, also included an overview that provides a succinct summary of this information.

An Executive Summary was prepared in each the Draft EIS/EIR and Supplement to the Draft EIS/EIR to assist the reader in understanding the potential impacts of the project in a concise presentation. The Executive Summary was translated into Spanish and made available to the public on LAWA's website and in hard copy upon request. (Please also see Response to Comment PC02236-15 regarding availability of other EIS/EIR-related materials in the Spanish language.) With specific regard to the Draft EIS/EIR, a separate, 145-page summary package was prepared that included the Executive Summary, Preface, Chapter 1, Regional Context, Chapter 2, Purpose and Need for the Proposed Action, and Chapter 3, Alternatives (Including Proposed Action). This same summary package included overviews of each of the environmental impact categories analyzed in Chapter 4, Affected Environment, Consequences, and Mitigation Measures. The summary package was available for purchase for \$139.00.

In order to provide ample opportunity for review of the document, the public review period was initially established for a 180-day length. The review period was extended twice, for a total length of 295 days. Nine public hearings were held on the Draft EIS/EIR throughout the Los Angeles region. Subsequently, a total of 12 public hearings were held on the Supplement to the Draft EIS/EIR (Please see Response to Comment SPHGH00002-4 regarding noticing requirements for public meetings and hearings.). Furthermore, in accordance with the spirit and intent of Executive Order 12898 and State of California

3. Comments and Responses

enacted legislation, LAWA established an Environmental Justice Task Force to help develop policy and guidelines to address issues related to environmental justice. A key component of LAWA's environmental justice program included Environmental Justice Workshops conducted as part of the public review process. Please see Topical Response TR-PO-1 for more information regarding the public review and hearing process, and locations of the hearings for both the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

Regarding the four reverse image pages included in the commentor's Exhibit 1(B) regarding the Draft EIS/EIR, the pages do not appear in reverse image in the hard copy or in the screen version of the electronic file (CD-ROM and Internet). However, certain pages may print in a reverse image due to the printer settings and/or printer driver configurations on individual computers.

AL00033-256

Comment:

Equally, if not more troubling, is the manner in which the Draft EIS/EIR is written. Contrary to NEPA and CEQA's requirements that an EIS/EIR be written in plain language so that decisionmakers and the public can rapidly understand the documents (Oregon Environmental Council v. Kunzman, 817 F. 2d 484, 494 (9th Cir. 1987); CEQA Guidelines § 15140), this Draft EIS/EIR could hardly have been made more complex. Technical experts with over 30 years of experience reviewing EIRs and EISs have informed us that this EIS/EIR is more difficult to review and understand than any other such document they have encountered. It is noteworthy that the substance of the document does not lie in the main text; instead, the reader must delve into numerous complicated technical appendices to attempt to understand the magnitude of the environmental impacts associated with the Master Plan.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR are clearly organized with extensive use of summaries and explanatory charts and diagrams so that it can be useful and understandable to the reader.

AL00033-257

Comment:

Even the technical appendices and reports, however, do not contain the minimum level of documentation necessary to verify the accuracy of the environmental analysis. We requested, via the Public Records Act and the Freedom of Information Act, that LAWA and the FAA make available documents pertaining to the Draft EIS/EIR. (See Letters to Mr. David Kessler, AICP, FAA and to Mr. Jim Ritchie, LAWA, dated April 4, 2001, Ex. I(A).) Critical information was never provided to us. For example, despite repeated requests for documentation that was needed to determine the accuracy of the air quality emission estimates, the agencies did not provide any information for on-airport sources of air pollution. Furthermore, the electronic information that was provided to us for off-airport pollution was use-protected, preventing us from inspecting the formulas that were used to make the calculations. In sum, it was impossible for us to verify the Draft EIS/EIR's air quality emission estimates.

As a result of the technical flaws in the electronic version of the document and the fact that critical supporting information was omitted from the electronic and hard copy, we requested an extension of time to conduct our analysis and provide comments. (See Exhibit 1(A).) LAWA provided only a perfunctory response stating that such an extension was unnecessary. (See id.) Subsequently, and only in reaction to a direct request by the new Mayor, 60 additional days were granted.

Response:

LAWA received a Public Information Act request from Shute, Mihaly & Weinberger LLP dated April 4, 2001. FAA received a similar Freedom of Information Act (FOIA) request of the same date and contents. LAWA responded to this request in a letter dated April 16, 2001 and in an electronic mail message on June 14, 2001. The information made available pertaining to both the on-airport and off-airport air quality analyses included the following information:

“On-Airport Criteria Pollutant Operational Data: Input/output model results (EDMS 3.2 and ISCST3) as well as Excel files relating to emission factors used in this modeling.

“On-Airport Criteria Pollutant Construction Air Quality Data: ISCST3 files.

“Off-Airport Criteria Pollutant Air Quality Data: ISCST3 and CAL3QHC files.

“Toxic Air Pollutant Data: Input/output model (ISCST3) as well as Excel files relating to emission factors used in this modeling.

The data provided included emission inventories for aircraft, ground support equipment, stationary, and on-airport traffic sources as well as dispersion results for aircraft, ground support equipment, stationary, on-airport traffic, off-airport traffic, and construction sources. Off-airport and construction emission and dispersion data files were also made available.

On July 11, 2001, FAA sent a letter to the commentor's office confirming the results of a telephone conversation with the requester. In this telephone conversation, a representative of Shute, Mihaly & Weinberger indicated that they had received from LAWA all the materials they had requested in their April 4, 2001 letter and that, therefore, they agreed that their FOIA request to the FAA could be considered by the FAA to have been withdrawn. The requester did not subsequently indicate to the FAA that the information that they were seeking was not, in fact, provided by LAWA.

Please see Response to Comment AL00033-255 regarding technical flaws in the electronic version of the document, the length of the public review periods, and the varied opportunities for public input during the review period on both the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00033-258

Comment:

In light of the flaws identified above, LAWA and the FAA should comprehensively revise the Draft EIS/EIR in a manner that makes it fully accessible to the public. Once revised, the document should be made available to the public at no cost and should be written in a cohesive manner in easily understandable language.

Response:

Comment noted. Please see Response to Comment AL00033-255 regarding the availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

AL00033-259

Comment:

This letter reports Illingworth & Rodkin's (I&R) comments on the Section 4 -Noise and Appendix D-Aircraft Noise Technical Report contained in the LAX Master Plan Draft EIR/EIS. Following we present and discuss problem areas which we have identified in our reading of these documents;

1. We find it very troublesome that measured noise data from LAX's noise monitoring program was not used to validate or calibrate the INM noise model's environmental baseline condition. The EIR justifies not using these measurements, which represent those experienced by the neighbors of LAX, through the use of a provision contained in a new draft FAA order (1050.1 E). It would appear, however, that by not using available noise monitoring data, the validity of the noise model results are seriously compromised.

Response:

Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.2.

3. Comments and Responses

AL00033-260

Comment:

Table 6 in Section 2.2 of the Noise Technical Report reports environmental baseline noise levels predicted from the INM model compared to the measured CNEL reported in the 4th quarter of 1996 (Baseline Year). The results of this comparison show that the CNELs reported at noise monitoring locations surrounding the airport are, on average, 1.1 decibels higher than those modeled with INM. This discrepancy in actual versus modeled noise levels varies from an under prediction of 2.9 decibels to an over-prediction of 3.0 decibels.

Response:

Please see Topical Response TR-N-1 for more information regarding the noise modeling approach, including the difference in measured vs. modeled noise levels.

AL00033-261

Comment:

These discrepancies have serious ramifications pertaining to the validity of the conclusions reached in the noise study. Under predictions of the actual noise levels by the INM model potentially allows for areas which are currently exposed to a CNEL of 65 dBA or greater to be represented as exposed to a CNEL of less than 65 dBA. Conversely the over-prediction of the noise levels by the INM model may allow for areas which are currently exposed to a CNEL of less than 65 dBA to be represented as exposed to a CNEL of 65 dBA or greater. These results are significant because the FAA mandated level of significance in areas exposed to levels less than 65 dBA CNEL is an increase of 3 dB and those above a CNEL of 65 dBA is an increase of 1.5 dBA. Thus, areas which are shown by the model to be exposed to a CNEL of less than 65 dBA, but are actually exposed to a CNEL above 65 dBA, will not be considered to be impacted significantly unless they experience an increase of 3 dBA instead of an increase of only 1.5 dBA.

Response:

Comment noted. For the purposes of noise evaluation in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the sponsor is not permitted to modify the results of the Integrated Noise Model (INM) to reflect measured noise levels. Furthermore, it is not possible to adequately adjust future computed noise levels for measured noise events that have not yet occurred. Consequently, had the measured noise levels been used for the baseline conditions, their comparison to modeled future noise levels would have resulted in substantially less significant impact than has been disclosed by the apples to apples comparison of modeled versus modeled noise levels. For information regarding the 65 dB threshold, see Subtopical Response TR-N-2.2 regarding use of the 65 CNEL to determine significant impacts.

AL00033-262

Comment:

While a computer model is useful to evaluate overall predicted theoretical levels based on average flight conditions at LAX, actual measurements in areas surrounding the airport can allow for the model to be more closely tuned to represent the effect of the real attenuation or amplification of aircraft noise due to the effect of the built environment, land terrain, and atmospheric conditions actually experienced by LAX's neighbors. Not utilizing available measurements of the actual noise exposure which the neighbors of LAX experience, but rather continuing to use an un-calibrated model calls the validity of the stated results of the study into question.

Response:

Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.2.

AL00033-263**Comment:**

2. One of the main ways in which the Master Plan accounts for the increased future operational needs of Lax is through a large increase in the number of heavy jets (weight >300,000 lbs.) over baseline levels for all alternatives. While the EIR acknowledges that single event noise levels from heavy jet operations are louder than light jets and propeller aircraft, it does not fully describe the impact of the take off and landing of these jets on the neighbors of LAX, particularly during the nighttime hours.

Response:

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to nighttime awakening in homes 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. Additionally, please see Topical Response TR-N-1 regarding the noise modeling approach, Topical Response TR-N-2 regarding single event noise and CNEL differences, and Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00033-264**Comment:**

The EIR fails to discuss the real impact on LAX's neighbors which result when jets either depart or arrive over these communities and produce high maximum noise levels. Use of the latest version of the INM model (6.0A) reveals that maximum aircraft noise levels from a Stage III B747 (a typical heavy passenger jet), approaching on a standard profile can produce maximum noise levels of 104 dBA at the homes below the flight path east of the airport. This level is 9 dBA higher, or almost twice as loud as the maximum level produced by smaller passenger jets such as the B767 or B737. The INM model also shows 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 LAX operates in a primarily western flow (approaches from the east and takeoffs to the west) where the preferred morning, daytime and evening arrival paths at LAX are from the east over the schools and residences of the surrounding communities.

Response:

The INM database used to calculate noise exposure for this EIS/EIR includes the actual noise produced by each aircraft/engine combination using the airfield as measured during aircraft certification. The model incorporates noise penalties for all aircraft operations which occur during the evening and nighttime hours. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to nighttime awakening in homes 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. In addition, please see Topical Response TR-N-1 regarding modeling approach, in particular Subtopical Response TR-N-1.1 regarding INM calculated noise levels compared to noise levels measured on the field and Topical Response TR-N-2 regarding single event noise and CNEL differences.

AL00033-265**Comment:**

Additionally, though the 1973 curfew order requires nighttime approaches and departures over the ocean, planes confronting typical, adverse, wind conditions still largely approach the airport over these communities during the nighttime hours. A review of the runway utilization tables in the Noise Technical Report for the Baseline (Table 2), No Action/No Alternative (Tables 9 &10), Alternative A (Tables 16 &17), Alternative B (Tables 23 &24) and Alternative C (Tables 30 &31) show that while a large percentage of the departures do or will use the over ocean procedures (99% current, 95% for all projected futures), over 72% of aircraft landing at LAX during the nighttime hours approach over homes east of LAX; and, though in the future this high percentage is expected to drop, between 59 and 60% of LAX's operations can be expected to continue to land over the homes east of the airport. When these nighttime landing percentages are combined with the Average Annual Daily Operations for each of these scenarios, we see that currently an average of 25 heavy jets land over the homes east of the

3. Comments and Responses

airport and that under all future scenarios this number of heavy jets at night landing over the homes may be expected to increase to between 26 and 36.

Response:

The over ocean procedures that occur during the nighttime hours at LAX are not a curfew. Currently there are no restrictions on flights during the nighttime hours. LAWA will be pursuing Federal approval of a restriction to alleviate that situation by making over-ocean procedures mandatory when they are in effect between midnight and 6:30 a.m. See Mitigation Measure MM-N-5 regarding the proposed part 161 regarding over-ocean procedures. As to the percentages of approaches that occur during the night hours, the normal operating configuration at the airport calls for a westerly traffic flow (arrivals from the east) until midnight and after 6:30 in the morning. For noise purposes, night is the period between 10:00 p.m. and 7:00 a.m. Therefore, all arrival operations that occur during the shoulder hours of 10 p.m. to midnight and 6:30 to 7:00 a.m. would be expected to operate from the east. A large proportion of the nighttime arrivals occur during these shoulder hours, thus inflating the usage percentages for arrivals from the east at night. As noted by the noise abatement procedures delineated in Topical Response TR-N-7, exceptions to the over-ocean procedures are available when weather of wind conditions require east traffic flow. Please see Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00033-266

Comment:

This number of nighttime operations is significant and should be addressed in the EIR since 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 which can produce short-term adverse effects, such as mood changes and poor performance at work the next day. With noise induced sleep disturbance the possibility also exists for more serious effects on health and well being when sleep interference continues over long periods of time.

Response:

Nighttime operations are already penalized in the CNEL metric. 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. In addition, please see Topical Response TR-N-5 regarding nighttime aircraft operations.

AL00033-267

Comment:

3. The lack of attention to the true impact of maximum noise levels resulting from aircraft operations brings us to another failing of the EIR, in its total reliance on the Community Noise Equivalent Level (CNEL), an annual average noise level, to describe noise changes and effects on the community. Though the use of CNEL noise levels resulting from changes in airport operations is one measure of the potential adverse effect of such changes on sensitive receptors living in the airport environs, changes in the CNEL do not provide a complete picture of the effects on the noise environment due to the increase in flights that would result with the adoption of LAX's master plan.

The FAA's significance thresholds¹ for a change in the CNEL are based on an associated increase in the percentage of the population "highly annoyed" with their noise environment. These CNEL significance thresholds do not directly address how the physical effects on the population due to the noise from the individual aircraft over flights or how an increase in the number of flights might be expected to increase the degree of annoyance for people who are either, not highly annoyed by existing operations but are certainly annoyed to some degree by the aircraft noise, or by that percentage of the population which is already highly annoyed.

This approach averages out the effect over the entire population and does not address specific effects on the substantial percentage of the population who are adversely affected by the noise of aircraft overflights.

1 1.5 dBA where the CNEL is below 65 dBA and 3 dBA where the CNEL is above 65 dBA

Response:

Tables A5-4 through Tables A5-8, in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR, provide noise impacts in DNL, Lmax and Time Above metrics. The use of the CNEL metric does not contend that individuals are not bothered or annoyed by single noise events. 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. In addition, please see Topical Response TR-N-2 regarding single event noise and CNEL differences.

AL00033-268

Comment:

An evaluation of the direct noise effects due to single event noise levels, including sleep disturbance and speech interference at the homes, schools and other sensitive uses surrounding LAX under the proposed master plan should be fully discussed.

Response:

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.

AL00033-269

Comment:

4. Another failing of the EIR's noise study is found in the use 1996 airport operations as the baseline for evaluation of significant impacts. Though we understand that in order for an analysis to be completed a base year needed to be selected, the use of 1996 data, when Stage III aircraft were not fully phased in, as opposed to 2000 data, when all aircraft using LAX were to meet Stage III requirements, allows for a misleading and inaccurate evaluation of the noise impacts on the surround environs. The validity of this conclusion is demonstrated through a review of quarterly reports from both 1996 and 2000. The 1st, 2nd 3rd and 4th quarter 1996 noise report gave the total incompatible area for all jurisdictions surrounding LAX as 2106.6, 2106.6, 2175.2, 2295.4 acres, respectively, while the 1st quarter 2000 noise report gave this area as reduced to 1804.6 acres. This is a reduction in noise impact area of over 14% from 1st quarter to 1st quarter in the four years between 1996 and 2000. Therefore, it would appear that the noise impact of LAX on its neighbors has been reduced somewhat in the 4 years between 1996 and 2000, likely due to Stage III implementation. The use of louder 1996 data as opposed to quieter 2000 data, for the baseline, causes the 'increase in the ambient' to be less than it actually will be, thereby under-representing the significance of the noise impacts of LAX's future operations upon its neighbors.

Response:

Comment noted. The Supplement to the Draft EIS/EIR provided substantial new information in response to comments questioning the relationship of future alternative noise levels to Year 2000 conditions. The Supplement to the Draft EIS/EIR addressed 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. For additional information on this topic, please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.3 and Subtopical Response TR-N-1.1. Also see Response to Comment AL00033-66.

3. Comments and Responses

AL00033-270

Comment:

5. A point of inaccuracy of the baseline analysis which has caught our attention is the estimate of total population exposed to a sound level of 65 CNEL or above in Table 4.1-2 on page 4-30 of the EIR's noise section. This table states that a population of 49,000 are exposed to a CNEL of 65 dB or greater. This is in direct contradiction with the 1996 1st, 2nd, 3rd and 4th quarterly LAX noise reports which show that the populations exposed to a CNEL of 65 dB or greater are 78991, 78991, 80655, and 85907, respectively. Thus, the noise study under represents the impacted population in the baseline condition by as much as 75%, raising the question of a misrepresentation of future population impacts and the validity of the overall results of the study.

Response:

Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.2 regarding modeled vs. measured baseline year noise levels. Please also see Response to Comment PC00109-5.

AL00033-271

Comment:

6. The EIR's conclusion on page 4-60 of the Noise Section that, "In 2005, all three build alternatives would improve upon the total noise exposure patterns of the No Action/ No Project condition," is misleading at the best and completely in error at the worst. We base this on the following concerns;

Response:

Please see Responses to Comments AL00033-272 through AL00033-275 above, which address the commentor's concerns.

AL00033-272

Comment:

- Though a review of Tables 4.1-10, 4.1-13 and 4.1-16 2 does show a decrease in the total estimated population exposure for Alternatives A, B and C, the total acreage over land and off airport exposed to a CNEL of 65 dBA is shown to increase from the No Action/ No Project scenario for each of the alternatives.

2 These tables compare the noise exposure effects of the build alternatives (A, B &C) with the environmental baseline and the No Action/ No Project Alternatives

Response:

Acreage of exposure to noise above 65 CNEL is not an impact category for purposes of the environmental analysis.

AL00033-273

Comment:

- Item 5 above, which addresses the misrepresentation of future population impacts, bring us to question whether it is valid to only use the total estimated population exposure as a means to establish 'the total noise exposure patterns'. Because of this question, we feel it may be more valid to compare the total impact areas and not estimations of the population exposed.

Response:

Population impacts are estimated through a systemized Geographic Information System estimate of the numbers of persons residing within each parcel located within the noise contours. The use of a total impacted acreage definition for noise impacts would result in the presumption that a parcel of industrial

land is equally impacted as a parcel of residential land. FAA Orders for environmental evaluations require the estimation of the numbers of persons and dwellings exposed to the noise levels of significance for the definition of impacts.

AL00033-274

Comment:

- The findings on page 4-13 of the Noise Section show that there will be an increase in the population 'newly exposed' to a CNEL of 65 dBA in 2005 for alternatives A, B & C of between 3,510 and 4,220 above the No Action/ No Project alternative.

Response:

The population newly exposed to noise above 65 CNEL would be greater for Alternatives A, B, and C in the year 2005 than for the No Action/No Project Alternative condition. However, the total number of persons and dwellings within the 65 CNEL would remain approximately the same or decrease from No Action/No Project Alternative conditions. For information on population newly exposed to Alternative D noise levels and single event aircraft noise, please see Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

AL00033-275

Comment:

- Table 4.1-7, Forecast Daily Aircraft Operations (page 4-38), shows that in 2005 the total number of heavy jet operations under the No Action/No Project Alternative will be 582 (out of 2105 total operations, or 28%), while the number of heavy jet operations for each of the build alternatives will be 549 (out of 2118 total operations, or 26%)³. This increase in the total number and percentage of heavy jet operations is likely the primary cause of the greater total estimated population exposure for the No Action/No Project Alternative than the build alternatives since heavy jets produce significantly more noise than light jets. A question arises as to whether the No Action/No Project Alternative would really have a higher number and percentage of heavy jet operations than the build alternatives.

3 Table 4.1-7 also shows, in error, that the percentage of heavy jet operations for the No Action/No Project and build alternatives is 26%.

Response:

Table 4.1-7 incorrectly lists the number of operations and percentages for the 2005 alternatives. In the 2005 forecast for the No Action/No Project Alternative, Table 4.1-7 has been corrected in the Final EIS/EIR to read 585 heavy jets at 28 percent, 1,005 light jets at 48 percent, and 517 props at 25 percent of aircraft operations for a total of 2,107 operations. This is correctly shown in the Draft EIS/EIR Appendix D, Aircraft Noise Technical Report, Table 7 of Section 3.1.1, No Action/No Project Alternative Operations Fleet Mix. Similarly, the 2005 Forecast for Alternatives A, B, and C should report 587 heavy jets at 28 percent, 1,016 jets at 48 percent, and 516 props at 24 percent of aircraft operations for a total of 2,119 operations as shown in Appendix D, Tables 14, 21 and 28 of Section 3.1.1 for 2005 Alternatives A, B, and C, respectively. The number of and aircraft type for passenger operations are the same for each of the 2005 Alternatives. The forecast for the 2005 build alternatives differs from the No Action/No Project Alternative only in the number of cargo operations. In 2005, the number of cargo operations increases from the No Action/No Project Alternative to the build alternatives. For Alternative D, aircraft operations and fleet mix, please see Section 3.1.1 in Appendix S-C1 of the Supplement to the Draft EIS/EIR. There is also a correction to the text of Section 3.1.1 Appendix D, Aircraft Noise Technical Report. The text lists 565 Heavy Jets per day in reference to the 2005 No Action/No Project Alternative Fleet Mix when it should be corrected to read 585 heavy jet operations. Please see Responses to Comments PC00599-7 and PC00593-1 for a discussion on the fleet mix assumptions and operational levels used in the Master Plan alternatives.

3. Comments and Responses

AL00033-276

Comment:

Considering these points of concern, we do not feel it is accurate to state that all of the build alternatives will improve upon the total noise exposure patterns of the No Action/ No Project condition.

Response:

Please see Responses to Comments AL00033-259 through AL00033-275.

AL00033-277

Comment:

SUMMARY OF PROJECT

Alternative C is identified as the Preferred Alternative. It accommodates 4.2 million tons air cargo and provides for 89.6 million passengers per year in 2015. It includes a new passenger terminal near Pershing Drive, a ring road, and a proposed LAX Expressway connecting areas to the north. Alternative C is proposed in two development phases as follows:

-Phase 1 (2005) adds capacity with a new west terminal, mid-field concourse and new cargo areas.

-Phase 2 (2015) adds support facilities including a ring road with direct connection to the 405 Freeway via the LAX Expressway and by extending the 105 Freeway.

- In order to substantially reduce project impacts, the major roadway improvements including the ring road, LAX Expressway, and the extension of the 105 Freeway should be accelerated.

PREFACE

Sepulveda and Aviation Boulevards are two major north/south arteries. The implementation of improvements requires temporary closure of these and other smaller roads at various times as well as establishment of temporary detour routes.

- While certainly true statements, the information provided is not sufficient to assess whether the commitments in the Master Plan will be fulfilled. Sepulveda, a State Highway, and Aviation are extremely important north-south major arterial highways in the area's grid system of roadways. Sepulveda currently carries 65,000 vehicles per day near Imperial and Aviation carries about 33,000 vehicles per day north of Rosecrans. Several intersections along both roadways currently operate at or near capacity during peak traffic hours. Closures of either of these critical highways will divert traffic to other parallel roadways potentially including local residential streets in El Segundo. The DEIR does not provide sufficient information to determine if the Master Plan commitments will be fulfilled. Further, the DEIR does not address impacts to motorists resulting from street closures and detours.

Response:

While it would be desirable in some respects to accelerate construction of the LAX Expressway and portions of the Ring Road, it is not feasible to construct all surface access components within the first few years of the project. In addition to the physical need for a project, other issues such as man-power availability and resulting environmental impacts were also considered when developing the project construction schedule. Even so, most of the major surface transportation projects are in the first phase of the Alternative A, B, and C plans, with the other major projects (LAX Expressway and completion of the Ring Road) completed shortly thereafter. Therefore, all major surface transportation improvements would be available for the majority of the construction period.

Both Sepulveda and Aviation Boulevards are critical north/south thoroughfares and would be managed very carefully during construction. Because these roads essentially operate together to provide north/south arterial access through the area, the project would not close both of these roads simultaneously for an extended period. The construction coordination office would be used to ensure just this type of coordination effort. The Supplement to the Draft EIS/EIR provided additional detail on

construction-related traffic impacts of all alternatives in Section 4.3, Surface Transportation. Please see Topical Response TR-ST-3 regarding phasing and detours.

AL00033-278

Comment:

The DEIR relies on the 1998 SCAG Regional Transportation Plan that indicates population with 1.5% annual growth to 21.4 million in 2015, employment with the same annual growth rate to 9.9 million in 2015, and income growth of 1.9% annually to \$26,550 in 2015. This growth equates to a projected passenger demand between 3 and 3.8% annual increase and cargo demand of 7.8% annual increase.

- The 2001 SCAG Regional Transportation Plan revises these projected growth rates downward, indicating a need to update the DEIR to reflect these changed projections.

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. Please see Topical Response TR-ST-2 for a discussion of the regional growth assumptions used in the LAX Master Plan and Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan (RTP).

AL00033-279

Comment:

Page 27 indicates the SCAG high-speed rail proposal would connect airports at Palmdale, LAX, Ontario, and March. However, the SCAG project was not selected in the recently concluded national competition, with the Baltimore/Washington proposal being chosen.

- The DEIR should be revised to reflect this recent decision.

California high-speed rail will not be available until 2017 at the earliest, with this project potentially diverting passengers from LAX.

- Does the DEIR assume passengers would be diverted as a result of high-speed rail? Is there any diversion included in the DEIR?

Response:

High Speed Rail/Maglev connections from LAX Airport to other portions of the Los Angeles region have been studied by SCAG and other agencies in the region. In spite of not being selected by the Federal Railroad Administration for continued project development, SCAG continues to study the feasibility of Intra-regional Maglev in southern California. The technical analyses for the Draft EIS/EIR and Supplement to the Draft EIS/EIR do not assume a high speed rail connection to the airport for horizon year 2015. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

AL00033-280

Comment:

The DEIR appears to have factored in a 5% trip reduction as a result of telecommuting and video conferencing.

- The DEIR provides no factual basis to support its 5% trip reduction, nor does the DEIR analyze impacts upon traffic levels assuming this 5% reduction does not occur.

Response:

The vehicle trip generation, as described in Technical Reports 3a, On-Airport Ground Access Report, of the Draft EIS/EIR and S-2a, Supplemental On-Airport Surface Transportation Technical Report, of the

3. Comments and Responses

Supplement to the Draft EIS/EIR, did not factor in any reduction for telecommuting and video conferencing. The assumptions used in the trip generation analysis are summarized in the above referenced reports.

AL00033-281

Comment:

Page 2-4 used SCAG 1998 RTP information. The SCAG Draft 2001 RTP is now available and it includes updated passenger activity trends.

- The DEIR should be revised to include the most recent SCAG assumptions.

Response:

This comment is similar to comment AL00017-47. Please see Response to Comment AL00017-47.

AL00033-282

Comment:

Page 2-5 describes passenger trends at LAX and indicates the region grew by 3% per year from 1996 to 1999 with 87% at LAX. The report then indicates that LAX grew by 3.6% per year from 1996 to 1999 and that the Master Plan forecast an average rate increase of 2.84% per year.

- These percentages appear to be inconsistent and contradictory, and they should be revised.

Page 2-6 indicates that cargo at LAX grew 7.05% per year from 1996 to 1999 whereas the Master Plan forecasts an average rate of increase for air cargo at 6% per year.

- These percentages appear to be inconsistent and contradictory, and they should be revised.

Response:

The data used to create the forecasts for passengers and cargo comes from a variety of sources including, but not limited to, the FAA, SCAG and LAWA. The first number in the passenger forecasts, 3.0 percent is based on actual regional passengers from 1996-1999; the second number, 3.6 percent is based on actual LAX passenger traffic from 1996-1999, and finally the third number, 2.84 percent is based on future Master Planner forecasts. With cargo, 7.05 percent is based on actual cargo from 1996-1999 at LAX and 6.0 percent is based on future Master Planner forecasts. Therefore, the percentages are not contradictory.

AL00033-283

Comment:

Page 2-10 indicates that future rapid transit systems will reduce the need for parking for employees and that this in turn will reduce the need for road improvements.

- Given this, then why does the Phase 1 improvements include construction of a new employee parking lot at Imperial/Aviation?

Response:

Even though many airport employees will travel to their jobs via mass transportation modes in the future, some will still drive and need parking. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

AL00033-284**Comment:**

Page 2-14 describes Phase 2 improvements 10 years after Phase 1 including the major projects of the ring road, LAX Expressway, and people movers.

- These are extraordinarily large infrastructure projects. What is the likelihood that they will be implemented? The DEIR fails to analyze the traffic impacts assuming these projects are not constructed. Although these projects are considered to be a part of the master plan, the DEIR does not contain any specific information (e.g., feasibility of construction, details of operation and/or ridership, etc) about the projects.

- The DEIR should also disclose the schedule for completion of the Green Line extension into LAX, since the addition of this rail line could significantly affect the LAX traffic and circulation system.

Response:

The ring road, the LAX Expressway, and the airport people movers are all proposed as essential elements of Master Plan Alternatives A, B, and C. If one of these alternatives is selected, then construction of these improvements are included in the construction of the Master Plan. The schedule for these improvements, including the MTA Green Line extension, are described in Section 3.2, Alternatives to Be Fully Evaluated, of the Draft EIS/EIR. Alternative D does not include the LAX Expressway or the ring road. Impacts associated with Alternative D were presented in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Supplement to the Draft EIS/EIR.

AL00033-285**Comment:**

Pages 2-15 and 2-16 include various planned development projects, listing a sample of 12 of the larger projects in the area including the Media Center in El Segundo. In Table 2.2 of the Technical Report regarding traffic impacts and mitigation, there are 15 relatively small development projects listed in El Segundo.

- The listing of planned development projects needs to be updated to reflect current expectations. The Media Center project also needs to be added.

Response:

The methodology used to analyze traffic impacts follows standard industry and legal guidelines, as explained in Subtopical Response TR-ST-2.1. The related projects that were included in the analysis were closely coordinated with all surrounding jurisdictions, including El Segundo. The Media Center was included. Where a parcel of land did not have a specific development project (i.e., related project) associated with it, SCAG data was used to generate traffic assumptions for that land parcel. Therefore, no land parcel was unaccounted for in the traffic analysis.

AL00033-286**Comment:**

Page 3-2 describes alternate modes of transportation, indicating that most have a small effect or they are not considered feasible or practical and were rejected.

- This appears to contradict comments earlier in the Regional Context where the DEIR assumed a 5% reduction (Page 1-29) for communication technologies. While LAWA should make every effort to promote alternative forms of transportation, the DEIR's transportation analysis should assume realistic mode split assumptions.

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Response:

The Draft EIS/EIR addressed on-airport mode splits for each alternative in Tables 3.1-1, 3.1-2, 3.2.8-1, 3.2.8-2, 3.3.8-1, 3.3.8-2, 3.4.8-1 and 3.4.8-2 of Technical Report 3a, On-Airport Ground Transportation Technical Report and in Technical Report S-2a, Supplemental On-Airport Surface Transportation Technical Report. The analytical procedures and assumptions regarding mode split are discussed in Chapter 2, Purpose and Need for the Proposed Action.

The reduction discussed on page 1-29 in Chapter 1, Regional Context, of the Draft EIS/EIR represents a reduction in air travel demand. Video-conferencing has the potential to decrease the need for an air passenger trip, so that person would not travel to the airport. This reduction represents a reduction in the flight schedule, not a shift from one mode to another.

AL00033-287

Comment:

Page 3-55 describes the traffic, circulation and parking facilities that would be implemented under Alternative C including the ring road, the LAX expressway, and the Green Line extension to the terminal as well as new employee parking in several lots along east side of airport.

- As there is no apparent connection to rapid transit for employees, the DEIR should identify and evaluate mitigation measures that would reduce employee trips to the airport.

Response:

Please see Topical Response TR-ST-5 regarding transit for employees.

AL00033-288

Comment:

Page 3-59 identifies a phasing plan showing the extension of I-105 to Pershing Drive during the sixth year, but there is no definitive schedule for the ring road, LAX Expressway, Green Line or other intersection improvements.

- The DEIR must describe the schedule for these critical transportation improvements.

Page 4-235 indicates that 72% of the passengers arrive by low occupancy private vehicles and that the new west terminal will accommodate over half of the airport's traffic.

- These statements seem to support the importance of accelerated construction of the major transportation improvements including the ring road, LAX Expressway, and other intersection improvements.

Response:

The intent is to get the transportation improvements in place as soon as possible. Therefore, most major transportation improvements for Alternatives A, B, and C would be in place in Phase I, including the majority of the Ring Road. The LAX Expressway would be started in Phase I, but may not be completed until Phase II. The Green Line extension would be completed after 2010. A mitigation phasing plan was included as Table S4.3.2-13 in the Supplement to the Draft EIS/EIR. Note that Alternative D does not include the LAX Expressway or ring road.

AL00033-289

Comment:

Page 4-236 indicates that Alternative C will increase traffic on the northbound to westbound ramp from Sepulveda to central terminal.

- The DEIR fails to disclose mitigation for this significant impact.

Page 4-243 states that summer airport volumes were used to evaluate construction impacts and that summer volumes depict a worst-case scenario.

- Traffic on holidays, and in particular Thanksgiving and Christmas, may be significantly higher than traffic levels during the summer. The DEIR should provide the factual basis for relying on summer traffic volumes instead of holiday traffic volumes. By relying on summer traffic volumes, the DEIR may have understated the actual traffic impact that will occur over the 14-year construction activity.

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. As was stated in Section 4.3.1 of the Draft EIS/EIR, there is no feasible mitigation measure for the significant impact that would occur on the northbound to westbound ramp from Sepulveda to the CTA. Therefore, the impact remains significant and unavoidable.

Much like a regional shopping mall, it would be inappropriate to design the facility to accommodate the peak two days of the year, and leave the excess capacity unused throughout the rest of the year. Rather, it is standard airport planning policy to use the Peak Month/Average Day (PMAD) for planning. This is discussed in further detail in Chapter III of the Draft LAX Master Plan.

AL00033-290

Comment:

The DEIR's assessment of parking needs on page 4-241 appears to rely on questionable assumptions. While LAWA anticipates that vehicle occupancy will increase from 1.45 to 1.50 as a result of an "O&D Flight Forecast", the DEIR fails to explain the relationship between origin and destination rates and vehicle occupancy rates. The DEIR should assume existing vehicle occupancy rates in its determination of parking needs.

- The DEIR should disclose how many additional parking spaces are needed at 1.45 people per car and identify where they will be located.

Response:

There is no direct relationship between the O&D forecast and the increase in vehicle occupancy, as was explained on page 4-241 in Section 4.3, Surface Transportation, of the Draft EIS/EIR. As stated, future parking demand was determined by first assuming a direct demand increase according the O&D forecast, and then applying the occupancy rate to the result. The South Coast Air Quality Management District mandated the adoption of Regulation XV requiring all large employers in the South Coast basin to increase the Average Vehicle Ridership (AVR) of employees' vehicles from 1.45 to 1.55 throughout the period of the master plan. This region-wide emphasis on increasing vehicle occupancies has direct implications on all aspects of planning and traffic forecasting for the Los Angeles metropolitan area, including airport access. The analysis used in the Draft EIS/EIR and Supplement to the Draft EIS/EIR studies was based on 1.50 occupancy per vehicle in 2005 and 1.55 occupancy per vehicle in 2015 for air passengers in private autos, as summarized in Table 2.4-3 of Technical Report 3a, On-Airport Ground Transportation Technical Report.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR studies have taken into account that increasing Origin and Destination travel as forecasted will increase parking demand. However, reductions can and should be taken to appropriately factor in this regionwide mandate concerning an increase in vehicle occupancy. Parking demand and vehicle occupancy are inversely related. More people per vehicle (higher vehicle occupancies) ultimately translates to fewer vehicles and less parking demand. It is not necessary to calculate how many parking spaces are needed at 1.45 people per car or where these spaces would be located since the ratios of 1.50 and 1.55 are substantiated.

3. Comments and Responses

AL00033-291

Comment:

Page 4-253 also indicates that vehicle occupancy will increase by 2015 and that, together with spreading flight schedules, there will be a corresponding reduction in private vehicles in the peak hour. However, spreading flight schedules through pricing policies is unlikely to produce significant additional benefits as mentioned on page 3-3.

- The DEIR must disclose the relationship between the spreading of flight schedules and vehicle occupancy rates.

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. As was stated on page 3-4 in Chapter 3, Alternatives, of the Draft EIS/EIR, the use of demand management strategies would not meet the project objectives nor prevent the need for improvements at LAX. Spreading flight schedules would have virtually no impact on vehicle occupancy rates for passengers traveling to and from the airport. Passenger occupancy rates are functions of travel party size and mode of access. These will not change substantially with the spreading of flight schedules. Spreading flight schedules may actually reduce vehicle occupancies for commuting employees by reducing the numbers of employees who travel to/from work at the same time.

AL00033-292

Comment:

- Page 4-254 indicates public parking will have 17% excess capacity in 2005 but the demand will exceed the capacity by 3% in 2015. Employee parking will be short by 1,500 spaces in 2005 and be 3,400 spaces in 2015.

- The DEIR does not identify the parking shortages as significant impacts. The DEIR must identify measures to mitigate these impacts.

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 parking shortages mentioned on Page 4-254 in Section 4.3, Surface Transportation, of the Draft EIS/EIR reflect the conditions during the No Action/No Project Alternative, not the project alternatives. Parking conditions under each alternative were presented separately for comparison purposes to the 1996 environmental baseline. Only parking shortages that meet the criteria for significant impacts must be mitigated. Section 4.3, Surface Transportation (subsection 4.3.1.4.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR describes CEQA thresholds of significance for on-airport surface transportation. A significant on-airport surface transportation impact would occur if the direct and indirect changes in the environment that may be caused by the particular project alternative would potentially result in one or more of the following future parking conditions: the project causes demand to regularly exceed the capacity of the on-airport and off-airport public parking capacity; the project causes demand to regularly exceed the capacity of the employee parking capacity. Alternative B does show that a Year 2015 deficiency of about 1,235 stalls (about 4 percent) while Alternative D is deficient by 634 stalls, however that demand would occur only during peak periods and it is anticipated that either private parking operators would meet the excess demands, or excess capacity in the employee parking areas could be made available for public parking during peak periods. Therefore, this is considered a less than significant impact.

AL00033-293**Comment:**

Several problems and issues are raised regarding pedestrians including pedestrian signals that impact traffic flow, poorly marked and inconvenient pedestrian access, and congestion on sidewalks particularly for passengers carrying luggage. Some of the forecast additional passengers will walk in the future, compounding existing problems.

- How will the pedestrian problems be mitigated?

- Expanding bus service is proposed to accommodate pedestrian demand. However, the number of busses and their impact on traffic flow has not been quantified or assessed.

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Most pedestrians on the airport would be accommodated on the Automated People Mover (APM) system. For those pedestrians that would walk, for example between the close-in parking garage and west terminals, an overhead walkway would be provided so that pedestrians could safely cross the terminal curbside without impacting the curbside flow. Buses were included in the analysis of off-airport traffic impacts, as addressed in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00033-294**Comment:**

Figure 4.3.1-4 shows southbound only traffic for Alternative C in 2005 and beyond.

- It is unclear how traffic would circulate back to the new terminal until the northbound lanes are completed in 2015. This would lead to circuitous driving and congestion of parallel roadways for 10 years between 2005 and 2015.

Response:

In 2005, there will only be a need for the southbound curbside. This traffic could directly recirculate without leaving the terminal/parking area using the northbound recirculation road, which travels around the west side of the short-term public parking garage, as was illustrated in Figure 3-18 of the Draft EIS/EIR.

AL00033-295**Comment:**

Page 4-259 indicates that Alternative A depends on people movers internal to the airport and the extension of the Green Line, with peak flow of 8300 passengers per hour per direction.

- Unless LAWA can demonstrate that these people movers will be constructed, the DEIR must identify and analyze impacts assuming these projects are not built.

Response:

The full build out of the Alternative A concept is based on both the Green Line Extension and the People Mover being built, which are both basic components of the alternative. NEPA and CEQA require that the potential impacts of a proposed project, inclusive of its individual and collective components, be addressed in an EIS and EIR. NEPA and CEQA do not require or encourage a "contingency" analysis of impacts assuming that some components of the project would be built and other components would not, as doing so would be speculative. The conveyance of air passengers from the terminals to the satellite concourses would not be feasible without the construction of the people mover. Completion of the Green Line Extension and the People Mover are considered to be

3. Comments and Responses

integral components of Alternative A. Please see Topical Response TR-ST-2 for a discussion on what would happen if LAX Master Plan is not approved.

AL00033-296

Comment:

Page 4-264 and Page 4-267 rely upon Master Plan Commitment ST-1 (which calls for an Adequate West Terminal Design) to suggest that the west terminal road system would operate at an acceptable LOS.

- The document does not provide any detail about this Master Plan Commitment to determine whether service levels would be acceptable.

Response:

Please see Response to Comment AL00033-295 regarding NEPA and CEQA requirements to evaluate the impacts of a project, inclusive of its individual and collective components. Please also see Response to Comment AL00008-6 for further information regarding funding.

AL00033-297

Comment:

Page 4-266 indicates the Alternative B people mover peak hour flow is 7300 passengers per hour per direction.

- What if funding is not received and this project is not built?

Response:

If the people mover project is not built, another environmental analysis would be prepared, since a major project component would change.

AL00033-298

Comment:

Page 4-266 refers to Figure 4.3.1-4 showing the suggested West Terminal cross section in 2005 and in 2015, but it does not show the separate bypass road or how northbound traffic in the area would be accommodated prior to construction of the northbound lanes along the west side of the terminal by 2015.

- What mitigation is proposed so northbound traffic will not have an impact on adjacent roadways between 2005 and 2015?

Page 4-267 indicates Alternative C would have a significant and unavoidable impact on the inbound upper level ramp from Sepulveda in 2005 and in 2015. There is more peak hour traffic on this ramp because of the anticipated 2015 flight schedules for Alternative C but these are different from Alternatives A and B.

- The DEIR should disclose the difference in flight schedules between the alternatives that would result in more peak hour traffic on this ramp under Alternative C.

Response:

Please see Response to Comment AL00033-294 regarding recirculating traffic in 2005. Northbound traffic on the west side would have a separate road in 2005, along the Pershing Road corridor. The procedures for converting flight schedule information into peak hour trips are included in Technical Reports 3a, On-Airport Ground Transportation Report, of the Draft EIS/EIR and S-2a, On-Airport Surface Transportation Technical Report, of the Supplement to the Draft EIS/EIR. Also, the information regarding flight schedules is available in the Draft LAX Master Plan, which is part of the documentation

for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Also, please see Topical Response TR-ST-2 regarding surface transportation analysis methodology.

AL00033-299

Comment:

The peak hour demand on the circulation route people mover system is projected to be 119 passengers per hour per direction (Page 4-269). This number is questionable given that the secure route is expected to accommodate 4,700 passengers per hour per direction and the sterile route is forecast to handle 2,800 passengers per hour.

- The DEIR should disclose why there is such a discrepancy in ridership on the various people mover systems.

Response:

The only people using the CTA-Circulator are a percentage of inter-terminal connections, which are air passengers with connecting flights between terminals. This is a small percentage of the overall airport trips being generated. More detailed information on APM ridership and the classification of air passengers using each system is provided in the APM Ridership Forecasts Appendix of Technical Report 3a, On-Airport Ground Transportation Technical Report, of the Draft EIS/EIR.

AL00033-300

Comment:

OFF-AIRPORT SURFACE TRANSPORTATION

Page 4-273 indicates Alternative C produces fewer trips than the other alternatives but still would still result in about 25,000 trips during the PM peak hour on the transportation system in 2015.

- While it indicates Alternative C has fewer peak hour trips, the additional new trips created by this alternative place a significant burden on the transportation system.

Page 4-274 identifies measures such as the LAX Expressway, the 105 Freeway extension, and ring road to bring relief for arterial roadways in areas immediately north and east of the airport, but not directly south. Traffic volumes to the north and south on the 405 Freeway have even heavier volumes than those adjacent to the airport.

- The DEIR should include mitigation of impacts for motorists trying to access the airport from the south to the same level as those recommended for the areas north and east of the airport.

From "1997 Traffic Volumes on California State Highways" published by Caltrans, traffic volumes on the 405 Freeway are nearly as high on the segment south of Rosecrans as on the segment from the 105 to 90 Freeways.

- The DEIR does not analyze or mitigate traffic impacts on the 405 Freeway south of the 105.

Response:

Topical Response TR-ST-2 describes how significant impacts under CEQA are identified, and indicates that the process is designed to include the impacts of all growth in airport-related trips. Impacts are identified both north and south of LAX, and mitigation measures are proposed both north and south of LAX. One of the project elements is to construct new HOV ramps providing convenient access from the I-405 HOV lanes south of LAX to the airport. Topical Response TR-ST-4 discusses the analysis of I-405. Alternative D, which was analyzed in the Supplement to the Draft EIS/EIR, does not include the LAX Expressway or a new ring road. The traffic analysis of Alternative D provided in Section 4.3.2, Off-Airport Surface Transportation, included the evaluation of a mitigation package with a new I-405 interchange opposite Lennox Boulevard to provide direct airport access.

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AL00033-301

Comment:

Page 4-274 of the report indicates all intersections in Alternative C are mitigated except for six, but this is contrary to information in the tables that follow. Table 4.3.2-27 indicates that six intersections remain unmitigated in 2005 including La Cienega/Arbor Vitae, La Cienega/Century, Lincoln/Jefferson, Lincoln/Marina Expressway, Linclon/Teale, and Sepulveda/La Tijera. Table 4.3.2-28 indicates that four intersections remain unmitigated in 2015 including La Cienega/Century, Lincoln/Jefferson, Lincoln/La Tijera, and Linclon/Teale.

- THE DEIR must identify mitigation for these intersections [unless they are significant and unavoidable].

Response:

Table 4.3.2-28 in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR contains a typographical error. The correct number of intersections that cannot be fully mitigated is presented in Table 4.3.2-27 of the Draft EIS/EIR. It should be noted that under Alternative D, added subsequent to publication of the Draft EIS/EIR, only three (3) intersections could not be fully mitigated. A complete analysis of the traffic impacts associated with Alternative D was presented in Section 4.3, Surface Transportation, of the Supplement to the Draft EIS/EIR, with supporting documentation provided in Technical Reports S-2a and S-2b.

AL00033-302

Comment:

Page 4-275 indicates that the traffic surveys were obtained from LADOT or from intersection traffic counts conducted in August 1996/1997.

- Does the month of August represent the peak for passenger and cargo activity? The DEIR should identify traffic volumes (i.e., passenger and cargo traffic) accessing LAX during holidays and during August to determine which period represents worst-case conditions.

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.

AL00033-303

Comment:

Page 4-277 (Figure 4.3.2-1) shows 120th Street in El Segundo and Intersection # 100 is incorrectly shown at Grand/Sepulveda.

- 120th Street should be labeled Mariposa in El Segundo. Mariposa/Sepulveda should be properly identified.

Page 4-284 indicates that LAX traffic south of LAX tends to use the 405 Freeway to access the airport instead of arterials.

- There is no justification or technical support for this assumption.

Figure 4.3.2-2 (Existing (1996) Off-Airport Road Congestion B PM Peak hour) and Figure 4.3.2-3 (Existing (1996) Airport Traffic vs. Non-Airport Traffic Comparison B PM Peak Hour) are illegible.

Page 4-289 indicates that there is little airport cut through traffic on South Bay arterials such as Sepulveda and Aviation, indicating these streets are used primarily by South Bay residents that are either passengers or employees.

- These statements are very general in nature and are not supported by the traffic data presented. Specific data that leads to this conclusion needs to be presented in the DEIR.

Page 4-289 states that only 8% of traffic on Sepulveda south of El Segundo is airport related in the afternoon peak hour.

- There is no data presented in the report to support this statement.

The DEIR states that the Transportation Element of the City's General Plan indicates an intersection in the City of Los Angeles is deficient if its Level of Service is E or F. The DEIR indicates that a freeway or freeway ramp is deficient if its Level of Service is F according to the Los Angeles County congestion management program standard.

- Other agencies define deficient intersections differently from the City of Los Angeles and the Los Angeles County congestion management program. The City of El Segundo's Circulation Element Update indicates that the minimum acceptable operating level of service at an intersection is LOS D, and that intersections operating at LOS E or F shall be considered deficient. Development impact is considered significant if traffic from a project causes an intersection service level change from LOS D or better to LOS E or F. Development impact is also considered significant if an increase in volume/capacity will be 0.02 or greater at an intersection forecast to operate at LOS E or F.

Page 4-290 indicates few passengers (5,400 per week) use the scheduled shuttle service between the Green Line Station at Imperial/Aviation and the central terminal area. It further indicates that 11% are using the associated Park and Ride lot as "airport parking".

- The DEIR should identify mitigation measures capable of increasing ridership on the Green Line and measures that would discourage misuse of the Park and Ride lot.

Page 4-291 identifies thresholds of significance in the LAX DEIR. For intersections, significant impacts for the operating level of service are:

- LOS C - an increase in the volume/capacity ratio by 0.040 or greater.
- LOS D - an increase the volume/capacity ratio by 0.020 or greater.
- LOS E or F - an increase the volume/capacity ratio by 0.010 or greater.

- The DEIR's traffic analysis does not, however, consistently rely on these thresholds as related to impacts during the airport peak hour. In many cases, the impact at intersections in El Segundo is significantly greater than these thresholds during the airport peak hour but the report discounts them unless the total traffic volume through the intersection is greatest during the airport peak hour and neither the AM nor PM peak hours were significantly impacted. This, in turn, leads to several intersections that are not totally mitigated. For Alternative C, these include Sepulveda/Mariposa in 2005 and both Sepulveda/Imperial and Sepulveda/Mariposa in 2015.

For roadway segments, significant impacts for the operating level of service are:

- LOS C - an increase in the volume/capacity ratio by 0.080 or greater.
- LOS D - an increase in the volume/capacity ratio by 0.040 or greater.
- LOS E or F - an increase in the volume/capacity ratio by 0.020 or greater.

- The DEIR's traffic analysis does not, however, consistently rely on these thresholds. The impact upon the link during the airport peak hour is not considered significant unless the total volumes exceed the AM and PM peak hour volumes and the criteria above are exceeded. For example, Link 5 on Overland south of Venice goes from 1.024 F to 1.045 F in the airport peak hour in 2015 for Alternative B, yet this is noted as not being impacted.

3. Comments and Responses

Response:

The error in Figure 4.3.2-1 is noted and has been corrected in the Final EIS/EIR. These errors are in the graphic only, and do not imply an error in the analysis. Figure 2.1 of Technical Report 3b of the Draft EIS/EIR includes the same information, without the errors.

The comment regarding the statement that traffic south of LAX tends to use I-405 takes this sentence out of context and misinterprets the statement. The referenced sentence is part of a larger discussion of existing traffic conditions, and observing that traffic currently diverts off of I-405 onto arterial streets. Later in the same discussion, on page 4-289, in Section 4.3, Surface Transportation, of the Draft EIS/EIR, there is a paragraph regarding South Bay arterial streets which states that airport-bound motorists on these arterial streets are primarily South Bay residents.

Printed copies of Figures 4.3.2-2 and 4.3.2-3 can be difficult to read, especially if printed in black-and-white. The graphics on the CD are in color and quite legible. Enlarged color prints of these graphics will be legible.

The cut-through traffic referred to on pages 4-282 and 4-289 of the Draft EIS/EIR is referring to existing conditions and addressed airport traffic that gets off of the freeway early and uses arterial streets instead. The text is simply pointing out that the freeway alignment in the South Bay area does not create the same incentive for this type of diversion for airport trips, when compared to the freeway alignment north of LAX. North of LAX, it is possible to shorten the distance to LAX by getting off the freeway early and using arterial streets. South of LAX, exiting I-405 early and using arterial streets does not shorten the distance to LAX. The analysis shows that a higher percentage of airport trips stay on I-405 south of LAX, compared to I-405 north of LAX. North of LAX, a higher percentage of airport trips exit the freeway early to use an alternative arterial street. South of LAX, the percentage of airport trips that exit I-405 early to use an alternative arterial street is lower, in relative terms. This comparative effect is shown graphically in Technical Report 3b, Attachment B of the Draft EIS/EIR. Further documentation in support of this observation is found in Technical Report 3b, Section 7.3.2. The data supporting this statement is shown graphically in Figure 4.3.2-2, in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR.

The City of El Segundo definitions of intersection deficiency and intersection impact are less stringent than the definitions used in this report. The 0.01 threshold for Levels of Service E and F covers any instance where the project causes an intersection to move into LOS E or F. Once at LOS E or F, the 0.01 threshold used in this analysis would capture more project impacts than the 0.02 threshold used in the City of El Segundo. All intersections operating at LOS E or F are considered deficient in this study, just as in the City of El Segundo.

Since the writing of the Draft EIS/EIR, LACMTA has taken measures to reduce misuse of the park and ride lot. Measures to increase ridership of the Green Line are included in the Draft EIS/EIR, including a new transit center with people mover connections to the terminals and extending the Green Line to the west. These are not mitigation measures, but project elements.

Unlike the other alternatives, Alternative D does not incorporate a West Terminal Complex. It also does not include an LAX Expressway or ring road to transport motorists to the west. However, because Alternative D incorporates a Ground Transportation Center and Intermodal Transportation Center on the east side of the airport, it relies upon, and proposes or anticipates substantial improvements to the roadway system east of the airport. An analysis of the traffic impacts of Alternative D and assumptions for roadway improvements was provided in Section 4.3.2, Off-Airport Surface Transportation (subsection 4.3.2.6.1.2), of the Supplement to the Draft EIS/EIR.

A discussion of the peak hours for analysis, including the airport peak hour, is found in Topical Response TR-ST-2.

AL00033-304

Comment:

Page 4-293 describes several LAX Master Plan commitments including ST-17 regarding closure of existing roadways. It indicates that except for very short periods of time at night, no existing roadways will be closed unless temporary detours are available for the same purpose.

- This conflicts with earlier discussion on Page 4-269 that describes significant unmitigated impacts associated with the construction of the south Sepulveda Tunnel Project. During this construction, all northbound traffic on Sepulveda would be forced to use Century Boulevard, resulting in LOS F operations. Other long term construction projects are cited later beginning on Page 4-868, with many of these projects requiring road closures for several years.

Response:

The commitment ST-17 is accurate. Although road closures will be minimized as much as possible, particularly on busy arterial streets such as Sepulveda Boulevard, there would be times when detours are necessary. The detours may use existing parallel arterials, such as Aviation Boulevard or La Cienega Boulevard. Because the detour may at times operate at poor levels of service, the impact of construction is shown as a significant and temporary impact.

AL00033-305

Comment:

Page 4-294 indicates that Alternative C will add the following new peak hour trips over and above 1996 environmental baseline volumes:

- In 2005 - 4,459 AM peak; 3,205 Airport peak; 4,796 PM peak.
- In 2015 - 11,406 AM peak; 10,605 Airport peak; 11,110 PM peak.

- These volumes are significant, with the 2015 volumes being more than half again the peak hour traffic using the 405 Freeway in both directions in 1997.

- The 405 Freeway south of the 105 Freeway is already very congested. When the traffic volumes associated with the significant LAX expansion are added, diversion of traffic from the 405 Freeway to arterials in the areas south of LAX is likely to occur as is now being experienced north of LAX. The DEIR does not recognize or attempt to address this likely diversion of traffic.

Page 4-296 shows a shift of airport demand to the proposed LAX Expressway north of the airport. The Expressway and other improvements shift traffic to the freeways and away from the city streets. The report then states this causes a reduction in airport traffic on Sepulveda, El Segundo, and Rosecrans.

- This statement contradicts Figure 4.3.2-4 showing more airport traffic on portions of Sepulveda, Aviation, El Segundo, and Grand.

- Exhibit 16 of the Circulation Element of the City's General Plan indicates future PM peak hour directional added trips. When LAX is isolated from other developments, LAX PM trips are shown to be 700 on Sepulveda, 400 on Aviation and 100 on El Segundo in the City's Circulation Element. These volumes are higher than those graphically depicted on Figure 4.3.2-4.

Documentation in the DEIR indicates that numerous intersections would be significantly impacted by the Master Plan but the document does not identify these impacts as significant. The definition of a significant impact for LAX requires that the highest traffic volume of the three peak traffic hours studied must occur during the airport peak hour and that neither AM nor the PM peak hours would be significantly impacted.

- This definition is faulty as most traffic studies evaluate impacts during the typical AM and PM peak hours as well as during the peak traffic hour of the generator being studied. In this case, with the airport generating its highest traffic volumes during midday, the same criteria for identifying a significant impact should be used during the airport peak hour as has been done during the AM and PM peak hours.

3. Comments and Responses

- Aviation/EI Segundo and Sepulveda/EI Segundo degenerate from Level of Service D to Level of Service F during the airport peak hour, yet the DEIR indicates this is not a significant impact.

- With the airport peak hour impacts not being considered significant according to this definition, the LAX project can get by with mitigation of impacts during only the AM and PM peak hours. During these typical commuter peak hours, airport traffic is less and background traffic is higher. Using this faulty approach, the mitigation required for LAX during these typical commuter peak hours is significantly less than that which would be necessary to mitigate the LAX project during the airport's peak hour during midday.

Table 4.3.2-8 on Page 4-300 indicates the traffic impacts in the year 2005 on EI Segundo intersections as follows:

Aviation/EI Segundo - AM and PM is identified as a significant impact.

- The DEIR fails to identify the airport peak as significant even though the V/C increases from 0.903 D to 1.044 F.

Aviation/Imperial - The V/C at this intersection under Alternative A is shown as 0.601, "A" as contrasted to 0.935 "E" for AM and shows 0.849 "D" versus 1.305 "F" for PM.

- The DEIR's calculations for Alternative A are obviously in error. With impacts defined as significant at Aviation/EI Segundo, it would seem that impacts must be significant at Aviation/Imperial given that this intersection is directly adjacent to the airport and there is no significant mitigation such as the 105 Freeway extension or the ring road planned for 2005.

Aviation/Rosecrans - AM and PM are identified as significant impacts.

- The DEIR fails to identify the airport peak hour as significant even though the intersection experiences a V/C increase from 1.336 "F" to 1.391 "F".

Sepulveda/EI Segundo - AM and PM are identified as significant impacts.

- The DEIR fails to identify the airport peak hour as significant even though the intersection experiences a V/C increase from 0.889 "D" to 1.022 "F".

Sepulveda/Imperial - AM and PM are identified as significant impacts.

- The airport peak hour calculations appear to be in error since the V/C increase appears nominal (0.794 to 0.798) yet this intersection is closer to the airport than the intersection of Sepulveda/EI Segundo that experienced a V/C increase from "D" to "F".

Sepulveda/Mariposa - This intersection appears to be mislabeled and may be Sepulveda/Grand instead. Both the AM and PM are shown as significant impacts.

- The airport peak hour rises from 1.096 "F" to 1.149 "F" yet the DEIR does not identify this increase as a significant impact.

Sepulveda/Rosecrans - The AM peak hour is identified as a significant impact and the PM peak hour should be recalculated as it drops from 1.700 to 1.595 without mitigation.

- The V/C during the airport peak hour increases from 1.803 "F" to 1.831 "F", yet the DEIR does not identify this as a significant impact.

Assuming corrected calculations for Aviation/Imperial, all seven intersections in EI Segundo are significantly impacted in 2005 by LAX in the AM, PM and/or airport peak.

In 2015, five of the seven intersections in EI Segundo are impacted in either the AM or PM peak hours and one intersection in the airport peak hour goes from 0.975 E to 1.082 F.

- The Aviation/Imperial calculations need to be corrected as the AM peak drops to 0.766 C without any mitigation.

Page 4-306, Table 4.3.2-11 depicts impacted intersections and links from Alternative A in 2015.

- This table is in error since it ignores the airport peak hour impacts as previously commented upon. Specifically, the intersections of Aviation/El Segundo, Aviation/Rosecrans, and Sepulveda/Rosecrans and the link on Aviation north of Rosecrans are significantly impacted.

Table 4.3.2-12 indicates the significant impacts in 2005 in El Segundo resulting from Alternative B. There are a number of errors in this table as follows:

- Aviation/El Segundo - AM and PM are correctly identified as impacted. However, the airport peak degrades from 0.903 "D" to 1.062 "F", and this is incorrectly shown as not impacted.
- Aviation/Imperial - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.243 "F" to 1.457 "F", and this is incorrectly shown as not impacted.
- Aviation/Rosecrans - AM is correctly identified as impacted. However, the airport peak degrades from 1.336 "F" to 1.408 "F" and this is incorrectly shown as not impacted.
- Sepulveda/El Segundo - AM is correctly identified as impacted. However, the airport peak degrades from 0.889 "D" to 1.025 "F", and this is incorrectly shown as not impacted.
- Sepulveda/Imperial - AM and PM are correctly identified as impacted. However, the airport peak degrades from 0.794 "C" to 0.848 "D", and this is incorrectly shown as not impacted.
- Sepulveda/Mariposa - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.096 "F" to 1.451 "F", and this is incorrectly shown as not impacted.
- Sepulveda/Rosecrans - Based on the impacts to other intersections nearby in El Segundo, this intersection would also appear to be impacted in all three peak hours. However, it has been omitted from Table 4.3.2-12.

Table 4.3.2-13 indicates the significant impacts in 2015 in El Segundo resulting from Alternative B. There are a number of errors in this table as follows:

- Aviation/El Segundo - PM is correctly identified as impacted. However, the airport peak degrades from 1.060 "F" to 1.175 "F", and this is incorrectly shown as not impacted.
- Aviation/Imperial - AM is correctly shown as impacted from 1.033 "F" to 1.084 "F."
- Aviation/Rosecrans - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.594 "F" to 1.719 "F", and this is incorrectly shown as not impacted.
- Sepulveda/El Segundo - Based on the impacts to other intersections nearby in El Segundo and the impacts identified in Table 4.3.2-12 in 2005, this intersection would also appear to be impacted in all three peak hours in 2015. However, it has been omitted from Table 4.3.2-13.
- Sepulveda/Imperial - AM and PM are correctly shown as impacted.
- Sepulveda/Mariposa - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.204 "F" to 1.679 "F", and this is incorrectly shown as not impacted.
- Sepulveda/Rosecrans - Based on the impacts to other intersections nearby in El Segundo, this intersection would also appear to be impacted in all three peak hours. However, it has been omitted from Table 4.3.2-13.

Table 4.3.2-14 summarizes the significant impacts at intersections and links from Alternative B.

- This table is in error since it ignores the airport peak hour impacts as previously commented upon. Additionally, the intersections of Aviation/El Segundo and Aviation/Rosecrans are incorrectly omitted from the table.

Table 4.3.2-15 indicates the significant impacts in 2005 in El Segundo resulting from Alternative C. There are a number of errors in this table as follows:

- Aviation/El Segundo - AM and PM are correctly identified as impacted. However, the airport peak degrades from 0.903 "E" to 1.033 "F", and this is incorrectly shown as not impacted.
- Aviation/Imperial - AM is correctly shown as impacted from 0.935 "E" to 1.457 "F." PM is also shown correctly as impacted from 1.305 "F" to 1.353 "F."
- Aviation/Rosecrans - AM is correctly identified as impacted. However, the airport peak degrades from 1.336 "F" to 1.385 "F", and this is incorrectly shown as not impacted.
- Sepulveda/El Segundo - AM is correctly identified as impacted. However, the airport peak degrades from 0.889 "D" to 0.993 "E", and this is incorrectly shown as not impacted.
- Sepulveda/Imperial - AM is correctly shown as impacted from 0.797 "C" to 0.849 "D." PM is also shown correctly as impacted from 1.015 "F" to 1.645 "F."

3. Comments and Responses

- Sepulveda/Mariposa - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.096 "F" to 1.464 "F", and this is incorrectly shown as not impacted.
- Sepulveda/Rosecrans - AM is correctly identified as impacted. However, the airport peak degrades from 1.803 "F" to 1.833 "F" and this is incorrectly shown as not impacted.

Table 4.3.2-16 indicates the significant impacts in 2015 in El Segundo resulting from Alternative C. There are a number of errors in this table as follows:

- Aviation/El Segundo - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.060 "F" to 1.206 "F", and this is incorrectly shown as not impacted.
- Aviation/Imperial - Based on the impacts to other intersections nearby in El Segundo and the impacts identified in Table 4.3.2-15 in 2005, this intersection would also appear to be impacted in all three peak hours in 2015. However, it has been omitted from Table 4.3.2-16.
- Aviation/Rosecrans - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.594 "F" to 1.706 "F," and this is incorrectly shown as not impacted.
- Sepulveda/El Segundo - AM is correctly identified as impacted. However, the airport peak degrades from 0.975 "E" to 1.087 "F", and this is incorrectly shown as not impacted.
- Sepulveda/Imperial - AM and PM are correctly identified as impacted. However, the airport peak degrades from 0.842 "D" to 0.924 "E" and this is incorrectly shown as not impacted.
- Sepulveda/Mariposa - AM and PM are correctly identified as impacted. However, the airport peak degrades from 1.204 "F" to 1.615 "F", and this is incorrectly shown as not impacted.
- Sepulveda/Rosecrans - PM is correctly identified as impacted. However, the airport peak degrades from 1.888 "F" to 1.936 "F", and this is incorrectly shown as not impacted.

Table 4.3.2-17 summarizes the significant impacts at intersections and links from Alternative C.

- This table is in error since it ignores the airport peak hour impacts as previously commented upon. In addition, the intersections of Aviation/El Segundo, Aviation/Rosecrans, Sepulveda/El Segundo and Sepulveda/Rosecrans are incorrectly omitted from the table.

Response:

The discussion on pages 4-284 through 4-289 in Section 4.3, Surface Transportation, of the Draft EIS/EIR concluded that little diversion of airport traffic leaving I-405 south of LAX and using arterial streets to access LAX occurs today primarily as a result of the roadway layout. The alignments of I-405 and arterial streets south of LAX are not conducive to encouraging trips already on the freeway to leave and use arterial streets on the way to LAX. This roadway layout does not change in the future, so the probability of traffic leaving the freeway and using arterial streets to access LAX will not increase in the future. This does not mean, however, that there will be no increase in airport traffic on South Bay arterial streets. On the contrary, growth in airport-related travel among South Bay residents will increase airport traffic on arterial streets in the future compared to the existing traffic. Such increases are identified, and significant impacts are mitigated in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

Table 4.3.2-4 on page 4-297, in Section 4.3, Surface Transportation, of the Draft EIS/EIR clearly shows that major portions of Sepulveda, El Segundo and Rosecrans Boulevards representing the majority of these streets in El Segundo have less airport traffic under Alternatives A, B, and C in 2015 than they would have under the No Action/No Project Alternative. The graphic is completely consistent with the referenced statement on page 4-296. The statement should not be misinterpreted to imply that future traffic with the Master Plan will be lower than existing volumes. No such interpretation is implied in this section.

The comparison of Figure 16 from the El Segundo Circulation Element to Figure 4.3.2-4 in the Draft EIS/EIR is not a true comparison of results. The Circulation Element figure is derived by comparing a scenario with future airport traffic to a scenario with existing airport traffic. The Draft EIS/EIR figure, on the other hand, compared two scenarios that both include future airport traffic.

The thresholds of significance for the airport peak hour were provided in Section 4.3.2, Off-Airport Surface Transportation (subsection 4.3.2.4), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. A discussion of the peak hours for analysis, including the airport peak hour, is found in Topical Response TR-ST-2.

AL00033-306

Comment:

Page 4-319 indicates that truck access will be primarily through two points, one of them north of Imperial/Main. For upwards of a year, construction will occur seven days a week, twenty hours a day, with two trucks every three minutes. Stockpile material is to be placed at four locations but access to and from the construction area would be concentrated at two locations.

- Construction access will result in significant impacts upon the City of El Segundo, which have not been fully analyzed or mitigated. The DEIR should fully evaluate impacts upon Imperial as well as impacts upon El Segundo streets located south of Imperial. The DEIR should identify additional access points so that the City will not bear the brunt of construction truck access impacts.

Page 4-319 indicates that a total of 4,500 construction workers are forecast on the first shift in the peak work quarter. The DEIR suggests that parking at the east end of the airport and at other locations away with shuttle buses provided to take workers to the construction areas. Shuttle bus service is also suggested from Palmdale, Van Nuys, and Ontario, with just these shuttle buses resulting in over 100 bus trips in and out.

- The DEIR provides no detail regarding construction worker access and does provide any certainty that the parking lots would actually be implemented or used. Moreover, the airport's proposal to have construction workers shuttled to the airport is inconsistent with the approach that these same employees work a staggered shift (Page 4-236). A detailed and effective plan must be prepared.

- The DEIR's discussion of traffic impacts resulting from construction does not contain any useful information. For example, page 4-319 states "maintaining traffic in these same corridors at speeds and with roadway capacities similar to existing facilities would be essential". In order to understand the extent of traffic impacts from this massive, long-term project, a detailed construction access plan must be prepared.

Response:

The construction entrance on Imperial Highway would accommodate traffic arriving and departing to the east on Imperial Highway/I-105. Construction traffic would not be allowed to travel to or from the south into the City of El Segundo. Because the haul route/detour plans that would be prepared for each specific project would conform to a series of restrictions intended to avoid impacts to residential streets, impacts on residential areas of El Segundo from construction traffic is not anticipated. If it is found that additional access points are required to alleviate traffic congestion at another location, additional access points/routes would be implemented through the proposed Traffic Coordination Office. The Supplement to the Draft EIS/EIR provided 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 in Section 4.3, Surface Transportation. Please see Topical Response TR-ST-3 regarding truck trip generation and staggered shifts and Response to Comment AL00018-42 regarding parking. Further, the Draft EIS/EIR and Supplement to the Draft EIS/EIR were 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 issues in a more specific manner, as necessary and appropriate.

AL00033-307

Comment:

MITIGATION MEASURES

Mitigation Measures proposed in the DEIR and explained further in Attachment F to the 3b. Off-Airport Ground Access Impacts and Mitigation Measures Technical Report contain a number of errors and miscalculations as identified in the following listing:

Alternative A Mitigation 2005 (Table 4.3.2-19)

3. Comments and Responses

Aviation/El Segundo - Automated Traffic Surveillance and Control (ATSAC) is proposed as mitigation. ATSAC provides manual monitoring of the conditions at traffic signals, with the option to remotely adjust signal timing at specific intersections based on current conditions.

- The reasons for the wide variation in the resulting improvements in the intersection's performance in the peak hours (from 0.03 in the AM to 0.13 in the PM) need to be verified.

- Attachment F indicates this measure requires right-of-way but that would be very unusual for a traffic signal project of this type.

Aviation/Imperial - Conversion of a northbound through/right turn lane to an exclusive right turn lane is proposed.

- This mitigation makes the intersection much worse compared to Table 4.3.2-8 as the AM goes from 0.601 to 0.903, PM from 0.849 to 1.228 and airport peak from 1.145 to 1.414.

- A field review indicates there is no existing northbound through/right lane at this intersection. Instead, there are two northbound through lanes and an exclusive northbound right turn lane with a northbound right turn arrow.

- Converting one of the two existing northbound through lanes to a second northbound right turn lane would leave only a single northbound through lane.

Aviation/Rosecrans - ATSAC is proposed as mitigation but the Technical Report indicates this measure leaves the AM peak as temporarily unmitigated.

- Additional mitigation should be proposed to mitigate the traffic impacts rather than leave them as temporarily unmitigated in the AM peak hour.

- The reasons for the wide variation in the resulting improvements in the intersection's performance in the peak hours (from 0.21 in the AM to 0.08 in the PM) need to be verified.

Sepulveda/El Segundo - plus ATCS, a traffic signal control system that continuously and automatically monitors conditions on a traffic signal grid system and then electronically adjusts signal timing based on real time conditions is proposed as mitigation but the Technical Report indicates these measures leave the airport peak as temporarily unmitigated.

- Additional mitigation should be proposed to mitigate the traffic impacts rather than leave them as temporarily unmitigated in the airport peak hour.

- The reasons for the wide variation in the resulting improvements in the intersection's performance in the peak hours (from 0.14 in the PM to 0.09 in the airport) need to be verified.

Sepulveda/Imperial - Proposed mitigation includes a second northbound left turn lane and a new eastbound free right turn lane.

- A field review indicates there is an eight-story office building currently under construction immediately adjacent to the southwest corner of this intersection. The proposed eastbound free right turn lane requires additional right of way and may not be feasible. The need for this additional right of way needs to be acknowledged, and other mitigation developed if the eastbound free right turn is not feasible.

Sepulveda/Mariposa - The proposes to add a second northbound left turn lane, a separate eastbound right turn lane and ATSAC.

- A field review indicates the west leg is narrow, about 40' between curbs. At Sepulveda, it provides one westbound lane, an eastbound left turn lane, and one eastbound through/right turn lane. There is an existing Union 76 gas station on the northwest corner and a two story commercial development on the southwest corner. Further west of Sepulveda, Mariposa is only a two-lane collector street with fronting residences.

- Significant additional right of way is needed on Mariposa west of Sepulveda, at least 24', to provide a second westbound lane to accept the second northbound left turn lane and to provide a separate eastbound right turn lane. The mitigation proposed is unrealistic and inappropriate.

Sepulveda/Rosecrans - ATSAC is proposed as mitigation.

- The reasons for the wide variation in the resulting improvements in the intersection's performance in the peak hours (from 0.15 in the AM to 0.05 in the PM) need to be verified.

Alternative A Mitigation 2015 (Table 4.3.2-20)

Aviation/El Segundo - Mitigation proposed includes adding a southbound right turn lane plus ATCS.

- A field review indicates there already is an existing southbound right turn lane. Does the proposed mitigation add a second southbound right turn lane? Does this include removal of one of the two existing southbound through lanes?

Aviation/Imperial - Mitigation proposes to add ATCS.

- The reasons for the wide variation in the resulting improvements in the intersection's performance in the peak hours (from 0.16 worse in the AM to 0.16 better in the PM) need to be verified.

Aviation/Rosecrans - No additional mitigation is proposed even though the airport peak is worse compared to the 2015 adjusted environmental alternative by 0.03.

Sepulveda/El Segundo - No additional mitigation is proposed although the project would result in significant impacts.

Sepulveda/Imperial - No additional mitigation is proposed, but the Technical Report indicates that right of way is required.

- Right of way should be acknowledged as needed in 2005 with the proposed mitigation to be implemented then, not in 2015 when no additional mitigation is proposed.

Sepulveda/Mariposa - No additional mitigation is proposed.

- The Technical Report still does not indicate the need for additional right of way to implement the major widening proposed as mitigation in 2005. It also does not acknowledge the significant impacts of this widening on the adjacent properties created by the 2005 mitigation.

Sepulveda/Rosecrans - No additional mitigation is proposed although the project would result in significant impacts.

Aviation north of Rosecrans - This segment was previously identified as an impacted link but no separate mitigation is proposed. Instead, the LAX impacts are shown as being mitigated by the assumed network/link widening of Aviation to six lanes.

- A field review indicates that implementation of this widening may be difficult with the adjacent homes and narrow sidewalk area along the east side of Aviation.

Alternative B Mitigation 2005 (Table 4.3.2-21)

Aviation/El Segundo - Mitigation proposes to temporarily stripe the eastbound right turn lane as a combination through/right turn lane. The Technical Report acknowledges that this intersection is temporarily unmitigated in the AM peak.

- What does "temporarily stripe..." mean? The proposed mitigation makes the AM slightly worse and makes the PM only slightly better, making this recommended mitigation questionable.

- Other mitigation should be developed to mitigate the LAX traffic impacts.

3. Comments and Responses

Aviation/Imperial - The study proposes to restripe one westbound through lane as a through right, to restripe a northbound through right as an exclusive right turn lane and to provide ATCS.

- A field review indicates that there is an existing westbound right turn lane and a westbound right turn arrow. Converting one of the three westbound through lanes to an optional through/right turn lane would result in nominal benefit, as only a single westbound through vehicle would block right turns on a green arrow from the through/right optional lane.

- A field review indicates that there is an existing exclusive northbound right turn lane with a right turn arrow as well as two northbound through lanes. Therefore, there is no existing northbound through/right turn lane available to be restriped as an exclusive right turn lane.

Aviation/Rosecrans - ATSAC is proposed as mitigation.

- The reasons for the wide variation in the resulting improvements in the intersection's performance in the peak hours (from 0.08 in the AM to 0.04 in the airport peak) need to be verified.

Sepulveda/EI Segundo - The DEIR proposes to temporarily add a separate right turn lane northbound.

- What does "temporarily" mean?

- A field review indicates this intersection is currently under construction. Upon completion, four through lanes in each direction on Sepulveda as well as separate turning lanes in critical directions will be provided. The volume/capacity calculations need to include these improvements and other mitigation needs to be developed as necessary to mitigate the LAX traffic impacts.

Sepulveda/Imperial - Mitigation proposes to add a free eastbound right turn lane and ATCS.

- A field review indicates there is an eight-story office building currently under construction immediately adjacent to the southwest corner of this intersection. The proposed eastbound free right turn lane requires additional right of way and may not be feasible. The need for this additional right of way needs to be acknowledged, and other mitigation developed if the eastbound free right turn is not feasible.

Sepulveda/Mariposa - Mitigation proposes to restripe to add a second northbound left turn lane, a separate eastbound right turn lane and ATSAC.

- A field review indicates the west leg is narrow, about 40' between curbs. At Sepulveda, it provides one westbound lane, an eastbound left turn lane, and one eastbound through/right turn lane. There is an existing Union 76 gas station on the northwest corner and a two story commercial development on the southwest corner. Further west of Sepulveda, Mariposa is only a two-lane collector street with fronting residences.

- Significant additional right of way is needed on Mariposa west of Sepulveda, at least 24', to provide a second westbound lane to accept the second northbound left turn lane and to provide a separate eastbound right turn lane. The mitigation proposed is unrealistic and inappropriate.

Sepulveda/Rosecrans - This intersection has been left out of the listing of intersections needing mitigation and improvement.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Alternative B Mitigation 2015 (Table 4.3.2-22)

Aviation/EI Segundo - No additional mitigation is proposed.

- What about the temporary restriping of the eastbound right turn lane to a through/right turn lane recommended for mitigation in 2005?

Aviation/Imperial - No additional mitigation is proposed.

Aviation/Rosecrans - No additional mitigation is proposed.

Sepulveda/El Segundo - This intersection is not shown in the chart in 2015, but it was shown as being impacted in 2005.

- The intersection has been incorrectly omitted from Alternative B mitigation in 2015 in both the DEIR and the Technical Report.

Sepulveda/Imperial - Mitigation proposes to add a second northbound left turn lane.

- What happened to the temporary separate northbound right turn lane proposed as mitigation in 2005?

- The Technical Report acknowledges that additional right of way is needed to provide the free eastbound right turn lane adjacent to the eight-story office building now under construction at the southwest corner. This acknowledgement is misplaced and should be included in the mitigation for 2005 as the additional right of way is needed for the eastbound free right turn rather than the northbound dual left turn lanes.

Sepulveda/Mariposa - No additional mitigation is proposed.

- The implementation of the mitigation measures proposed in 2005 (the second northbound left turn lane and the eastbound right turn lane) absolutely will require significant amounts of additional right of way, not "may require" as shown in the Technical Report.

- The comment on the right of way needs should be included in the 2005 section, not in the 2015 section of the Technical Report.

Sepulveda/Rosecrans - This intersection has been left out of the listing of intersections needing mitigation and improvement.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

LADOT Analysis of Alternative C

Page 4-330 indicates that the preliminary mitigation plan was presented to LADOT and then LADOT refined the modeling and performed more detailed analyses.

- The same opportunities should have been made available to other agencies including the City of El Segundo.

Table 4.3.2-23 summarizes the LADOT analysis for Alternative C in 2005, with the following impacts on intersections in El Segundo:

AM peak - Seven intersections in El Segundo show slight improvement with mitigation compared to the 2005 environmental base.

Airport peak - Six of the seven intersections in El Segundo show slight improvement with mitigation. Sepulveda/Mariposa however is worse than the environmental base.

- Appropriate mitigation is needed for Sepulveda/Mariposa in 2005.

PM peak - Four of the seven intersections in El Segundo show slight improvement when compared to the environmental base. However, the intersections of Aviation/imperial, Sepulveda/Imperial, and Sepulveda/Mariposa are worse than the environmental base.

- Appropriate mitigation is needed for these intersections in 2005.

Table 4.3.2-24 indicates the LADOT analysis for Alternative C in 2015 as follows:

AM peak - Five of the seven intersections in El Segundo show slight improvement as compared to the environmental base. However, Aviation/Rosecrans and Sepulveda/Mariposa are both worse.

3. Comments and Responses

- Appropriate mitigation is needed for these intersections in 2015.
- Aviation/El Segundo is incorrect in the table with its V/C of 0.865 F.

Airport peak - Five of the seven intersections in El Segundo show slight improvement compared to the environmental base. However, Sepulveda/Imperial and Sepulveda/Mariposa are worse than the environmental base.

- Appropriate mitigation is needed for these intersections in 2015.
- At Sepulveda/Mariposa, the proposed mitigation addresses only about half of the project's impacts (from 0.415 to 0.203) indicating the measures do not fully mitigate the projects impacts at this location.

PM peak - Five of the seven intersections in El Segundo show slight improvement compared to the environmental base. However, Sepulveda/Imperial and Sepulveda/Mariposa are worse than the environmental base.

- Appropriate mitigation is needed for these intersections in 2015.
- At Sepulveda/Mariposa, the proposed mitigation addresses only about half of the project's impacts (from 0.357 to 0.163) indicating the measures do not fully mitigate the projects impacts at this location.

According to LADOT, Table 4.3.2-25 on Page 4-347 of the DEIR indicates Alternative C significantly impacts all seven intersections in El Segundo in 2005.

Table 4.3.2-26 on Page 4-348 of the DEIR shows six of the seven intersections as significantly impacted by Alternative C in 2015. Only the intersection of Aviation/Imperial is less than the environmental base in all peak hours.

- The reasons for this reduction are not apparent and need clarification.

Alternative C Mitigation 2005 (Table 4.3.2-27)

Aviation/El Segundo - Mitigation calls for signal enhancement using ATSAC or an equivalent. This would provide a traffic signal system that allows manual remote control of the traffic signals, with the option to remotely adjust signal timing at specific intersections based on current conditions.

Aviation/Imperial -The DEIR proposes to widen the north side Imperial east of Aviation to add an additional westbound right turn lane in the DEIR. The table in the Technical Report recommends temporarily restriping a northbound through/right lane as an exclusive right turn lane.

- The mitigation proposed in the DEIR contradicts the mitigation proposed in the Technical Report.
- The Technical Report appears to be in error as there already is an existing exclusive northbound right turn lane together with a right turn arrow. The restriping proposed would result in only one northbound through lane.
- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Aviations/Rosecrans - Mitigation in the DEIR proposes signal enhancement using ATSAC or equivalent, but the Technical Report indicates this mitigation requires additional right of way.

- Additional right of way would be extremely unusual for mitigation of this type.
- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/El Segundo - Mitigation in the DEIR proposes signal enhancement using ATSAC or equivalent, but the Technical Report indicates no additional improvements are necessary as the impacts are mitigated by network/link improvements.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/Imperial - Mitigation in the DEIR includes modification of the median to provide northbound dual left turns, provides signal enhancement/ATSAC equivalent, and modification of the traffic signal to provide a northbound right turn overlap arrow. The Technical Report mitigation calls for providing an eastbound free flow right turn lane.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/Mariposa - Mitigation proposed in the DEIR provides "Signal Enhancement B" ATSAC equivalent. Mitigation proposed in the Technical Report includes a second northbound left turn lane, a separate eastbound right turn lane, and ATSAC.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/Rosecrans - Mitigation proposed in the DEIR provides "Signal Enhancement B" ATSAC equivalent. The Technical Report indicates that no additional improvements are needed as mitigation will be accomplished by the network/link improvements.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Alternative C Mitigation 2015 (Table 4.3.2-28)

Aviation/El Segundo -The DEIR proposes to remove the railroad bridge over El Segundo and provide dual eastbound left turn lanes, to modify the median on the south leg for northbound dual left turn lanes, and modify traffic signal equipment. The Technical Report proposes to add a separate westbound right turn lane and ATSAC.

- The majority of train traffic now using this branch line will relocate to the Alameda Corridor upon its completion in 2002. However, this branch line may continue to be used as a back up freight route to the Alameda Corridor. It could also be used for passenger rail/high speed rail connections in the future. In any case, the removal of this bridge appears to be premature. If mitigation for the LAX traffic impacts cannot be accomplished by other measures, then the railroad bridge will need to be replaced as part of the mitigation.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Aviation/Imperial -This intersection is impacted and mitigation measures are proposed in 2005. However, it has been left out of tables in both the DEIR and the Technical Report for 2015.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Aviation/Rosecrans - No additional mitigation has been proposed in either the DEIR or in the Technical Report.

3. Comments and Responses

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/EI Segundo - The DEIR mitigation provides a westbound right turn overlap arrow and modifies the traffic signal. The Technical Report does not include this additional mitigation.

- A westbound right turn overlap and traffic signal modification may already be included in the Sepulveda improvement project currently under construction.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/Imperial - No additional mitigation has been proposed in the DEIR. While the Technical Report includes the second northbound left turn lane, it does not mention the ATSAC and northbound right turn overlap recommendations for 2005 shown in the DEIR. Instead, the Technical Report recommends a free right turn lane eastbound adjacent to the eight-story office building now under construction at the southwest corner but does not acknowledge the need for additional right of way. The Technical Report also recommends restriping a northbound through lane as a through/right turn lane.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/Mariposa - No additional mitigation has been proposed in the DEIR. The Technical Report recommends a second northbound left turn lane and a separate eastbound right turn lane but does not indicate the right of way requirements and the severe impacts associated with these measures.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

Sepulveda/Rosecrans - - No additional mitigation has been proposed in the DEIR. The Technical Report indicates that ATSAC should be provided.

- Mitigation measures proposed in the DEIR and Technical Report are inconsistent and contradictory.

- Appropriate mitigation of the LAX traffic impacts needs to be developed and included in the DEIS and supporting Technical Report.

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.

Alternative A Mitigation 2005

Aviation/EI Segundo - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied. The comment in Attachment F indicating a requirement for R/W as part of the mitigation plan for Aviation/EI Segundo in 2005 should be moved to the 2015 mitigation table for this intersection.

Aviation/Imperial - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied. The definition of the mitigation measure for this intersection should be reversed - the existing right turn lane should be converted into a shared right/through lane.

Aviation/Rosecrans - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column

labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied. There is no need to mitigate this intersection when the project is completed in 2015. The impact is only a temporary impact in 2005 which goes away later on. An unnecessary disruption to the community would result to implement intersection improvements that become unnecessary in a few years.

Sepulveda/El Segundo - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied. There is no need to mitigate this intersection when the project is completed in 2015. The impact is only a temporary impact in 2005 which goes away later on. An unnecessary disruption to the community would result to implement intersection improvements that become unnecessary in a few years.

Sepulveda/Imperial - It is the intent of the mitigation plan that if any proposed mitigation measures become infeasible at the time of implementation, then another mitigation measure with comparable benefits can replace the original measure, if LADOT and the affected jurisdiction(s) concur. This may be the case at this intersection.

Sepulveda/Mariposa - It is the intent of the mitigation plan that if any proposed mitigation measures become infeasible at the time of implementation, then another mitigation measure with comparable benefits can replace the original measure, if LADOT and the affected jurisdiction(s) concur. This may be the case at this intersection.

Sepulveda/Rosecrans - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied.

Alternative A Mitigation 2015

Aviation/El Segundo - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied. The added southbound right turn lane converts the existing shared right/through lane into separate through and right turn lanes. R/W is required.

Aviation/Imperial - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied.

Aviation/Rosecrans - Under the definition of impact thresholds, the increase in airport peak hour V/C does not constitute a significant impact.

Sepulveda/El Segundo - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A."

Sepulveda/Imperial - Reference to R/W for this intersection should be removed.

Sepulveda/Mariposa - R/W required should be added to this intersection.

Sepulveda/Rosecrans - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied.

Aviation n/o Rosecrans - The widening of Aviation to six lanes is not a project mitigation measure, and is not the reason for the mitigation of the impact. It is assumed as a funded background improvement in all alternatives. The implementation of other off-site mitigation measures identified on pages 5.5-5.6 of Technical Report 3b mitigates the impact on this link.

Alternative B Mitigation 2005

Aviation/El Segundo - The re-striping of this intersection mitigates year 2005 impacts, but the intersection needs to be returned to its current striping by 2015.

Aviation/Imperial - The definition of the mitigation measure for this intersection should be reversed - the existing right turn lanes should be converted into a shared right/through lane.

Aviation/Rosecrans - The comment incorrectly compares the column labeled "Final" to the column labeled "Alt A". The correct comparison should be between the column labeled "Final" and the column labeled "Mit Alt A." When the correct comparison is made, the impact of ATSAC is consistently applied.

Sepulveda/El Segundo - The re-striping of this intersection mitigates year 2005 impacts, but the intersection needs to be returned to its current striping by 2015. Four through lanes on Sepulveda, each direction, and separate critical turning lanes are already assumed in the analysis of this intersection.

Sepulveda/Imperial - It is the intent of the mitigation plan that if any proposed mitigation measures become infeasible at the time of implementation, then another mitigation measure with comparable benefits can replace the original measure, if LADOT and the affected jurisdiction(s) concur. This may be the case at this intersection.

3. Comments and Responses

Sepulveda/Mariposa - It is the intent of the mitigation plan that if any proposed mitigation measures become infeasible at the time of implementation, then another mitigation measure with comparable benefits can replace the original measure, if LADOT and the affected jurisdiction(s) concur. This may be the case at this intersection.

Sepulveda/Rosecrans - This intersection is not impacted during any peak hour in 2005 by Alternative B.

Alternative B Mitigation 2015

Aviation/EI Segundo - The temporary re-striping of this intersection in 2005 needs to be returned to its existing condition by 2015.

Aviation/Imperial - Year 2005 mitigation measures are sufficient to mitigation 2015 impacts.

Aviation/Rosecrans - Year 2005 mitigation measures are sufficient to mitigation 2015 impacts.

Sepulveda/EI Segundo - The re-striping of this intersection mitigates year 2005 impacts, but the intersection needs to be returned to its current striping by 2015. Once the striping is returned to its existing condition, there are no Year 2015 impacts at this intersection with Alternative B.

Sepulveda/Imperial - The Year 2005 improvements are not temporary and are maintained in 2015. It is acknowledged that R/W may be required in 2005.

Sepulveda/Mariposa - It is acknowledged that R/W may be required for Year 2005 improvements.

Sepulveda/Rosecrans - Impacts to this intersection are mitigated by other off-site mitigation measures described on pages 5.5 and 5.6 of Technical Report 3b.

LADOT Analysis of Alternative C

The City of Los Angeles is the lead agency for the Draft EIS/EIR. As a department of the City, LADOT was asked to refine the intersection analysis of Alternative C. The refined intersection analysis supersedes the intersection analysis for Alternative C in Technical Report 3b. Impacts to all intersections are determined based on the thresholds for significance in Section 4.3.2.4. Some increases in V/C ratio may not be large enough to constitute a significant impact.

Concerns regarding the proposed mitigation at Aviation/EI Segundo and the recommended removal of the railroad bridge across EI Segundo are noted. It is the intent of the mitigation plan that if any proposed mitigation measures become infeasible at the time of implementation, then a revised mitigation measure or another mitigation measure with comparable benefits can replace the original measure, if LADOT and the affected jurisdiction(s) concur. This may be the case at this intersection.

AL00033-308

Comment:

Technical Reports

As indicated previously, the content of the Technical Report for the LAX Master Plan EIS/EIR 3b. Off-Airport Ground Access Impacts and Mitigation Measures frequently contradicts materials contained in the DEIR itself. The following additional comments are also made regarding the Technical Report:

Planned Development Projects - Table 2.2 on pages 2-5 through 2-12 lists 180 planned development projects in the area that may contribute additional traffic to the streets impacted by the expansion of LAX. This listing includes 14 new projects in the City of EI Segundo as well as the removal of one office building on Nash Street.

- This listing should be updated to reflect currently proposed projects and their timing for completion and occupancy.

- Traffic volumes associated with these projects on the approaches to the intersections studied in EI Segundo as well as on the adjacent links were not included in the Technical Report. These volumes need to be provided so they may be checked and verified for accuracy.

Regional Roadway Improvements - Table 2.3 on pages 2-13 through 2-15 lists 113 planned roadway improvements in Southern California together with their expected completion timing. Roadway projects within the City of EI Segundo include the following:

-Aviation widening from 4 to 6 lanes from 1000' south of Rosecrans to Imperial before 2005.

-Rosecrans widening from 6 to 8 lanes for 1000' from Aviation before 2005.

-Addition of right and left turn lanes in all directions at Sepulveda/Rosecrans before 1996 (project now under construction.)

-Sepulveda widening from 6 to 8 lanes was not shown in the listing but is now under construction.

- This listing should be updated to reflect currently proposed projects and their timing for completion and occupancy.

Response:

A substantial number of related development projects in El Segundo were identified and assumed in the analysis. The list of assumed related projects in Table 2.2 was current at the time of the analysis. An update was made and additional projects were incorporated into the list for the subsequent analysis of Alternative D. These new projects are described on page 15 of Technical Report S-2b of the Supplement to the Draft EIS/EIR, and incorporated into Table S3 of that report. Traffic volumes from the related projects are generated by the LAX Ground Access Model based on population, housing units and employment following SCAG trip generation, distribution and assignment procedures. Trips from these developments at El Segundo intersections are included with all other trips. The detailed traffic volume numbers at individual intersections are provided in Attachment I of Technical Report S-2b.

The comment identifies four highway improvements. Three of these improvements (Aviation widening - #9, Rosecrans widening - #42, and Sepulveda/Rosecrans additional lanes - # 44) are included in Table 2.2, in Technical Report 3b of the Draft EIS/EIR. The fourth improvement, Sepulveda widening from 4 to 6 lanes, was inadvertently omitted from the table, but was assumed in the analysis and assumed to be completed by the year 2005. Corrections to the subject table are identified in Section 4.3.2, Off-Airport Surface Transportation, of the Final EIS/EIR. Even though the improvement was not identified in Table 2.2, the widening of Sepulveda was included in the model networks for all year 2005 and 2015 scenarios. A review of these assumptions was conducted prior to the analysis of Alternative D, and it was determined at that time that no other roadway improvement projects should be added to the list.

AL00033-309

Comment:

Level of Service Summaries - Attachments C through E provide summaries of the volume/capacity calculations and corresponding levels of service. The Technical Report focuses on seven intersections in or immediately adjacent to the City of El Segundo including:

1. Aviation/El Segundo
2. Aviation/Imperial
3. Aviation/Rosecrans
4. Sepulveda/El Segundo
5. Sepulveda/Imperial
6. Sepulveda/Mariposa
7. Sepulveda/Rosecrans

The Technical Report does not include evaluations of the following 15 critical intersections in or immediately adjacent to the City of El Segundo that may be impacted by LAX expansion:

1. Sepulveda/Grand
2. Grand/Vista Del Mar
3. Imperial/Nash
4. Imperial/Douglas
5. Imperial/Main
6. El Segundo/Douglas
7. El Segundo/Nash
8. Mariposa/Main
9. Grand/Main
10. El Segundo/Main
11. Rosecrans/Vista Del Mar
12. Nash/Mariposa
13. Douglas/Mariposa
14. Sepulveda/Maple

3. Comments and Responses

15. Sepulveda/Hughes

- The calculations themselves for each of the various alternatives for all of the intersections above and for the links need to be provided so they can be checked and verified for accuracy, and so that appropriate mitigation can be provided for all of the LAX traffic impacts.

- Each of the calculations needs to indicate the proper roadway geometry including the number of left turn, through, right turn, and any shared lanes.

Response:

This comment incorrectly asserts that the following intersections were not included in the analysis: Grand/Vista Del Mar (#36), Imperial/Nash (#48), Imperial/Douglas (#34), Imperial/Main (#47), and Rosecrans/Vista Del Mar (#43). Please refer to Subtopical Response TR-ST-2.1 for a discussion of the study area definition and identification of facilities analyzed. The worksheets used in this analysis were not included in the Draft EIS/EIR. They are available in the Administrative Record. Also, please see Response to Comment AL00033-110.

AL00033-310

Comment:

Back Up Calculations of Intersection Capacity Utilization

Supporting intersection capacity utilization calculations were located in various documents in the reading room at the Proud Bird Restaurant adjacent to LAX. However, there are numerous inaccuracies in these calculations and they are inconsistent with the calculation summary sheets that are shown in the technical reports and those contained within the DEIR tables. The following documents were reviewed:

- "Revised 2005 Adjusted Environmental Baseline for LAX Master Plan EIS/EIR" dated March 6, 2000.
- "Revised 2005 Adjusted Environmental Baseline (1997 LAX, 2015 Region) for LAX Master Plan EIS/EIR" dated February 22, 2000.
- "Draft Modify and Reevaluate 2005 Access/Mitigation Plan Alternative C for LAX Master Plan EIS/EIR" dated March 10, 2000.
- "Draft Analyze 2015 Mitigation Plans Alternative C (with the City's Framework Employment Goals) for LAX Master Plan EIS/EIR" dated April 14, 2000.

Each of the documents listed above were reviewed as they pertain to intersections within El Segundo. Of major importance, this review disclosed that there are no calculations within any of these four documents that are based upon the mitigation proposed. Instead, only baseline calculations are provided in each of these documents. Additionally, the following omissions as well as errors and inaccuracies in the lane configurations were found during the review:

Aviation/El Segundo

- The intersection capacity calculation sheets for the AM peak hour are missing from the 2005 environmental baseline document.

Aviation/Imperial

- A field review of this intersection indicates there are two southbound left turn lanes, one southbound through lane, one southbound through/right turn lane, and an exclusive southbound right turn lane. The calculations in each of the documents erroneously include a second southbound through lane.

Aviation/Rosecrans

- The intersection capacity calculation sheets for the AM peak hour are missing from the 2005 environmental baseline document.
- Northbound right turns have an existing right turn green arrow overlap. The calculations in each of the documents do not include this existing feature.
- Southbound traffic presently includes one through lane and one through/right turn lane, not two southbound through lanes plus a shared through/right turn lane used erroneously in each of the calculations in each of the documents.

- Westbound traffic presently includes two through lanes and a shared through/right turn lane, not three through lanes plus a separate right turn lane used erroneously in each of the calculations in each of the documents.
- In the AM peak hour, westbound traffic presently has two through lanes and an exclusive right turn only lane, together with a right turn green arrow overlap. These special conditions are not reflected in any of the calculations in the AM peak hour in any of the documents.
- Eastbound traffic presently has two through lanes and a shared through/right turn lane, not three through lanes and an exclusive right turn lane as used erroneously in each of the calculations in each of the documents.

Sepulveda/EI Segundo

- The intersection is currently under construction and is being widened, with additional lanes being added. The calculations in each peak hour in each of the documents need to be checked against the improvements now being constructed to ensure that the proper baseline lane configurations are being used.

Main/Imperial

- The Alternative C calculations include significant differences in the geometry of the existing intersection, and they include a "North Portion" intersection only in 2005. Traffic volumes associated with this intersection are radically different from today's volumes and include 1,100 westbound left turns and a nominal northbound left turn volume. The mitigation proposed for this intersection is not explained and the traffic volumes also need supporting documentation and explanation.
- The Alternative C calculations include significant differences in the geometry of the existing intersection, and they include both a "North Portion" and a "South Portion" intersection in 2015. Traffic volumes associated with the "South Portion" intersection are radically different from today's volumes and include 900 southbound through vehicles and 800 northbound right turns. The mitigation proposed for this intersection is not explained and the traffic volumes also need supporting documentation and explanation.

Sepulveda/Imperial

- The lane configurations used in each peak hour in each of the documents match the existing conditions in the field. However, there are no supporting calculations to demonstrate the effectiveness of the proposed mitigation to add a second northbound left turn and a northbound right turn green arrow overlap in Alternative C in 2005.

Sepulveda/Mariposa

- The intersection capacity calculation sheets for the AM peak hour are missing from the 2005 environmental baseline document.

Sepulveda/Rosecrans

- The intersection is currently under construction and is being widened, with additional lanes being added. The calculations in each peak hour in each of the documents need to be checked against the improvements now being constructed to ensure that the proper baseline lane configurations are being used.
- The existing traffic signal has both a westbound and a northbound right turn green arrow overlap in the present operation. Neither of these features is reflected in any of the calculations.

Other Inconsistencies With the DEIR

The "Draft Analyze 2015 Mitigation Plans Alternative C (With the City's Framework Employment Goals) for LAX Master Plan EIS/EIR" dated April 14, 2000 does not match any of the capacity calculations contained within the DEIR. Furthermore, there are several inconsistencies between the summary tables and the calculation sheets contained within this document, in particular several relating to the operation of the "North Portion" and the "South Portion" intersections of Imperial/Main.

Response:

The list of reference documents cited in this comment is not a complete listing of the supporting documentation for the intersection LOS analyses contained within the Draft EIS/EIR. A full set of supporting documents is available upon request from Los Angeles World Airports (LAWA). This information was part of the underlying basis of the analysis. Responses to comments on individual intersections are as follows.

3. Comments and Responses

1. Aviation/El Segundo -- The support documentation for this intersection is available upon request from LAWA.
2. Aviation/Imperial -- As described in Section 2.4 of Technical Report 3b, future year analyses of baseline and project alternatives include funded transportation improvements. Table 2.3 indicates that Aviation is to be widened to six lanes between Imperial and Arbor Vitae by 2005. This widening is assumed to include an additional southbound through lane at this intersection. Therefore, all future year LOS calculations include this improvement.
3. Aviation/Rosecrans -- The support documentation for this intersection is available in upon request from LAWA. As described in Section 2.4 of Technical Report 3b, future year analyses of baseline and project alternatives include funded transportation improvements. Table 2.3 indicates that Aviation is to be widened to six lanes, from 1,000 feet south of Rosecrans to Imperial, by 2005. In addition, Rosecrans is to be widened 1,000 feet each direction from Aviation by 2005. These widening projects are assumed to include additional northbound, southbound and westbound through lanes at this intersection. Therefore, all future year LOS calculations include these improvements. The reference to right-turn-overlaps in the northbound and westbound directions is immaterial because the analysis assumes right turns on red for these movements, which is a similar assumption and removes the right turns from the critical movements for the intersection. The minor adjustment to use the overlap would have no impact on the LOS results.
4. Sepulveda/El Segundo -- Improvements to this intersection were not funded as of 1999 when the future year background transportation improvement assumptions were made for the analysis. Therefore, the future year analysis maintained the existing geometrics of this intersection.
5. Main/Imperial -- With the development of the ring road in Alternatives A, B, and C, Imperial Highway west of Sepulveda Boulevard is modified to function as a freeway. The intersection of Imperial and Main is converted into a tight diamond interchange with signalized intersections on either side of the Ring Road. The LOS calculations are performed for the new interchange/intersections.
6. Sepulveda/Imperial -- The support documentation for this intersection is available upon request from LAWA.
7. Sepulveda/Mariposa -- The support documentation for this intersection is available upon request from LAWA.
8. Sepulveda/Rosecrans -- Funded improvements to this intersection were anticipated and are shown in Table 2.3 of Technical Report 3b. These improvements, including additional turning lanes on all approaches, are assumed in all future year analyses.
9. The LOS analyses were performed twice, once with RTP growth assumptions and again with Framework growth assumptions. A review of "Draft, Analyze 2015 Mitigation Plans, Alternative C (With the City's Framework Employment Goals), April 14, 2000," shows that the capacity calculations documented in this report are identical to those reported in Technical Report 3b, Attachments C and D. Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR does not contain within it any capacity calculations pertaining to the "With-Framework" scenarios. Refer to response 5 above for an explanation of the analysis of two intersections at Main and Imperial.

AL00033-311

Comment:

AIR QUALITY

The Draft Environmental Impact Report ("DEIR") does not contain an adequate analysis of air quality impacts. Criteria pollutant emissions are internally inconsistent and generally underestimated. Air quality impacts were underestimated by using a speculative rollback procedure. Sulfate and PM10 impacts were not evaluated. The alternative analysis does not include any alternative that would substantially lessen air quality impacts. The DEIR does not contain the conformity analysis, as it must. Finally, the proposed mitigation program only requires that a small percentage of the very substantial increase in

emissions be mitigated and fails to impose all feasible mitigation measures. The air quality analysis and mitigation program need to be substantially revised, and the DEIR recirculated for public review.

Response:

Please see Responses to Comments AL00033-312 through AL00033-337 below.

AL00033-312

Comment:

I. THE AIR QUALITY ANALYSIS DOES NOT COMPLY WITH CEQA

I.A. The Project Is Inconsistent With The AQMP

The California Environmental Quality Act ("CEQA") requires that an EIR "discuss any inconsistencies between the proposed project and applicable general plans and regional plans. Such regional plans include, but are not limited to, the conformity analysis and applicable air quality attainment or maintenance plan or State Implementation Plan..." § 15125(d).) The DEIR does not contain the conformity analysis and only discusses consistency with land use plans. (DEIR, Technical Report 1.) However, it fails to discuss the consistency of the project with applicable air quality plans. As discussed below, the project's emissions are not consistent with applicable air quality plans.

The applicable air quality plan for LAX is the 1997 Air Quality Management Plan, and amendments thereto ("AQMP"). Although the DEIR acknowledges the existence of this plan (DEIR, p. 4-476), it makes no pretense of evaluating the consistency of the project with the AQMP. In fact, the word "consistency" is not even used in the air quality section of the DEIR. (DEIR, § 4.6.)

The South Coast Air Quality Management District ("SCAQMD") CEQA Guidelines set forth two criteria that must be met to demonstrate consistency with the AQMP:

1. Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. Whether the project will exceed the assumptions in the AQMP in 2010 or increments based on the year of project buildout and phase.

As demonstrated below, both of these criteria are violated. Therefore, the project is not consistent with applicable plans. The SCAQMD CEQA Guidelines caution that before a lead agency trades off social, economic, or other benefits for significant impacts on air quality that it should recognize that "the region will not be able to achieve the air quality standards within the time frame specified in law," resulting in potential restrictions on federal funding, imposition of federal plans and regulations, federal sanctions and/or the need for regulation of additional sources in order to make up the emission reductions lost. (SCAQMD CEQA Guidelines, p. 12-3.)

Response:

As the commentor points out, the 1997 AQMP and the 1999 amendment to the 1997 AQMP are applicable to the proposed project. As noted in Section 4.6.9, Level of Significance After Mitigation, of the Draft EIS/EIR, the build alternatives were predicted to have significant and unavoidable impacts on air quality with respect to CO, VOC, NOx, NO2, SO2, PM10, and O3 after the application of mitigation measures. Relative to consistency of the proposed project with the 1997 AQMP and the 1999 amendment to the 1997 AQMP, the analyses presented in the Draft EIS/EIR predict future exceedances of the one-hour NO2 CAAQS and the 24-hour and annual PM10 CAAQS. However, in Attachment Z to Technical Report 4 of the Draft EIS/EIR, a supplemental analysis was presented which demonstrated that the one-hour NO2 CAAQS can be attained in the vicinity of LAX for operations during the horizon years of Alternatives A, B, and C. An updated analysis presented in the Supplement to the Draft EIS/EIR demonstrated that combined concentrations from operations and construction for the horizon years of all build alternatives will comply with the one-hour NO2 CAAQS. With respect to PM10, it should be noted that SCAQMD recognizes the particular challenges faced in the South Coast Air Basin in attaining the stringent PM10 CAAQS. According to the 2003 AQMP, (Appendix V, Chapter 2), none of the sites in the South Coast Air Basin will meet the 24-hour PM10 CAAQS in 2006 or 2010, even with

3. Comments and Responses

proposed emission controls. With respect to what CEQA requires under Section 15125(d), a conformity analysis is neither a "general plan" nor a "regional plan," and CEQA does not require that an EIR include a conformity analysis. Please see Topical Response TR-AQ-3 regarding air quality impacts of the build alternatives. Please see Response to Comment PC02203-92 regarding consistency with regional plans.

AL00033-313

Comment:

I.A.1. Project Would Violate Air Quality Standards

These guidelines require that the first criterion be addressed by performing an air quality modeling analysis. "In order to be found consistent, the analysis will need to demonstrate that the project's emissions will not increase the frequency or the severity of existing violations, or contribute to a new violation at the project. The violations that are referred to are the state and federal criteria pollutant ambient air quality standards." (SCAQMD CEQA Guidelines, p. 12-3.)

The air quality modeling analysis in the DEIR demonstrates that mitigated operational emissions from all three alternatives would cause new exceedances of the State 1-hour NO₂ standard and increase the frequency and severity of existing violations of the State annual PM₁₀ standard (in 2005 only) and State 24-hour PM₁₀ standard. (DEIR, Table 4.6-20.) Mitigated construction emissions were not modeled. However, unmitigated construction emissions from all three alternatives would cause new exceedances of the federal annual NO₂ standard, the State 1-hour NO₂ standard, the federal annual PM₁₀ standard, and the federal 24-hour PM₁₀ standard. In addition, project construction would increase the frequency and severity of existing violations of the State annual and 24-hour PM₁₀ standards. (DEIR, Table 4.6-13.) As discussed below, these impacts would be more severe than indicated because all project emissions were not included. Further, the project would additionally cause new exceedances of the federal and State annual NO₂ standard and aggravate existing exceedances of the federal and State 8-hour CO standard. (Comment III.A.) Therefore, the project does not meet the first criterion and thus does not conform to the AQMP.

Response:

Please see Topical Response TR-AQ-3 regarding increased air pollution. Also, please see Response to Comment AF00001-14 regarding the general conformity determination.

AL00033-314

Comment:

I.A.2. Project Would Exceed Emissions in AQMP

The SCAQMD guidelines also require that mitigated emissions be compared with emissions in the AQMP in 2010 and increments based on the year of project buildout. As a practical matter, the emission estimates in future years in the AQMD have already been exceeded because the 1997 AQMP assumed that EPA would adopt new regulations to control aircraft engine emissions below then-existing levels. Because EPA did not adopt such regulations, and since commercially available aircraft engines are not capable of meeting the SCAQMD-assumed reductions, the 1997 AQMP emissions underestimate projected future airport emissions. (Orange 4/01, 1 p. 2-39.) Therefore, the project would aggravate this situation, making it even more difficult for the South Coast to come into compliance with federal ambient air quality standards. Additionally, as demonstrated below, the project alone would exceed some of the aircraft emissions assumed in the AQMP.

First, the mitigated aircraft PM₁₀ emissions in 2010 are 0.17 ton/day.² These emissions exceed the 2010 emissions assumed in the AQMP for non-government aircraft of 0.05 ton/day. (AQMP, Table A-13, p. III-A-39) Second, the project would increase mitigated NO_x aircraft emissions by 10.1 ton/day³ between the baseline year of 1996 and buildout year of 2005 under Alternative C (the only alternative with sufficient data to make a calculation). The AQMP assumed that NO_x emissions would only increase by 5.40 ton/day over roughly this same period⁴. Thus, this project would consume over 100% of the increase allowed by the AQMP.

1 County of Orange, Draft Environmental Impact Report No. 573 for the Civilian Reuse of MCAS, El Toro and the Airport System: Master Plan for John Wayne Airport and Proposed Orange County International Airport, Draft Supplemental Analysis, April 2001.

2 Mitigated aircraft emissions estimated from DEIR, TR 4, Attach. W and Table 4.6-18 as: (67 ton/yr - 6 ton/yr)/365 day/yr = 0.17 ton/day.

3 Increase in mitigated NOx emissions between 1996 and 2020 (DEIR, TR 4, Attach. W, Table 4.6- 18): 6,190 ton/yr -3,722 ton/yr 101 ton/yr -305 ton/yr)/365=5.65 ton/day.

4 Increase in NOx emissions between 1997 and 2020 (AQMP, Tables A-4 and A-14): 19.99 ton/day - 14.59 ton/day = 5.40 ton/day.

Response:

As was noted in the Draft EIS/EIR, there is a dearth of readily available data describing aircraft PM10 emissions. For this reason, FAA's EDMS cannot be used to address emissions of PM10 from aircraft. Those limited data that do exist (primarily based on data more than 20 years old and mostly for military aircraft) were used by SCAQMD in developing its emissions estimates for the 1997 AQMP. In the interests of public disclosure, a method was developed during preparation of the Draft EIS/EIR to predict PM10 emissions from all aircraft at LAX (see Attachment H of Technical Report 4 of the Draft EIS/EIR). This method, while based on recent studies of aircraft emissions, has not been adopted for use by SCAQMD. The method is generally conservative (i.e., it will overestimate total aircraft PM10 emissions compared to emissions estimates obtained from the method currently used by SCAQMD). Therefore, the commentor is correct that the mitigated PM10 emissions attributed to aircraft exceed the PM10 emissions for aircraft for future years identified in the 1997 AQMP. However, dispersion modeling, presented in the Draft EIS/EIR Section 4.6.9 and in the Supplement to the Draft EIS/EIR Section 4.6.9 demonstrated that the PM10 NAAQS will be protected in future years. Regarding the PM10 CAAQS, SCAQMD noted in the 2003 AQMP that none of the sites in the South Coast Air Basin will meet the PM10 CAAQS in 2006 or 2010, even with proposed emission controls.

It should be noted that the Supplement to the Draft EIS/EIR presented the air quality impact analysis for Alternative D, and updated emission inventories for Alternatives A, B, and C, the No Action/No Project Alternative and the 1996 environmental baseline. The NOx emission inventory for aircraft under Alternative D is consistent (less than or equal to) the LAX emission inventories used by the SCAQMD in developing the 1997 AQMP and the 2003 AQMP.

Please see Topical Response TR-AQ-3 regarding an updated air quality analysis for all build alternatives in the Supplement to the Draft EIS/EIR. Please see Response to Comment PC02203-92 regarding consistency with regional plans. Please see Response to Comment AF00001-4 regarding the general conformity determination.

AL00033-315

Comment:

I.B. Alternative Analysis Is Not Adequate

CEQA requires that the "discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (14 CCR 15126.6(b).)

The buildout operational emissions for all criteria pollutants (DEIR, Tables 4.6-8/9) from both alternatives are slightly higher than the emissions from the proposed action, Alternative C. Similarly, the construction emissions from both alternatives are indistinguishable from those of the proposed action. Therefore, the alternatives analysis has failed to include an alternative that avoids or substantially lessens the highly significant air quality impacts and is thus inadequate.

Response:

CEQA does not require that the alternatives evaluated in an EIR avoid or substantially lessen every significant effect of a project. Rather, Section 15126.6 of the CEQA Guidelines states, that an EIR must

3. Comments and Responses

evaluate feasible alternatives that could "avoid or substantially lessen one or more of the significant effects." Moreover, the same section also states that "an EIR need not consider every conceivable alternative to a project." Nevertheless, as indicated in Tables S4.6-19 and S4.6-20, in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, Alternative D would result in substantially lower emissions of most pollutants compared to the other build alternatives. As indicated in Table S4.6-21, emissions in the peak year of construction of Alternative D would be lower than emissions in the peak year of construction of the other build alternatives.

AL00033-316

Comment:

I.C. Impacts From Increased Electricity Demand Not Evaluated

CEQA requires that indirect impacts of a project be evaluated. In this case, these include the generation of electricity to support the project. The DEIR did not evaluate the air quality impacts of generating additional electricity to support the project.

Most power in California is generated by power plants that burn natural gas. The cleanest and newest plant operated by Los Angeles Department of Water and Power ("LADWP") is the 80-MW Harbor Cogeneration Facility, which was started up in 1994 and emits 1.3 ton of NO_x, 1.2 ton of CO, 0.2 ton of PM₁₀, and 0.4 ton of SO_x6 per megawatt-year ("MW-yr") of power produced.⁷ The other in-basin plants owned by LADWP are substantially older, 28 to 46 years old (LADWP 8/15/00,⁸ Table B-1) and emit substantially more pollution. Older plants that have not been repowered, such as those operated by LADWP, can produce well over 100 times more pollution than the newer plants.

The unmitigated project will significantly increase the demand for electricity. Alternative B, for example, the most energy-intensive alternative, would increase the electricity demand by 386,693 megawatt hours per year ("MWH/yr") in 2015 compared to the environmental baseline and by 258,860 MWH/yr compared to the no action/no project alternative. These represent increases of 234% and 62%, respectively. (DEIR, Table 4.17.1-2.) This amounts to about 44 MW of additional demand under baseline conditions and 30 MW under the NA/NP option.

This electricity would be generated by LADWP. Assuming that LADWP's cleanest plant produced the increased electricity, the generation of electricity would produce an additional 57 ton/ yr of NO_x, 53 ton/ yr of CO, 9 ton/ yr of PM₁₀, and 18 ton/ yr of SO₂ under baseline conditions and 39 ton/ yr of NO_x, 36 ton/ yr of CO, 6 ton/ yr of PM₁₀, and 12 ton/ yr of SO₂ under NA/NP conditions. The increase in SO₂ emissions offsets 100% of the reductions achieved by the DEIR's proposed mitigation program. (DEIR, Table 4.6-18.)

Actual emissions could be substantially higher, over 100 times higher, if this electricity is generated by the dirtier plants that make up the majority of LADWP's generation capacity. Although LADWP proposes to repower some of these plants (DEIR, p. 4-782), it is not clear that these upgrades will either supply the project or be on-line in the 2005 to 2015 planning horizon.

The DEIR declined to evaluate this impact because only about 27% of LADWP's electricity is generated within the LA basin and the emissions would be widely distributed due to the practice of "wheeling". (DEIR, Attach. G, P. 23.) However, the emissions from electricity generation, wherever they may occur, are potentially large, at least as large or larger than other sources of emissions that were included in the air quality analyses. Under 14 CCR § 15126.2(a), an EIR is required to evaluate secondary, indirect impacts.

The LADWP currently produces 52% of its power from coal. This share is projected to decline to 39% by 2010, due to the proposed divestiture of the Mohave Generating Station. (LADWP 8/15/00, p. 13.) The merchant power provider AES has offered to buy 100% of Mohave GS, but the deal has run into snags, namely the reneging of Nevada Power. Thus, its future is uncertain. The EIR cannot rely on divestiture until it is final. Further, divestiture does not mean that LADWP will cease to rely on power from Mohave. LADWP will continue to own shares in other out-of-basin coal plants, including the Intermountain Generating Station and the Navajo Generation Station. (Id., p. B-1.) The LADWP also wheels power from other coal-fired units, located along California's border. (Id., Fig. F-1.)

The emissions from these coal-fired units are substantially higher than from the Harbor Cogeneration Facility, LADWP's cleanest facility. The Intermountain Generating Station, located in Delta, UT, is the largest coal-fired power plant in the U.S., and LADWP owns a 67% "take-or-pay" entitlement to 1095 MW during summers and 1108 MW during winters. (LADWP 8/15/00, p. B-1.) The Intermountain GS emits 23 ton/ MW-yr of NO_x and 7 ton/ MW-yr of SO_x.⁹

If the electricity to supply LAX came from this or other similar or dirtier coal-fired plants owned by LADWP or that otherwise supply LADWP power demand, the project would increase emissions of NO_x by 1,012 ton/ yr and SO_x by 308 ton/ yr relative to baseline conditions, and NO_x by 690 ton/ yr and SO_x by 210 ton/ yr relative to NA/NP conditions. These increases amount to 90% of the proposed reductions in NO_x and 400% of the reductions in SO_x under the DEIR's mitigation program, exporting a significant air quality impact to another state. (DEIR, Table 4.6-18.)

Although all of the coal-fired plants that LADWP relies on are outside of California, there are at least two coal-fired plants near the California border in Nevada and Arizona that are tied into LADWP's transmission system-Reid Gardner and Mohave. These two plants are about 70 and 2 miles, respectively, from the California border. Thus, emissions from these coal-fired plants contribute to regional ozone and visibility problems in California and thus impact air quality in California due to their proximity.

In addition, many of the proposed air quality mitigation measures will substantially increase the regional demand for electricity. The air quality mitigation program relies heavily on the conversion of mobile sources and fuel-fired equipment to electric power. Ground support equipment would be converted to electric power. Incentives would be offered to promote the use of electric engines in commercial vehicles that use the terminal areas, in cargo vehicles entering the airport, and in rental cars using on-airport RAC facilities. Ground power and preconditioned air systems would be electrified. Free parking, charging stations and preferential parking would be provided for electric vehicles. (DEIR, § 4.6.8.)

The DEIR recognizes that these measures increase electricity demand (DEIR, p. 4-522) and admits that "the additional increase in electricity would exacerbate the additional load to the electrical power distribution system that would occur under the build alternatives under the unmitigated condition." (DEIR, p. 4-523.) However, the DEIR does not require any mitigation for the energy impacts (DEIR, p. 4-806) and fails to evaluate the air quality consequences of this additional demand and to take it into account in calculating the reduction in emissions and impacts achieved by the various mitigation measures. (DEIR, Tables 4.6-16/20.) Thus, the actual air quality benefits of those mitigation measures that increase electricity demand are smaller than claimed. Further, CEQA requires that the impacts of proposed mitigation measures be evaluated. The DEIR has not evaluated the secondary air quality impacts from its proposed mitigation program.

5 Carnot Source Test Report, Unit 2, Harbor Generating Station, Los Angeles Department of Water and Power, November 1995.

6 ROG= reactive organic gases; CO = carbon monoxide; NO_x = nitrogen oxides; SO_x = sulfur oxides; PM₁₀ = particulate matter with an aerodynamic diameter less than 10 microns.

7 U.S. EPA Region 9 Electronic Permit Submittal System, Permit No. 106325, Harbor Cogeneration Co.

8 Los Angeles Department of Water and Power, 2000 Integrated Resource Plan, As Amended and Adopted by the Board of Water and Power Commissioners and the Los Angeles City Council, August 15, 2000.

9 State of Utah, Title V Operating Permit, No. 2700010001, Intermountain Power Service Corporation, January 9, Revised February 25, 2000.

Response:

The Supplement to the Draft EIS/EIR addressed air quality impacts from increased electricity production in Section 4.6, Air Quality (subsection 4.6.10).

AL00033-317

Comment:

II. THE EMISSION ESTIMATES ARE FLAWED

3. Comments and Responses

Emission estimates are the heart of an air quality analysis. I was unable to verify the emission estimates in the DEIR because necessary supporting information is missing from the DEIR, and LAWA was unable to provide the required information in response to our Public Record Act and Freedom of Information Act requests.

The relevant supporting emission information supposedly was presented in the Air Quality Technical Report. However, this Report was scanned in backwards and was thus illegible when printed out.

Response:

Please see Response to Comment AL00033-257 regarding the Public Record Act and Freedom of Information Act requests to LAWA and FAA, respectively, from Shute, Mihaly & Weinberger LLP. Please see Response to Comment AL00033-255 regarding the electronic version of the document. As indicated in that comment, hard copies of the document did not include any reverse image pages. The CD-ROMs and Internet versions of the Air Quality Technical Report do not contain reverse image pages when viewed onscreen. However, certain pages may print out in reverse image due to the printer settings and/or printer driver configurations on individual computers. It should be noted that LAWA's records reflect that Shute, Mihaly & Weinberger ordered a full paper copy of the Draft EIS/EIR, including all its appendices and technical reports. Additionally, the City of El Segundo was sent a full paper copy on January 18, 2001.

AL00033-318

Comment:

After acquiring a legible copy, I discovered that many of the assumptions and procedures used to calculate the emissions that the DEIR relied on are not in the Air Quality Technical Report. In response to a formal request for electronic copies of the spreadsheets on April 4, 2001, I finally received on June 26, 2001, a compact disk alleged to contain the emission spreadsheets.

However, this disk only contains partial information for construction and off-airport emission estimates. No information is provided for on-airport sources. Further, all of the spreadsheets on this disk are use-protected, preventing me from inspecting the formulas that were used to make the calculations, the very thing I need to verify the calculations. Therefore, the files on this disk provide no more information than what is already available in the Air Quality Technical Report.

In sum, it is impossible to verify the emission estimates that the DEIR's air quality analyses are based on. This is a serious matter because it is evident, based on inspection of the emission summaries, that the DEIR's emission estimates are riddled with errors and should be subjected to independent peer review. The problems that I was able to identify, based on incomplete information, are discussed below.

Response:

LAWA and FAA sincerely regret the inconvenience experienced by the commentor in obtaining data supporting the air quality analyses. The input data and assumptions for these analyses were included in Section 4.6, Appendix G, and Technical Report 4 of the published Draft EIS/EIR as well as in Section 4.6, Appendix S-E, and Technical Report S-4 of the published Supplement to the Draft EIS/EIR, and Section 4.6 and Appendix F-B of the Final EIR.

AL00033-319

Comment:

II.A. The 1996 On-Site Environmental Baseline Emissions Are Contradicted

The on-site project impacts for CEQA purposes are evaluated relative to the 1996 baseline, which is stated to represent activity levels at LAX in 1996 and facilities as of 1997. (DEIR, p. 4-462.) The emissions for this case are discussed in Section 4.6.3.5 and summarized in Table 4.6-6. These emissions are then included in Table 4.6-8 and used to evaluate the significance of project emissions under CEQA.

However, the 1996 environmental baseline emissions in Tables 4.6-6 and 4.6-8 differ rather substantially from those reported in the Air Quality Technical Report ("TR 4"), Attachment C, which

supposedly provides the support for emission estimates. The following inset table summarizes these discrepancies:

	EMISSIONS (ton/yr)	
	Table 4.6-6/8	TR4
CO	16,589	20,216
VOCs	2,069	3,041
NOx	5,175	5,903
SOx	183	210
PM10	159	191

The DEIR does not contain sufficient information to resolve the noted discrepancies. Thus, there is no creditable support for the baseline emissions used to evaluate the significance of impacts under CEQA. These discrepancies should be resolved and the EIR and supporting technical report recirculated for public review.

Response:

Table S4.6-6 and 4.6-8 in Section 4.6, Air Quality, of the Draft EIS/EIR contained the environmental baseline emission inventory results for on-airport sources. Technical Report 4 also contains a preliminary estimate of off-airport traffic emissions as well as on-airport sources, which accounts for the difference. Since publication of the Draft EIS/EIR, on- and off-airport emission inventories including the 1996 baseline inventory have been revised. The Supplement to the Draft EIS/EIR addressed the updated baseline emission inventory in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E and Technical Report S-4. Direct calculations of 1996 environmental baseline emissions using EDMS 4.11 emission factors for aircraft and APUs, CARB OFFROAD emission factors for GSE, and CARB EMFAC 2002 emission factors for motor vehicles are included in this Final EIS/EIR.

AL00033-320

Comment:

II.B. The Wrong Baseline Is Used To Evaluate Off-Airport Emissions

CEQA requires that an EIR evaluate impacts relative to the existing baseline, as correctly noted in the DEIR. (DEIR, p. 4-7.) The correct CEQA baseline was used to evaluate emissions from on-airport sources. (DEIR, Table 4.6-8.) However, the off-airport sources were evaluated relative to future baselines, rather than the existing baseline required under CEQA. The off-airport impacts in the year 2005 were evaluated relative to a "2005 adjusted environmental baseline." Off-airport impacts in the year 2015 were evaluated relative to a "2015 adjusted environmental baseline." (DEIR, Table 4.6-9.) This violates CEQA.

The increase in emissions due to the project is the difference between the year 2005 or year 2015 emissions and the existing 1996 baseline. This increment must be reduced below the significance threshold by imposing mitigation measures. Because peak hour on- and off-airport traffic for Alternative C is projected to increase by 16% to 33% in 2005 and by 54% to 84% in 2015, relative to 1996 (DEIR, p. 2-94, Table 4.3.2-4), the adjusted environmental baselines used in the DEIR are much higher than the proper CEQA baseline of 1996. Therefore, the DEIR has substantially underestimated an already staggering increase in off-airport emissions caused by the project. This, in turn, results in underestimating the amount of mitigation required to reduce these emissions.

This is a very serious fundamental flaw in the air quality analyses that must be corrected before a reasonable mitigation program can be designed. The corrected EIR should be recirculated for public review.

Response:

Please see Topical Response TR-GEN-1 regarding the adjusted environmental baseline.

3. Comments and Responses

AL00033-321

Comment:

II.C. The No Action/No Project Emissions Are Unreasonable And Unsupported

The emissions from each alternative are evaluated relative to the No Action/No Project ("NA/NP") alternative to comply with both the National Environmental Protection Act ("NEPA") and CEQA requirement to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. Therefore, it is very important that the emissions from the NA/NP alternative accurately reflect future no project conditions. The NA/NP alternative does not appear to fairly reflect future conditions without the project.

First, the no project alternative appears to assume that the airport can grow nearly unrestrained. (DEIR, Tables 3-1 to 3-4.) However, the Master Plan¹⁰ notes many facilities are currently at capacity, viz., "Nearly all major airport facilities are at or near their practical capacities." (Master Plan, p. ii.) "The region's airport system, however, does not currently have the ability to meet this rapidly climbing demand." (Id., p. i-i.9.) Based on a simulation analysis of current operations, "This indicates that the airport was operating near its practical capacity at the lower delay boundary." (Id., p. i-2.2.) The DEIR is wholly silent on how the acknowledged limit on capacity was addressed in constructing the NA/NP alternative. The NA/NP emissions assume nearly unconstrained future growth, without regard to airside or landside capacity limitations or regulatory constraints. (DEIR, Tables 3-1 to 3-4.) Thus, their magnitude is not an accurate reflection of the no action/no project alternative and would lead to a biased weighting of the merits of building the project.

¹⁰ Los Angeles World Airports, Los Angeles International Airport Master Plan, Draft, November 7, 2000.

Response:

The No Action/No Project Alternative does not assume that the airport can grow nearly unrestrained. On the contrary, the No Action/No Project Alternative is a constrained alternative. Table 3-2 of Chapter 3, Alternatives, of the Draft EIS/EIR provides a comparison of the unconstrained forecast and the No Action/No Project Alternative 2015 activity levels. The table examines over a dozen parameters associated with passenger, cargo, and aircraft activity. For each one of these parameters, the No Action/No Project Alternative is substantially lower (generally 20 to 25 percent lower) than the unconstrained forecast. For example, MAP is projected to be 78.7 under the No Action/No Project Alternative compared to 97.9 MAP in the unconstrained forecast. Cargo activity would be 3,120,000 tons per year (TPY) compared to 4,172,000 TPY. The number of total annual aircraft operations would be 783,430 compared to 1,004,591.

The Draft EIS/EIR did not disregard airside and landside capacity constraints. On the contrary, these constraints were described in Section 2.2.2 of the Draft EIS/EIR and fully evaluated in Chapter V of the Draft LAX Master Plan.

AL00033-322

Comment:

Second, the NA/NP emissions suggest that all three alternatives would reduce the emissions of CO and VOC from on-airport sources in the years 2005 and 2015, but increase the emissions of NOx, SO2, and PM10. (DEIR, Table 4.6-8.) The NA/NP emissions also suggest that all three alternatives would reduce the emissions of CO and VOC from off-airport sources during the year 2005 (except Alternative B for CO), but increase the emissions of NOx, SO2, and PM10. (DEIR, Table 4.6-9.)

This is not believable. The vast majority of project emissions derive from on-road and off-road mobile sources. It is reasonable to expect that all criteria pollutants from mobile sources would move in harmony, either uniformly increasing or decreasing relative to the NA/NP alternative, absent an explanation to the contrary. The distinct patterns for CO and VOC compared to NOx, SO2 and PM10 suggest a fundamental flaw in the emission calculations, or underlying NA/NP assumptions. Further, all three alternatives represent substantial increases in airport activity and hence off-airport traffic. The changes due to the project are in addition to future changes under the NA/NP. Therefore, all three

alternatives should result in increases in all criteria pollutants. It is impossible to evaluate these apparent discrepancies because the NA/NP emissions themselves are not adequately supported in the DEIR.

The assumptions and calculations used to arrive at the NA/NP emissions in Tables 4.6-8 and 4.6-9 are missing from the DEIR or if present, cannot be readily identified as such. The only discussion of the NA/NP alternative is a brief description on pages 4-8 and 4-9 and summaries of activity levels (DEIR, Table 3-1,3-2) and facilities (DEIR, Table 3-3,3-4), which are not useful for estimating emissions.

The NA/NP alternative is "based on reasonable projections of future activity levels that are anticipated to occur." (DEIR, p. 4-9.) How were these projections converted into emissions? How were the acknowledged airside and landside capacity limitations factored in, if at all? The DEIR goes on to explain that "the airlines are expected to modify their fleet mix by scheduling more larger aircraft that can accommodate more passengers and cargo." (Ibid.) However, the DEIR does not reveal what modified fleet mix was assumed in estimating NA/NP emissions. The DEIR states that the NA/NP includes "contemplated development of the Continental City and LAX Northside project," but never tells the reader what that development is or quantifies it in a way that is meaningful for estimating emissions in any of the materials dealing with air quality.

Without this type of detailed information it is impossible to evaluate whether the NA/NP emissions are reasonable. The Air Quality Technical Report does not contain any of this information in a form that can be used to estimate emissions by a knowledgeable person. Therefore, it is impossible to make any meaningful comments on the emissions that would result from the NA/NP alternative.

Response:

The calculation of emissions from both on- and off-airport sources is not solely dependent on the number of aircraft, equipment, or vehicles present.

Total aircraft emissions are dependent on aircraft fleet mix and time-in-mode (TIM) for each aircraft operation mode (approach, climbout, takeoff, and taxi/idle). For a given year, the fleet mix is not expected to vary much between the alternatives. However, the alternatives have different taxi/idle TIM for each airframe. Reducing taxi/idle times was one of the many criteria used to develop the Master Plan alternatives. Thus, many of the commercial aircraft taxi/idle TIM are slightly lower for the build alternatives than the No Action/No Project Alternative. This affects the distribution of criteria pollutant emissions. The scenario with higher taxi/idle TIM will have higher emissions of CO and HC because the engine efficiency (conversion of fuel to energy) is lower and more products of incomplete combustion (CO and HC) are emitted in this mode. On the other hand, the build alternatives have more relative time spent in hotter operation modes (approach, climbout and takeoff), which generates more NO_x. SO_x emissions are dependent on sulfur content and fuel flow, thus SO_x emission rates are also higher for climbout and takeoff than for taxi/idle. PM₁₀ is apparently also dependent on fuel flow (Wayson, et. al 2003). Therefore, on-airport emission inventories are higher in CO and HC for the No Action/No Project Alternative due to higher taxi/idle TIM for this alternative. The emissions of NO_x, SO₂ and PM₁₀ are higher for the build alternatives because more operations occur and at hotter operation conditions and higher fuel flows in approach, climbout, and takeoff modes.

Total vehicle emissions are calculated based on several criteria including (but not limited to) vehicle-miles-traveled, vehicle-hours-traveled, fleet mix, and average speeds. Other factors such as mitigation measure implemented, future technologies utilized, and fuels usage can result in an increase of some criteria pollutants while there is an overall decrease in other criteria pollutants. A more detailed discussion of mobile source emission calculations for all alternatives can be found in Appendix G, Air Quality Impact Analysis, of the Draft EIS/EIR and in Appendix S-E, Supplemental Air Quality Impact Analysis, of the Supplement to the Draft EIS/EIR. These Appendices are supplemented by the technical data provided 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-GEN-2 regarding assumptions included in the No Action/No Project Alternative. Emissions from the No Action/No Project Alternative were calculated using the same methodologies utilized for the build alternatives as was described in detail in Section 4.6, Air Quality, of the Draft EIS/EIR and as updated in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

3. Comments and Responses

AL00033-323

Comment:

II.D Claimed Emission Reductions Are Not Supported In The Record

The estimated emission reductions for each alternative are tabulated by control option and pollutant in Table 4.6-17. The voluminous, 2-inch thick air quality technical appendix does not contain any supporting calculations for these claimed reductions. The only support for these claimed reductions is a cryptic description of the measures on Table 4.6-16 and an equally cryptic footnote listing some, but not all, assumptions.

This cryptic information is not adequate to allow an expert in emission estimating procedures to verify and reproduce the calculations. For example, reductions of 2,907 ton/ yr of CO, 167 ton/ yr of VOC, and 243 ton/ yr of NOx are claimed for conversion to electric GSE in Alternative C. (DEIR, Table 4.6-17.) The only description provided of the measure is "convert GSE to electric power (or extremely low emission technology, such as fuel cells.)" (DEIR, Table 4.6-16.) A footnote declares that 70% of GSE would be converted to battery electric, or equivalent technology by 2005. (DEIR, p. 4-517, note 1.)

The DEIR does not reveal the actual number and type of GSE that would be converted. Thus, one is left wondering, "70% of what?" Further, the DEIR provides no basis whatsoever for the assumed 70% conversion. What is this based on, and is it a reasonable goal? The DEIR admits that the conversion is "partially in-place" and would be accelerated. (DEIR, Table 4.6-16.) However, one is left to puzzle over whether the already in-place conversion and "accelerated" conversion that would otherwise take place over a longer time period are counted as mitigation and included in the emission reduction calculation. They should not be, but the reviewer cannot figure this out and thus cannot make meaningful comments.

The DEIR does not indicate what emission factors (unmitigated and mitigated) were used to estimate the reduction in emissions. Thus, even if one knew how many and what type of GSE were involved, one would not be able to calculate a reduction and verify the emissions in Tables 4.6-16 and -17. Finally, the DEIR claims that GSE would be converted to "battery electric" or "equivalent." However, the DEIR does not explain what constitutes "equivalent," or how many "equivalent" units would be involved. Some alternatives to battery electric, such as natural gas, LNG, fuel cells, or combined electric-gas vehicles emit criteria pollutants, unlike "battery electric," requiring a different calculation that would yield a different answer.

Each mitigation measure included in the estimated emission reductions in Table 4.6-16 and -17 has similar problems, which prevent a knowledgeable person from verifying the emissions and preparing meaningful comments. Therefore, the claimed emission reductions are not supported and the efficacy of the proposed mitigation program cannot be verified. The DEIR should be revised to include documented emission spreadsheets, similar to those now included in Technical Report 4 for project emissions, and be recirculated for public review.

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 Supplement to the Draft EIS/EIR included the emissions data requested regarding the proposed mitigation program.

With respect to the commentor's concern regarding the conversion of GSE to electric, an inventory of 1996 GSE population at LAX was determined (Clean Fuel Vehicle Mitigation Strategy Assessment, Prepared by CALSTART for LAWA, April 1999), including fuels used. From this population inventory, it was determined over 35 percent of GSE at LAX was operated on electric batteries or alternative fuels (natural gas or propane). Emission inventories were developed using diesel and gasoline emission factors included in the Emissions and Dispersion Modeling System, Version 3.2 (EDMS 3.2), and natural gas and propane (LPG) factors developed by the California Air Resources Board (CARB, Air Pollution Mitigation Measures for Airports and Associated Activity, 1994). In the unmitigated 2005 build alternatives, it was assumed that 22 percent of the LAX GSE would be electric-powered, 33 percent

would be natural gas fueled, 19 percent would be propane fueled, and the remaining would be diesel or gasoline fueled. By 2015, it was assumed that almost all conventional fueled equipment would be replaced with natural gas (37 percent), or electric (59 percent) equipment. The remaining 4 percent was assumed to be gasoline fueled. The mitigation measure would preferentially accelerate the use of electric-powered GSE and would move to eliminate all conventional fueled GSE. Thus, the mitigation plan would convert 70 percent of the LAX GSE to electric power by 2005.

AL00033-324**Comment:****II.E Claimed Emission Reductions Are Incorrect**

It is evident that the claimed emission reductions in Table 4.6-17 and -18 contain errors. However, due to the lack of technical support discussed in Comment II.E, it is not possible to correct these errors or figure out which set of conflicting values is correct. Thus, the effectiveness of the proposed mitigation program cannot be adequately assessed, requiring recirculation. Errors that can be readily identified by inspection of tables in Section 4.6 are discussed below.

II.E.1. On-Airport Operational Emissions

Tables 4.6-17 (2005) and 4.6-18 (2015) summarize the claimed emission reductions by mitigation option for on-airport and off-airport sources. The on-airport reductions in Table 4.6-17 should equal the difference between the unmitigated on-airport operational emissions in Table 4.6-8 and the mitigated on-airport operational emissions in Table 4.6-19. There are major discrepancies for both 2005 and 2015. The following inset tables summarize the discrepancies without comment, as the DEIR does not contain sufficient information to allow a knowledgeable individual to figure out which set of estimates, if either, is correct:

2005 ON-AIRPORT EMISSION REDUCTIONS (ton/yr)		
	Table 4.6-17	Table 4.6-19 minus Table 4.6-8
CO	4,370	4,346
NOx	616	622
VOCs	659	445
PM10	6	10
SOx	24	23

2015 ON-AIRPORT EMISSION REDUCTIONS (ton/yr)		
	Table 4.6-18	Table 4.6-19 minus Table 4.6-8
CO	2,968	3,434
NOx	567	620
VOCs	396	472
PM10	11	10
SOx	12	30

Response:

The claimed emission reductions were corrected in the Supplement to the Draft EIS/EIR. In general, emission reductions were revised to maintain a similar percent reduction across all alternatives. Since publication of the Draft EIS/EIR, on-airport emission inventories have been updated. The Supplement to the Draft EIS/EIR addressed the on-airport baseline emission inventory in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E and Technical Report S-4.

3. Comments and Responses

AL00033-325

Comment:

II.E.2. Construction Emissions

The construction emission reductions presented in Table 4.6-18 are inconsistent with those presented in Table 4.6-16 for the same mitigation measure, use of low-emission trucks. The following inset table summarizes the discrepancies without comment, as the DEIR does not contain sufficient information to allow a knowledgeable individual to figure out which set of estimates, if either, is correct:

PEAK YEAR CONSTRUCTION EMISSION REDUCTIONS (ton/yr)		
	Table 4.6-16	Table 4.6-18
CO	up to 150	(465) to (518)
NOx	up to 125	877 to 911
VOC	up to 60	(4,703 to 5,198)

Further complicating any meaningful review of construction emission reductions (and hence mitigation) is the use of parentheses for the CO and VOC reductions, but not for the NOx reductions. Normally, parentheses are used to indicate negative values. A negative reduction would be an increase. Thus, Table 4.6-18 suggests that the use of low emission trucks would cause a large increase in both CO and VOC emissions. If this is correct, either the basic emission estimating methodology is flawed, or the proposed low-emission engine is not acceptable and should be rejected as mitigation. The SCAQMD is nonattainment for both CO and ozone. The reduction in NOx is not a reasonable tradeoff for substantial increases in CO, a nonattainment pollutant, and VOC, an ozone precursor like NOx. Thus, if this interpretation of Table 4.6-18 is correct, the proposed use of low-emission trucks of the type evaluated can hardly be classified as mitigation due to its adverse collateral impacts.

The construction emission reductions are also confusing because Table 4.6-17 (for the year 2005) and Table 4.6-18 (for the year 2015) both report peak year construction emission reductions. The peak year is reported to be year 2004. Therefore, the peak year construction emission reductions in these two tables should be identical, but they are not. They differ by substantial amounts.

In sum, the claimed emission reductions in the DEIR are in a state of disarray. The actual reductions that would be achieved by the proposed mitigation program cannot be readily ascertained. Based on analyses presented elsewhere in these comments, the DEIR appears to substantially overestimate the claimed benefits and reductions achieved by its proffered mitigation program.

Response:

The recommended mitigation measures and associated emission reductions have been revised extensively since publication of the Draft EIS/EIR. Table 4.6-17 (Estimated Emission Reductions for Specific Mitigation Options - Year 2005) and Table 4.6-18 (Estimated Emission Reductions for Specific Mitigation Options - Year 2015) have been removed. As was shown in Table 4.6-18 of the Draft EIS/EIR, a focus on using construction equipment meeting a low-NOx emission limit results in increases in other criteria pollutants, namely VOC and CO. Additional mitigation measures were proposed in the Supplement to the Draft EIS/EIR that would serve to lower emissions of all pollutants from construction equipment, both mobile and stationary. Table S4.6-18 in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR summarized the revised mitigation measures and potential emission reductions.

AL00033-326

Comment:

III. AIR QUALITY IMPACTS ARE UNDERESTIMATED

III.A. Rollback Procedure Is Not Warranted

Air quality impacts are evaluated by using dispersion models to convert project emissions into increases in ambient concentrations of each pollutant. These incremental concentrations are then added to

background ambient concentrations to estimate ambient concentrations after the project is built. These projections are then compared with ambient air quality standards to determine if the project would cause a significant air quality impact. See more detailed discussion in DEIR, Appendix G, Section 2.2, Dispersion Modeling.

It is standard practice to use the maximum measured existing ambient concentration at the nearest monitoring station as the background in these calculations. The DEIR, however, deviated substantially from the accepted approach and estimated future background concentrations using a linear rollback approach used in the 1997 AQMP to determine if the proposed region-wide controls would bring the basin into compliance with standards. (DEIR, Appx. G, § 2.4.) This approach assumes that changes in emissions will change ambient air concentrations proportionally. The use of this approach resulted in very substantial reductions in future background concentrations, nearly a factor of two for CO and 50% for NOx. (DEIR, p. 4-470, Table 4.6-2, Table 4.6-5.)

The use of this questionable approach obscured the two major air quality impacts of this project. If this approach were not used, both the federal and State 8-hour CO air quality standard and the federal and State annual NO₂ standard would be exceeded by substantial amounts. These impacts are not discussed in the DEIR. These are serious impacts. The South Coast is currently in compliance with the federal annual NO₂ standard. Thus, the project could trigger a reclassification of the South Coast to nonattainment for NO₂. The South Coast currently violates the federal and State 8-HOUR CO standard. This project would cause new violations of this standard, preventing the South Coast from coming into compliance and resulting in serious economic and other penalties.

The use of any rollback procedure is not warranted for at least three reasons.

First, many of the reductions that are forecast to occur in the region are based on rules that have not been adopted and control technologies that do not yet exist and may never exist. Thus, they are speculative and not acceptable for use in a CEQA analysis.

Second, the appropriate amount of rollback, if any, depends on the emission reductions achieved by the AQMP in a specific region. The AQMP itself states: "A linear rollback approach is used to evaluate future nitrogen dioxide concentrations. It assumes the ambient concentrations above background levels are directly proportional to the emissions in the immediately adjacent areas." (AQMP, Chpt. 5, p. 2, emphasis added.)

The DEIR relied on an extrapolation from the 1997 AQMP for downtown Los Angeles. (DEIR, Appx. G, p. 46.) The DEIR has made no showing that the projected reductions assumed in the rollback calculations would occur in the area around LAX. The vicinity of LAX contains a number of very large stationary sources, e.g., the Chevron El Segundo Refinery, which would not be substantially affected by the proposed AQMP control measures. Thus, downtown Los Angeles is not a reasonable surrogate for the immediate vicinity of LAX. In fact, the NA/NP alternative projects a substantial increase in emissions at and around LAX, which more than offset the reductions proposed in the 1997 AQMP. Therefore, there is no basis for concluding that the projected 1997 AQMP emission reductions would improve the air quality around LAX in the future, compared to the 1996 baseline. In fact, it appears that future increases in emissions without the project would increase baseline air quality in the vicinity of LAX.

Third, as noted above, the AQMP underestimated future emissions from aircraft because it assumed that EPA would adopt regulations requiring cleaner aircraft engines. These regulations were not adopted. Thus, emissions in the vicinity of LAX would be much higher than projected in the 1997 AQMP, offsetting any reductions that may occur nearby or elsewhere.

In sum, a rollback procedure is not warranted. Thus, the project would cause new violations of federal standards, significant impacts that were not discussed in the DEIR.

Response:

Please see Response to Comment AR00003-48, regarding future background concentrations.

3. Comments and Responses

AL00033-327

Comment:

III. B All Emissions Were Not Included In Air Quality Analysis

The air quality dispersion analysis did not include any off-airport emissions of NO_x, SO_x, and PM₁₀ nor any off-airport stationary source emissions of CO. (DEIR, Appx. G, § 2.4.) Because the majority of the emissions occur off-airport, the dispersion analyses have substantially understated the true air quality impacts of the project.

Response:

All on- and off-airport emissions are presumed to be included in the monitored background concentrations (per standard modeling practice). Since they are added directly to the modeled concentrations, the analyses likely overestimate concentrations since emissions from on-airport sources are counted twice (once modeled and once in the monitored concentrations).

AL00033-328

Comment:

III. C. Sulfate Omitted

California has an ambient air quality standard for sulfate of 25 µg/m³ based on a 24-hour average. (DEIR, Table 4.6-3.) Sulfate is a toxic air pollutant that is recognized by OEHHA and is normally included in health risk assessments. Sulfate can cause changes in lung function and damage to lung tissue. Sulfates also impair the defense mechanisms of the lung. Health effects studies have shown an increase in respiratory illness from exposure to sulfates.¹¹

In contrast to other State standards, the sulfate standard was set at a "critical harm" level rather than the usual "threshold with a margin of safety" health effects level (CCR, Title 17, § 70200.) The threshold health effects level of ambient sulfates is estimated to be in the range of 8 to 10 µg/m³. Thus, the State standard for sulfates of 25 µg/m³ has a negative margin of safety.

The DEIR proposes a significance threshold for sulfate of 1 µg/m³ (DEIR, Table 4.6-7). However, the DEIR does not determine whether this threshold is exceeded. In fact, the DEIR does not evaluate either air quality or public health sulfate impacts, instead arguing that "All sulfur emitted by airport-related sources included in this analysis was assumed to be released and to remain in the atmosphere as SO₂. Therefore, no sulfate inventories or concentrations were estimated." (DEIR, pp. 4-482,4-495.) Elsewhere, the DEIR argues that there are no significant sources of sulfate at LAX. (DEIR, Table 4.6-2, note 1 and Appx. G, P. 2.)

This is incorrect as amply demonstrated in numerous CARB staff reports. There are two types of sulfate, primary and secondary. Primary sulfate is directly emitted from cooling towers, cars, trucks, and stationary combustion sources such as boilers and heaters. In fact, cooling tower emissions commonly contain enough sulfate by themselves to violate the sulfate standard. Secondary sulfate, on the other hand, forms when oxides of sulfur (SO₂) are transformed into sulfate particles through physical and chemical processes in the atmosphere.¹² Ambient conversion of SO₂ to sulfates is especially intense in the humid or foggy conditions found along the California coast, particularly in spring.¹³ Essentially 100% of emitted SO₂ will eventually be oxidized to sulfate in the atmosphere. The DEIR incorrectly assumed that 100% of the fuel sulfur is emitted as SO₂ and remains as SO₂ in the atmosphere.

The current ambient sulfate levels in the South Coast are high and exceed the levels CARB considers safe near the project (e.g., see West Los Angeles: VA Hospital, North Main Street; North Long Beach; Hawthorne). The maximum reported concentration in the vicinity of LAX was 18.4 µg/m³ between 1996 and 1998. (DEIR, table 4.6-5.) The South Coast violated the sulfate standard up until very recently. The standard was exceeded in August 2000 at North Long Beach. Emissions from this project are high enough to again cause exceedances of the ambient sulfate standard. They are also high enough to exceed the significance threshold of 1 µg/m³ established in the DEIR for sulfates.

The State sulfate standard is 50 µg/m³, averaged over 24 hours. Using the modeling completed for unmitigated operational SO₂ emissions (Table 4.6-11) and assuming that 100% of the SO₂ is converted into sulfate in the atmosphere, the increase in sulfate concentration in 2005 would be about 50 µg/m³,¹⁴ or nearly two times higher than the State standard and over five times the levels considered by CARB to pose a health hazard. When this increment is added to the maximum background ambient concentration of 18.3 µg/m³, the ambient concentrations of sulfate could reach 68 µg/m³ nearly seven times higher than the threshold health levels identified by CARB. Similarly, the project would cause the sulfate concentration in 2015 to increase by 63 µg/m³ and ambient concentrations would increase up to 81 µg/m³.

The DEIR did not model construction SO₂ emissions, which would likely also cause the State sulfate standard to be exceeded. The DEIR also did not model mitigated operational SO₂ emissions, but mitigated ambient sulfate concentrations would remain significant because the proposed mitigation measures would reduce SO₂ emissions by less than 10%.

Therefore, the DEIR failed to evaluate whether the project would comply with a State ambient air quality standard and ignored a significant health impact of the project. Sulfate emissions from the project would cause the State sulfate standard to be exceeded and ambient concentrations of sulfate in the region to exceed threshold health levels. This is a significant impact that was not discussed in the DEIR.

11 California Air Resources Board (CARB), Regulations Concerning a 24-hour Sulfate Ambient Air Quality Standard, Staff Report #77-20-3, February 20, 1976; CARB, Review of 24-hour Sulfate Ambient Air Quality Standard, Staff Report #77-20-3, September 29, 1977.

12 California Air Resources Board (CARB), Prospects for Attaining the State Ambient Air Quality Standards for Suspended Particulate Matter (PM₁₀), suspended Particulate Matter (PM₁₀), Visibility Reducing Particles, Sulfates, Lead, and Hydrogen Sulfide, March 1991.

13 CARB, Proposed Amendment to the Designation Criteria and Amendments to the Area Designations for State Ambient Air Quality Standards and Proposed Maps of the Area Designations for the State and National Ambient Air Quality Standards, August 1998, p. 30.

14 The project would increase the 24-hr SO₂ concentration from a current background level of 0.007 ppm to 0.019 ppm, or by 0.019 - 0.007 = 0.012 ppm in the year 2005. (DEIR, Table 4.6-11.) Converting this to µg/m³ of sulfate: (0.012 ppm)(105 µg/m³/0.04 ppm)(96/64) = 47 µg/m³.

Response:

The concentration thresholds presented in Table 4.6-7 in Section 4.6, Air Quality, of the Draft EIS/EIR are incremental project concentration thresholds specific to the South Coast Air Basin, unlike the thresholds presented in Table 4.6-3 of the Draft EIS/EIR, which are total concentrations, including both project-related incremental concentrations and the background concentration. For the Draft EIS/EIR, onsite-monitoring data was used where available. Concentrations for pollutants not monitored on-site, as is the case with sulfate concentrations, were taken from the closest available South Coast Air Quality Management District (SCAQMD) monitoring station, Monitoring Station 094 SW Coastal Los Angeles County. The SCAQMD Air Quality Summaries for 1996 through 2001 show no exceedances of the sulfates ambient air quality standard (AAQS), as shown in Table 4.6-5 of the Draft EIS/EIR.

Sulfate, similar to ozone, is a regional pollutant created in the atmosphere through a complex process of photochemical reactions. Individual projects, including those as large as the LAX Master Plan, generally do not model the creation of sulfates due to the complexity of the reactions and number of variables, but instead model precursor pollutants. Similar to ozone, sulfates are difficult to quantify due to the complexity of the atmospheric photochemical reactions, and the large number of variables dictating the formation of this regional pollutant. For these regional pollutants, projects instead monitor and calculate the emissions of their precursor pollutants, in this case SO₂. To assume 100 percent conversion of SO_x to sulfates is an overestimation.

According to the Draft 2003 AQMP, in 1995, the South Coast Air Basin had 106.8 tons per day (tpd) of SO_x emissions and the 24-hour sulfate max measurement in Central Los Angeles was 15.5 µg/m³. By comparison, the increase in SO_x emissions from Alt C (mitigated) in 2015 is 517 tons per year (tpy) minus the baseline of 382 tpy or 135 tpy, or approximately 0.37 tpd. This represents approximately 0.35 percent of the 106.8 tpd, so by a ratio, the project may contribute the proportionate amount or

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approximately 0.05 ug/m³ to the 24-hr average in South Coast Air Basin. Please note, the conversion of SO_x to sulfate is very complex and this is a very simplified method of estimating an impact.

SO₂ concentrations from construction sources were included in the Table S4.6-22 of the Supplement to the Draft EIS/EIR. Unmitigated SO₂ concentrations were predicted to be below AAQS and, therefore, did not require additional mitigated analysis and are considered to be less than significant.

AL00033-329

Comment:

III. D. PM_{2.5} Omitted

Historically, health impacts due to particulate matter ("PM") were regulated through ambient air quality standards on particulate matter with an aerodynamic diameter of less than or equal to 10 microns ("PM₁₀"). However, a substantial amount of important new health effects information has been published documenting new health impacts at much lower concentrations and for different size fractions of particulate matter than previously known. (U.S. EPA 4/ 96.15)

This new research documented that the inhalation of particulate matter, particularly the smallest particles, those with an aerodynamic diameter of less than or equal to a nominal 2.5 microns ("PM_{2.5}"), causes premature mortality, aggravation of respiratory (e.g., cough, shortness of breath, wheezing, bronchitis, asthma attacks) and cardiovascular disease, declines in lung function, changes to lung tissues and structure, altered respiratory defense mechanisms, and cancer, among other effects. (U.S. EPA 4/96; 61 FR 65638.16)

The U.S. EPA, in its review and analysis of this new information, concluded that coarse and fine particles have fundamentally distinct physical and chemical properties and health effects and thus are separate classes of pollutants that should be separately regulated and measured so that effective control strategies can be developed. (U.S. EPA 4/96, pp. 13-93.) To address this issue, a new national ambient air quality standard for PM_{2.5} was promulgated in 1997 (62 FR 38652 17).

This new PM_{2.5} standard was challenged by industry (American Trucking Associations, Inc. v. United States Environmental Protection Agency, No. 97-1440 (D.C. Cir., May 14, 1999)) and subsequently appealed to the Supreme Court. Thus, the DEIR declined to evaluate PM_{2.5} impacts because, at the time that the DEIR was prepared and published, the status of the PM_{2.5} standard was uncertain. (DEIR, Appx. G, pp. 49-50.) However, although the status of the PM_{2.5} standard itself was somewhat ambiguous, the court found ample scientific basis for the PM_{2.5} standard itself. (See Opinion, § IV.C.)

Thus, the substantial new information on health effects of PM_{2.5} should - have been evaluated in the DEIR. Nearly 100% of the project's operational emissions are combustion emissions. According to CARB and EPA, combustion emissions are PM_{2.5}.¹⁸ The new health studies reviewed above indicate that an increase in 24-hr average PM_{2.5} concentrations of 10 µg/m³ increases the daily acute mortality by 0.8% to 2.2%. (U.S. EPA 7/96, Table V-14.) An increase in the 24-hr average PM_{2.5} concentration of 25 µg/m³ increases the relative risk of hospitalization by 3% to 16% and of respiratory symptoms by 5% to 82%. (U.S. EPA 7/96, Table V-12.)

The dispersion modeling for unmitigated operational impacts (DEIR, Table 4.6-11) indicates that the preferred option would increase PM_{2.5} in 2005 by 14 µg/m³ and in 2015 by 13 µg/m³.²⁰ Based on EPA's research, this corresponds to an up to 3.1% increase in daily acute mortality, an increase in the relative risk of hospitalization of up to 9.0%, and an increase in the relative risk of respiratory symptoms up to 46%. These impacts would decline somewhat to 11 µg/m³, and 10 µg/m³ respectively, for the mitigated scenario (DEIR, Table 4.6-20), but would nevertheless remain significant.

Therefore, the project will certainly cause or significantly contribute to exceedances of the new PM_{2.5} standards. Further, there is no longer any reason not to evaluate PM_{2.5} because the Supreme Court has upheld the PM_{2.5} standard itself. Thus, the DEIR should be revised to include PM_{2.5} analyses and recirculated for review.

15 U.S. Environmental Protection Agency, Air Quality Criteria for Particulate Matter, Report EPA/600/P-95-001af through 001cf, April 1996.

16 National Ambient Air Quality Standards for Particulate Matter: Proposed Decision, Federal Register, v. 61, no. 241, December 13, 1996 pp. 65638-65675.

17 National Ambient Air Quality Standards for Particulate Matter: Final Rule, Federal Register, v. 62, no. 138, July 18, 1997.

18 For example, 99.2% of gasoline PM combustion emissions, 96.7% of jet fuel PM combustion emissions, and 100% of natural gas combustion emissions is less than 2.5 microns. CARB, PM Size Fractions from the California Emission Inventory Development and Reporting System (CEIDARS), Updated March 24, 1999.

19 U.S. EPA, Review of the National Ambient Air Quality Standards for Particulate Matter: Policy Assessment of Scientific and Technical Information, OAQPS Staff Paper, Report EPA-452/R-96-013, July 1996.

20 The increase in PM_{2.5} is based on the annual arithmetic mean (AAM) and assumes that 100% of the PM₁₀ is PM_{2.5} because it is derived from combustion sources. The increment is calculated as the difference between the unmitigated operational concentrations including background in Table 4.6-11 and the future background concentrations in Appendix G, Table 22. For example, - for the year 2005 for Alternative C, 42 µg/m³ -28 µg/m³ = 14 µg/m³.

Response:

It is true that the U.S. EPA, CARB and the SCAQMD now recognize PM₁₀ and PM_{2.5} ambient air quality standards. However, there is a three-year transition period currently underway for the collection of PM_{2.5} air quality monitoring data. This information will be used to identify and delineate zones in the Los Angeles area that do not meet these new criteria. Until the SCAQMD completes this initial data collection process, it is difficult to establish whether the area near LAX is in compliance with the federal and state PM_{2.5} standards.

As an interim measure, the U.S. EPA recommends that PM₁₀ be used as a surrogate for PM_{2.5} as was done for both the Draft EIS/EIR and Supplement to the Draft EIS/EIR air quality analyses.

Importantly, the Human Health Risk Assessment, Section 4.24.1 and Technical Report S-9a of the Supplement to the Draft EIS/EIR, addressed the potential effects of diesel PM emissions associated with the LAX Master Plan. It is this type (i.e., petroleum-based) and size (i.e., <2.5 microns) of PM that is of greatest concern to the U.S. EPA, state and local agencies from the standpoint of human health.

The findings from this health risk assessment determined that the potential effects to human health (both on the airport and in nearby communities) from a wide array of hazardous air pollutants (including diesel PM) are diminished with the adoption of Alternative D (the LAWA-staff preferred alternative) when compared to the No Action/No Project Alternative. This benefit is largely attributable to improved roadway operating conditions on and around the airport resulting from the proposed Master Plan improvements.

Please also see Topical Response TR-AQ-3 regarding increased air pollution, Response to Comment PC00070-1 regarding existing air pollution levels, and Response to Comment AR00003-53 regarding modeling of PM.

Because these emission factors are based on (a) an aggregate from all aircraft operational modes (i.e., take-off, landing, climb-out, etc.) and (b) a predominately older aircraft fleet (i.e., B727, B737, DC10, etc.), they are considered to be conservatively high values for either PM₁₀ or PM_{2.5} relative to those expected from the fleet at LAX.

AL00033-330

Comment:

III.E. Urban Heat Island Effect Ignored

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The hot surfaces of black pavements and roofs quickly warm the air over urban areas, leading to the creation of summer urban "heat islands." On a clear summer afternoon, the air temperature in urban areas can be 2 F to 9 F hotter than the surrounding rural area. The maximum daily temperatures in downtown Los Angeles are now 7 F higher than they were in 1880. The elevated temperature increases cooling energy demand, accelerates the rate of smog production, and increases evaporative losses of organic compounds from gasoline tanks of vehicles parked over the hot surfaces.

The project would significantly expand the area of potentially black roofs and pavements at LAX, thus contributing to the well-documented heat island effect in Los Angeles. ²¹ This effect would increase local concentrations of ozone due to elevated ambient air temperatures and increased evaporative emissions of vehicles visiting LAX. These impacts were not discussed in the DEIR, but can be reduced by requiring cool surfaces for paving and roofs.²²

²¹ H. Akbari, M. Pomerantz, and H. Taha, Cool Surfaces and Shade Trees to Reduce Energy Use and Improve Air Quality in Urban Areas, Solar Energy Journal, 2000.

²² H. Taha, Ozone Air Quality Implications of Large-Scale Albedo and Vegetation Modifications in the Los Angeles Basin, Energy Analysis Program 1995 Annual Report, LBNL Energy & Environment Division, August 1996.

Response:

A number of facts which the commentor states are correct. However, urban heat island effects are regional effects. Since the comparative scales of the Los Angeles urban area compared to the scale area of increased "black surfaces" is immensely disproportionate, any increase in "black surfaces" at LAX would be minimal with respect to the entire LAX urban area. Thus, the contribution of construction included in the LAX Master Plan would be effectively zero.

AL00033-331

Comment:

III.F. Benefits Do Not Outweigh Costs

The project includes a number of stationary sources that will require permits from the SCAQMD. These include fuel storage tanks, boilers, gas turbines, internal combustion engines, cooling towers, and heaters. (DEIR, Appx. G, Table 5.) In nonattainment areas, the federal Clean Air Act provides that permits to construct and operate may only be issued if "an analysis of alternative sites, sizes, production processes and environmental control techniques for such proposed source significantly outweigh the environmental and social costs imposed as a result of its location, construction, or modification." (42 U.S.C. § 7503(a)(5).)

Response:

Comment noted.

AL00033-332

Comment:

The DEIR does not contain any demonstration that the benefits of the proposed project significantly outweigh the environmental and social costs imposed as a result of its location. The environmental costs of this project are huge. Thus, the project should be denied on this basis alone, similar to the recent decision in Washington on the Sumas Energy Facility.²³

²³ State of Washington, Energy Facility Site Evaluation Council, Application No. 99-01, Sumas Energy 2, Inc., Council Order No. 754, February 16, 2001, www.efsec.wa.gov/Sumas2/adj/se2dj.html.

Response:

The purpose of an environment assessment document prepared pursuant to NEPA or CEQA- in this case a joint EIS/EIR- is to disclose the environmental impacts of a proposed project in order to provide information to decision makers. Project approval does not require that the benefits of a project

outweigh its impacts. It should be noted that, in many cases, the impacts of the Master Plan would be less than the impacts of the airport without the implementation of the Master Plan, i.e., the No Action/No Project Alternative.

AL00033-333

Comment:

IV. THE PROPOSED MITIGATION PROGRAM IS INADEQUATE

The proposed mitigation program is technically and legally flawed, as documented below. The problems identified below should be corrected and the EIR recirculated for public review.

IV.A. Regulations And Plans Inappropriately Included As Mitigation

The proposed mitigation measures appear to include a number of measures that are mandated by existing regulations or would be implemented anyway under existing plans.

Fugitive dust from construction activities would be reduced using soil stabilization or watering. (DEIR, pp. 4-513, -516.) However, SCAQMD Rule 402 requires implementation of best available dust suppression control measures to assure that dust is not visible beyond the property line. Therefore, this measure is already required and cannot be claimed as mitigation. The EIR must be expanded to include additional construction fugitive dust mitigation, not specifically required by SCAQMD Rule 402. Some suitable measures that have been found technically feasible by both the SCAQMD and other air districts are discussed below in Comment IV.E.

Most of the mitigation measures proposed for this project are already being implemented as part of an existing Air Quality Mitigation Program. The DEIR does not explain what this existing program is or its basis-e.g., required to mitigate impacts from another project, required as part of a use permit, etc. However, it is abundantly clear that this is an on-going program. The DEIR proposes "expanding" this program to mitigate the impacts of the proposed LAX Master Plan. (DEIR, p. 4-512.) This expanded program would "expand and revise" the existing Mitigation Program. (DEIR, p. 4-513.)

The individual mitigation measures included in this existing Program include: "continued conversion of ground support equipment;" "continued use and encouragement of the LAWA carpool and rideshare program;" "ongoing implementation of the traffic management program;" "ongoing expansion of the FlyAway Bus service;" "continued addition of 400-Hertz electrical ground power and preconditioned air;" and "continued conversion of GSE to alternative fuels."

Table 4.6-16 clarifies that those measures which represent a continuation of current policy and requirements would be "accelerated" by including infrastructure in the Master Plan. (DEIR, Table 4.6-16.) Therefore, the DEIR is apparently taking credit for actions that would occur anyway, under an existing Program, although over a longer period of time. Acceleration of an action that would occur anyway is not valid mitigation. Further, it appears that emission reductions due to this existing Program are already included in the project baseline and NA/NP alternatives against which impacts are evaluated. Thus, the DEIR has double counted these emissions and has failed to include bona fide mitigation.

IV.B. The Mitigation Program Would Be Prepared Out of Public View

The DEIR includes "an extensive list of potential Mitigation Measures" in Technical Report 4, Appendix X. (DEIR, p. 4-514.) Nearly 150 mitigation measures were identified. However, the DEIR analyzed only 30 of these. (DEIR, p. 4-461.) The DEIR does not commit to even these 30, arguing that they must be approved by the implementing agency and thus are "considered preliminary." Further, the DEIR claims that "Some of these measures may not be implementable for a variety of technical reasons or may be preempted by the federal government." (DEIR, p. 4-513/514)

The DEIR never reveals which measures it has absolutely committed to, instead noting that "These measures will be further analyzed in terms of feasibility of implementation and cost-effectiveness, along with additional Mitigation Measures suggested through public and agency comments." (DEIR, p. 4-461.) This is exactly the type of information that should be included in the EIR, not sprung on the public for

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the first time in the FEIR, where there is no opportunity for comment. The DEIR even states that the evaluation of mitigation measures is ongoing and that a comprehensive Environmental Action Plan for air quality will be published in the Final EIS/EIR. It proclaims, for example, that "all mitigation options are still under consideration." (DEIR, p. 4-473.)

Thus, it appears that the bulk of the mitigation program will be assembled out of public view, precluding any meaningful review. This violates the requirement to propose meaningful mitigation in the DEIR and compromises the public review process. The measures that will be implemented should be fully described in the DEIR and reasons for rejecting mitigation measures should likewise be clearly stated in the DEIR.

IV.C. Mitigation Measures Are Not Enforceable

The 30 mitigation measures that were evaluated in the DEIR (p. 4-513) are not enforceable for two reasons.

First, they do not include specific performance standards that would allow them to be implemented, let alone allow their effectiveness to be evaluated. Four of the measures would only "encourage" participation, viz., the LAWA carpool and rideshare program, promoting alternative-fueled vehicles or SULEV/ZEV engines in commercial vehicles, reduced-engine taxiing, and single vehicle trips.

Second, none of the proposed measures quantify the number of units that would be involved, the time frame over which the action would occur, nor describe the proposed measure with enough specificity to allow it to be implemented, let alone reviewed by the public or enforced if eventually adopted. The measures only require generic "acceleration," "promotion," "conversion," and "implementation."

To be enforceable, the mitigation measures must be quantifiable. Thus, the description of the measure must specifically state what infrastructure would be provided, when it would be provided, and how compliance would be verified.

IV.D. All Feasible Mitigation Measures Not Required

The South Coast Air Basin where LAX is located is acknowledged to have the worst air quality in the nation. The severity of its nonattainment is classified as "extreme" for ozone and "serious" for CO and PM10. In fact, it has the most serious ozone nonattainment problem in the United States. It alone is classified as an "extreme" ozone nonattainment area. This project would aggravate this serious problem by emitting huge amounts of the ozone precursors, NOx and VOCs. Most of these emissions would not be mitigated. Further, the area where LAX is located is the only area in all of California and one of the few areas in the entire United States that is nonattainment for CO. This project would aggravate this serious problem by emitting huge amounts of unmitigated CO.

Alternative C would increase operational NOx emissions by 3,719 ton/ yr in 2015 compared to the baseline, of which only 1,126 ton/yr or 30% would be mitigated. Similarly, construction would increase NOx emissions by 4,152 ton in the peak year, of which only 125 tons or 3% would be mitigated. Alternative C would additionally increase operational VOC emissions by 3,563 ton/ yr of which only 27% would be mitigation. Construction would increase VOC emissions by 645 ton in the peak year, of which only 9% would be mitigated. (Fig. 1.) The conclusions are similar when evaluated relative to the NA/ NP condition, except for CO and VOC, which appear to have been incorrectly estimated, as discussed above in Comment II.C. (Fig. 2.) The actual increases in emissions could be substantially higher than reflected in Figures 1 and 2 due to errors in emissions estimates and incorrect baselines, as discussed in Comment II. (Please see original letter for figures.)

In spite of these huge emissions and the severe ozone nonattainment problem in the South Coast, this project is proposing to mitigate only a small fraction of its emissions. The EIR admits that construction and operational impacts would remain significant after mitigation. (DEIR, pp. 4-525 to 4-529.) These emissions are not included in the current State Implementation Plan ("SIP") and thus have not been considered by SCAQMD in its efforts to come into compliance with ambient air quality standards. (DEIR, pp. 4-476/478.) Because the South Coast is required by law to come into compliance with federal and state ozone standards, these emissions must be reduced by somebody. Therefore, the DEIR by failing to propose adequate mitigation, in effect, has placed the burden on other parties to mitigate emissions from the expansion of LAX.

Because of the severe air quality problems in the region, this project should not be approved unless these emissions are reduced to insignificance. It is not clear that this is feasible. However, there are numerous additional feasible air quality mitigation measures that were not identified or evaluated in the EIR. (TR4, Attach. X.) There are also numerous additional feasible mitigation measures that are routinely recommended by other agencies and that are included in other airport EIRs. All of these measures must be adopted.

The following sections discuss additional feasible measures that should be evaluated. These should be evaluated, additional feasible measures adopted, and the revised EIR recirculated.

Response:

Comment noted. Since publication of the Draft EIS/EIR, the proposed mitigation program has been significantly revised and updated. The Supplement to the Draft EIS/EIR addressed the proposed mitigation program in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix S-E.

With respect to dust suppression control measures, the commentor is assumed to be referring to SCAQMD Rule 403 - Fugitive Dust, in this comment rather than Rule 402 - Nuisance. LAWA agrees with the assertion that complying with a rule or regulation is not mitigation. Rule 403 offers myriad dust control options for man-made fugitive dust occurrences at construction sites. Any mitigation that goes beyond that required of Rule 403 (i.e., opting to water three times daily rather than the mandated twice daily) can be considered mitigation. Further, implementing more of the menu of measures than is required under the regulation would also be considered mitigation. The Draft EIS/EIR does not take credit for measures that would occur anyway based on regulatory requirements.

A detailed and comprehensive air quality analysis was conducted for Alternatives A, B, C, and D as well as the No Action/No Project Alternative. This analysis was included in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR. The analysis addressed impacts from carbon monoxide and its effect on air quality and human health.

The commentor may be aware that in order for a project to be approved, it need not reduce its adverse environmental impacts below significance. There are many large-scale projects, such as this one, that simply cannot reduce all environmental impacts below significance. CEQA requires that all feasible mitigation measures be evaluated and implemented. If impacts remain significant, then a Statement of Findings is required pursuant to state CEQA Guidelines Section 15091, and a Statement of Overriding Consideration is required pursuant to state CEQA Guidelines Section 15093. The Overriding Considerations must find that the project's benefits outweigh its unavoidable adverse environmental effects. The Findings and Overriding Considerations are adopted by the Lead Agency during certification of the Final EIS/EIR.

Regarding the comment related to mitigation measures, 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 finding in conjunction with project approval. The mitigation monitoring or 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. For information regarding the formulation of mitigation measures at a program-level of planning, please see Response to Comment AR00003-63.

AL00033-334

Comment:

IV.E. Additional Feasible Construction Mitigation Measures

Construction of the project would take place over a 14-year period and emit up to 4,152 ton/yr of NO_x; 3,279 ton/yr of CO; 2,071 ton/yr of PM₁₀; 582 ton/yr of SO_x; and 645 ton/yr of VOC. (DEIR, Table 4.6-10.) In spite of these huge emissions, the DEIR only requires three mitigation measures: (1) requiring all construction deliveries to be made with clean fuel vehicles; (2) using soil stabilization and/or watering to

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reduce fugitive dust; and (3) using an on-site rock crushing facility to minimize truck haul trips. These three measures would reduce emissions of NO_x by up to 125 ton/yr (3%), VOC by 60 ton/yr (9%), CO by 150 ton/yr (5%), and PM₁₀ by 543 ton/yr (26%). (DEIR, p. 4-516, 517.) Construction air quality impacts remain significant after mitigation. (DEIR, pp. 4-525 to 4-529.) Therefore, all feasible mitigation measures must be implemented. There are many feasible mitigation measures that are routinely required as CEQA mitigation in other areas that have not even been considered here. These broadly fall into two categories, fugitive dust measures and engine exhaust measures. Each is discussed below.

IV.E.1. Fugitive Dust Mitigation Measures

Fugitive dusts arise from excavating, grading, and wind erosion of storage piles and other disturbed areas. These PM₁₀ emissions can be readily reduced using a wide range of technically feasible and economic mitigation measures, as discussed below. The only fugitive dust mitigation measure that apparently would be used by the Project is water/stabilizer application. The DEIR assumes that this application would reduce fugitive dust by 60%. (DEIR, Table 4.6-17/18.) However, the DEIR fails to describe the details of the water/stabilizer application, such as frequency of application and areas that would be watered (e.g., haul roads, storage piles) and to indicate how it would be monitored, if at all. Therefore, it is not possible to determine whether it would achieve the claimed reductions.

PM₁₀ reductions can be significantly increased beyond the claimed 60% using numerous other fugitive dust mitigation measures that are routinely required and implemented as CEQA mitigation for other projects. These include measures contained in the CEQA guidelines of several air districts including the Bay Area Air Quality Management District (BAAQMD 1996, pp. 12-14),²⁴ the South Coast Air Quality Management District (SCAQMD 1993, pp. 11-3, 11-4, 11-13 to 11-15),²⁵ the Monterey Bay Unified Air Pollution Control District (MBUAPCD 1995, pp.),²⁶ the Ventura County Air Pollution Control District (VCAPCD 1989, pp. 7-2 to 7-4),²⁷ the San Luis Obispo County Air Pollution Control District (SLOCAPCD 1995, pp. 23-27),²⁸ the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD 1998, pp. 22, 62, 63),²⁹ the Sacramento Metropolitan Air Quality Management District (SMAQMD 1994, pp. 10, 20),³⁰ the Santa Barbara County Air Pollution Control District (SBCAPCD 1997, pp. 16-18),³¹ Butte County Air Quality Management District (BCAQMD 1997),³² and the Yolo-Solano Air Quality Management District (YSAQMD 1996, Appx. D).³³ All of these measures should be implemented for the project by requiring them as standard contract language. These measures include:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical / stabilizers/ suppressant, or vegetative ground cover (BAAQMD, SJVUAPCD).
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/ suppressant (BAAQMD, SJVUAPCD).
- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking (BAAQMD, SJVUAPCD).
- When materials are transported off-site, all material shall be covered, effectively wetted to limit visible dust emissions, or at least six inches of freeboard space from the top of the container shall be maintained (BAAQMD, SJVUAPCD).
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at least once every 24 hours when operations are occurring. (BAAQMD) (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.) (SJVUAPCD).
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant (SJVUAPCD).
- Limit traffic speeds on unpaved roads to 15 mph (BAAQMD, SJVUAPCD).
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than 1% (BAAQMD, SJVUAPCD).

- Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site (BAAQMD, SJVUAPCD).
- Install wind breaks at windward side(s) of construction areas (BAAQMD, SJVUAPCD).
- Suspend excavation and grading activity when winds exceed 20-25mph (BAAQMD, SJVUAPCD).
- Limit areas subject to excavation, grading, and other construction activity at any one time (BAAQMD, SJVUAPCD).
- Water all active construction sites at least twice daily. (BAAQMD, BCAQMD, SBCAPCD, SMAQMD, SCAQMD)
- Cover inactive storage piles. (BAAQMD, BCAQMD, SBCAPCD, MBUAPCD)
- During initial grading, earth moving, or site preparation, projects 5 acres or greater may be required to construct a paved (or dust palliative treated) apron, at least 100 ft in length, onto the project site from the adjacent site if applicable. (BCAQMD)
- Hydroseed or apply soil stabilizers to inactive construction areas (previously graded areas inactive for 10 days or more). (BAAQMD)
- Replant vegetation in disturbed areas as quickly as possible. (BAAQMD)
- Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 24 hrs. (BCAQMD, MBUAPCD)
- Prior to final occupancy, the applicant demonstrates that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions. (BCAQMD)
- Gravel pads must be installed at all access points to prevent tracking of mud on to public roads. (SBCAPCD)
- Trucks transporting fill material to and from the site shall be tarped from the point of origin. (SBCAPCD)
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. (SBCAPCD, SLOCAPCD)
- Prior to land use clearance, the applicant shall include, as a note on a separate informational sheet to be recorded with map, these dust control requirements. All requirements shall be shown on grading and building plans. (SBCAPCD, SLOCAPCD)
- All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. (SLOCAPCD)
- Pave, apply water three times daily, or apply soil stabilizers on all unpaved access roads, parking areas and staging areas. (BAAQMD)
- Sweep streets at the end of each day (or as needed) if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible. (BAAQMD, SLOCAPCD, VCAPCD, MBUAPCD, BAAQMD, SCAQMD)
- Pave all roads on construction site. (MBUAPCD, SCAQMD)

Many of these measures are routinely required elsewhere. See, for example, the construction mitigation program proposed for the El Toro Airport in Exhibit 1.

IV.E.2. Engine Exhaust Measures

3. Comments and Responses

Internal combustion engines, such as those used in most construction equipment, burn fossil fuels, primarily diesel. The combustion process is always somewhat inefficient, creating byproducts such as NO_x, CO, SO_x, ROG, and PM₁₀. The vast majority of the project's construction emissions -- 100% of the NO_x, CO, SO_x, and ROG -- arise from the combustion of fuel in engines. The only mitigation measure required for these emissions is the use of clean fuel delivery vehicles (DEIR, p. 4-513, Table 4.6-16), which comprise a very tiny fraction of the total construction exhaust emissions and a Master Plan Commitment to use low-NO_x construction equipment (DEIR, § 4.6.5). There are numerous other technically feasible measures identified in the CEQA guidelines of air districts and/or routinely required by other agencies. These are as follows:

- Use alternative fueled construction equipment. (SJVUAPCD)
- Minimize idling time (2-10 min maximum). (SJVUAPCD, SCAQMD)
- Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use. (SJVUAPCD)
- Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). (SJVUAPCD)
- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak-hour of vehicular traffic on adjacent roadways. (SJVUAPCD)
- Implement activity management (e.g., rescheduling activities to reduce short-term impacts). (SJVUAPCD)
- The engine size of construction equipment shall be the minimum practical size. (SBCAPCD)
- Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or precombustion chamber engines. (SBCAPCD, SLOCAPCD)
- Install high pressure injectors on diesel construction equipment. (SLOCAPCD)
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible. (SBCAPCD, SLOCAPCD)
- Diesel catalytic converters shall be installed, if available. (SBCAPCD)
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite. (SBCAPCD)
- During smog season (May through October), the construction period should be lengthened so as to minimize the number of vehicles and equipment operating at the same time. (VCAPCD)
- Construction activities should utilize new technologies to control ozone precursor emissions as they become available and feasible. (VCAPCD)
- Use electricity from power poles rather than temporary diesel power generators. (SCAQMD)
- Emission offsets if ROG or NO_x emissions exceed 6.0 tons/quarter. (SLOCAPCD)

Post-combustion controls have recently been widely required as CEQA mitigation. These include oxidation catalysts, which remove 90% of the CO, 40% to 60% of the VOCs, and 20+% of the PM₁₀ and soot filters that remove 90% of the PM₁₀. Thus, these measures are cost-effective and technically feasible and must be used here to comply with the obligation to impose all feasible mitigation.

The Port of Oakland has proposed to substantially expand its facilities and recently adopted and allocated about \$9 million for mobile source CEQA mitigation. This mitigation package included soot filters and catalytic converters to control exhaust emissions from cargo-handling equipment (e.g., cranes, loaders) and on-highway container transport trucks.³⁴

These controls were also required as CEQA mitigation by the San Luis Obispo Air Pollution Control District for the Avila Beach remediation project, and are now routinely required by SLOAPCD as CEQA mitigation for construction impacts. The City of San Diego required oxidizing soot filters on all equipment larger than 100 hp, except cranes as CEQA mitigation for the Padres Ball Park.

The California Energy Commission requires the use of oxidizing soot filters on equipment used to construct power plants that it licenses. Several 500+MW power plants are currently under construction or have been constructed, successfully using these controls, including High Desert, Elk Hills, Midway-Sunset, and Sunrise.

Post-combustion controls are also in use at the "Big Dig," the massive, 5-year \$10 billion-plus Central Artery road project in Boston's North End and one of the largest infrastructure construction projects in history.

IV. E.3. Low Emission Trucks Would Increase VOC Emissions

The DEIR proposes to require that all construction deliveries be made with clean fuel vehicles. (DEIR, p. 4-516.) The reductions achieved by this measure as reported on Table 4.6-16, page 4-516, are substantially different from those claimed on Tables 4.6-17 and 4.6-18. In the latter two tables, the DEIR appears to claim that this measure would reduce NO_x, PM₁₀, and SO₂ emissions, but substantially increase CO and VOC emissions. See Table 4.6-18, page 4-519.

The CO and VOC emission reductions are in parentheses, which generally means the reductions are negative. Negative reductions represent an increase. This interpretation is likely if these reductions include implementation of the MOU between EPA, CARB and engine manufacturers to make low-NO_x engines available by 2005. If this low NO_x construction equipment (DEIR, p. 4-467) meets the stipulated NO_x limit by lowering the engine combustion temperature, this would reduce NO_x, but increase VOCs and CO. If this interpretation is correct, the EIR is proposing to mitigate NO_x emissions from construction by using engines that would roughly triple the VOC emissions, thus effectively canceling its ozone benefits.

24 Bay Area Air Quality Management District, BAAQMD CEQA Guidelines. Assessing the Air Quality Impacts of Projects and Plans, April 1996.

25 South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.

26 Monterey Bay Unified Air Pollution Control District ("MBUAPCD"), CEQA Air Quality Guidelines, October 1995.

27 Ventura County Air Pollution Control District ("VCAPCD"), Guidelines for the Preparation of Air Quality Impact Analyses, October 24, 1989.

28 San Luis Obispo Air Pollution Control District ("SLOAPCD"), CEQA Air Quality Handbook, August 1995.

29 San Joaquin Valley Unified Air Pollution Control District ("SJVUAPCD"), Guide for Assessing and Mitigating Air Quality Impacts, August 20, 1998.

30 Sacramento Metropolitan Air Quality Management District ("SMAQMD"), Air Quality Thresholds of Significance, 1994.

31 Santa Barbara County Air Pollution Control District ("SBCAPCD"), Scope and Content of Air Quality Sections in Environmental Documents, September 1997.

32 Butte County Air Quality Management District ("BCAQMD"), Indirect Source Review Guidelines, March 20, 1997.

33 Yolo-Solano Air Quality Management District, Air Quality Handbook, May 1996 (Construction mitigation is identical to SMAQMD).

34 Port of Oakland, Berths 55-58 Project Final Environmental Impact Report, April 8, 1999.

3. Comments and Responses

Response:

The Draft EIS/EIR did not contain a final mitigation program for air quality impacts. Rather, as indicated on page 4-513 in Section 4.6, Air Quality, of the Draft EIS/EIR, the document included a list of mitigation options under consideration by FAA and LAWA at that time. Where possible, the benefit of the potential measures was quantified. As was stated in the Draft EIS/EIR, "The Final EIS/EIR will include a comprehensive Environmental Action Plan for air quality, consisting of specific Mitigation Measures and commitments and incorporating public comments on the Draft EIS/EIR, where appropriate, as well as additional evaluation being undertaken by LAWA during the public review period."

The Supplement to the Draft afforded FAA and LAWA an opportunity to provide a comprehensive air quality mitigation program for the LAX Master Plan prior to publication of the Final EIS/EIR. (See Section 4.6.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR and Section 2.3 of Appendix S-E.) The number of measures included in the program has been substantially expanded since publication of the Draft EIS/EIR. However, not all measures have benefits that can be quantified. Recommended measures whose benefits cannot be easily quantified were not incorporated into the post-mitigation modeling analysis, although they remain an important component of the mitigation strategy. Table S24, Recommended Air Quality Mitigation Measures, of Appendix S-E, Supplemental Air Quality Impact Analysis, of the Supplement to the Draft EIS/EIR lists all of the measures in the recommended mitigation program, including many of the measures identified by the commentor. The following measures identified by the commentor were not included in the program for the reasons listed below.

- Access points would be paved. Therefore, there is no need to install gravel pads at access points to prevent tracking of mud onto the public roads.
- Construction will cease during Stage 1 smog episodes or during high wind conditions. In addition, construction shifts would be scheduled to avoid the peak traffic hours to the maximum extent feasible. However, construction will not be curtailed during period of high ambient pollutant concentrations.
- All construction equipment was assumed to be diesel-powered. Therefore, the installation of catalytic converters on gasoline-powered equipment is not necessary.
- Carpooling is not required for construction workers. Construction workers perform tasks generally on an hourly basis with varying schedules and construction phases. Construction shifts would be scheduled to avoid peak traffic hours to the maximum extent feasible to avoid contributing to congestion in and around the airport area. On-site lunch trucks would be provided.
- Emission offsets are not required for construction-related emissions and are not included in the recommended air quality mitigation program.

Emission reductions from fugitive dust have been conservatively estimated to be approximately 63 percent. Actual emission reductions may be substantially higher than 63 percent; however, this analysis uses the emission reduction methodologies from the SCAQMD's CEQA Air Quality Handbook, which equates to 63 percent from implementation of a number of fugitive dust measures. Please see Response to Comment AR00003-50 regarding construction equipment emission assumptions.

AL00033-335

Comment:

IV.F. Operational Mitigation Measures

In the buildout year of 2015, Alternative C would increase emissions up to 6,613 ton/ yr of CO; 3,563 ton/ yr of VOCs; 3,719 ton/ yr NOx; 184 ton/ yr of SO₂, and 348 ton/yr of PM₁₀. (DEIR, Tables 4.6-8/9.) In spite of these huge emissions and the severe air quality problems in the region, the DEIR only requires that 12% of the CO, 9% of the VOCs, 8% of the NOx, 8% of the SO₂, and 4% of the PM₁₀ to be mitigated. (DEIR, Tables 4.6-19/21.) Operational air quality impacts remain significant after mitigation. (DEIR, pp. 4-525 to 4-529.)

Mitigation measures can take a variety of forms. They may avoid the impact altogether; minimize the impact by limiting its degree or magnitude; rectify the impact by repairing, rehabilitating, or restoring; reduce or eliminate the impact; or compensate for the impact by replacing or providing substitute resources or environments. (14 CCR § 15370; SCAQMD CEQA Guidelines, § 20.22.) There are many

feasible mitigation measures that fall into these categories of acceptable mitigation that were not considered in the DEIR. Many of these are routinely required as CEQA mitigation in other areas.

IV.F.1. Measures That Compensate

There are at least three obvious examples of feasible mitigation measures that compensate for the impacts of this project that were not considered and which would reduce project emissions. There are: (1) reducing emissions from existing sources within LAX; (2) reducing emissions from sources outside of LAX; and (3) offsetting emissions with Reclaim credits.

IV.F.2. Reducing Emissions At LAX

There are many opportunities to reduce emissions from current activities and sources of emissions at LAX. The DEIR suggests that in-airport stationary sources are already well regulated, limiting opportunities for reductions. (DEIR, p. 4-513.) The DEIR does not support this claim with actual inventory information. Most existing sources at LAX predate the development of and widespread application of control technologies such as SCONOx, SCR, oxidation catalysts, and soot filters. Some examples of feasible measures to reduce emissions at existing (as well as new) sources at LAX include the following:

- retrofit existing boilers, gas turbines, furnaces, and heaters with SCR, SCONOx, and/or oxidation catalysts to control NOx, VOCs, and PM10;
- retrofit existing internal combustion engines with oxidation catalysts to control VOCs, soot filters to control PM10, and SCR to control NOx;
- mandate the use of 15 ppm diesel fuel in all airport-related fleets that do not use an alternative, lower-emitting fuel;
- implement energy conservation programs in existing terminal and auxiliary facilities (e.g., photovoltaics, cool roofs, etc.);
- install ozone destruction catalysts such as PremAir on existing air conditioning systems;
- contract with commercial landscapers who operate equipment that complies with the most recent CARB certification;
- contract with delivery and waste hauling companies that use CARB certified or other low-emission vehicles;
- provide free transit passes to all employees;
- equip cooling towers with high efficiency drift eliminators to control PM10 and sulfate emissions.
- cover any parking structures that receive direct sunlight to reduce volatile emissions from vehicle gasoline tanks;

See also the list of additional measures included in the El Toro DEIR in Exhibit 1.

IV. F.3. Reducing Emissions Elsewhere

There are numerous opportunities to reduce emissions from stationary sources elsewhere in the South Coast Air Basin. In Los Angeles County alone, combustion sources (e.g., boilers, heaters, and turbines in refineries and power plants) emit 494 ton/day of NOx and 41 ton/ yr of VOCs.³⁵ These emissions could be reduced by installing state-of-the art pollution control equipment on these existing sources. The regulations of the SCAQMD, for example, require that most of these sources meet a NOx limit of 30 ppm or higher and a CO limit of 100 ppm or higher. There is currently technically feasible and cost effective technology that can meet NOx limits of 1 to 2 ppm and reduce VOC and CO up to 90% on most types of combustion sources, including heaters, boilers, furnaces, generators, and turbines. For example, both SCONOx and selective catalytic reduction (SCR) can reduce NOx by over 95%. Similarly, oxidation catalysts and SCONOx can reduce VOCs and CO by 90% or more. Therefore,

3. Comments and Responses

LAWA could retrofit large combustion sources in other industries in the general region with SCR, SCONOX, and/or oxidation catalysts (as well as other technologies) and meet its mitigation obligation.

Response:

The Supplement to the Draft EIS/EIR contained revised information and data relative to feasible mitigation measures and their control efficiency. In addition, the Supplement to the Draft EIS/EIR included new and detailed mitigation information, including many measures related to the application of oxidation catalysts and soot filters.

The 15 ppm sulfur diesel is assumed to already be achieved in practice. As such, no mitigation credit was taken. The City of Los Angeles has been purchasing ultra low sulfur (<15 ppm) diesel fuel since November 2001 for use in various city vehicles. Particulate traps are being installed on a variety of heavy duty trucks and buses. The city participated in a demonstration program that assessed the effect of running equipment with ultra low sulfur fuel and diesel particulate traps. The fleet operators reported no change in performance and results showed that emissions were substantially reduced. (City of Los Angeles, Environmental Affairs, September 2002.) The city also requires low sulfur fuel in construction equipment. (City of Los Angeles, B.O.E. Master Specification 01562 - Environmental Mitigation.) The Supplement to the Draft EIS/EIR provided an enhanced discussion of air quality mitigation measures in Section 4.6.8, Mitigation Measures, and in Appendix S-E, Section 2.3.

Cooling towers are already equipped with drift eliminators at LAX.

Parking structures are proposed to be covered in the Supplement to the Draft EIS/EIR.

Free transit passes are neither cost-effective nor quantifiable. However, LAWA does currently offer a variety of rideshare incentives and has already demonstrated a 1.5 average vehicle ridership (AVR) in its SCAQMD Rule 2202 Plan.

Commercial landscapers will be asked to comply with the most recent CARB certification.

Energy conservation strategies such as solar panels or enclosing parking lots are still being researched as is the cost-effectiveness of PremAir.

With respect to waste hauling companies, LAWA continues to pursue all available methods to require or encourage the use of low emission vehicles by its tenants and contractors. The City of Los Angeles has adopted resolutions to convert all city-owned waste hauling trucks to either alternative fuels or ultra low sulfur diesel with particulate traps.

Retrofitting combustion sources in other industries does not mitigate the emissions from LAX. In addition, the FAA has no legal authority over another site and cannot begin retrofitting equipment that does not belong to it. Therefore, this option is not legally enforceable nor does it begin to mitigate emissions from the proposed project at hand.

AL00033-336

Comment:

IV.G. Energy Conservation Measures

Air quality impacts can be mitigated by reducing the demand for electricity at the existing airport as well as in the proposed new facilities. The Master Plan includes an energy conservation and efficiency program for the proposed new facilities. However, this plan does not apply to existing facilities. Further, it is only very generally described in the DEIR as a "commitment" to "design new facilities to meet or exceed the prescriptive standards required under Title 24." (DEIR, p. 4-792.) It is not clear what this "commitment" entails. Specific energy efficiency goals are not established, and no commitment is made to any specific measures beyond those required in Title 24. Other energy conservation programs that have been implemented in California establish specific goals relative to Title 24.

The Sacramento Municipal Utility District ("SMUD") has implemented an energy conservation program that the SMAQMD requires as CEQA mitigation for large commercial projects. This program requires that new commercial projects be designed and built to exceed California Title 24 energy requirements.

The Tier 1 program requires that new commercial projects be designed to exceed the requirements of CCR Title 24 building standards by 25% and the Tier 2 program requires that Title 24 is exceeded by 35%.³⁶ A minimum goal of 35% should be required for new LAX facilities because of its large increase in electricity demand and huge unmitigated air emissions.

These reductions can be achieved by using a number of measures, including energy-efficient air conditioners (e.g., water-cooled, rather than air-cooled), high-efficiency lighting and glass, daylighting (e.g., skylights), high-efficiency motors, automatic controls for lighting and equipment, photocell dimming, higher insulation levels than required by code, reflective roofs, and photovoltaics, among others. The DEIR does not contain any commitment to any specific efficiency goals (e.g., 35% greater than Title 24) or measures beyond complying with Title 24 for new facilities. It also does not contain a commitment to implement these types of measures for existing facilities. Therefore, any increases in efficiency of existing facilities and increases beyond Title 24 for new facilities can be required as air quality mitigation. Three specific measures that are feasible and thus should be required as air quality mitigation are further described below.

IV.G.1. Fuel Cells

The project includes a number of diesel generators that emit carcinogenic diesel exhaust. See, for example, discussion of fuel farm generators in the Master Plan, page V-K.35. These, and other existing generators could be replaced by fuel cells, which produce energy from hydrogen and have no emissions. They are supported by the California Energy Commission and the South Coast Air Quality Management District. These cells are more expensive than an equivalent diesel generator, costing about \$600,000 for a 200 kw unit. However, the U.S. EPA refunds \$200,000 of the cost of a fuel cell, making its life cycle costs quite attractive.

IV.G.2. Photovoltaic Energy Systems

Photovoltaic energy systems generate electricity using solar panels, and reduce air pollution by reducing conventional electric power generation. These types of systems are required as CEQA mitigation by the SMAQMD and thus can be presumed to be feasible. A number of buildings in Sacramento have recently included photovoltaics as CEQA mitigation, including 30 kw on the roof of the Cal EPA office tower, a 75-kw system on the roof of the Cal Expo parking structure, and the Sacramento Zoo. Photovoltaic systems have been installed in many large office buildings elsewhere. These, include 4 Times Square in New York, the Thoreau Center for Sustainability in the Presidio National Park, San Francisco, the National Air and Space Museum in Washington, D.C., and the State University of New York in Albany, among many others.³⁷

A wide variety of photovoltaic systems are available in today's markets. Most of them can be grouped into two main categories -- facade systems and roofing systems. Facade systems include curtain wall products, spandrel panels, and glazings. Roofing systems include tiles, shingles, standing seam products, and skylights. Individual solar cells are interconnected and encapsulated on various materials to form a module. Modules are strung together in an electrical series with cables and wires to form an array. Direct or diffuse light, usually sunlight, shining on the solar cells induces the photovoltaic effect, generating unregulated DC electric power. This DC power can be used, stored in a battery system, or fed into an inverter that transforms and synchronizes the power into AC electricity. The electricity can be used in the building or exported to a utility through a grid interconnection.

Photovoltaic systems require negligible maintenance. They are typically guaranteed for 90% of design output for 20 years by the manufacturer. Systems are commercially available to provide 1 kw to 1 MW of electricity at 10 net watts per square foot and are able to meet the peak load of most large businesses. The systems are lightweight, weighing only about 4 pounds per square foot, less than half the weight of a conventional ballasted roof.³⁸ Improved manufacturing has substantially reduced the cost of these systems since the 1970s, and numerous providers are available.³⁹ However, BIPV electricity still costs more per kilowatt-hour ("kWh") than utility-supplied electricity. The higher cost is primarily due to the initial capital cost of the system, which typically ranges from \$6 to \$8 per watt installed. Assuming this cost is amortized for 20 years at 10% interest, this amounts to about \$0.08 to \$0.10 per kWh⁴⁰ or about 15% to 40% more than usual commercial electric rates.

IV.G.3. Energy Star Roof Products

3. Comments and Responses

Most commercial and residential buildings have dark roofs. Dark roofs absorb 80% to 90% of the incident sunlight, heating the roof and plenum space. Because the air distribution system is typically installed in the plenum space between the roof deck and the dropped ceiling over the finished interior space, this raises the summertime cooling demand. In addition, heating the roof heats the air that passes over the roof. Thus, the entire region around a dark roof becomes warmer.

Dark roofs (and parking lots) quickly warm the air over urban areas, leading to the creation of summer urban "heat islands." The additional air conditioning demand created by this temperature effect is responsible for 5% to 10% of urban peak electric demand. The increased power demand leads to higher emissions from power plants. This increase in temperature causes a 10% to 20% increase in urban ozone, and in some cases, has been estimated to generate as much ozone as all on-road motor vehicles in the Los Angeles area.⁴¹ Measures to reverse the heat island effect and reduce electricity demand include planting shade trees and other vegetation and incorporating reflective roofs and pavements into urban landscapes. These measures have been required by SMAQMD as CEQA mitigation and thus are feasible.

Intercepting the sunlight before it heats a building keeps its surface cooler and reduces the heat flow into the building. This reduces the demand for air conditioning. This can be accomplished by using light-colored, reflective roofs. A light-colored roof can reduce the amount of energy needed for cooling by 20% to 70%, depending on the amount of insulation under the roof and design of the air ducting system. This is achieved by reflecting most of the energy, rather than absorbing it. The difference between the roof surface and ambient air temperatures may be as high as 90 F, while for reflective roofs, the difference is only about 18 F. This reduces peak cooling demand, cooling costs, the size of the HVAC system, and the rating and amount of insulation required in a building, and increases the lifetime of the roof. This also reduces air pollution by reducing the amount of external power that must be produced and the amount of ambient ozone that is formed in the vicinity of the development from the heat island effect.

Normal asphalt-based roofing products typically have a reflectivity of 10% to 20%. Energy Star-labeled roof products are roofing products certified to achieve at least 65% reflectivity and to maintain a reflectivity of 50% under normal conditions for 3 years after installation. The program is sponsored by the U.S. EPA and the Department of Energy. There are currently over 115 manufacturers enrolled in the program. Reflective roofing is also recognized as an acceptable design option in the latest edition of the American Society of Heating, Refrigerating and Air-Conditioning Engineers ("ASHRAE") Standards 90.1 42 and 90.2 on energy-efficient buildings.

Energy Star roof products are economical to apply and maintain and are frequently cheaper than or comparable to conventional roofing products, which cost from \$1.50 to \$2.50 per square foot installed.⁴³ Cool roofs come in a variety of styles, including reflective coatings, reflective membranes, or metal roofs made of galvanized or other coated metal. Coatings have a consistency of thick paint and cost from \$0.75 to \$1.50 per square foot installed. Membranes are single-ply, pre-fabricated sheets applied in a single layer, typically made of PVC (poly vinyl chloride), TPO (tripolymer olefin), Hypalon, or CPA (copolymer alloy) and cost from \$1.50 to \$3.00 per square foot. A reflective roof can be installed or applied over almost any type of roof material, including directly on a plywood deck in place of asphalt.

Cool roofs have been widely used in California, including on the American Airlines airport terminal in San Jose, on control towers at the Stockton and Palmdale airports, at the 300,000 ft² Honda distribution warehouse in Stockton, the 200,000 ft² JC Penny warehouse in Buena Park, and numerous buildings in Silicon Valley. Their performance has been extensively documented in both field studies and computer simulations⁴⁴

At a one-story school in Sacramento, increasing the reflectivity of the roof from 8% to 68% by painting with a white coating reduced the cooling energy use over the June to October period by 34% and peak power by 32%.⁴⁵ In another Sacramento study, daily air conditioning savings of 17%, 26%, and 39% were documented in an office, museum, and hospice with high reflectivity roofs.⁴⁶ At a one-story, 31,700 ft² Kaiser medical office building in Davis, increasing the reflectivity of an R-19 flat roof from 24% to 60% reduced summertime average weekday air conditioning by 18%. At another one-story, 23,800-ft² Kaiser medical office building in Gilroy, increasing the reflectivity of an R-7 flat roof from 25% to 65% reduced the summertime average weekday air conditioning by 13%. At a 33,000-ft² drug store in San Jose, increasing the reflectivity of a foil barrier flat roof from 18% to 28% reduced the summertime average daytime air condition by 2%.⁴⁷ A high-reflective coating on an office building in Mississippi

reduced cooling energy demands by 22%.⁴⁸ Reflective coatings reduced cooling energy costs by 12% to 18% in two other commercial buildings in California. ⁴⁹

The reflectivity of a conventional unsurfaced galvanized corrugated metal roof of seven retail stores in a strip mall in Florida was increased from 29% to 75% with a white coating. This reduced the summer space cooling energy use by 25%, with a range in savings of 13% to 48%, depending on the temperature maintained in the shops. Those maintaining the lowest interior temperatures saved the least on a percentage basis. The cost of the application was \$0.53/ft² with a payback period of about 9 years.⁵⁰

At a single family residence in Sacramento, increasing the reflectivity of the roof from 18% to 79% by painting with a white coating reduced the cooling energy use over the June to October period by 66% and the peak power by 17%. In nine Florida homes, daily air conditioning energy use was reduced by 2% to 43% and peak demand was reduced by an average of 22%. The amount of energy savings was inversely correlated with the amount of ceiling insulation and duct system location, with the largest savings in poorly-insulated homes and those with duct systems in the attic space and smaller savings in well-insulated homes.⁵¹

The best candidates for cool roofs are air-conditioned buildings that have large roof surface areas compared to the overall size of the facility and reside in a hot, sunny location with more cooling-degree days than heating-degree days. Thus, reflective roofs would be very cost effective for terminals and ancillary airport facilities. The average energy savings in the Davis medical center was 193 kwh per day during the June to September period for 31,700 ft² of space cooled with a reciprocating air-cooled chiller. Assuming the same savings for LAX (and much higher savings have been documented), the energy use for the 5.7 million square feet of new buildings planned for Alternative C (Master Plan, Appx. K) would be reduced by 4,234 MWH and the cooling bills by \$296,000 ⁵² over the June to September period. Much higher savings could be achieved by coating the roofs of existing buildings currently at LAX.

In sum, this measure would save a substantial amount of money over the life of the project and would cost no more than a standard roof. It would also reduce pollution by reducing the generation of power and the formation of ozone from the heat island effect. Therefore, Energy Star roofing should be required for existing and new facilities, where appropriate.

³⁵ www.arb.ca.gov/app/emisinv/emssumcat_query.php.

³⁶ CCR Title 24 is the California Building Code. Part 6 is the California Energy Code, promulgated by the California Energy Commission and adopted by the City of Elk Grove. The newest revisions to Title 24 become effective June 1, 2001. See www.energy.ca.gov/title24/.

³⁷ P. Eiffert and G.J. Kiss, Building-Integrated Photovoltaic Designs for Commercial and Institutional Structures. A Source Book for Architects, U.S. DOE, 2000.

³⁸ See www.powerlight.com and www.epv.net.

³⁹ James & James, The World Directory of Renewable Energy. Suppliers & Services with Market Overview, 2000.

⁴⁰ Cost of photovoltaic electricity = (0.12)(\$6000/kw)/(8,760 hr/yr) = \$0.08/kwh.

⁴¹ Hashem Akbari, Cool Roofs Save Energy, ASHRAE Transactions, v. 104, Pt. 1, 1998; H. Taha, Modeling the Impacts of Large-Scale Albedo Changes on Ozone Air Quality in the South Coast Air Basin, Atmospheric Environment, v. 31, no. 11, 1997, pp. 1667-1676.

⁴² American Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc., Energy Standard for Buildings Except Low-Rise Residential Buildings, Standard 90.1-1999.

⁴³ R.S. Means, Square Foot Costs, 21st Ed., 2000, Division 5, Roofing.

⁴⁴ See, for example: H. Akbari, S. Konopacki, C. Eley, B. Wilcox, M. Van Geem and D. Parket, Calculations for Reflective Roofs in Support of Standard 90.1, ASHRAE Transactions, v. 104, no. 1,

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1998, pp. 984-996; L. Gartland, S. Konopacki, and H. Akbari, Modeling the Effects of Reflective Roofing, ACEEE 1996 Summer Study on Energy Efficiency in Buildings, v. 4, 1996, pp. 117-124.

45 H. Akbari, S. Bretz, D. Kurn, and J. Hanford, Peak Power and Cooling Energy Savings of High-Albedo Roofs, Energy and Buildings, v. 25, 1997, pp. 117-126.

46 E.W. Hildebrandt, W. Bos, and R. Moore, Assessing the Impacts of White Roofs on Building Energy Loads, ASHRAE Technical Data Bulletin, v. 14, no. 2, 1998.

47 H. Akbari, L. Gartland, and S. Konopacki, Measured Energy Savings of Light-Colored Roofs: Results from Three California Demonstration Sites, Proceedings of the 1998 ACEEE Summer Study on Energy Efficiency in Buildings, v. 3, no. 1, 1998.

48 C. Boutwell and Y. Salinas, Building for the Future - Phase I: An Energy Saving Materials Research Project, Mississippi Power Co., Rohm and Haas Co and the University of Mississippi, 1986.

49 S. Konopacki, H. Akbari, L. Gartland, and L. Rainer, Demonstration of Energy Savings of Cool Roofs, LBNL Report 40673, 1998.

50 D. Parker, J. Sonne, and J. Sherwin, Demonstration of Cooling Savings of Light Colored Roof Surfacing in Florida Commercial Buildings: Retail Strip Mall, Florida Solar Energy Center Report FSEC-CR-964-97, 1997. (www.fsec.ucf.edu/Bldg/pubsonline.htm)

51 D.S. Parker and others, Measured and Simulated Performance of Reflective Roofing Systems in Residential Buildings, ASHRAE Proceedings (Winter Meeting), Atlanta, GA, 1998. (www.fsec.ucf.edu/Bldg/pubsonline.htm)

52 LAX cooling bill savings = $[193 \text{ kwh/day}/31,700 \text{ ft}^2](122 \text{ days})(5.7 \times 10^6 \text{ ft}^2)(\$0.07/\text{kwh}) = \$296,368$ for the June to September period.

Response:

Fuel cells are not technologically feasible at this time to replace electricity demand at LAX. During construction, this project will use utility-produced electricity to the extent possible and, when on-site generators are used, employ low-emitting diesel fuel and particulate traps. LAWA is considering the use of fuel cell vehicles in the future.

The FAA has done extensive analysis regarding the incorporation of photovoltaic energy systems into the build design element. The FAA agrees with the commentor's analysis of the maintenance, guarantees, cost, etc., and is incorporating some type of photovoltaic system into the air quality mitigation measure for the Supplement to the Draft EIS/EIR.

LAWA has committed to providing energy efficient buildings, as was stated in Section 4.17, Energy Supply and Natural Resources (subsection 4.17.1.5), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, Master Plan Commitment Number E-1 (i.e., to continually improve the energy efficiency of building design and layouts during implementation of the LAX Master Plan). Where appropriate in an airport environment, cool roofs will be specified as Master Plan projects are initiated.

AL00033-337

Comment:

IV.G.4. Alternative Diesel Fuel

The construction of the project will consume 31.6 million gallons of diesel fuel. (DEIR, p. 4-799.) On-airport vehicles will consume another 1.13 million gallons per year in 2005 and 0.55 million gallons in 2015. (DEIR, Table 4.17.1-2, p. 4-795.) Diesel exhaust is the major contributor to health risks in the South Coast and a major contributor to the health risk of this project. Requiring the use of alternative, low-emission diesel fuels for 100% of the on-airport demand would reduce the emissions of NO_x and PM₁₀ and reduce health impacts. This measure has been required by the SMAQMD on all CalTrans construction projects in the greater Sacramento area and is thus feasible.

CARB verified the first alternative diesel fuel, PuriNOx, on January 31. This fuel was jointly developed by Caterpillar and Lubrizol, the world's largest independent manufacturer of specialty chemicals. This fuel is an emulsion of diesel and water, which is certified to reduce NOx by 14% and PM10 by 63%. Other similar fuels, such as blends of diesel and ethanol or soybean oil, are currently being demonstrated and may be certified and locally available within the timeframe of this project.

PuriNOx can be used in any direct-injection heavy-duty compression ignition engine. It is compatible with existing engines and existing storage, distribution, and vehicle fueling facilities. It has been successfully used in Sacramento school bus and county off-road equipment fleets and at construction sites in the Sacramento area as well as elsewhere. Operational experience indicates little or no difference in performance and startup time, no discernable operational differences, no increased engine noise, significantly reduced visible smoke, and substantial reductions of objectionable diesel exhaust odors.

The fuel can be either manufactured on-site in a vendor-supplied, self-contained, automated PuriNOx blending system from commercial diesel fuel, tap water, and a special additive package. The 10% to 20% water that is added improves combustion efficiency and lowers peak combustion temperatures, reducing emissions. The blending unit can be leased or purchased in sizes to meet volume requirements and applications and typically measures about 20 feet by 8 feet by 8 feet. The blending unit is located at the fuel rack, distributor's facilities, or end user's on-site location.

The additive package and blending results in a net increase in cost of about 10 cents per gallon, which can be offset using incentives administered by the SCAQMD. The water has no energy content and thus reduces peak horsepower and torque by around 12% after correcting for increased thermal efficiency due to better fuel atomization and flame spread characteristics, but requires more frequent refueling. The increased operating costs range from negligible for lower output applications to as high as 15%, depending on the age of the engine, equipment design, and operating conditions.

Response:

The FAA is familiar with PuriNOx, which is a low-emitting diesel fuel, and has already utilized it in some of its operational vehicles. As part of the air quality analyses conducted for this project, PuriNOx (low-emitting diesel fuel) is assumed to be used as mitigation in off-road construction equipment. It is also assumed to be used in on-site generators needed to supply power during construction.

With respect to the operational fleet at LAX, PuriNOx will be incorporated to the maximum extent feasible.

AL00033-338

Comment:

HUMAN HEALTH AND SAFETY

The DEIR does not contain an adequate human health analysis. Public health impacts were underestimated by using an unusually high significance threshold for chronic impacts, excluding acute impacts, excluding impacts to terminal passengers, excluding impacts due to construction, and underestimating toxic air pollutant ("TAP") emissions by ignoring the influence of engine power settings on emission rates and improperly assessing lead and acrolein emissions.

Response:

Please see Response to Comment AF00001-40 for a discussion of the significance threshold for chronic impacts. An evaluation of acute health impacts was provided in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. Regarding impacts to passengers, please see Response to Comment AL00033-348. Section 4.24.1 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR address, at a programmatic level of analysis, human health impacts associated with overall long-term operations of the LAX Master Plan improvements proposed under each of the five alternatives (No Action/No Project Alternative and Alternatives A, B, C, and D). For the period of construction, the risk analysis includes a number of very conservative assumptions, such as a 70-year exposure duration that far exceeds the time when construction will actually take place, which indicate that overall human health impacts on the surrounding communities are unlikely to be underestimated. The analysis approach, assumptions -- including a strong conservative (protective) bias, and

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conclusions are appropriate for a programmatic level of evaluation of long-term operational impacts for Master Plan alternatives. Actual construction activities associated with Master Plan alternatives will occur as a sequence of events over a 10+ -year period. These events will be of varying durations and intensities and will occur at different locations within the Master Plan study area. Thus, unlike human health impacts for airport operations, which determined the location of, and risk level for, a maximally exposed individual (MEI) based on the LAX activities during the construction period, impacts (i.e., location of and exposure for people living near the airport) associated with construction activities would vary greatly over time depending on the nature, duration, and location of individual construction projects underway at any given time. Not all construction activities would occur concurrently nor would any single project continue for the duration of the construction period. This level of complexity can not be adequately addressed at a programmatic level of analysis. Instead, human health impacts associated with construction activities can be better addressed at a project level of analysis, where appropriate, based on the specifics of each project. Please see Response to Comment AL00033-226 for a discussion of emissions by aircraft operations mode, and acrolein emission. Regarding evaluation of lead impacts, please see Response to Comment AL00033-245.

AL00033-339

Comment:

The proposed mitigation program, identical to the air quality mitigation program discussed in Comment IV, is inadequate for human health impacts for the same reasons discussed above. Additionally, the proposed mitigation program fails to recognize the differences in approaches that are required to mitigate air quality versus human health impacts.

Response:

The content of this comment is essentially the same as comment AL00022-38; please refer to Response to Comment AL00022-38.

AL00033-340

Comment:

V. PUBLIC HEALTH IMPACTS ARE UNDERESTIMATED

The public health consequences of this project are large and appear to have been underestimated through a number of omissions and adjustments to standard risk assessment protocols.

Response:

The human health risk assessment followed California Environmental Protection Agency and U.S. Environmental Protection Agency guidance, adapted to the airport environment. Methods used in the human health risk assessment are more likely to overestimate than underestimate possible health risks. For example, risks are calculated for individuals that are likely to be exposed at locations where toxic air pollutant emissions are predicted to be highest. Individuals are assumed to be exposed for almost all days of the year and for many years to maximize estimates of possible exposure. Toxicity information used in the human health risk assessment incorporated conservative assumptions designed to protect the more sensitive receptors, such as children, the elderly, and individuals with respiratory conditions. Resulting incremental risk estimates represent upper-bound predictions of exposure and health risk.

AL00033-341

Comment:

V.A. Significance Thresholds

The DEIR uses an incremental hazard index of 5 as the significance threshold for noncancer health impacts. (DEIR, p. 4-1009.) It provides no justification for this unusual choice, beyond citing a SCAQMD letter that does not address noncancer health impacts. (DEIR, p. 4-1009, note 684.) By selecting a high significance threshold, the DEIR has failed to find significant impacts that should have been classified as significant and mitigated.

A hazard index is the ratio of the sum of concentrations of pollutants emitted by the project to the concentrations deemed by the State to be safe. (DEIR, p. 4-1009, note 679.) A noncancer significance threshold of 5 means the project can cause the concentrations of toxic substances to be five times higher than the State has determined will result in significant health impacts before the DEIR declares the impact to be significant.

The significance of noncancer health risks is routinely evaluated using guidelines established by CARB in 1993. These guidelines recommend a hazard index of one as the significance threshold for noncancer health impacts. (CARB 7/93.53) These guidelines have been adopted in CEQA guidelines and regulations by air districts throughout the State that are routinely used to assess noncancer health impacts in EIRs. Every air district in the State that has established significance thresholds for noncancer health risks for purposes of CEQA has established a significance threshold of 1 for these impacts. Excerpts from CEQA guidelines of air districts are included in Exhibit 2.

The SCAQMD's CEQA Guidelines do not contain any recommendation for significance thresholds for noncancer impacts. Other EIRs prepared for project in the SCAQMD have routinely used a significance threshold for noncancer health impacts of 1. See typical excerpts in Exhibit 3. Further, SCAQMD Rule 1401 requires that noncancer hazard indices not exceed 1.0 for new permit units, relocations, or modifications to existing permit units that emit TAPS. (Rule 1401(d)(2) and 1401(d)(3).) Although this rule does not apply to aircraft emissions at LAX because the SCAQMD does not have jurisdiction over mobile source emissions, the choices for significance thresholds in the rule reflect the general state-wide consensus on this issue. As a practical matter, the significance of health impacts does not depend on the source of the emissions -- mobile sources versus stationary sources -- only on the specific chemicals and their impacts on humans.

53 CARB, Risk Management Guidelines for New and Modified Sources of Toxic Air Pollutants, July 1993.

Response:

The threshold of significance identified for noncancer health effects was 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.

CARB's document Risk Management Guidelines for New and Modified Sources of Toxic Air Pollutants, July 1993, suggests an action range for the total hazard index ranging from a lower level of 1 to an upper level of 10. The Draft EIS/EIR text stating that "a HQ greater than one indicates an exposure greater than that considered safe" was revised in the Supplement to the Draft EIS/EIR to indicate that U.S. EPA Risk Assessment Guidance for Superfund (1989) states that the noncancer hazard quotient assumes that there is a level of exposure (i.e., reference concentration) below which it is unlikely for even sensitive subpopulations to experience adverse health effects. If the exposure level exceeds this threshold there may be concern for potential noncancer effects. As a rule, the greater the value of the hazard quotient above unity, the greater the level of concern. The hazard index is equal to the sum of the hazard quotients. When the hazard index exceeds unity, there may be concern for potential health effects. As indicated by CARB in their 1993 Air Toxics "Hot Spots" Program, Revised 1992 Risk Assessment Guidelines, exceeding the REL does not automatically indicate a health impact.

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.

AL00033-342

Comment:

V.B. Acute Health Impacts

3. Comments and Responses

There are two types of noncancer health impacts: those which result from exposures to low concentrations for long periods of time (chronic) and those which result from short exposures to high concentrations (acute). The noncancer health analyses presented in the DEIR are only for chronic impacts.

The DEIR establishes a significance threshold for acute health impacts (DEIR, p. 4-1009), but does not conduct any analyses of acute health impacts. (TR14, Table 6.) Acute impacts are those caused by short-duration exposures, typically one hour or less. It is standard practice to include acute impacts in a public health analysis. Regulatory guidance requires these analyses.

Response:

An evaluation of acute health hazards associated with the proposed alternatives was addressed in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.4, Environmental Consequences), of the Supplement to the Draft EIS/EIR. Also please refer to Technical Report S-9a, of the Supplement to the Draft EIS/EIR for additional information regarding acute impacts; specifically Subsection 4.2.2, Assessment of Acute Hazards and Subsection 6.3, Cumulative Acute Hazards.

AL00033-343

Comment:

These impacts will be highly significant because all of the major emission sources involved in the expansion emit acrolein, which has a very low acute reference exposure level. Based on my rough calculations, the acrolein concentrations will be high enough to exceed the safe exposure level of 0.19 µg/m³ by factors of 20 to 200 or more, posing a significant health hazard. Acrolein is an eye and respiratory irritant and will cause burning eyes in the most sensitive individuals. This is a significant impact that was not evaluated in the DEIR and which would not be reduced to a less than significant level by the proposed mitigation measures.

Response:

Acute hazards were addressed in Section 4.24.1, Human Health Risk Assessment (subsections 4.24.1.6 and 4.24.1.9), of the Supplement to the Draft EIS/EIR. Additional detail concerning acute hazards is provided in Technical Report S-9a (subsection 4.1.2) of the Supplement to the Draft EIS/EIR.

As discussed in these sections, acrolein is the only TAP of concern in emissions associated with LAX operations that might be present at concentrations approaching a threshold for acute effects. The acute reference exposure level (REL) was used along with predictions of 1-hour maximum concentrations of acrolein to assess possible acute health impacts for all build alternatives and the No Action/No Project Alternative. Short-term concentrations for acrolein were estimated using the Industrial Source Complex Air Dispersion Model, ISCST3. Operational data for emissions and chemical species in exhausts or other forms of air emissions are discussed in Technical Report 14a (Section 3.3) of the Draft EIS/EIR. None of the estimated acrolein concentrations in air approached a level of 200 times the acute reference exposure level (REL), and only for the No Action/No Project Alternative were acrolein concentrations as high as 20 times the REL. Thus, the suggestion in the comment that build alternatives could result in acrolein concentrations greatly in excess of the REL is incorrect.

Table ES-3 in the Executive Summary of the Supplement to the Draft EIS/EIR presented a summary of the level of significance of acute impacts. Acute impacts associated with acrolein emissions estimated for Alternatives A, B, and C are potentially significant and unavoidable. Predicted maximum acute hazards for Alternative D are less than those predicted for baseline operations from Year 1996 and, therefore, implementation of Alternative D would result in a beneficial impact for acute impacts.

Please also refer to Section 7.3, of Technical Report S-9a, of the Supplement to the Draft EIS/EIR regarding uncertainties associated with acute impacts. Acute effects are highly 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. Aircraft emissions are responsible for the majority of acrolein emissions associated with LAX operations. A recent study of jet aircraft emissions indicates that emissions of acrolein during taxi and queue operations, when most acrolein is released, may have been

overestimated by 80 percent (Gerstle et. al., 1999), suggesting that both acute and chronic hazards may be substantially overestimated in the current analysis.

Gerstle, T.; P. Virag; M. Wade; and L. Kimm. Aircraft Engine and Auxiliary Power Unit Emissions Testing: Vol. 2, Detailed Sampling Approach and Results. US Air Force, IERA-RS-BR-1999-0060-Vol 2. March 1999.

AL00033-344

Comment:

V.C. Acrolein Chronic Health Impacts Underestimated

The DEIR concluded that for chronic health impacts, "acrolein would contribute over 98.6 percent (Phase I emissions) and 93.8 percent (Phase II emissions) of the cumulative relative impact of all TAPs [toxic air pollutants] evaluated." (TR14, p. 12.) Elsewhere, "acrolein is the only chemical for which the HQ exceeds one. Acrolein contributes more than 95 percent to the total HQ for all alternatives." (Id., p. 36.) Therefore, acrolein is the most important constituent emitted by the project. However, the actual impacts of acrolein are far more significant than revealed in the DEIR.

Acrolein emissions were estimated by multiplying VOC emissions by the weight fraction of acrolein present in aircraft (and other) exhaust. These weight fractions were measured using a standard test procedure that is now widely recognized to significantly underestimate acrolein.

In this test method, acrolein is reacted with 2,4-dinitrophenylhydrazine ("DNPH") acidified with hydrochloric acid, which converts the acrolein into its hydrazone derivative. The hydrazone derivative is then analyzed by high performance liquid chromatography.

However, research over the last decade has demonstrated that this method substantially underestimates the emissions of acrolein and other similar double-bonded aldehydes. The California Air Resources Board ("CARB"), for example, has recently published an advisory that states: "any data or results, based on the use of M430 to determine acrolein... are suspect and should be flagged as nonquantitative wherever they appear." (CARB 4/28/00.54 CARB) considers acrolein emission factors estimated from source tests in which a DNPH method is used to be a lower bound estimate. The EPA also cautions against the use of this method for acrolein. (EPA Method TO-11.) References documenting these problems are contained in Exhibit 4.

Therefore, the DEIR has underestimated acrolein emissions by at least a factor of 10. All of the chronic health hazard indices summarized in Tables 4.24.1-3 and 4.24.1-4 should be at least ten times higher than shown.

54 Letter from William V. Loscutoff, Chief, Monitoring and Laboratory Division, to All Air Pollution Control Officers/Executive Officers, Re: Advisories to Limit the Use of ARB Method 430 (M430) Determination of Formaldehyde and Acetaldehyde in Emissions from Stationary Sources, April 28, 2000.

Response:

The Human Health Risk Assessment used well-accepted methods and best currently available emission factor data to develop estimates of emissions, and estimates and assumptions are reasonable and appropriate. ARB has identified concerns with methods used to estimate acrolein emissions from stationary sources; however, ARB has not identified a replacement method for acrolein quantification. The most current and appropriate methods available at the start of the project were used to evaluate acrolein emissions. Given the data currently available, these methods provide the best estimates of acrolein emissions. Whether CARB's advisory, which considers acrolein emission factors estimated from source tests in which a DNPH method is used as lower bound estimates, is applicable to the evaluation of aircraft emissions data currently available is uncertain. Moreover, as discussed below, a number of other factors related to acrolein emissions and exposure suggest substantial overestimation of acrolein-associated hazards.

As discussed in Section 7 of Technical Report S-9a of the Supplement to the Draft EIS/EIR, the paucity of data on acrolein emissions from jet aircraft engines makes estimates of non-cancer health hazards

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very uncertain. Emissions estimates for acrolein were based on available data that were generated from aircraft engines not generally in use today and using military fuel that differs from fuel used at LAX. Acrolein emissions for aircraft were estimated from four U.S. Air Force/Battelle reports (Spicer, et al. 1984; Spicer, et al. 1987; Spicer, et al. 1988; Spicer, et al. 1990) that provided speciated total hydrocarbon (THC) emissions from 10 different aircraft. Acrolein THC mass fractions from these reports were averaged for each operating mode (takeoff, climbout, approach, and taxi/idle/queue). Acrolein mass fractions were then multiplied by aircraft THC mass emissions calculated for each mode in each alternative and year analyzed. Acrolein from on-road mobile sources was developed from emission factor data provided by the California Air Resources Board between November 12, 1999 and December 8, 1999. Acrolein mass fractions for mobile off-road vehicles were obtained from the California Air Toxic Emission Factor database and a U.S. EPA memorandum (USEPA 1997). Details were provided in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, and related technical reports.

Recent studies suggest that acrolein emissions from aircraft may be overestimated and that dependence on regulatory databases with estimated acrolein emissions may have substantially overestimated possible releases of acrolein during LAX operations. A recent study of jet aircraft emissions indicates that emissions of acrolein during taxi and queue operations, when most acrolein is released, may have been overestimated by 80 percent (Gerstle et. al., 1999), suggesting that both acute and chronic hazards may be substantially overestimated in the current analysis.

Acrolein is not generally recognized as a significant TAP in the South Coast Air Basin. Acrolein is unlikely to be transported over long distances because of its high reactivity and short half-life in air. A recent study at Chicago O'Hare Airport (IEPA, 2002) found that acrolein was not a significant TAP associated with airport operations. The Illinois EPA measured airborne levels of various air contaminants in the vicinity of the O'Hare Airport as well as at other locations in the Chicago area over a seven-month period in 2000. An objective of the air toxics monitoring program was to determine if emissions associated with O'Hare Airport had a measurable impact on air quality in areas adjacent to the airport. Acrolein was not reported at measurable levels in air at locations near the airport during the air toxic monitoring program.

All of this information suggests that the analysis presented for acrolein in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR may substantially overestimate releases, and thus may overestimate possible chronic and acute impacts to human health. Available information is not consistent with an underestimation of acrolein hazards by a factor of 10 or more as suggested in the comment.

Gerstle, T.; P. Virag; M. Wade; and L. Kimm. Aircraft Engine and Auxiliary Power Unit Emissions Testing: Vol. 2, Detailed Sampling Approach and Results. US Air Force, IERA-RS-BR-TR-1999-0060-Vol 2. March 1999.

Illinois Environmental Protection Agency, Bureau of Air, Final Report Chicago O'Hare Airport, Air Toxic Monitoring Program June-December, 2000, May 2002.

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

Spicer, C.W., M.W. Holdren, T.F. Lyon, and R.M. Rigglin. 1984. "Composition and Photochemical Reactivity of Turbine Engine Exhaust," ESL-TR-84-28, Engineering and Services Laboratory, Tyndall Air Force Base, FL. September.

Spicer, C.W., M.W. Holdren, S.E. Miller, D.L. Smith, R.N. Smith, M.R. Kuhlman, D.P. Hughes. 1987. "Aircraft Emissions Characterization: TF41-A2, TF30-P103, and TF30-P109 Engines," ESL-TR-87-27, Engineering and Services Laboratory, Tyndall Air Force Base, FL. December.

Spicer, C.W., M.W. Holdren, S.E. Miller, D.L. Smith, R.N. Smith, D.P. Hughes. 1988. "Aircraft Emissions Characterization," ESL-TR-87-63, Engineering and Services Laboratory, Tyndall Air Force Base, FL. March.

Spicer, C.W., M.W. Holdren, D.L. Smith, S.E. Miller, R.N. Smith, D.P. Hughes. 1990. "Aircraft Emissions Characterization: F101 and F110 Engines," ESL-TR-89-13, Engineering and Services Laboratory, Tyndall Air Force Base, FL. March.

U.S. Environmental Protection Agency (USEPA). 1997a. Internal memorandum from Rich Cook to Anne Pope with subject "Source Identification and Base Year 1990 Emissions Inventory Guidance for Mobile Source HAPs on the OAQPS List of 40 Priority HAPs". Anne Arbor, MI. June.

AL00033-345

Comment:

V.D. Lead

Lead was evaluated by comparing modeled ambient concentrations with the ambient air quality standard for lead. (TR 14, p. 12.) This is not a reasonable way to assess lead health impacts. The ambient lead standard was promulgated many decades ago before the health impacts of lead were understood and is too high to protect public health. This standard does not reflect current knowledge of lead toxicity. Lead is both a carcinogen and a potent neurotoxin, causing well-documented learning disabilities in children.

The public health risks of lead are virtually never evaluated in this fashion in California. The carcinogenic health risks of lead are normally evaluated by including lead in the risk assessment along with other carcinogens. The noncarcinogenic health risks are normally evaluated by estimating the increase in blood lead levels using a program such as DTSC's "Lead Spread," which takes into account the cumulative impact of multiple sources of lead, e.g., drinking water and food.

In addition to failing to include lead in the risk analysis, the lead emission inventory does not appear to include lead emissions from piston aircraft. Very high concentrations of lead are found in aviation gasoline, as discussed in my comments on Hazardous Materials.

Response:

No significant sources of lead exist or are proposed at LAX. Use of the California ambient air quality standard (AAQS) for lead is appropriate as a screening threshold given the lack of significant sources. The carcinogenic health risks of lead are not typically evaluated in risk assessments performed in California. Likewise, EPA's Carcinogen Assessment Group recommends that a numerical estimate of carcinogenic potential not be used. Quantifying lead's cancer risk involves many uncertainties, some of which may be unique to lead. Age, health, nutritional state, body burden, and exposure duration influence the absorption, release, and excretion of lead (EPA, 2002). Health impacts associated with lead exposure are normally evaluated using DTSC's Lead Spread model. Using default or typical values for lead exposure in this model, lead in air at the AAQS would be associated with a small percentage of children with blood levels above the usual target value of 10 ug/dL only if other significant sources of lead exposure, such as a substantial home produce garden and/or higher than usual lead in drinking water. Overall, screening (conservative) estimates of lead in air as a result of LAX emissions are 30 times lower than the AAQS, suggesting negligible potential for lead exposure.

Regarding lead emissions, the emissions inventory does include aircraft emissions, and these emissions were used to screen for possible impacts of lead emissions. According to the FAA air quality handbook (Appendix C), the primary but typically insignificant source of lead at airports is the combustion of leaded aviation gasoline (AvGas) in piston-engine aircraft (FAA, 1997). Piston engine planes are the only type of aircraft that use leaded fuel (AvGas). The portion of fuel used for aviation that comprises AvGas is extremely small, approximately 1.9 percent of all aviation fuel (EPA 1998). Storage facilities for AvGas at LAX consist of a single aboveground tank, compared to Jet A fuel, which is stored in large aboveground tanks and numerous smaller above ground and underground tanks.

EPA. 2002. Integrated Risk Information System online database. Lead. Reviewed on September 11, 2002.

EPA. 1998. Bi-National Toxics Strategy. Stakeholder Forum.

FAA. 1997. Air Quality Procedures for Civilian Airports and Air Force Bases. April

3. Comments and Responses

AL00033-346

Comment:

V.E. Health Impacts Of Construction

The acute health impacts of construction are virtually always significant due to emissions of diesel exhaust and acrolein. It does not appear that the health impacts of constructing the project have been evaluated or if evaluated, they certainly have not been properly evaluated. The risk assessment technical report mentions construction emissions on pages 1,2 and 26 and notes that "Year 2005 was chosen as a reasonable interim date during implementation of the LAX Master Plan where human health impacts during construction could be evaluated." (TR14, p. 26.) However, the documentation for the risk assessment is silent on how this might have been done and contains no evidence that construction emissions were actually included in the emissions and hence, risk estimates. This issue could not be resolved because the detailed emission spreadsheets were not received.

Response:

Human health impacts were addressed in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, 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. In addition, please see Topical Response TR-HRA-3 regarding human health impacts. Detailed construction emissions were not included in this assessment because of the difficulty in accurately projecting construction staging. Construction emissions may be a contributor to short-term project impacts, and this issue will be considered in decisions of if and how to implement the Master Plan.

AL00033-347

Comment:

V.F. Low Load Emission Factors Were Not Used

Aircraft operate in five modes -- taxi, queue, takeoff, climbout, and approach. The gas turbines that propel aircraft operate at different power settings during these various operational modes. The DEIR estimated toxic emissions by multiplying VOC emissions estimated by EDMS by speciation data (i.e., concentrations, expressed percent of each compound as percent of total VOCs), apparently for full load operation. (TR14, p. 14.) However, the speciation profile for an engine and resulting toxic emission rate are very strong functions of the power setting.

It is well documented that gas turbine performance, in terms of combustion efficiency, degrades as load decreases. Turbines are designed to run efficiently at full load where fuel combustion is nearly 100% efficient. During low power setting, when loads fall below 50% (e.g., queue, taxi), turbine combustors are extremely inefficient,⁵⁵ which results in incomplete combustion.⁵⁶

Reduced turbine efficiency increases products of incomplete combustion, such as carbon monoxide ("CO"), aldehydes, and hydrocarbons. This has been amply demonstrated in several studies. The Gas Research Institute ("GRI") and the Electric Power Research Institute ("EPRI") characterized TAP emissions from a variety of gas-fired power generation units as a function of load, including several aeroderivative turbines.⁵⁷ The Federal Aviation Administration ("FAA") maintains a database consisting of aircraft engine (both turbine and piston engine) vendor performance test data that is collected as part of the FAA engine certification process.⁵⁸ Finally, research scientists have published speciation data for several aircraft engines as a function of power settings. (Ex. 5.59)

These studies uniformly demonstrate that TAP emissions are dramatically higher at low power setting that would be experienced while aircraft are on the ground, compared to takeoff and airborne emissions. The largest impact on public health occurs while aircraft are on the ground. This, the DEIR has substantially underestimated the health risks of the project.

⁵⁵ R. H. Kehlhofer, J. Warner, H. Nielsen, and R. Bachmann, Combined-Cycle Gas Steam Turbine Power Plants, 2nd Ed., PennWell, Tulsa, OK, 1999, Chapter 8: Operating and Part Load Behavior.

56 A. H. Lefebvre, Gas Turbine Combustion, 2nd Ed., Taylor & Francis, Philadelphia, PA, 1998, Sec. 9-4, Mechanisms of Pollutant Formation.

57 Gas Research Institute ("GRI") and Electric Power Research Institute ("EPRI") 1996. Gas-Fired Boiler and Turbine Air Toxics Summary Report. Prepared by Carnot Technical Services for GRI and EPRI, August 1996.

58 Federal Aviation Administration ("FAA"), FAA Aircraft Engine Emission User Guide and Database, FAA Office of Environment and Energy.

59 C.W. Spicer and others, Chemical Composition of Exhaust from Aircraft Turbine Engines, Journal of Engineering for Gas Turbines and Power, v. 114, 1992, pp. 111-117; C.W. Spicer and others, Chemical Composition and Photochemical Reactivity of Exhaust from Aircraft Turbine Engines, Annales Geophysicae, v. 12, 1994, pp. 944-955.

Response:

The page referenced in the comment, page 14 of Technical Report 14a, Human Health Risk Assessment, of the Draft EIS/EIR, discussed evaluation of particulate matter from airplanes. It is unclear what the commentor is basing the comment upon from this page. However, as indicated on page 14 of Attachment B of Technical Report 14a under Aircraft, emissions were evaluated for five aircraft operational modes, consisting of takeoff, taxi, queue, climb out, and approach. As stated in the report, taxi in and taxi out times were combined into one total taxi time. Aircraft queue time was included in total taxi time, since emissions during queue and taxi are very similar. In addition, please refer to Appendix G, Air Quality Impact Analysis, Subsection 2.2.6.2, of the Draft EIS/EIR. Toxic air contaminants, modeled in ISCST3, were modeled for taxi, queue, approach, climb out, and takeoff as indicated in Table 19.

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. Included in the Supplement to the Draft EIS/EIR was an evaluation of Alternative D, an evaluation of health risks based on exposure duration of 70 years, and an evaluation of health risks and hazards measured against Year 2000 conditions. In addition, Section 4.24.1, Human Health Risk Assessment, evaluated the potential for short-term (1-hour) exposures to cause immediate, or acute, health impacts.

AL00033-348

Comment:

V.G. Passengers Not Evaluated

The DEIR evaluated the health risks to on-airport workers and off-airport adults and children, but did not evaluate the health risks to passengers. (TR14, p. 20.) Passengers represent the most highly exposed individuals. They would be exposed entering and existing terminals, boarding aircraft, and waiting within terminals. The DEIR is wholly silent on the exposure of these receptors. The DEIR should be modified to evaluate the health impacts that the expansion would pose to passengers.

Response:

Passengers may potentially be exposed to TAPs associated with LAX operations. The Human Health Risk Assessment quantitatively evaluated exposures for human receptors potentially most affected by LAX operations, including onsite workers and residents living adjacent to LAX. Exposures for passengers would be less than these receptors, since exposure durations for passengers generally are short and infrequent. It was assumed that passengers would not be subject to exposures any longer than occupational exposure conditions. The onsite worker was assumed to be exposed to TAPs related to LAX operations 8 hours a day. Occupational exposures were assessed by comparing maximum 8-hour concentrations of TAPs near gates and aprons, estimated through air dispersion modeling, to Permissible Exposure Limits - Time Weighted Average (PEL-TWAs). PEL-TWAs are air concentrations for chemicals developed by Occupational Safety and Health Administration (OSHA), adopted by

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California Occupational Safety and Health Administration (Cal-OSHA) to represent maximum concentrations (8-hour time-weighted average) to which workers may be repeatedly exposed during business hours without developing adverse health effects. These occupational limits are deemed adequate to protect healthy workers during repeated 8-hour exposures to toxic compounds.

Estimated maximum 8-hour concentrations for the build alternatives and the No Action/No Project Alternative were well below PEL-TWAs for all TAPs. This suggests that air concentrations from air emissions associated with LAX operations will not exceed those considered acceptable by Cal-OSHA. Under American Conference of Governmental Industrial Hygienists (ACGIH) guidelines, if TAP concentrations are below PEL-TWAs, health impacts from exposures to air emissions are unlikely for LAX workers. Please refer to Technical Report 14a (subsections 6.3.1 and 6.4.1) of the Draft EIS/EIR for an evaluation of occupational exposures for horizon years 2005 and 2015. Since potential impacts to workers were determined to be less than significant and since exposures for passengers would be less than those for workers, passengers were not quantitatively evaluated.

Potential acute exposures for onsite receptors were evaluated in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR and also discussed in Section 6.3, of Technical Report S-9a of the Supplement to the Draft EIS/EIR. As discussed in these documents, a high degree of uncertainty is associated with the estimation of acrolein concentrations, the majority of which is produced by aircraft engines in idle and taxi mode. The potential for acute health hazards related to LAX operations resulting from emissions of acrolein may be overestimated. The respiratory system is the major target of toxicity following acute inhalation exposures to acrolein. Symptoms include general respiratory congestion and eye, nose and throat irritation. Please refer to Response to Comment AL00033-344 regarding potential acute health impacts from acrolein.

AL00033-349

Comment:

V.H. Cumulative Health Impacts Not Properly Evaluated

A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the DEIR together with other projects causing related impacts. (Guidelines, § 15130(a).)

Section 15355 in turn defines "cumulative impact" as follows:

"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); emphasis added.)

Thus, for purposes of a cumulative impacts analysis, lead agencies must evaluate a proposed project's impacts in conjunction with related impacts from related past and present projects, in addition to future projects. "Past projects" may have already caused impacts that are cumulative significant. (EPIC v. Johnson, *supra*, at 624-625.) Thus, even where a current project would add only a small increment to an existing problem, the current project's effects may nonetheless be considered significant. (Los Angeles Unified School District v. City of Los Angeles (1997) 58 Cal.App.4th 1019, 1025-1026.)

The DEIR does not contain a responsive analysis. The DEIR only estimated the incremental increase in health risk, substantially underestimating the total risk. A responsive cumulative analysis would evaluate the health impacts of the 1996 baseline plus the increment due to the project plus reasonably anticipated project. Instead, the DEIR compares the increment due to the project to the NA/NP baseline and a study (MATES II). (DEIR, § 4.24.1.7.2, Fig. 4.24.1-2.) The NA/NP baseline is the wrong baseline. Further, the DEIR itself concedes that the MATES II study "does not have sufficient resolution to determine the fractional contribution of current LAX operations to TAPS in the airshed." (DEIR, j p. 4-1007.) Thus, even though the DEIR concluded cumulative impacts are significant, it has substantially underestimated those impacts, thus limiting its ability to mitigate those impacts.

Response:

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. 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, of the Draft EIS/EIR.

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 United States 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.

Please refer to TR-HRA-1 regarding baseline issues. The No Action/No Project Alternative is not the baseline but is used as another gauge to judge the impact of the build alternatives. Possible future emissions associated with LAX under the No Action/No Project Alternative and the four build alternatives were estimated from the established baseline by either increasing or decreasing emission rate estimates from specific sources based on projected changes in airport operations as described in Technical Report 14a, Human Health Risk Assessment Technical Report, of the Draft EIS/EIR.

AL00033-350

Comment:

VI. MITIGATION OF HEALTH IMPACTS IS INADEQUATE

The DEIR does not impose any mitigation specifically for health impacts, instead relying exclusively on air quality mitigation for VOCs (DEIR, p. 4-1021.) As discussed in Comment IV, the air quality mitigation program is inadequate for air quality impacts. This program is likewise inadequate to mitigate health impacts, for the same reasons discussed in Comment IV. The air quality mitigation program would only reduce the emissions of VOCs by 8%, the surrogate used by the DEIR for TAPS. This is de minimis compared to the magnitude of the health impacts.

Further, the proposed mitigation program fails to recognize the differences in approaches that are required to mitigate air quality versus human health impacts. It is not sufficient to rely solely on air quality mitigation to mitigate public health impacts. Other types of mitigation measures should be considered to prevent exposure and thus protect public health. These might include measures such as upgrading the LAX ventilation system, installing efficient charcoal filters on the LAX intake air to remove TAPs, and improving the ventilation systems and treating the intake air of nearby sensitive receptors who would be most affected by TAP emissions from the project.

Response:

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

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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 Year 2015. These recommended mitigation measures would also reduce impacts to human health associated with exposure to TAPs.

The Supplement to the Draft EIS/EIR contained an extensive list of potential mitigation measures and highlighted those being carried forward. Mitigation measures presented in the Final EIS/EIR represent the final package of mitigation measures based on comments on both the Draft EIS/EIR and the Supplement EIS/EIR. 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. Although ventilation systems as described by the commentor could improve indoor air quality, indoor air is not a primary issue for exposure to TAPs. Therefore, the focus was placed on mitigation measures that would decrease emissions from identified sources such as automobiles and trucks, which contribute to TAPs concentrations in the airport vicinity.

AL00033-351

Comment:

HYDROLOGY AND WATER QUALITY

The project would intensify airport activity and associated off-site traffic. These changes would increase the amount of pollutants discharged into Santa Monica Bay and Dominguez Channel in urban runoff. Urban runoff consists of two components, wet weather runoff or stormwater runoff, which occurs during rainfall events, and dry weather runoff, which occurs at times when there is no rainfall. These discharges would result in significant water quality impacts. The DEIR's analysis of these impacts is inadequate. The DEIR substantially underestimated the magnitude and nature of stormwater discharges and failed to analyze the impact of dry weather flow and construction on water quality. The DEIR also failed to impose adequate mitigation for these impacts, instead relying on future studies and existing rules, guidelines, and policies.

Response:

As was stated in the Draft EIS/EIR, flow and concentration of dry weather flows are extremely variable, being dependent primarily upon when, where, and how a particular activity occurs that could result in a non-stormwater discharge. This variability makes estimation of dry weather flows highly speculative. Because sufficient dry weather flow data was not available from LAX, LAWA assessed potential impacts through identification of potential sources due to airport activities that would occur under baseline conditions, the No Action/No Project Alternative, and the four build alternatives. Construction impacts were considered to be less than significant as a result of adherence to LAWA's existing construction SWPPP, and to compliance with the Wet Weather Erosion Control Plan, that must be developed for all construction occurring during the wet season, as defined by the City of Los Angeles. Also, please see Topical Response TR-HWQ-1 regarding the storm water pollutant load estimation method, Response to Comment AL00033-360 regarding appropriateness of pollutant load estimation method, and Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AL00033-352

Comment:

I. MITIGATION MEASURE NOT ADEQUATE

Dry and wet weather runoff from the project would be discharged into Santa Monica Bay and the Dominguez Channel Estuary. This runoff is conveyed through storm drains directly to the ocean, where it is often discharged untreated onto beaches close to the surf zone ocean water, where the potential for human contact is great. Urban runoff is the major source of pollutants in near-shore coastal areas of Los Angeles County.¹ Other sources of pollution, such as from wastewater treatment plants, are discharged through marine outfalls at some distance from shore and at depth, where human contact is minimal. The project will substantially increase the volume and pollutant loads carried by urban runoff into local receiving waters.

The DEIR properly concluded that these are significant impacts, but only proposed a single mitigation measure, Master Plan Commitment HWQ-1. This measure requires the development of a detailed drainage plan in the future, after a preferred alternative is selected. The goal of the drainage plan would be to adequately convey stormwater runoff, prevent flooding, and achieve no net increase in pollutant loads. (DEIR, pp. 4-546/547.)

The description of the proposed drainage plan is too cryptic and incomplete to evaluate whether the plan, once developed, would actually achieve the stated goals. The plan will be developed wholly outside of the public review process. While the detailed engineering design of physical facilities to contain and convey stormwater cannot be performed until an alternative is selected, it is feasible to develop a conceptual level design for each alternative and to identify and evaluate mitigation measures that could be used to reduce the impacts found in the DEIR. Further, the analyses in DEIR, on which the drainage plan hinges, contain numerous omissions and errors that result in incomplete characterization of the nature of the problem. Without full disclosure of the nature of the problem to guide design, it is unlikely that HWQ-1 will mitigate the impacts. These shortcomings must be corrected before effective mitigation can be identified.

1 Santa Monica Bay Restoration Project, Taking the Pulse of the Bay 1998, January 1998.

Response:

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR are program level documents; Master Plan facilities have not been conceptually designed. Therefore, it is premature to design drainage facilities at even a conceptual level. Also, please see Topical Response TR-HWQ-1 regarding model constituents and stormwater pollutant load estimation method, Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1, and Response to Comment AR00003-63 regarding approval of mitigation measures.

AL00033-353

Comment:

I.A. All Feasible Mitigation Not Required For Flows

The DEIR claims that specific mitigation measures would be selected from among those identified in the EIS/EIR. However, the list of measures included in the DEIR is very limited. Measures listed to reduce peak flow rates and flooding only include seven structural measures related to the design of conventional stormwater collection and conveyance facilities. (DEIR, p. 4-546.) This section completely ignores the large body of best management practices ("BMPs") that has been developed to reduce the volume and peak flow rates of stormwater at the source, as well as inspection and maintenance programs. The list of potential measures that are available to reduce peak flow rates and flooding should be expanded to include all feasible measures, based on the large number of manuals and guidelines published by federal, state, and local agencies.²

2 Stormwater Quality Task Force, California Storm Water Best Management Practice Handbooks, March 1993; San Diego County, Best Management Practices for Erosion and Sedimentation Control and Storm Water Detention/Retention, Prepared for The San Diego County Association of Resource Conservation Districts, Spring 1998.

Response:

Section 4.7, Hydrology and Water Quality (subsection 4.7.5), of the Supplement to the Draft EIS/EIR (and the Draft EIS/EIR) contained a comprehensive list of classes of structural controls that LAWA will

3. Comments and Responses

use to achieve the commitment of no net impact to receiving waters. In addition, the Supplement to the Draft EIS/EIR stated that "other structural BMPs may also be selected from the literature and the many federal, state and local guidance documents available." Further, the Supplement to the Draft EIS/EIR stated, "[i]n addition to the structural BMP types that will be used, non-structural/source control BMPs will continue to be a part of the LAX program to reduce pollutant loadings." These non-structural BMPs typically include inspection and maintenance programs, as suggested by the commenting agency, as well as good housekeeping and training programs. Moreover, as part of the project-specific Standard Urban Stormwater Mitigation Plan (SUSMP) that will be prepared for the project once specific BMPs are identified, a maintenance plan must be developed and implemented for all new structural BMPs. Also, please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AL00033-354

Comment:

I.B. All Feasible Mitigation Not Required For Water Quality

The DEIR claims that it would reduce the discharge of pollutants from the stormwater conveyance systems "to the maximum extent practicable" by designing the stormwater system to meet the requirements of the Standard Urban Storm Water Mitigation Plan ("SUSWMP"). The DEIR then lists only nine measures that could be employed. However, LAX is already required by existing permits and regulations to comply with this Plan.³ Therefore, the SUSWMP does not constitute valid mitigation and cannot be relied on to conclude that all water quality impacts have been mitigated.

Further, there are many additional methods that could be used to mitigate water quality impacts that should have been identified and evaluated. These include extending the stormwater outfalls used by LAX beyond the near-shore zone to protect swimmers and beach users, source control programs, good housekeeping practices, and education programs, among many others.⁴ The list of potential measures that are available to reduce pollutant loads should be expanded to include all feasible measures, based on manuals and guidelines published by federal, state, and local agencies, some of which are listed above.

3 Standard Urban Storm Water Mitigation Plan for Los Angeles County and Cities in Los Angeles County, March 8, 2000.

4 Bay Area Stormwater Management Agencies Association, Start at the Source. Design Guidance Manual for Stormwater Quality Protection, 1999.

Response:

Please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1 and Response to Comment AL00033-353 regarding the types of BMPs that LAWA will consider implementing to achieve no net increase in pollutant loading from the selected alternative. As was stated in Section 4.7, Hydrology and Water Quality (subsection 4.7.8), of the Supplement to the Draft EIS/EIR, with the implementation of Master Plan Commitment HWQ-1, Alternatives A, B, C, and D would not have any significant impacts relative to drainage or water quality and no project-level mitigation would be required. To reduce cumulative drainage impacts, mitigation measure MM-HWQ-1 is proposed to upgrade the regional drainage facilities.

AL00033-355

Comment:

I.C. Method Used To Evaluate Effectiveness Not Stated

The DEIR does not include any mitigation monitoring provisions nor explain how the effectiveness of HWQ-1 will be determined. It reports a range of control efficiencies for four classes of pollutants for nine BMPs, based on an EPA study, but does not indicate whether these control efficiencies would be used to evaluate the effectiveness of the LAX water quality mitigation program, and if so, how these estimates would be applied. (DEIR, p. 4-547.) The DEIR also inexplicably ignores a similar study, conducted in the Santa Monica Bay Area, which is more directly relevant to this project.⁵

The EPA study and other similar studies of control measures should not be used to evaluate the effectiveness of mitigation for this project because the reported ranges of control efficiencies are very wide and do not address local, site-specific conditions unique to a highly urbanized desert environment. The only way to assure that the goal of "no net increase" in pollutant loads articulated in the DEIR is actually achieved is through a monitoring program.

Monitoring is always preferable to empirical calculations, as conceded by the DEIR, viz., "The most accurate method to estimate a non-point source pollutant load is to collect, analyze, and evaluate samples of storm water runoff directly from the project site." (TR6, p. 20.) However, the DEIR argued that pollutant loads were too variable to provide valid statistical results. Others have collected statistically valid data in short-term studies that were relied on in the DEIR. (TR6, pp. 23-24.) Further, if the DEIR had commenced monitoring three years ago, when the empirical analyses in the DEIR were commenced, it would have more than enough data at buildout to evaluate mitigation effectiveness. Failure to take timely action is not an excuse for not using the best possible method to assure that impacts are fully mitigated.

A stormwater flow and pollutant load baseline should be established by monitoring stormwater discharges for at least two complete years before the start of construction. Monitoring should be continued until at least two years after buildout and should only be discontinued if it is demonstrated that the mitigation goals have been achieved. The monitoring program should be described with sufficient specificity to allow a knowledgeable individual to assess its efficacy, e.g., it should specify, at a minimum, pollutants that would be monitored, sampling and analytical methods, monitoring locations, and monitoring frequency. This plan should be included in a revised EIR and circulated for public review.

5 Woodward-Clyde, Santa Monica Bay Area Municipal Storm Water/Urban Runoff Pilot Project - Evaluation of Potential Catchbasin Retrofits, Prepared for Santa Monica Cities Consortium, September 24, 1998.

Response:

As was stated in Section 4.7, Hydrology and Water Quality (subsection 4.7.5), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, BMPs will be selected from the list included in Master Plan Commitment HWQ-1, and possibly from local, federal, and state guidance documents and other studies found in the literature, such as the Santa Monica Bay area study cited by the commentor that focuses on catch basin retrofits. Also, please see Response to Comment AR00003-63 regarding mitigation monitoring and reporting.

AL00033-356

Comment:

I.D. No Net Increase Not Defined

The drainage plan would be designed to achieve "no net increase" in pollutant loads, which is a reasonable goal. However, the DEIR never discloses how "no net increase" would be calculated. A net increase must be defined relative to a baseline but it is unclear from the DEIR whether changes in pollutant loads would be calculated by comparison to the 1996 baseline, 2001 conditions, the No Project Alternative or some other baseline. To fully comply with CEQA and NEPA, we recommend that the EIR be modified to define "no net increase" as the absence of any increase over either the environmental or NA/NP baseline in pollutant loading.

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 regarding the mitigation monitoring and reporting program.

AL00033-357

Comment:

I.E. Pollutant Loading Not Defined

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The drainage plan would be designed to achieve no net increase in "pollutant loads." However, the term is not defined, and no method is provided for calculating those loads. Presumably, the pollutant loads estimated in the DEIR would be the basis of the determination. However, as discussed below, the method used in the DEIR to estimate pollutant loads has numerous shortcomings, resulting in a substantial underestimate of pollutant loads. The DEIR also failed to evaluate all pollutants of concern. As noted above, the only way to assure that no net increase in loads is achieved is through a monitoring program. Thus, the DEIR should be revised to clearly define pollutant loads, including the method that would be used to determine them.

Response:

Please see Topical Response TR-HWQ-1 regarding model constituents and storm water pollution load estimation method, Topical Response TR-HWQ-2 regarding performance standards, and Response to Comment AL00033-360 regarding appropriateness of the pollutant load estimation method. 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 regarding the mitigation monitoring and reporting program.

AL00033-358

Comment:

I.F. Dry Weather Flows Not Covered

Master Plan Commitment HWQ-1 does not appear to cover dry weather flows, discussed below in Comment III.A. The DEIR's description of this measure repeatedly refers to "storm water." It never once mentions dry weather flows, or "urban runoff," a term that typically subsumes both. Because dry weather flows would also result in significant impacts, HWQ-1 must be modified to clarify that it refers to dry weather flows and to incorporate measures specific to dry weather flows.

Response:

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

AL00033-359

Comment:

II. STORMWATER POLLUTANT LOADINGS UNDERESTIMATED

The analysis of water quality impacts is based on an estimate of pollutant loadings caused by changes in stormwater runoff volume. This analysis substantially underestimates pollutant loads for a large number of reasons, detailed below. This underestimate is a serious deficiency because HWQ-1, the only proposed mitigation measure, requires no net increase in pollutant load. If pollutant loads are underestimated, the proposed mitigation will not be effective in mitigating water quality impacts.

II.A. Event Mean Concentrations Are Underestimated

The DEIR estimated pollutant loads by multiplying the event mean concentrations ("EMCs") of stormwater runoff by the change in volume of stormwater runoff. Pollutant loads were underestimated by relying on outdated data that is not specific to the region.

First, the DEIR used 1994-1999 stormwater monitoring data reported by the Los Angeles County Department of Public Works ("LACDPW") for all land uses (industrial, commercial, residential, open space, transportation) except airport operations and airport open space. After the DEIR made its calculations, but prior to publication, these data were updated to cover the period 1994-2000. The updated data indicate that almost all EMCs are higher than those assumed in the DEIR. Compare Table 4-12, LACDPW 7/31/00 with Technical Report 6 ("TR6"), Table 6. . Because the revised data were available long before the DEIR was published, there is no excuse for using this outdated data set. The pollutant load calculations should be revised to use the most current data set. Further, if empirical loads are used to assess mitigation (and we recommend that the results from a LAX-specific monitoring

program be used instead) these calculations should be revised at the time that the mitigation measure is implemented.

Second, the DEIR relied on a Federal Highway Administration ("FHWA") report for EMCs for land uses categorized as airport operations and airport open space.⁶ (TR6, Table 6.) This study does not appear to have included any sites in Southern California or any sites from a highly urbanized, desert area with an airport as busy as LAX. Therefore, it is unreasonable to apply these data to LAX.

Further, for the purposes of regulation under 40 CFR Subchapter N and the California General Industrial Activities Storm Water Permit, airports are regulated as "transportation facilities." Storm water quality data are available for transportation facilities in Los Angeles County. (LACDPW 7/31/00, Table 4-12.) The DEIR used the LACDPW data for copper, lead, and zinc for transportation land uses to represent airport uses, but inexplicably used the FHWA data for all other pollutants. The EMCs based on local LACDPW data are much higher for all pollutants than the FHWA data (TR6, Table6), as summarized below:

Analyte	Event Mean Concentration (mg/L)	
	LACDPW	TR6, Table 6
TSS	78	19.01
Total P	0.44	0.24
TKN	1.9	1.07
O&G	3.1	2.29
BOD5	21	6.58
COD	50	45.7

The LACDPW transportation data should have been used for all constituents for airport uses because it was collected locally. These data are substantially higher for most pollutants than the EMCs used in the DEIR. Thus, pollutant loads estimated in the DEIR (TR6, Tables 8-17) would be proportionately higher.

6 Brenda Ostrom, Predictive Pollutant Loads in Airport Storm Water Runoff - Advanced /Spatial Statistics, May 12, 1994.

Response:

Please see Topical Response TR-HWQ-1 regarding model constituents and event mean concentration source data.

AL00033-360

Comment:

II.B. Non-HWQSA And Non-Land-Use Changes Ignored

The water quality analyses in the DEIR only considered increases in pollutant loads caused by changes in land use within the HWQSA. This is problematic for two reasons. Evidence suggests land use does not determine stormwater quality. Further, intensification of activity is more significant in determining event mean concentrations of stormwater than land use.

First, it is not clear that land use is determinative for estimating the EMCs of stormwater runoff. The DEIR asserts that the "NURP7 report concluded that concentrations of pollutants in urban runoff can be a function of land use and that pollutant loads from these land uses can be assessed for planning purposes using Event Mean Concentrations (EMCs)." (TR6, p. 21.)

However, the NURP report is quite clear that this is not true, opining that "we can conclude that, while there can be differences in the responses of different sites at a given location significant differences do not appear to be widespread, and where they occur, the site and use category is virtually useless in trying to understand or predict them." (NURP 1983,8 p. 6-28.) Similarly, "geographic location, land use category, or other factors appear to be of little utility in explaining overall site-to-site variability or predicting the characteristics of unmonitored sites, the best general characterization of urban runoff can be obtained by pooling the site data for all sites (other than the open/nonurban ones)." (NURP 1983, p. 6-43.)

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Second, as discussed below in more detail, the project would increase the event mean concentration of pollutants in stormwater runoff due to increases in traffic and airport activity. Thus, the project would increase stormwater pollutant loads from 100% of the stormwater runoff within the HWQSA, not just the fraction that experiences a change in land use. Further, 100% of the stormwater runoff generated from regions that experience project-related traffic increases would experience an increase in stormwater runoff pollutant loads. Thus, the DEIR has substantially understated the magnitude of the increase in pollutant loads.

7 Nationwide Urban Runoff Program or NURP.

8 U.S. EPA, Results of the Nationwide Urban Runoff Program, Report PB-185552, December 1983.

Response:

Event mean concentration data generated from specific land use types is frequently and consistently used to estimate pollutant loading for the purposes of storm water planning, for comparing pollutant loading among different sites, and for evaluating changes in pollutant loads over time. This method was used in the Part 1 NPDES storm water permit applications by many municipalities across the country in their annual storm water reports as one means of assessment of the performance of their storm water program. The EPA and the LACRWQCB accept the use of this methodology. In addition, land use water quality data from southern California counties' monitoring programs were used to generate characteristic land use concentrations for the storm water runoff-loading model used by the Southern California Coastal Water Research Project (SCCWRP) in their study published in 2000 entitled, "Pollutant Mass Emissions to the Coastal Oceans of California". The SCCWRP is a highly respected research organization whose members include representatives from the U.S. EPA and the California Regional Water Quality Control Board. Also, please see Topical Response TR-HWQ-1 regarding appropriateness of method and land use intensification.

AL00033-361

Comment:

II.C. The Project Would Cause Event Mean Concentrations

The DEIR estimated the increase in pollutant loadings based solely on changes in land use. However, as discussed above, changes in land use are not a reasonable surrogate for water quality impacts of the project. Increases in airport activity and indirect traffic will have a much more substantial impact on water quality. The DEIR did not evaluate the impact of changes in airport activity and indirect traffic on water quality.

The DEIR estimated pollutant loads by multiplying the event mean concentrations of stormwater runoff by the change in volume of stormwater runoff. The change in volume of stormwater runoff was estimated from the change in land use. (TR6, § 3.2.2.3.) These calculations assumed that the event mean concentration is a constant that would not be affected by the project and that the only impact of the project on stormwater runoff would be due to changes in land use. These assumptions are incorrect.

The contaminants present in stormwater runoff originate from two sources. They may be picked up by stormwater as it moves across surfaces (e.g., roofs, streets, parking lots, landscaped areas). These materials may settle out of the atmosphere ("dry deposition") or they may originate from anthropogenic sources, such as oil leaks from cars, trash, and spills. Alternatively, contaminants in stormwater runoff may wash out ("wet deposition") of the atmosphere and thus are present in the precipitation itself. A noted textbook, for example, states: "Precipitation (including wet and dry processes) is a major source of impurities in stormwater. Precipitation contributes chemical substances to surface waters and should be considered in analyzing surface water quality. Precipitation cannot be ignored." (Wanielista and Yousef 1993,9 Chapter 5.)

Aerial deposition is currently being studied in the watersheds that drain into Santa Monica Bay in the vicinity of LAX. (LACDPW 7/31/00, Appx. H.) Similar work in the Great Lakes has demonstrated that aerial deposition is a major source of PCBs and lead, concluding that atmospheric deposition "plays an important, if not dominant, role in the loading of many toxic chemicals to surface waters....".¹⁰ The Santa Monica Bay work should have been reviewed and incorporated into the DEIR.

The approach used to estimate pollutant loadings in the DEIR ignores the fact that the project would increase the concentration of many pollutants in stormwater runoff by intensifying on- and off-airport activity. The project, for example, would substantially increase the amount of particulate matter (PM10) and toxic substances emitted to the atmosphere from increased flight activity and increased off-airport traffic. (DEIR, Chapters 4.6 and 4.24 and Technical Reports 6 and 14.) A portion of these increased emissions would be incorporated into stormwater runoff through wet and dry deposition processes. This would increase event mean concentrations compared to baseline concentrations. Similarly, one of the major components of stormwater runoff is oil and grease, which originates from vehicle drips and leaks. The project would substantially increase traffic and other off-road vehicle activity at and in the vicinity of LAX. The intensification of airport activity and associated indirect off-airport traffic are substantially larger than the changes in land use. Thus, land use is not a reasonable surrogate for the impact of the project on water quality.

Thus, the project would increase the event mean concentration of many constituents in the vicinity of and within the HWQSA. Pollutants likely to increase include oil and grease, total suspended solids ("TSS"), and pollutants absorbed to TSS such as dioxins, PAHs and metals. The DEIR assumed that the event mean concentration was constant and did not evaluate water quality impacts outside of the HWQSA. Thus, the DEIR has substantially underestimated the increase in pollutant loads due to the project.

9 M.P. Wanielista and Y.A. Yousef, Stormwater Management, John Wiley & Sons, Inc., New York, 1992.

10 William M.J. Strachan and Steven J. Eisenreich, Mass Balance Accounting of Chemicals in the Great Lakes, In: D.A. Kurtz (Ed.), Long Range Transport of Pesticides, Lewis Publishers, Inc., Chelsea, MI, 1990, Chapter 19.

Response:

Please see Topical Response TR-HWQ-1 and Response to Comment AL00033-360 regarding appropriateness of the pollutant load estimation method. Also, please see Topical Response TR-HWQ-1 regarding land use intensification and storm water toxicity and Response to Comment AR00002-7 regarding impacts to water quality from aerial deposition.

AL00033-362

Comment:

II.D. Pollutants Of Concern Not Properly Selected

The water quality analysis only considered nine pollutants -- total suspended solids ("TSS"), phosphorus, total kjedahl nitrogen, copper, lead, zinc, biochemical oxygen demand ("BOD"), chemical oxygen demand ("COD"), and oil and grease ("O&G"). These were allegedly selected from a list of 19 pollutants of concern that were identified for Santa Monica Bay, based on the report, State of the Bay 1993, prepared by the Santa Monica Bay Restoration Project ("SMBRP")¹¹ (DEIR, P. 4-535; TR6, p. 15.)

First, no specific pages are cited to support the claim that the report identified only 19 constituents of concern. We reviewed this report, and it does not single out 19 pollutants of concern. Instead, it discusses the sources of pollution to Santa Monica Bay and qualitatively discusses the trends in pollutants and the biological impacts of some of these. The report documents that current levels of pollutants exceed levels associated with adverse biological effects for a number of pollutants that are found in stormwater runoff that were not analyzed in the DEIR, including mercury (SMBRP 1/94, pp. 8-3,9-3), cadmium, and chromium. (Id., p. 9-3 to 9-8,12-4.) These three pollutants should be incorporated into the DEIR's water quality analysis.

Second, the DEIR relied solely on a 1994 report to select pollutants of concern. Significant additional work has been completed since 1994 that indicates that other pollutants should have been considered in the DEIR's analysis. Some of this information is discussed below, and, in general, is reflected in the Los Angeles Regional Water Quality Control Board's ("LARWQCB's") designations for Santa Monica Bay and Dominguez Channel under Section 303(d) of the Clean Water Act.

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Section 303(d) of the Clean Water Act requires that states identify water bodies that do not meet water quality objectives and allocate total maximum daily loads ("TMDLs") to bring the listed water bodies into compliance with water quality objectives. There are several constituents in Santa Monica Bay and Dominguez Channel that are on the 303(d) list, indicating that they currently violate water quality objectives, that were not evaluated in the DEIR. These include PAHs, ammonia, and chromium in Dominguez Channel, and cadmium, nickel, mercury, and silver in Santa Monica Bay. The current TDML list is posted on the LARWQCB's website. Although this information was acknowledged in the DEIR (TR6, pp. 11-2), it was inexplicably not used to select pollutants of concern.

11 Santa Monica Bay Restoration Project, Characterization Study of the Santa Monica Bay Restoration Plan - State of the Bay 1993, January 1994.

Response:

Please see Section 4.7, Hydrology and Water Quality (subsection 4.7.2 and subsection 4.7.3), of the Supplement to the Draft EIS/EIR regarding additional constituents included in the pollutant load analysis. Also, please see Topical Response TR-HWQ-1 regarding selection of model constituents and event mean concentration source data.

AL00033-363

Comment:

II.E. Toxicity Was Not Considered

The Southern California Coastal Water Research Project ("SCCWRP") recently completed a study on the impact of stormwater runoff on beneficial uses of Santa Monica Bay. (SCCWRP 7/99.12) This study documented widespread toxicity in stormwater runoff. "Toxicity was detected in virtually every sample obtained from Ballona Creek and this toxicity was often present even after the sample was diluted 10-fold in the laboratory." Ballona Creek is a concrete-lined storm drainage channel that drains the area immediately adjacent to LAX. "Toxicity was frequently detected in surface water within the stormwater plume offshore of Ballona Creek, indicating that the initial dilution of stormwater discharge from this watershed was not sufficient to reduce the concentrations of stormwater toxicants below levels that are harmful to marine organisms." (Id., p. 10-11.) The study concluded that 5% to 44% of the observed toxicity was due to copper and zinc. The cause of the balance of the toxicity was not identified.

The DEIR did not discuss or evaluate the fact that stormwater runoff from the vicinity of the project is known to be toxic to marine organisms. The only mitigation proposed to reduce water quality impacts requires "no net increase in loadings of pollutants of concern." (DEIR, p. 4-547.) However, if the pollutants responsible for the observed toxicity are not the "pollutants of concern" evaluated in the DEIR and hence subject to control, this mitigation measure would do nothing to mitigate toxicity from increases in stormwater runoff caused by the project.

Thus, the EIR should be revised to review and discuss the toxicity of stormwater runoff. The project would increase the volume of stormwater runoff and thus contribute to and aggravate this existing problem. Thus, mitigation must be proposed to reduce the toxicity of stormwater runoff. We recommend a pilot study to assess the toxicity of stormwater runoff from baseline operations at LAX. We further recommend that stormwater from the project be collected and routinely tested before it is discharged. This practice is commonly followed elsewhere in the Basin, e.g., at the Port of Long Beach. If toxicity is detected, the toxic waters should be routed to a treatment facility to remove toxicity before the water is discharged.

12 S. Bay, B.H. Jones, and K. Schiff, Study of the Impact of Stormwater Discharge on the Beneficial Uses of Santa Monica Bay, Prepared for Los Angeles County Department of Public Works, July 1999.

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. As noted in Topical Response TR-HWQ-2, LAWA will continue to be subject to compliance with the General Industrial Storm Water Permit, which includes a requirement for monitoring, a requirement to not cause or contribute to an exceedance of water quality objectives, including toxicity, and a requirement to

implement BMPs to achieve this objective. Also, please see Topical Response TR-HWQ-1 regarding selection of model constituents and storm water toxicity, Topical Response TR-HWQ-2 regarding performance standards and compliance with regulations, and Response to Comment AR00003-63 regarding mitigation measures and monitoring.

AL00033-364

Comment:

II.F. Pollutants Unfairly Excluded

The DEIR started with a list of 19 pollutants, narrowing it to only nine by arguing that the others would not typically be associated with storm water runoff in general or runoff from airport facilities in particular. The pollutants that were excluded include DDT, PCBs, PAHs, chlordane, tributyltin, cadmium, chromium, silver, and other metals, chlorine, and pathogenic bacteria and viruses. (TR6, pp. 21-23.) We disagree with several of these choices, as discussed below. Further, the DEIR wholly failed to consider dioxins and furans, which are among the most toxic substances known.

Response:

Please see Topical Response TR-HWQ-1 regarding selection of model constituents and storm water toxicity.

AL00033-365

Comment:

II.F.1. Pathogens And Viruses

The DEIR eliminated pathogens and viruses because the sources for these constituents "are not likely to be prevalent on the airport." (TR6, p. 22.) However, this is not plausible, given the wealth of scientific data that demonstrates that no land use is spared from bacterial contamination. Further, there are numerous sources of pathogens and viruses within the airport.

Pathogens and viruses are one of the principal contaminants of concern in stormwater runoff in the region.¹³ High-use beaches adjacent to storm drain outfalls exceeded water quality thresholds for as much as 60% of their shoreline mile-days.¹⁴ Epidemiological studies in Santa Monica Bay have demonstrated that swimming-related illnesses increase next to storm drains compared to 400 yards away.¹⁵ The incidence of illness increased from 88 to 305 out of 10,000 swimmers within 150 feet of a storm drain. The types of illnesses most frequently observed in swimmers near storm drains included respiratory disease, fever, coughing with phlegm, chills, highly credible gastroenteritis, and ear discharge.

Further, studies conducted by Los Angeles County Department of Public Works ("LACDPW") have demonstrated that total coliforms and fecal bacteria have been detected in all stormwater samples tested since 1994 at densities between several hundred to several million cells per 100 mL, irrespective of the land use. Every single wet weather bacteria sample exceeded public health criteria for indicator bacteria. (LACDPW 4/00,16 § 4.2.2.) This is consistent with numerous other similar studies that have been conducted nationally as well as in the region.¹⁷

Further, there are numerous on-airport sources of viruses and bacteria. Aircraft sanitary holding tanks must be emptied and cleaned. Ground crew likely urinate an airport grounds. Sanitary sewers and their appurtenances, e.g., manholes, are known to leak. Leakage rates typically range from 100 to 10,000 gallons per day per inch of pipe diameter per mile. LAX started operations in 1928, and the plumbing system was likely built up over the first half of the twentieth century. Most pipe sewers built during this period were laid with cement mortar joints or hot-poured bituminous compound joints. Manholes were almost always constructed of brick masonry. Deterioration of pipe joints, pipe-to-manhole joints, and waterproofing of brickwork is common in these old sewer systems and results in high sewage leakage rates.¹⁸ Modern sewers are typically designed for exfiltration (leakage) rates of no more than 200 gallons per inch of pipe diameter per mile per day¹⁹ and thus also leak. Therefore, leakage from the LAX sanitary sewer system would provide a ready source of pathogens and viruses. Finally, fecal

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bacteria are normal residents of the digestive tracts of humans and other warm-blooded animals. It is not difficult to imagine that there would be warm-blooded animals within the HWQSA.

Thus, pathogens and viruses should not have been eliminated from the DEIR's analysis of water quality impacts of the project. Pathogens and viruses are the main constituent of concern in local near-shore waters where LAX discharges its stormwater runoff and cause hundreds of beach closures every year. The project will certainly contribute to this existing significant impact by intensifying airport activity. Thus, the DEIR must be revised to evaluate the impact of the project on bacteriological quality of receiving waters and propose mitigation to eliminate this impact.

13 R. Kebejian, Monitoring the Urban Effects on Recreational Waters, *Journal of Environmental Health*, v. 56, 1994, pp. 15-19.

14 R.T. Noble and others, A Regional Survey of the Microbiological Water Quality Along the Shoreline of the Southern California Bight, *Environmental Monitoring and Assessment*, 1999.

15 R.W. Haile and others, The Health Effects of Swimming in Ocean Water Contaminated by Storm Drain Runoff, *Journal of Epidemiology*, v. 104 pp. 355-363.

16 Los Angeles County Department of Public Works (LACDPW), Los Angeles County 1994-2000 Integrated Receiving Water Impacts Report July 31, 2000.

17 R.T. Noble and others, A Regional Survey of the Microbiological Water Quality Along the Shoreline of the Southern California Bight, Southern California Coastal Water Research Project Annual Report 2000, 2001; M. Gold, M. Bartlett, J. Dorsey, and C.D. McGee, An Assessment of Inputs of Fecal Indicator Organisms and Human Enteric Viruses from Two Santa Monica Storm Drains, Santa Monica Bay Restoration Project Report, 1992; K. Schiff, Review of Existing Stormwater Monitoring Programs for Estimating Bight-wide Mass Emissions from Urban Runoff, Southern California Coastal Water Research Project Annual Report 1996, 1997; U.S. EPA, Bacteriological Ambient Water Quality Criteria for Marine and Freshwater Recreational Waters, 1986.

18 Metcalf & Eddy, Inc., *Wastewater Engineering: Treatment, Disposal and Reuse*, 3rd Ed., Irwin McGraw-Hill, Boston, 1991, pp. 29-32.

19 Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, *Recommended Standards for Wastewater Facilities*, 1997, section 33.94, p. 30-6.

Response:

Fecal coliform bacteria, total coliform bacteria and fecal streptococcus bacteria (as well as ammonia) were included in the pollutant load modeling performed for the Supplement to the Draft EIS/EIR, as described in Section 4.7, Hydrology and Water Quality (subsection 4.7.2). Also, please see Topical Response TR-HWQ-1 regarding selection of model constituents, Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1, and Response to Comment AL00033-363 regarding BMPs and pollutant removal.

AL00033-366

Comment:

II.F.2. Dioxins And Furans

Dioxins and furans are among the most potent toxins known. These compounds are suspected human carcinogens,²⁰ and they are known to impair immune system function, decrease testosterone in men, and cause behavioral disorders, among other adverse health impacts.²¹ They are also extremely fat soluble and thus bioaccumulate in the food chain. Recent research has demonstrated that these compounds are present in stormwater runoff.²² Studies conducted in the Los Angeles Basin in the vicinity of LAX have confirmed that dioxins and furans are present in stormwater runoff from the area.²³ These compounds have also been identified in biota from Santa Monica Bay.²⁴

Dioxins and furans are emitted by combustion sources, including motor vehicles²⁵ and numerous other combustion sources.²⁶ A dioxin emission inventory prepared for the San Francisco Bay Area by the

Bay Area Air Quality Management District found that on-road mobile sources emitted 50% of the regional dioxin.²⁷ The project will substantially increase emissions from aircraft and motor vehicles in the vicinity of LAX (DEIR, § 4.6) and thus emissions of dioxins and furans. Once emitted to the atmosphere, these compounds are removed from the atmosphere through dry and wet deposition²⁸ and subsequently incorporated into stormwater runoff. Thus, the project will increase the amount of dioxin and furans that are discharged into Santa Monica Bay and other local receiving waters, where they will bioaccumulate through the food chain. This is a significant impact that was not evaluated by the DEIR.

20 U.S. EPA, Dioxin Reassessment - An SAB Review of the Office of Research and Development's Reassessment of Dioxin, Report EPA-SAB-EC-0-006, May 2001.

21 U.S. EPA, Exposure and Human Health Reassessment of 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) and Related Compounds, Report EOA/600/P-00/001Ba, September 2000.

22 M. Horstmann and M.S. McLachlan, Concentrations of Polychlorinated Dibenzo-p-Dioxins (PCDD) and Dibenzofurans (PCDF) in Urban Runoff and Household Wastewaters, *Chemosphere*, v. 31, no. 3, 1995 pp. 2887-2896.

23 T.S. Fisher and others, Dioxins and Furans Urban Runoff, *Journal of Environmental Engineering*, February 1999, pp. 185-191.

24 Southern California Coastal Water Research Project, MBC Applied Environmental Sciences, and University of California Santa Cruz Trace Organics Facility, Santa Monica Bay Seafood Contamination Study, Final Report, Submitted to Santa Monica Bay Restoration Project, October 20, 1992.

25 A.W. Gertler, J.C. Sagebiel, and W.A. Dippel, Measurement of Dioxin and Furan Emission Factors from Heavy-Duty Diesel Vehicles, *Journal of Air & Waste Management Association*, v. 48, 1998, pp. 276-278; B.K. Hullett and J.V. Ryan, On-Road Sampling of Diesel Engine Emissions of Polychlorinated Dibenzo-p-Dioxin and Polychlorinated Dibenzofuran, *Proceedings 17th International Symposium on Chlorinated Dioxins and Related Compounds*, Indianapolis, IN, v. 32, August 25-29, 1997; A.W. Gertler, J.C. Sagebiel, W.A. Dippel, and L.H. Sheetz, A Study to Quantify On-Road Emissions of Dioxins and Furans from Mobile Sources: Phase 2, API Publication No. 4642, December 1996.

26 U.S. EPA, Estimating Exposure to Dioxin-Like Compounds, Draft Final, Report EPA/600/P-00/001, September 2000.

27 Bay Area Air Quality Management District, Air Emissions of Dioxins in the Bay Area, March 27, 1996.

28 C.J. Koester and R.A. Hites, Wet and Dry Deposition of Chlorinated Dioxins and Furans, *Environmental Science & Technology*, v. 26, no. 7, 1992, pp. 1375-1382; L.P. Brzuzy and R.A. Hites, Global Mass Balance for Polychlorinated Dibenzo-p-dioxins and Dibenzofurans, *Environmental Science & Technology*, v. 30, no. 6, 1996, pp. 1797-1804.

Response:

Please see Topical Response TR-HWQ-1 regarding storm water toxicity and Response to Comment AL00033-363 regarding BMPs and pollutant removal.

AL00033-367

Comment:

II.F.3. Other Chlorinated Organics

The DEIR eliminated DDT, chlordane, and PCBs from review because they have been banned in the United States and are no longer used. (TR6, p. 22.) However, these and other similar organochlorine compounds are still in use outside of the United States²⁹ and are present in ambient air and precipitation throughout the world in areas where they have never been used.³⁰ Further, DDT, chlordane, and PCBs have been listed under Section 304d of the Clean Water Act as currently exceeding water quality objective in Dominguez Channel and Santa Monica Bay. Finally, recently

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deposited, near-surface sediments (top 2 cm) from the mouth of Ballona Creek had significantly higher concentrations of total DDT and total PCB than other areas.³¹

The project would increase the loading of all of these compounds because the project will significantly increase the volume of stormwater runoff. Therefore, these compounds should have been included in the DEIR's analysis of water quality impacts. The DEIR should be revised to analyze chlorinated organic compounds and methods proposed to reduce them in stormwater runoff.

29 Large amounts of these compounds are currently used in India, Mexico, Africa, Latin America and elsewhere. See, for example, T.F. Bidleman and others, Chlorinated Pesticides and Polychlorinated Biphenyls in the Atmosphere of the Canadian Arctic, In: D.A. Kurtz (Ed.), Long Range Transport of Pesticides, Lewis Publishers, Inc., Chelsea, MI, 1990, Chapter 23.

30 S. Tanabe, R. Tatsukawa, M. Kawano, and H. Hidaka, Global Distribution and Atmospheric Transport of Chlorinated Hydrocarbons: HCH (BHC) Isomers and DDT Compounds in the Western Pacific, Eastern Indian and Antarctic Oceans, Journal of Oceanographical Society of Japan, v. 38, 1982, pp. 137-148; D.A. Kurtz (Ed.), Long Range Transport of Pesticides, 1990; J.F. Pankow and others, Organic Compounds in Los Angeles and Portland Rain - Identities, Concentrations, and Operative Scavenging Mechanisms, In: Precipitation Scavenging, Dry Deposition, and Resuspension, Elsevier, New York, Volume 1, 1983 pp. 403-414; D. J. Gregor and W.D. Gummer, Evidence of Atmospheric Transport and Deposition of Organochlorine Pesticides and Polychlorinated Biphenyls in Canadian Arctic Snow, Environmental Science & Technology v. 23, n. 5, 1989, pp. 561-565; Raymond M. Hoff, D.C.G. Muir, and N.P. Grift, Annual Cycle of Polychlorinated Biphenyls and Organohalogen Pesticides in Air in Southern Ontario. 2. Atmospheric Transport and Sources, Environmental Science & Technology, v. 26, no. 2, 1992, pp. 276-283.

31 S. Bay and K. Schiff, Impacts of Stormwater Discharges on the Nearshore Environment of Santa Monica Bay, Southern California Coastal Water Research Project Annual Report 1996, 1997.

Response:

Please refer to Topical Response TR-HWQ-1 regarding storm water toxicity and Response to Comment AL00033-363 regarding BMPs and pollutant removal.

AL00033-368

Comment:

II.F.4. Polynuclear Aromatic Hydrocarbons

The DEIR eliminated polynuclear aromatic hydrocarbons ("PAHs") from compounds reviewed for water quality impacts because they are not listed in the Statewide Industrial Activities Storm Water General Permit ("Industrial Permit") for airports and were allegedly not evaluated under the Los Angeles County monitoring program. (TR6, p. 22.) This elimination was improper.

The Los Angeles County Municipal Storm Water Permit requires that PAHs be monitored in stormwater.³² These compounds are currently monitored by Los Angeles County in stormwater and have been detected at elevated concentrations. During the 1999-2000 season, two PAH compounds, phenanthrene and pyrene, exceeded the California Ocean Plan objectives at the Malibu Creek station. (LCDPW 7/31/00, p. 47.) PAHs have been listed under Section 304d of the Clean Water Act as currently exceeding water quality objectives in Dominguez Channel, which receives drainage from LAX. Finally, PAHs were elevated at the mouth of Ballona Creek, which is a concrete-lined stormwater drainage channel for a large portion of Los Angeles County immediately adjacent to LAX. Ballona Creek had significantly higher sediment concentrations of PAHs than Malibu Creek, a relatively undeveloped watershed. Total PAHs were highest in sediments sampled directly offshore of the creek mouth and concentrations decreased upcoast and downcoast. (Bay and Schiff 1997.)

These compounds are emitted by motor vehicles³³ and aircraft³⁴ in both vapor and particulate phases. They are also present in crankcase oils and other drippings from on-road mobile sources and are present in oily materials spilled from on-airport maintenance facilities. Thus, they would be incorporated into stormwater runoff through dry and/or wet deposition and washed off of contaminated surfaces such as roadways and parking lots. PAHs, for example, are present in Los Angeles air³⁵ and are known to

be scavenged from Los Angeles air by precipitation.³⁶ Thus, because the project would significantly increase and intensify both aircraft and motor vehicle activity, it would also increase drippings of oil and direct emissions of PAHs and thus, the amount of PAHs in stormwater runoff.

In light of the foregoing, PAHs would clearly qualify as one of the pollutants LAWA is obligated to monitor under the Industrial Permit on the ground that it is "likely to be present in storm water discharges in significant quantities." See Industrial Permit at X (Fact Sheet). It was therefore improper for the DEIR to exclude PAHs from its analysis simply because they are not listed in the Industrial Permit. The DEIR should be revised to evaluate PAHs

32 California Regional Water Quality Control Board, Los Angeles Region, Order No. 96-054, NPDES No. CAS614001, Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges Within the County of Los Angeles, July 15, 1996.

33 A.H. Miguel and others, On-Road Emissions of Particulate Polycyclic Aromatic Hydrocarbons and Black Carbon from Gasoline and Diesel Vehicles, *Environmental Science & Technology*, v. 32, 1998, pp. 450-465.

34 D.J. Robertson, R.H. Groth, and T.J. Blaska, Organic Content of Particulate Matter in Turbine Engine Exhaust, *Journal of the Air Pollution Control Association*, v. 30, no. 3, pp. 261-266; C.W. Spicer and others, Chemical Composition of Exhaust from Aircraft Turbine Engines, *Journal of Engineering for Gas Turbines and Power*, v. 114, 1992, pp. 111-117; C.W. Spicer, M.W. Holdren, R.M. Riggan, and T.F. Lyon, Chemical Composition and Photochemical Reactivity of Exhaust from Aircraft Turbine Engines, *Annales Geophysicae*, v. 12, 1994, pp. 944-955.

35 D. Grosjean, Polycyclic Aromatic Hydrocarbons in Los Angeles Air From Samples Collected on Teflon, Glass and Quartz Filters, *Atmospheric Environment*, v. 17, no. 12, 1983, pp. 2565-2573.

36 J.F. Pankow and others, Organic Compounds in Los Angeles and Portland Rain: Identities, Concentrations, and Operative Scavenging Mechanisms, pp. 403-415.

Response:

Please refer to Topical Response TR-HWQ-1 regarding storm water toxicity, Topical Response TR-HWQ-2 regarding compliance with regulations, and Response to Comment AL00033-363 regarding BMPs and pollutant removal.

AL00033-369

Comment:

II.F.5. Metals

The DEIR eliminated all metals except copper, lead and zinc from its water quality analysis, arguing that these were found at substantially higher concentrations than those that were omitted -- mercury, cadmium, chromium, nickel, and silver. (TR6, p. 22.) However, this is not a reasonable basis for eliminating these constituents.

The toxicity and sources of the individual metals should have been considered. Although zinc, lead, and copper may be present in higher relative concentrations, metals like cadmium, hexavalent chromium, arsenic, selenium, mercury, and silver are generally of greater concern because they are more toxic to aquatic organisms³⁷ and/or to humans. Further, the omitted metals are more likely to bioaccumulate, thus potentially impacting aquatic organisms and/or human health from consumption of seafood.³⁸ Thus, lower relative concentrations of the metals that were eliminated are not a reasonable basis for eliminating these metals.

We also note that stormwater runoff is the principal source of two of the metals that were eliminated - chromium and nickel. In a summary of mass emission rates of selected constituents discharged into the South California Bight, urban runoff was found to contribute 76% of the chromium and 64% of the nickel. These percentages are comparable to or higher than those for the three metals that were included - copper (59%), lead (77%), and zinc (71%).³⁹

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Finally, the NURP report relied on in the DEIR provides ample evidence that other metals are important to evaluate. This study reported that chromium was detected in 58% of the urban runoff samples, arsenic in 52%, cadmium in 48%, nickel in 43%, antimony in 13%, beryllium in 12%, and selenium in 11%. (EPA 1983, Table 6-20.) This study also concluded that cadmium concentrations in urban runoff exceeded freshwater chronic water quality objectives 48% of the time and that among the metals that were frequently detected, lead, nickel, arsenic and beryllium were the most significant pollutants to evaluate for public health impacts. (EPA 1983, p. 9-2.)

The DEIR should be revised to consider the sources and toxicity of all toxic metals that would be increased by the project. At a minimum, the DEIR should be revised to evaluate mercury, nickel, chromium, and arsenic.

37 S. Ramamoorthy and E.G. Baddaloo, Handbook of Chemical Toxicity Profiles of Biological Species, CRC Lewis Publishers, 1995; E.M. Sorensen, Metal Poisoning in Fish, CRC Press, 1991; A.G. Heath, Water Pollution and Fish Physiology, 2nd Ed., 1995.

38 S.E. Jorgensen, S.N. Nielsen, and L.A. Jorgensen, Handbook of Ecological Parameters and Ecotoxicology, Elsevier, 1991; I. Pais and J.B. Jones, Jr., The Handbook of Trace Elements, St. Lucie Press, Boca Raton, FL, 1997; B.L. Carson, H.V. Ellis III, and J.L. McCann, Toxicology and Biological Monitoring of Metals in Humans, Lewis Publishers, Inc., 1986.

39 K.C. Schiff, M. James Allen, E.Y. Zeng and S.M. Bay, Southern California, Marine Pollution Bulletin, v. 41, no. 1-6, 2000, pp. 76-93.

Response:

Please refer to Topical Response TR-HWQ-1 regarding storm water toxicity and Response to Comment AL00033-363 regarding BMPs and pollutant removal.

AL00033-370

Comment:

II.F.6. Pesticides

Pesticides, herbicides and fertilizers are likely to be applied on portions of the landscaped areas. The pesticides diazinon and chlorpyrifos, for example, are widely used and are well known to cause widespread aquatic toxicity effects. These substances could enter surface runoff and find their way into Santa Monica Bay and Dominguez Channel. The DEIR did not identify the pesticides that would be used by the project or discuss the impacts of currently used pesticides on water quality.

The most effective way to limit the impact of pesticides on aquatic organisms is to ban those pesticides that are acknowledged to be the most toxic. The EIR should review pesticide aquatic toxicity data and identify those compounds that are most toxic to the organisms present in local receiving waters. These would include organophosphate pesticides such as diazinon and chlorpyrifos, which are widely used and highly toxic at extremely low concentrations. A mitigation measure requiring the use of only nontoxic pesticides and banning certain others should be recommended. A similar approach was recently taken by the City of San Diego in the DEIR for the Padres Ballpark.

Response:

When updating the LAX SWPPP, LAWA will consider mitigation measures such as those proposed that would require use of only non-toxic pesticides. Also, please see Topical Response TR-HWQ-1 regarding storm water toxicity and Response to Comment AL00033-363 regarding BMPs and pollutant removal.

AL00033-371

Comment:

II.G. Stormwater Runoff Coefficient Underestimated

The DEIR estimated the amount of stormwater runoff by multiplying the average annual precipitation by the increase in area and a runoff coefficient that expresses the fraction of the total flow volume that would become stormwater runoff. (TR6, P. 24.) The DEIR estimated the runoff coefficient using a method advocated by the FHWA. (TR6, p. 25.) A similar method is used by LACDPW and other local agencies. The method used in the Los Angeles area results in higher runoff coefficients and hence greater runoff, as summarized below. (LACDPW 7/31/00, p. 4-10.)

Land Use	Runoff Coefficient	
	DEIR	LACDPW
Airport Operations	80%	90%
Airport Open Space	42%	46%
Non-Airport Roads	66%	74%
Industrial	80%	90%
Commercial	80%	90%
Residential	80%	90%
Open Space	35%	38%

The method in wide use locally should have been used in the DEIR because it more accurately captures local conditions unique to the desert environment.

Response:

Please see Topical Response TR-HWQ-1 regarding model parameters - runoff coefficients.

AL00033-372

Comment:

III. ALL IMPACTS WERE NOT EVALUATED

III.A. Dry Weather Flows Were Not Analyzed

Some storm drains discharge continuously during the year. Discharges that occur during dry weather, when it is not raining, are referred to as "dry weather flows" and are known to cause significant environmental impacts. For example, during dry weather, total and fecal coliform levels in flowing storm drains range from the low thousands to hundreds of thousands and enterococcus levels from the low hundreds to thousands of organisms per 100 ml. (Kebabjian 1994.) The DEIR describes the many sources of dry water flows (TR6, pp. 33-34) at the airport, which include aircraft and support equipment maintenance and washing, fueling activities, painting and stripping, deicing and anti-icing, and landscaping activities. The discharges from these activities currently flow to a retention basin and then to the Hyperion Treatment Plant. (TR6, p. 34.) However, the detention basin would be removed under all build alternatives, allowing dry weather flows from LAX to enter the storm drain system and discharge untreated to Santa Monica Bay or Dominguez Channel. (DEIR, pp. 4-553, -556, -558.)

The DEIR does not contain any analysis of the impact of removing this detention basin or the potential changes in the amount and quality of these dry weather flows due to intensification of airport activity. Instead, it argues that the increase in dry weather discharges from intensification would be offset by relocating heavy maintenance activities off the airport. However, the DEIR totally fails to evaluate the dry weather water quality impacts of these relocated activities.

Further, the DEIR concludes that the increased potential for spills and leaks caused by the intensification of airport activities would be a potentially significant impact, but argues that "compliance with existing regulations and airport procedures.. . would reduce potential impacts associated with hazardous materials spills." (Ibid.)

This perfunctory analysis is inadequate under CEQA. A Superior Court judge recently invalidated lead agencies' practice of relying on compliance with another agency's standards or permitting requirements to conclude that a project will have a less-than-significant impact. In *Environmental Protection Information Center, et al. v. California Resources Agency* (Sacramento Sup. Ct. Case No. 00CS0030000 (April 13, 2001)), the Court struck down the provision of the CEQA Guidelines that

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allowed a lead agency to consider an impact "less-than-significant" if that impact was consistent with a standard adopted by another agency. (Guidelines, § 15064(h).)

The DEIR should be modified to quantitatively evaluate the impacts of dry weather flows and to impose feasible mitigation to reduce the impacts to a less-than-significant level.

Response:

Please see Response to Comment AR00002-3 regarding management of dry weather discharges under Alternatives A, B and C which call for removal of the Imperial retention basin, Topical Response TR-HWQ-1 regarding land use intensification, Topical Response TR-HWQ-2 regarding performance standards and compliance with regulations, and Response to Comment AL00033-351 regarding quantification of dry weather flows.

AL00033-373

Comment:

III.B. Construction Water Quality Impacts Were Not Evaluated

Construction of the project would occur over an extended period of time and affect a very large area. Construction activities are notorious for creating erosion and generating muddy, turbid runoff. The DEIR contains no analysis of this issue, instead arguing that following the procedures in LAWA's Construction SWPPP for LAX would assure that these impacts would be less than significant. (DEIR, pp. 4-553, -556, -559.) As noted in Comment III.A, reliance on existing regulations and procedure cannot be used to avoid performing a proper analysis.

Response:

Please refer to Topical Response TR-HWQ-2 regarding compliance with regulations.

AL00033-374

Comment:

Review of Biological Resources Analysis in LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report

This review pertains to the Federal Aviation Administration and Los Angeles World Airports Joint Draft Environmental Impact Statement/Environmental Impact Report ("EIS/R"). It addresses Sections 4.10 (Biotic Communities), 4.11 (Endangered and Threatened Species of Flora and Fauna), 4.12 (Wetlands), 4.14 (Coastal Zone), and 4.18 (Light Emissions). The review was prepared by Dr. Travis Longcore and Catherine Rich, who are experts in the ecology and history of the natural communities that would be affected by the proposed airport expansion. Dr. Longcore has co-authored several peer-reviewed scientific articles on the El Segundo Dunes and the Los Angeles Coastal Prairie (including its vernal pools),¹ which both would be adversely affected by the proposed project.

The presentation of information in the EIS/R about biological resources is segmented into several sections. For the purpose of this review, however, all biological resource issues are treated together, because mitigation measures for biological impacts are largely the same.

1. Mattoni, R., T. Longcore, C. Zonneveld, and V. Novotny. 2001. Analysis of transect counts to monitor population size in endangered insects: the case of the El Segundo blue butterfly *Euphilotes bernardino* allynii. *Journal of Insect Conservation* 5(3):197-206. Longcore, T., R. Mattoni, G. Pratt, and C. Rich. 2000. On the perils of ecological restoration: lessons from the El Segundo blue butterfly. Pp. 281-286 in J.E. Keeley, M. Baer-Keeley, and C.J. Fotheringham (eds.) *2nd Interface Between Ecology and Land Development in California*. U.S. Geological Survey, Sacramento, CA. Mattoni, R., T. Longcore, and V. Novotny. 2000. Arthropod monitoring for fine scale habitat analysis: a case study of the El Segundo dunes. *Environmental Management* 25(4):445-452. Mattoni, R., and T.R. Longcore. 1997. The Los Angeles Coastal Prairie, a vanished community. *Crossosoma* 26(2):71-102.

Response:

Please see Responses to Comments AL00033-166, AL00033-385, and AL00033-415 below regarding specific comments on the analysis of biological resources.

AL00033-375**Comment:****1.0 Project Description**

For the purpose of discussing the impacts to biological resources, the EIS/R does not provide a complete project description. Within the extent of the Master Plan boundaries, it is unclear what the disposition of certain areas of biologically significant property will be. In maps of the various project alternatives, the legend indicates useless designations such as "Airport Related."² There is no way to ascertain with certainty what the use of such land will be under the various alternatives.

2. EIS/R, Figures 3-6, 3-11, 3-15.**Response:**

Please see Response to Comment AL00033-166 regarding "airport-related" properties.

AL00033-376**Comment:****1.1 Failure To Analyze Northside/Southside Project**

The EIS/R describes the LAX Northside Project as "Collateral Development" that previously has been entitled through the CEQA process.³ Reliance on old CEQA documentation is problematic, and development of this project would seem to require a reopening of the environmental review, especially given the changed conditions since the approval in 1983. However, the real difficulty is that the EIS/R replaces the LAX Northside Project with the Westchester Southside Project in each of the three build alternatives for the Master Plan. These projects are not the same, and even if the CEQA documentation for the Northside Project is deemed adequate, the Southside Project must be fully analyzed under CEQA. The EIS/R does not completely describe or analyze the biological impacts of the Southside Project.

The Westchester Southside Project, as depicted in the EIS/R,⁴ would include the conversion of 100 acres of the El Segundo Dunes to a golf course. (Several figures in the EIS/R appendices map this area at the northern portion of the dunes as "golf course/open space" and include "Resort Hotels" within the same color designation. At a minimum the maps indicate some level of development of the dunes as part of the Westchester Southside project.) The dunes golf course/open space development was not included in the CEQA analysis for the LAX Northside Project, and remains unanalyzed for compliance with any environmental laws (CEQA, NEPA, California Coastal Act). It is inappropriate for the EIS/R to rely on the Westchester Southside Project - which is a site for relocation of displaced businesses⁵ - for mitigation, and not to evaluate the full impacts of the development. While all of the El Segundo Dunes are within the Master Plan area, and the alternatives themselves show no development on the 100 acres at the northern end of the dunes, the result of adopting any of the three project alternatives is to develop 100 acres of dunes in association with "Resort Hotels" and "golf course/open space."⁶ The resource value of this area is discussed later, but the analysis of the Westchester Southside Project should not be piecemealed. Currently, the biological impacts of the Westchester Southside Project do not seem to be analyzed fully, nor are they included in the discussion of cumulative impacts for the project. Even if one accepts the premise of the EIS/R that the project will proceed absent approval of the Master Plan, the Westchester Southside Project is "reasonable foreseeable" - in fact relied upon for mitigation - and all of its impacts must be disclosed and mitigated as part of the Master Plan EIS/R.

The decision not address the biological impacts of the Westchester Southside Project can be interpreted as a strategic choice to avoid disclosure of the full impacts of the airport expansion project. From a biological standpoint, the Westchester Southside Project, even though it would involve fewer square feet of built space than the Lax Northside Project (2.6 million square feet vs. 4.5 million square feet), it has a larger geographic footprint and greater biological impact. Any of the three build

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alternatives plus the Westchester Southside Project would be a catastrophe for the biological resources found at LAX.

3. EIS/R, pp. 3-20, 2-39.

4. EIS/R, Appendix J1. Biological Assessment Technical Report, Figures 8, 11, 14.

5. EIS/R, pp. 3-33, 3-47, 3-56.

6. City of Los Angeles Ordinance 169, 767 restricts use of the northern 100 acres of the El Segundo Dunes at LAX to "nature preserve and accessory uses only." This ordinance was passed unanimously by the City Council on April 6, 1994 as part of the General Plan/Zoning Consistency Program. Given this unequivocal direction from the City, it is unclear why the Master Plan is ambiguous about the disposition of this area, unless the intention is to attempt to remove the development conditions for the property and seek another use as part of the Westchester Southside Project.

Response:

The LAX Master Plan does not include any development of the 104.3 acres in the Los Angeles/El Segundo Dunes, with the exception of changes to FAA-required navigational aids and associated service roads currently located in the Dunes. No golf course, hotel resort, or any other type of development is proposed.

Please see Response to Comment AS00005-9 regarding impacts from the LAX Northside and Westchester Southside Projects and Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR for revised Figures 8, 11, and 14 of Appendix J1, Biological Assessment Technical Report. In addition, please see Response to Comment AL00033-167 regarding the LAX Northside and Westchester Southside Projects.

AL00033-377

Comment:

1.2 Previous Failure to Disclose Impacts of Development on El Segundo Dunes

Los Angeles World Airports ("LAWA") has previously failed to disclose impacts of development on the El Segundo Dunes. In 1999, a newspaper story announced that LAWA was planning to install landscaping on the northern end of the El Segundo Dunes, along Waterview, Rindge, and Napoleon streets. The Urban Wildlands Group, a Los Angeles-based nonprofit whose board includes the authors of this letter, contacted LAWA to inform project managers of the sensitive resources present and request that the project not include invasive plants that would degrade the dunes. LAWA promised, but then failed to provide, the plant list for the project. LAWA proceeded to implement the project, but failed to secure the proper permits from the City of Los Angeles as required under the California Coastal Act. After installing a new walkway and over 90 mature, non-native palm trees in a sensitive habitat area,⁷ LAWA was instructed to stop work by the California Coastal Commission, told that it must obtain a permit, and subsequently applied for a permit from the City. The Urban Wildlands Group opposed the permit application for the partially implemented project because it would significantly disrupt habitat values of an environmentally sensitive habitat area ("ESHA"), as defined under the California Coastal Act.⁸ The City analysis of the project also agreed that the site was an ESHA.⁹ The appeal of the permit was denied by the City of Los Angeles Board of Public Works with the stipulation that LAWA resolve the issue in consultation with The Urban Wildlands Group and those residents opposed to the palm trees. This has not yet happened.

LAWA steadfastly maintains that the 100 acres outside of the El Segundo Blue Butterfly Preserve is not part of the El Segundo Dunes and that it will be developed as a golf course.¹⁰ The area, however, is within the jurisdiction of the California Coastal Commission, and no approved Local Coastal Plan has been produced that would allow for a golf course. The EIS/R provides even more information to join previously published source¹¹ showing that the area is an environmentally sensitive habitat area and therefore protected by Section 30240(a) of the California Coastal Act. For example, the EIS/R itself discloses that El Segundo blue butterflies (*Euphilotes bernardino allyni*) occupy one subsite,¹² sensitive Lewis' evening primrose (*Camissonia lewisii*) occupies seven subsites,¹³ and the area is occupied by sensitive species such as silvery legless lizard (*Anniella pulchra*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*),¹⁴ loggerhead shrike (*Lanius ludovicianus*; breeding),¹⁵ and Dorothy's sand dune weevil (*Trigonoscutea dorothea dorothea*).¹⁶ The golf course or other development on the dunes should either be analyzed as part of the Master Plan EIS/R for conformance with

applicable laws, including the California Coastal Act, or be explicitly deleted from the plans for the area. The EIS/R should offer some certainty about what development will take place within the Master Plan boundaries and disclose the impacts of that development.

7. Installation of palm trees is damaging ecologically, and also provides sites for birds to perch, potentially increasing bird strikes with aircraft. Consultants for the airport report that "[t]he El Segundo Dunes provides relative few attractants to birds which may partially account for the significantly lower percentage of strikes occurring over this area than over the approach area. The El Segundo Dunes naturally supports very few trees - the only trees present are non-native trees that have been planted...." (EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 341). Without complete environmental review, LAWA planted more attractants for birds in the form of palm trees. The EIS/R also reports that the native birds of the dunes are not involved in bird strikes, while species promoted by urban development, such as pigeons and gulls, are involved in the most strikes.

8. California Public Resources Code §§ 30107.5, 30240.

9. City of Los Angeles. 2001. Coastal Development Permit Application No. 00-05 Final Staff Report, p. 5, "Consequently, for Coastal Act analysis purposes, the Project site is within an environmentally sensitive habitat area...."

10. Personal communication with Steve Crowther, LAWA Environmental Management Bureau, March 9, 2000, by telephone with Dr. Travis Longcore. City of Los Angeles 2001. Coastal Development Permit Application No. 00-05 Final Staff Report, p. 3, "The Project, a narrow, landscaped area along the streets, would provide a buffer between the golf course and residential areas...."

11. Mattoni, R., T. Longcore, and V. Novotny. 2000. Arthropod monitoring for fine scale habitat analysis: a case study of the El Segundo dunes. *Environmental Management* 25(4):445-452.

12. EIS/R, Appendix J 1. Biological Assessment Technical Report, Figure 20.

13. EIS/R, Figure 4.10-2.

14. EIS/R, Figure 4.10-4.

15. EIS/R, Figure 4.10-5. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 244.

16. EIS/R, Appendix J1 . Biological Assessment Technical Report, p. 214.

Response:

LAWA has made every effort to evaluate and disclose all possible impacts of the project. All build alternatives were evaluated with respect to (1) the goals of the California Coastal Act, (2) the Coastal Zone Management Act, and (3) CEQA guidelines. None of the build alternatives were found to have a significant impact to the coastal zone or coastal access according to coastal zone management thresholds derived from the goals of the California Coastal Act. Impacts on the Coastal Zone were addressed in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

With regard to the 104 acres outside of the El Segundo Blue Butterfly Habitat Restoration Area, this area has been considered part of the 307-acre Los Angeles/El Segundo Dunes and was analyzed as such in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The 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, contained incorrect information. There are no golf courses or resort hotels proposed for the 100 acres outside of the Habitat Restoration Area within the Los Angeles/El Segundo Dunes; the area shall remain open space. In response, Figures 8, 11, and 14 of Appendix J1, Biological Assessment Technical Report, 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.

With regard to the 1999 landscaping in an area of the Los Angeles/El Segundo Dunes, see Response to Comment AL00033-171 above. LAWA is currently working with the California Coastal Commission to rectify any issues due to the installation of Mexican fan palms. On April 10, 2002, the California Coastal Commission approved Coastal Development Permit No. 5-02-008, requested by LAWA and subject to special conditions, for development consisting of the following: "After the fact permit to plant 90 non-native *Washingtonia robusta* (Mexican fan palm), install irrigation, pedestrian path, and minor street, curb, and gutter realignment, and a permit to remove 30 of the palm trees previously planted, landscape with native plants, and replace an existing chain-link fence with a decorative fence." Special conditions of the permit include, but are not limited to (1) submission of a plan for landscaping that is compatible with habitat restoration within the El Segundo Blue Butterfly Habitat Restoration Area,

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(2) submission of an assessment of existing native plants, (3) submission of a plan for public access signage, and (4) submission of fence plans.

1 Notice of Intent to Issue Permit (upon satisfaction of special conditions), May 9, 2002. Permit Application No. 5-02-008. California Coastal Commission, South Coast Area Office, P.O. Box 1450, 200 Ocean Gate 10th Floor, Long Beach, CA 90802-4325.

AL00033-378

Comment:

2.0 Current Conditions

The description of current conditions of the biological resources within the Master Plan boundaries is biased toward underestimating the value of the habitats that will be impacted.

Response:

A detailed description of the methods used to characterize existing biotic communities within the LAX Master Plan boundaries was presented in Section 4.10, Biotic Communities (subsection 4.10.2), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The description of current conditions complies with standard practices and is intended to accurately describe the value of impacted habitats. Also, please see Topical Response TR-BC-1 regarding the use of a modified Habitat Evaluation Procedure (HEP).

AL00033-379

Comment:

2.1 Surveys

A great deal of effort was expended surveying the insects of the El Segundo Dunes, especially within the El Segundo Blue Butterfly Preserve, even though this area is not targeted for direct development. Surveys for areas that would be subject to significant direct impacts were inadequate. It appears that only one type of survey - sweep netting - was conducted east of Pershing Drive in the areas that would be most affected by development. This single method would not detect all of the sensitive species that might occur in the area. For example, the El Segundo Jerusalem cricket (*Stenopelmatus* sp.), a burrowing insect, would not be detected with sweep netting. Pitfall trapping would be required to ascertain its presence, and should be performed in the areas of project impacts east of Pershing Drive. Other survey methods, including black lighting and malaise trapping, were conducted only west of Pershing Drive on the El Segundo Dunes, not in the areas of direct project impacts.

While the extensive surveys conducted on the El Segundo Dunes may be useful for evaluating the impacts of the Westchester Southside Project, which the EIS/R does not do, they offer little information to understand the biological communities supported in the open spaces that would be developed under the three development alternatives. For example, the EIS/R provides no summary of the bird surveys conducted at the ephemeral wetlands and open spaces found in the western area of the airport, and provides only handwritten notes buried in the appendices.¹⁷ A summary would be useful to understand the character of the biotic communities in these areas. Species of local conservation concern such as Costa's hummingbird (*Calypte costae*), western meadowlark (*Sturnella neglecta*), and common yellowthroat (*Geothlypis trichas*) were recorded in these areas, yet no complete description of the communities is provided in the text of the document. The biological consultants for the EIS/R report that the ephemeral wetland area at the west end of the airport "provides resting and foraging habitat for numerous resident and migratory bird species,"¹⁸ but the EIS/R provides no summary of these observations or description of the impact of development on these species.

For the El Segundo Dunes, an extensive list of birds is found, complete with species that are almost certainly not present at all. The "Floral Compendium" and "Faunal Compendium" include "species observed or expected to occur on or in the immediate vicinity of the site."¹⁹ On this list are found species that are highly unlikely to be present on the dunes or even near the dunes. For example, acorn woodpecker (*Melanerpes formicivorus*) is not likely to be found on the El Segundo Dunes now or in recent history. Acorn woodpeckers in Los Angeles would be associated with coast live oaks, which are found nowhere on the El Segundo Dunes or the Los Angeles Coastal Prairie. The rather excessive bird

list in the Faunal Compendium is made ever more curious by the statement elsewhere by the biological consultants for the EIS/R that "the Dunes does not support a large resident bird population."²⁰ It is odd to include these ambitious lists, because the biological analysis does not evaluate the impacts of the three alternatives on the species of wildlife in them.

17. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, pp. 224 (Memo-Results of Winter Directed Surveys for American Peregrine Falcon, et al., 1998), 292 (Memo-Results of Spring Directed Surveys for Burrowing Owl, 1998), 311 (Memo-Results of Winter Directed Surveys for Burrowing Owl, 1998), 416 (Memo-Wildlife Survey of the Argo Ditch, 1997).

18. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 340 (Memo-Aircraft Bird Strike Literature Review).

19. EIS/R, Appendix J1. Biological Assessment Technical Report, Appendix A, pp. 1-5.

20. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 342 (Memo-Aircraft Bird Strike Literature Review).

Response:

Various invertebrate sampling methods were prohibited on the LAX airfield because they would conflict with FAA regulations. Pitfall trapping and black lighting survey methods were not allowed within areas east of Pershing Drive due to potential aircraft hazards. Pitfall trapping also has the potential to collect non-target species such as reptiles, and could unintentionally impact reptile species because traps are checked less frequently for invertebrates than for reptiles. Detailed impact analyses for avian species that are not designated as listed or sensitive by federal or state agencies were not performed. LAWA is legally responsible for identifying and mitigating impacts to species afforded protection under the Federal Endangered Species Act and the California Endangered Species Act. Species lists were included in Appendix J-1 of the Draft EIS/EIR as a courtesy and to report the results of wildlife surveys. The faunal list for the Los Angeles/El Segundo Dunes includes a list of all birds that either currently or historically utilized portions of the proposed project area, or areas immediately adjacent to the project area. It is acknowledged that certain species on the faunal list may no longer occupy the proposed project area, may not be a resident species, and may be a casual or vagrant species.

AL00033-380

Comment:

2.2 "Determined Absent"

The summary table for sensitive species provided in Section 4.10 of the EIS/R is misleading. For many species, the table indicates that they have been "determined absent" from the Master Plan boundaries based on directed surveys. When dealing with small arthropods that are difficult to capture, persist at low numbers, and may have large annual variation in numbers, one cannot conclude that a species is "determined absent." All that can be done is to state that the species was not found during a certain duration and intensity of searching. It is likely that the survey methodology did not possess sufficient statistical power to detect the species.²¹ Presence may be determined conclusively, but absence cannot, especially for cryptic (i.e., small or camouflaged) species. Some degree of certainty about absence could be derived if one had knowledge of the population size, yearly variation in population size of the species, and the trapping efficiency of the survey methods. This information is not available, and therefore no statistically defensible declaration of absence can be made about the sensitive arthropod species.

In other instances, the declaration of absence is contradicted by the reports upon which the section is based. For example, Table 4.10-2 claims that the following species are absent from the Master Plan boundaries: Henne's ecospirid moth (*Eucosa hennei*), Rivers' dune moth (*Euxoa riversii*), Ford's sand dune moth (*Psammobotrys fordii*), El Segundo scythrid moth (*Scythris new sp.*), lesser dunes scythrid moth (*Scythris new sp.*), El Segundo goat moth (*Comadia intrusa*), and Santa Monica dunes moth (*Copeblepharon sanctamonicae*). However, in the underlying report, Frank Hovore, the surveyor, writes:

Sensitive moth species (general *Comadia*, *Copeblepharon*, *Euxoa*, *Psammobotrys* [sic], *Scythris*) - A wide variety of moth specimens, including some possibly representing all of these species except *Psammobotrys* [sic], were taken in light traps, but moths in the traps were rendered unidentifiable by the combination of alcohol and churning actions of other species. All of the moth species previously known

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to occur on the dunes probably persist, because all of the known larval hosts are present. For most moth species, focused light collecting would be necessary to determine presence and distribution, using dry traps or light sheets. Very large numbers of *Psammobotrys* [sic] were collected on the dunes historically (LACM collection), and it is assumed that this species is present, but is highly seasonal and difficult to collect without sustained and focused field efforts.²²

The text presented in Table 4.10-2 of the EIS/R contradicts the surveys that were conducted. Far from being absent, as maintained in Table 4.10-2, a qualified surveyor determined that the methodology was insufficient to determine presence of these moth species, but that the species were indeed probably present. Mischaracterization such as this undermines the credibility of the description of current conditions presented in the EIS/R.

21. Gibbs, J.P., S. Droege, and P. Eagle. 1998. Monitoring populations of plants and animals. *Bioscience* 48(1):935-940.

22. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 214 (Memo-Results of Spring Surveys for Gastropods and Arthropods, 1998).

Response:

The moth species discussed were not positively identified during directed surveys conducted between 1996 and 1998. However, if sensitive moth species are present within the Los Angeles/El Segundo Dunes, impact to their habitat from construction of navigational aids would be less than 1 percent of potentially suitable habitat for these species. Implementation of mitigation measures MM-BC-10 through MM-BC-13 of the Supplement to the Draft EIS/EIR would replace lost habitat at a 1:1 ratio within the Los Angeles/El Segundo Dunes, including the El Segundo Blue Butterfly Habitat Restoration Area. Restoration efforts for impacts to biotic communities within the Airport Operations Area (AOA) would also be undertaken within the Los Angeles/El Segundo Dunes, ultimately restoring high quality habitat for utilization by sensitive species. In addition, Section 4.10, Biotic Communities (subsection 4.10.6), of the Supplement to the Draft EIS/EIR provided a discussion of potential indirect impacts from air and light to sensitive moth species. Noise levels on the Los Angeles/El Segundo Dunes would be equal to or less than noise levels of the environmental baseline and therefore noise levels would not result in significant impacts to sensitive moth species.

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Comment:

2.3 Terminology

The EIS/R is inconsistent in its use of terminology describing the 100 acres north of the El Segundo Blue Butterfly Preserve. This area, along with the preserve, is part of the El Segundo Dunes.²³ It has been degraded through residential construction and intrusion of exotic plant species, but it remains of significant biological value and is itself a sensitive habitat (see above, Section 1.2). In various places in the EIS/R, this area is referred to as "dunes and adjacent landforms," "non-restructured dunes,"²⁴ "100 acres north of Sandpiper Street,"²⁵ and "the 100-acre open space north of the preserve."²⁶ Implicit in the choice of terminology for this area is perhaps the intention to construct a golf course upon it. The Los Angeles Airport/El Segundo Dunes Specific Plan, adopted in 1992, incorrectly claims that "approximately 100 acres of the Dunes . . . do not contain significant habitat resources."²⁷ The Specific Plan requires the proposed golf course to provide revenue for the upkeep of the dunes habitat preserve,²⁸ thereby lifting that burden from LAWA, which perhaps partially explains LAWA's enthusiasm for the idea. However, existing zoning for the area - established more recently than the Specific Plan - is as a nature preserve. EIS/R maps should be consistent with the existing "nature preserve" zoning and should consistently acknowledge this area as part of the El Segundo Dunes.

23 . Mattoni, R.H.T. 1992. The endangered El Segundo blue butterfly. *Journal of Research on the Lepidoptera* 29(4):277-304. Mattoni, R., and T.R. Longcore. 1997. The Los Angeles Coastal Prairie, a vanished community. *Crossosoma* 26(2):71-102. U.S. Fish and Wildlife Service. 1998. Recovery plan for the El Segundo blue butterfly (*Euphilotes battoides allyni*). U.S. Fish and Wildlife Service, Portland, Oregon, 67 pp.

24. EIS/R, p. 4-619.

25. EIS/R, p. 4-614 (this is listed separately from "the Los Angeles/El Segundo Dunes").

26. EIS/R, p. 3-20,

27. City of Los Angeles General Plan, Los Angeles Airport/El Segundo Dunes Specific Plan. Ordinance No. 167,940. June 28, 1992.

28. Id. At 6.

Response:

There is no implicit intent in the use of various phrases to describe the approximately 104.3 acres of the Los Angeles/El Segundo Dunes north of the Habitat Restoration Area. This area consists of disturbed dune scrub/foredune, non-native grassland/ruderal communities, and paved roads. Impacts to state-designated habitats within the Los Angeles/El Segundo Dunes were explicitly stated in Section 4.10, Biotic Communities, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Figure 4.10-1, Biotic Communities: Baseline Conditions, of the Draft EIS/EIR regarding the location of the Los Angeles/El Segundo Dunes. Please see Response to Comment AS00005-9 regarding the golf course.

AL00033-382

Comment:

The EIS/R also exhibits some difficulty with terminology to describe the habitat that formerly was found throughout the entire project area inland of the El Segundo Dunes. In a published article, Mattoni and Longcore describe this area as the Los Angeles Coastal Prairie, and document the historic plant diversity and the presence of extensive vernal pools.²⁹ The article has been commended as an exemplar of the practice of historical ecology in *The Historical Ecology Handbook: A Restorationist's Guide to Reference Ecosystems*.³⁰ For some reason, the EIS/R avoids using the Mattoni and Longcore article where it could be useful. For example, Mattoni and Longcore provide documentation of many sensitive species historically present within the study area from herbarium label texts. This includes a full list of vernal pool species historically found in the area, as well as upland forbs, grasses, and shrubs. Instead, the EIS/R chooses to classify the site as Valley Needlegrass Grassland. The historic evidence does not support the assumption that this area was dominated by perennial grasses; rather it was dominated by forbs. This is an important conclusion of Mattoni and Longcore's research that the EIS/R neither accepts nor attempts to dispute.

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

30. Egan, D., and A. Howell. 2001. Introduction. Pp. 1-23 in D. Egan and A. Howell (eds.) *The Historical Ecology handbook: a restorationist's guide to reference ecosystems*. Washington, D.C.: Island Press.

Response:

The valley needlegrass grassland classification for a portion of the Los Angeles/El Segundo Dunes is consistent with the R. Mattoni and T.R. Longcore's description of Los Angeles Coastal Prairie. Historic and present plant community composition of the Los Angeles/El Segundo Dunes was thoroughly examined in preparation of the Draft EIS/EIR, and included references from R. Mattoni and T.R. Longcore (1997) (please refer to page 4-643 of Section 4.10, Biotic Communities, of the Draft EIS/EIR for this reference). Grassland comprising deflation plain of the Los Angeles/El Segundo Dunes is considered historically a part of a larger area referred to as the Los Angeles Coastal Prairie which extended inland from the dunes. Present day grassland is now limited to the deflation plain area behind the coastal dune system, as was described in the Draft EIS/EIR. The Los Angeles Coastal Prairie was an instance of "valley needlegrass grassland" as classified by Holland (1986).¹

The native habitat and vernal pool complex was present on site through the 1930's, however, has been converted as a result of repeated grading, stockpiling, and recontouring in support of airport operations and wildlife hazards management.

1 Environmental Science Associates in association with Sapphos Environmental, Inc. and Rudolf H. T. Mattoni, July 23, 1992. Long-term Habitat Management Plan for Los Angeles Airport/El Segundo Dunes. Prepared for City of Los Angeles, Environmental Affairs Department.

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AL00033-383

Comment:

2.4 Disturbed Dune Scrub/Foredune

Concurrent with the changing terminology about the portion of the El Segundo Dunes not found within the habitat preserve is the decision to classify all dune scrub/foredune outside of the preserve area as disturbed dune scrub. While it is true that the dunes area outside the habitat preserve has a heavier exotic species load, and does not support coast buckwheat (*Eriogonum parvifolium*), it nevertheless has more biological value than is implied by the description. For example, this area supports sensitive plants (Lewis' evening primrose, *Camissonia lewisii*), birds (loggerhead shrike, *Lanius ludovicianus*), and arthropods (see above, Section 1.2). Mattoni et al. describe the ex-residential area in their 2000 article:

Removal of the residences in the 1970s was superficial, leaving some foundations, substantial rubble, foreign soil, roads, and other infrastructure. Vegetation regenerated without assistance, producing a cover of predominately iceplant (*Carpobrotus edulis*) and acacia (*Acacia cyclops*) with patches of a few highly dispersive dune shrub species.³¹

However, not all ex-residential sites supported the same arthropod communities. Some sites within the ex-residential area supported terrestrial arthropod communities (including rare and sensitive species) that were similar to those found on undisturbed foredune and undisturbed backdune sites.³² This variation in the vegetation and associated wildlife across the 100 acres should be reflected in the EIS/R. The wholesale characterization of the area as "disturbed dune scrub/foredune" is misleading in terms of its value to the dune system and proper statutory designation as an ESHA,

31. Mattoni, R., T. Longcore, and V. Novotny, 2000. Arthropod monitoring for fine scale habitat analysis: a case study of the El Segundo dunes. *Environmental Management* 25(4):445-452, at 446.

32. Id. at Table 1, Figure 2.

Response:

Classification of the biotic communities that make up the Los Angeles/El Segundo Dunes 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 as disturbed. 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 portion of the Los Angeles/El Segundo Dunes not found within the Habitat Restoration Area has not yet been subject to similar restoration, and its communities are termed accordingly.

As was stated on page 4-612 in Section 4.10, Biotic Communities, 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). It would not be appropriate to classify disturbed areas as southern foredune or southern dune scrub when they do not contain the dominant species that define these communities, regardless of their biological value to any particular sensitive species.

The 38.6 acres of roads and other large remnants of infrastructure on the Los Angeles/El Segundo Dunes, including the Habitat Restoration Area, have been classified as "developed" and mapped appropriately. Figure 4.10-7 in Section 4.10, Biotic Communities, of the Draft EIS/EIR illustrated the developed areas of the Los Angeles/El Segundo Dunes.

The locations of and impacts to sensitive floral and faunal species on the Los Angeles/El Segundo Dunes, regardless of the biotic communities they occupy, were described and addressed in Section 4.10, Biotic Communities, of the Draft EIS/EIR.

The Draft EIS/EIR addressed the designation of the Los Angeles/El Segundo Dunes as an Ecologically Sensitive Habitat Area (ESHA) pursuant to Section 30240 of the California Coastal Act in Section 4.10, Biotic Communities (subsection 4.10.2).

AL00033-384**Comment:****2.5 El Segundo Blue Butterfly**

Much ado is made over the population size of the El Segundo blue butterfly ("ESB"). However, the methodology used to calculate population size by LAWA is flawed and overestimates population size by at least 400%. While many methods to track trends in butterfly population size exist in the scientific literature,³³ when LAWA hired consultants in 1994 to prepare the EIS/R, they inexplicably used none of the established methods. While consultants continued walking a transect to count butterflies established by Mattoni in 1984, they stopped conducting surveys throughout the entire season. It is absolutely essential to survey throughout the flight season of the butterfly to obtain an estimate of total population size. Furthermore, rather than using an established method to analyze transect counts, Dr. Andrew Huang, an engineer at LAWA, constructed his own method to estimate population size. This method is flawed, and these flaws were explained by Dr. Travis Longcore to Dr. Huang in an email earlier this year, portions of which bear repeating here. The message describes methods used to estimate population size of the ESB by Longcore and others in a scientific article that was at that time in review and has subsequently been accepted for publication in an international scientific journal, the *Journal of Insect Conservation*.

The first method [of calculating population size] was the Pollard Index, which is quite straightforward and about which there can be no argument. There is not a lot of latitude in summing the average weekly count over the course of the season.

The second method is essentially the same as your numerical approximation. This method is first used, albeit with different data sources, by Watt et al in 1977 (Watt, Ward B., Frances S, Chew, Lee R. G. Snyder, Alice G. Watt, and David E. Rothschild 1977. Population structures of Pierid butterflies I. Numbers and movements of some montane *Colias* species. *Oecologia* 27:1-22.) Watt et al. estimated "total animals [butterflies] present in the brood" by estimating daily butterfly numbers through MRR and extrapolation, summing them to calculate total animal-days, and multiplying this number by the death rate (determined by MRR). Dividing by the longevity (or residence time) would yield the same result. This is what we did, using Arnold's 1979 residence time estimates (ave 6.1 days). Your model does not divide by average longevity, but rather another figure. This is what I don't understand. What is wrong with the logic (used by Watt et al. as well) that the total brood size is equal to the total number of butterfly-days divided by the average butterfly longevity?

$$\frac{\text{butterfly-days}}{\text{longevity (days)}} = \text{butterflies}$$

Your model does something similar, calculating total butterfly days by integrating under the curve (gaussian or not) and dividing by a figure. The question, and the crux of the differences in our result, is the number that you divide by, which is 1.59. You get your number by parameterizing based on the recapture rates. I think the difficulty with this is that you do not know the age of the butterflies that were initially captured. Your method would work if all of the butterflies captured by Arnold on the first day were freshly eclosed adults. However, they cannot be. Some of them will be one, two, or more days old. Failure to account for this will skew your estimate of longevity downwards, and your total population estimate upwards. Now, I am going to guess that you will say that 1.59 days is not the longevity. But if it is not, what is it? Can you see a flaw in the logic of the Watt et al. method or otherwise reconcile it with your method?

One last thing on this method. Our application of it gave a population estimate for 1984 at LAX of 432, while Arnold's MRR estimate was 664, and the Zonneveld model estimated 910. Application of your method would give an estimate of 1,658. (Note: in case you want to calculate these numbers, with the exception of Arnold's estimate, they include an adjustment for the number of flowerheads) (Arnold, R.A. (1986) Studies of the El Segundo blue butterfly - 1984. Inland Fisheries Administrative Report 86-4.)

The third method that we used was the Zonneveld model. What is interesting is that our estimate of death rate (3.3-5.9 days), which vary from year to year, are similar to those given by Arnold (2.3-7.3

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days) from MRR. We followed the model as set out by Zonneveld in the 1991 paper. We did not doubt the magnitude of the results because of the correspondence with the Watt et al method, the Pollard index, and the reasonableness of the longevity estimates.³⁴

Dr. Huang did not defend his method, stating in a response to Dr. Longcore, "You have raised many outstanding issues. . . . I am very busy with a number of projects. I won't be able to respond to your questions for awhile."³⁵ To date, he has not provided a substantive response. The EIS/R should therefore be adjusted to reflect El Segundo blue butterfly population numbers that are calculated using the best available scientific methods. Three methods of evaluating the transect counts are given in the Journal of Insect Conservation paper, the proofs of which are appended to this report.³⁶

As is evident from the literature about butterfly population size estimation,³⁷ the block counts promoted in the EIS/R are useful only to determine presence of the butterfly, not to estimate population size. The most perplexing part of the discussion of ESB population size by LAWA, both in reports by its consultants and in the EIS/R, is that none of the relevant scientific literature is referenced. Butterflies are conspicuous organisms, and schemes were developed in the 1970s to track population size, yet these are ignored. Sometimes remaking the wheel can lead to innovation, but in this instance it has led to confusion and the propagation of the myth that there are 40,000-80,000 El Segundo blue butterflies on the LAWA property. For example, LAWA claims that in 1998 there were roughly 12,000 ESB along the transect,³⁸ while proper analysis of the data indicates a population of 3,356 +/- 805 S.D.³⁹ Similarly extravagant claims for the period 1996-2000⁴⁰ should be revised.

The EIS/R discussion of the ESB population size provides a diversion from the real issues at hand. Recovery of the species and downlisting from endangered to threatened status requires securing all of the El Segundo Dunes, including that area not currently in the habitat preserve.⁴¹ The 200-acre preserve is still vulnerable to disease, adverse weather, fire, and other accidents. Long-term extinction risk for the butterfly can be minimized through increasing habitat area, not simply by relying on existing areas to provide spectacular numbers. Furthermore, concentration on the El Segundo blue butterfly draws attention away from the ten other endemic invertebrates found on the dunes whose continued persistence depends on habitat values beyond those needed to maintain the butterfly.⁴²

LAWA's persistent strategy has been to focus on the butterfly and the 200-acre preserve to the exclusion of all else. For example, in the above-described Waterview Street Landscaping Project, LAWA's main claim in support of the project was that it did not affect the butterfly preserve or the butterfly. None of the appellants had argued that the project directly affected the butterfly, and pointed instead to the other sensitive species and habitats found on the project site. This notwithstanding, there are legitimate impacts to the El Segundo blue butterfly that would result from the alternatives in the EIS/R.

33 . Pollard, E., D.O. Elias, M.J. Skelton, and H.A. Thomas, 1975. A method of assessing the abundance of butterflies in Monks Wood National Nature Reserve in 1973. *Entomologist's Gazette* 26:27-88. Pollard, E. 1977. A method for assessing change in the abundance of butterflies. *Biological Conservation* 12: 115-132. Pollard, E. 1984. Synoptic studies of butterfly abundance. Pages 59-61 in R.I. Vane-Wright and P.R. Ackery (eds.) *The biology of butterflies*. Academic Press, London. Pollard, E. 1988. Temperature, rainfall and butterfly numbers. *Journal of Applied Ecology* 25(3):819-828. Zonneveld, C. 1991. Estimating death rates from transect counts, *Ecological Entomology* 16:115-121. Moss, D., and E. Pollard, 1993. Calculation of collated indices of abundance of butterflies based on monitored sites. *Ecological Entomology* 18(1):77-83. Pollard, E., D. Moss, and T.J. Yates. 1995. Population trends of common British butterflies at monitored sites. *Journal of Applied Ecology* 32(1):9-16. Van Strien, A.J., R. Van De Pavert, D. Moss, T.J. Yates, C.A.M. Van Swaay, and P. Vos. 1997. The statistical power of two butterfly monitoring schemes to detect trends. *Journal of Applied Ecology* 34(3):817-828. Brown, J.A., and M.S. Boyce. 1998. Line transect sampling of Karner blue butterflies (*Lycia melissa samuelis*). *Environmental and Ecological Statistics* 5(1):81-91. Royer, R.A., J.E. Austin, and W.E. Newton. 1998. Checklist and "Pollard walk" butterfly survey methods on public lands. *American Midland Naturalist* 140(2):358-371. King, R.S. 2000. Evaluation of survey methods for the Karner blue butterfly on the Necedah wildlife management area. *Transactions of the Wisconsin Academy of Sciences Arts and Letters* 88:67-75.

34. Longcore, T. 6 March 2001. Email to Dr. A. Huang.

35. Huang, A. 7 March 2001. Email to Dr. T. Longcore.

36. Mattoni, R., T. Longcore, C. Zonneveld, and V. Novotny. 2001. Analysis of transect counts to monitor population size in endangered insects: the case of the El Segundo blue butterfly, *Euphilotes bernardino* allyni. *Journal of Insect Conservation* 5(3):197-206.

37. Id.

38. Huang, A. November 25, 1998. Estimate of LAX El Segundo Blue Butterfly (ESB) Population (unpublished report).

39. Mattoni, R., T. Longcore, C. Zonneveld, and V., Novotny. 2001, Analysis of transect counts to monitor population size in endangered insects: the case of the El Segundo blue butterfly, *Euphilotes bernardino allyni*. *Journal of Insect Conservation* 5(3):197-206, at Table 2.

40. EIS/R, Appendix J1. Biological Assessment Technical Report, Table 4.

41. U.S. Fish and Wildlife Service. 1998. Recovery plan for the El Segundo blue butterfly (*Euphilotes battoides allyni*). U.S. Fish and Wildlife Service, Portland, Oregon, 67 pp.

42. Mattoni, R., T. Longcore, and V. Novotny. 2000. Arthropod monitoring for fine scale habitat analysis: a case study of the El Segundo dunes. *Environmental Management* 25(4):445-452, at 450.

Response:

Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly for a discussion of the methodology used to calculate butterfly population size.

AL00033-385

Comment:

3.0 Assessment of Impacts

While the EIS/R identifies impacts to biological resources, its improper quantification of those impacts results in an underestimation of the actual biological consequences of the build alternatives and ultimately the incorrect conclusion that those impacts can be mitigated to a less than significant level.

Response:

Mitigation measures and ratios were determined separately for each species and biotic community. Mitigation measures in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR described restoration of the Los Angeles/El Segundo Dune area. In addition, please see Topical Response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP). Also, please see Response to Comment AS00005-14 regarding Lewis' evening primrose; Response to Comment AL00033-390 regarding Belkin's tabanid dune fly; Response to Comment AS00005-17 regarding San Diego black-tailed jack rabbit; Response to Comment AL00033-393 regarding burrowing owl; Response to Comment AS00005-18 regarding loggerhead shrike; and Response to Comment AL00033-394 regarding western spadefoot toad. Please see Topical Response TR-ET-2 regarding Riverside fairy shrimp and vernal pool mitigation.

AL00033-386

Comment:

3.1 Direct Impacts

The EIS/R uses what it calls a "modified Habitat Evaluation Procedure" to determine impacts on sensitive vegetation types and to quantify impacts to habitats of sensitive species.⁴³ This procedure is supposedly based on "Habitat Evaluation Procedures" ("HEP")⁴⁴ previously developed by the U.S. Fish and Wildlife Service that have some degree of scientific validity and history of usage.⁴⁵ However, the methodology employed in the EIS/R uses the name of this procedure without incorporating any of the essential elements of the analysis. By comparing existing habitat for sensitive species against an abstracted, ideal habitat type, the EIS/R argues that loss of up to 500 acres of habitat for sensitive species can be mitigated by "improving" 100 acres of land already in a nature preserve. This conclusion is not supported by any accepted methodology of impact assessment and seems to have been specifically designed to underestimate the actual impacts to sensitive species at LAX.

HEP was designed for use with target species by the U.S. Fish and Wildlife Service in the 1970s to provide a form of standardization and comparability for environmental analysis. In HEP implementation, the term "habitat" is defined as the biophysical requirements of an individual species (e.g., bald eagle habitat), not as a general term synonymous with vegetation type (e.g., grassland habitat). The U.S. Fish and Wildlife Service states this in the guiding policies for HEP implementation:

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HEP is a species-habitat approach to impact assessment; and habitat quality for selected evaluation species is documented with an index, the Habitat Suitability Index (HSI). This value is derived from an evaluation of the ability of key habitat components to supply the life requisites of selected species of fish and wildlife.⁴⁶

The explicit species-based approach of the HEP is apparent in the manual describing the procedure:

HEP is a species-based assessment methodology. It is applicable only for the species evaluated and does not directly relate that species with other ecosystem components. HEP conceptually addresses only the issues of species populations and habitats.⁴⁷

The "modified" HEP in the EIS/R does not establish which species will be used to evaluate the value of the reference sites, nor does it create HSIs for them. Rather, it sets habitat evaluation standards based on an "optimal" site with "a multitude of floral and faunal species."⁴⁸

The "modified" HEP does not provide information about the value of habitats within the subject site for several of the sensitive species found there. For example, it does not consider the habitat requirements of loggerhead shrike (*Lanius ludovicianus*) or black-tailed jackrabbit (*Lepus californicus bennettii*). It assigns values of 0.25 for vegetation types that are occupied by these species (Non-Native Grassland/Ruderal). By definition under a true HEP, occupied sites would score much higher. By "modifying" the HEP to address an abstract ideal habitat, actual habitat values to sensitive species are ignored (see below, Table 1). (Please see original letter for table.)

In fact, the "modified" HEP resembles actual HEP implementation only superficially, in that values between 0 and 1 are assigned to certain arbitrary standards for vegetation types within the study area. None of the essential features of HEP are present in the modified method; the "modified" HEP therefore does not provide the basis for impact assessment in the project area.⁴⁹

Not only is the "modified" HEP quite different from the actual procedure, the standards used to evaluate habitats do not reflect ecological value. This problem derives from the physical and biologic criteria used to evaluate habitat and the so-called "ecosystem functional integrity" components of the analysis. Rather than using target species and HSIs to characterize vegetation types as required in HEP, the EIS/R evaluates whether each of the vegetation types in the project area meets the characteristics found in a "reference site." The habitat type chosen for this standard is that of Valley Needlegrass Grassland/Vernal Pool complex⁵⁰ (i.e., Los Angeles Coastal Prairie). For some inexplicable reason, all habitats are measured against this standard, including Southern Foredune, Southern Dune Scrub, and Disturbed Dune Scrub/Foredune. Of course these dune habitats do not have features found in a needlegrass grassland/vernal pool complex. Therefore, because of their failure to have vernal pools and associated species, these vegetation classifications are assigned lower habitat values, 0.35 for both Southern Dune Scrub and Disturbed Dune Scrub/Foredune, and 0.45 for Southern Foredune. These values are ludicrous, first because habitat values and "Habitat Units" are supposed to be relevant to individual species, and second because one vegetation type is measured by the features of another. The analysis succeeds only in illustrating that dune habitats are not the same as vernal pool/grassland complexes.

The portion of habitat value deriving from "ecosystem functional integrity" is another wholesale creation of the EIS/R. These standards are not part of HEP, and the choice of standards is arbitrary, with little to do with the sensitive species and vegetation types under analysis. Whether a site is "under regulatory conservation" does not necessarily have anything to do with the ecological value of its vegetation type to sensitive species. Similarly, "contiguity with state-designated habitat" is not an ecological criterion. "Variety of pollinator/dispersal mechanisms present" is oriented toward vernal pool habitats, and the choice of "contiguous native habitat >40 acres" is arbitrary. Throughout, the analysis avoids recognition that sensitive plants and wildlife utilize habitats that are not dominated by native species. Loggerhead shrikes forage in ruderal and non-native grasslands as well as in dune scrub. Jackrabbits are thriving in an area with little native plant component. A true HEP would calculate the value of the areas being utilized by carefully selected individual species and use those values to quantify impacts. The EIS/R's "modified" HEP is fatally flawed and must either be revised to follow established procedure, or be abandoned.

43. EIS/R, p. 4-615.

44. The EIS/R refers to a "Habitat Evaluation Procedure" in the singular form, while the U.S. Fish and Wildlife Service manual calls the method "Habitat Evaluation Procedures" in the plural form. We abbreviate both as "HEP" and treat the acronym as a singular noun indicating a methodology.
45. For example, see Johnson, T.L., and D.M. Swift. 2000. A test of a habitat evaluation procedure for Rocky Mountain bighorn sheep. *Restoration Ecology* 8(4S):47-56.
46. U.S. Fish and Wildlife Service. 1996. Fish and Wildlife Service manual, 870 FW 1, Habitat Evaluation Procedures. [online at <http://policy.fws.gov/870fw1.html>].
47. U.S. Fish and Wildlife Service. 1980, Habitat as the Basis for Environmental Assessment, 101 ESM.
48. EIS/R, p. 4-616.
49. U.S. Fish and Wildlife Service. 1980. Habitat Evaluation Procedures (HEP), 102 ESM.
50. EIS/R, p. 4-615.
59. Zedler, P.H., and C. Black. 1992. Seed dispersal by a generalized herbivore: rabbits as dispersal vectors in a semiarid California vernal pool landscape. *The American Midland Naturalist* 128(1):1-10. (Jackrabbits play a similar role in the vernal pool landscape.)
60. Johnson, R.D., and J.E. Anderson. 1984. Diets of black-tailed jack rabbits in relation to population density and vegetation. *Journal of Range Management* 37(1):79-83, MacCracken, J.G., and R.M. Hansen. 1982, Herbaceous vegetation of habitat used by blacktail jackrabbits and Nuttall cottontails in southeastern Idaho. *American Midland Naturalist* 107(1): 180-184. Jameson, E. W., Jr., and H.J. Peeters. California mammals. Berkeley: University of California Press.

Response:

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

AL00033-387

Comment:

3.1.1 Sensitive Vegetation Types

With the exception of the ambiguous treatment of the 100 acres on the northern portion of the El Segundo Dunes, the EIS/R claims not to be proposing direct impacts to sensitive vegetation types. The vegetation types to be removed by the three build alternatives are 306-404 acres of Non-Native Grassland/Ruderal and 60-96 acres of Disturbed/Bare Ground. Although these are not sensitive vegetation types, they are used extensively by sensitive species. Whereas the impacts of removal are to sensitive species, the EIS/R proposes mitigation of abstract "Habitat Units" using the "modified" HEP. The result of the use of the "modified" HEP is to underestimate the effects on the species that use these habitats. The "modified" HEP does not evaluate the value of non-native grassland and disturbed areas to each of the species involved, but rather compares those habitats against an idealized habitat. This allows the EIS/R to state losses and to mitigate in "Habitat Units" instead of acres. "Habitat Units" calculated in the HEP do not reflect the value of the habitats to the sensitive species. The EIS/R considers these "Habitat Units" as fungible entities, and thereby proposes to mitigate effects to one vegetation type by enhancing another habitat type. Also, by ranking vegetation types on the dunes by comparing them with Valley Needlegrass Grassland/Vernal Pool complex, the EIS/R creates an artificial deficit of "Habitat Units" within the dunes area. The EIS/R then proposes to mitigate for the loss of Non-Native Grassland (occupied by sensitive species) by enhancing the habitat within the already-preserved and restored area of the El Segundo Dunes. If one accepts the logic of the EIS/R's HEP and mitigation scheme, the loss of Non-Native Grassland can be mitigated by making the El Segundo Dunes more like a Valley Needlegrass Grassland/Vernal Pool complex. (The EIS/R actually claims to restore these areas to Southern Dune Scrub, but does not reconcile that the "deficit" in habitat values on the dunes was caused by the "failure" of dune scrub to have vernal pool/grassland characteristics.) So by the twisted logic of the "modified" HEP, the loss of 366-500 acres of vegetation types occupied by sensitive species putatively can be mitigated by "improving" roughly 100 acres already protected as a nature reserve or zoned as such.⁵¹ Because the "modified" HEP does not measure habitat values for the sensitive species involved, the description of impacts in terms of "Habitat Units" will drastically underestimate the impacts to those vegetation types. Again, it must be noted that the procedure used in the EIS/R has no basis in scientific literature and resembles the actual HEP in name only.

All alternatives propose the removal of sensitive habitats within the El Segundo Dunes to allow construction of navigational aids. These impacts range from 640-1,344 square feet. While this does

3. Comments and Responses

constitute a significant impact, it is dwarfed in comparison to the other direct and indirect impacts proposed under the three build alternatives.

The discussion of acreage and "Habitat Units" lost under each alternative is not clear with respect to the Westchester Southside Project. Some impacts from the Westchester Southside Project are included (e.g., loss of mature trees), but the effects of the "Resort Hotels" and golf course/open space development are not discussed. The No Action/No Project Alternative explicitly includes the loss of habitat from the LAX Northside and Continental City projects. As mentioned above, this improperly assumes completion of the LAX Northside Project even though changed conditions should result in reopening of the environmental analysis. Inclusion of these speculative developments as part of the No Project alternative serves only to make the impacts of the Master Plan alternatives appear smaller. The EIS/R mentions but does not discuss adequately one impact of the Westchester Southside development: the removal of 300 mature trees that are used as "nursery" sites for raptors.⁵² The biological appendix contains no reference to this impact, or the abundance and species of raptors involved.⁵³ Neither is a description immediately apparent in the "Biological Resources Memoranda for the Record on Floral and Faunal Surveys."⁵⁴ The EIS/R should contain a full description of the species of raptors involved, their relative abundance, the location of the trees, and behaviors observed to allow a full evaluation of the impacts.

51. While there are certainly adequate opportunities to enhance the habitat on the El Segundo Dunes through road/infrastructure removal and revegetation, the area available is simply inadequate to compensate for the loss of sensitive species habitat under the three build alternatives.

52. EIS/R, pp. 4-657,4-658,4-663.

53. EIS/R, Appendix J1 . Biological Assessment Technical Report

54. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys.

Response:

Please see Topical Response TR-BC-1 regarding the modified HEP methodology and assessment of impacts. The 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. There are no golf courses or resort hotels proposed for the 100 acres outside of the Habitat Restoration Area within the Los Angeles/El Segundo Dunes; the area shall remain open space. In response, corrections to Figures 8, 11, and 14 of Appendix J1, Biological Assessment Technical Report, of the Draft EIS/EIR are reflected in Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR.

AL00033-388

Comment:

3.1.2 Sensitive Species

The faulty "modified" HEP results in the underestimation of impacts on sensitive species in the EIS/R. The statement of the impacts to populations are low, which results in improper conclusions about mitigation (see below, Section 4.0).

Response:

Please see Topical Response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP).

AL00033-389

Comment:

Lewis' evening primrose (*Camissonia lewisii*). All alternatives acknowledge direct impacts to Lewis' evening primrose. This is expressed in terms of the number of individuals that would be affected. While the number of individuals is important, the area that these individuals occupy is as important to the conservation of the species. However, the map showing the distribution of the species indicates locations only on the El Segundo Dunes west of Pershing Drive. No indication is given of the location of areas occupied east of Pershing Drive, which total 2.5 acres.⁵⁵ Populations separated from one

another offer some degree of insurance against catastrophic losses at individual sites. The complete geographic distribution of the species at LAX should be provided in the EIS/R.

55. EIS/R, p. 4-664.

Response:

Please see Response to Comment AS00005-14 regarding mitigation for impacts to Lewis' evening primrose.

The areas occupied by Lewis' evening primrose east and west of Pershing Drive are approximately 150 feet apart and most likely represent only one population. Please refer to the revised Figure 4.10-2, Location of Sensitive Plant Species in the Final EIS/EIR. Establishment of a mitigation site within areas scheduled for improvement at the Los Angeles/El Segundo Dunes, as described in MM-BC-5 of the Supplement to the Draft EIS/EIR, shall mitigate for impacts to the small portion of the population east of Pershing Drive. Approximately half of the 74.6 acres of Disturbed Dune Scrub/Foredune scheduled for improvement currently do not support Lewis' evening primrose.

AL00033-390

Comment:

Belkin's tabanid dune fly (*Brennania belkini*). The EIS/R does not acknowledge the loss of habitat for the Belkin's tabanid dune fly, which is a sensitive species.⁵⁶ This species was recorded as present in the "north runway expansion area."⁵⁷ The report indicates that the species may disperse into suitable habitat areas. The presence of this dune-associated species and the sensitive Lewis' evening primrose in the north runway expansion area suggests that this area has a substrate suitable for dune obligate species. This may be the result of previous grading, but the value of this site to these and other sensitive species (e.g., potentially El Segundo crab spider, Ebo new sp.⁵⁸) should be noted.

56. California Department of Fish and Game Natural Diversity Database. 1999. Special Status Plants, Animals and Natural Communities of Los Angeles County, U.S. Fish and Wildlife Service. 1998. Recovery Plan For the El Segundo blue butterfly (*Euphilotes battoides allyni*). U.S. Fish and Wildlife Service, Portland, Oregon, 67 pp.

57. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 213.

58. Id. at 209.

Response:

Existing vegetation communities on the north runway expansion area are characterized as degraded, non-native grassland and ruderal. The substrate consists of compacted soils that have been previously graded and leveled to meet FAA standards for safety areas in the vicinity of the runways. The areas are routinely managed by LAX to prevent vegetative growth from becoming a hazard to aviation. There is no vegetation assemblage characteristic of a dune community within this area, nor are there sandy substrates to support such a community. The lack of a dune plant community confirms the lack of suitable habitat to support this species. Belkin's tabanid fly is mentioned because it is listed in the Special Animals list prepared by the California Department of Fish and Game (CDFG).¹ However, Belkin's tabanid fly has no protected status that requires analysis under the federal and state Endangered Species Acts. Potential impacts to sensitive species were discussed 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. Restoration and preservation measures for the federally listed El Segundo blue butterfly are anticipated to preserve habitat for this species as well.

1. California Department of Fish and Game, Wildlife and Habitat Data Analysis Branch, California Natural Diversity Database, 2002. Special Animals. Sacramento, CA: California Department of Fish and Game.

3. Comments and Responses

AL00033-391

Comment:

San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). The EIS/R acknowledges direct impacts to the habitat of this species, west of the southern runway, east of Pershing Drive. Each of the alternatives would result in the loss of 118.75 acres of occupied area, consisting of the entire population at LAX. The EIS/R maintains that these 118.75 acres equal 14.91 "Habitat Units," or roughly 15 acres of ideal vernal pool/grassland complex. As discussed above, this conversion to "Habitat Units" is misguided and wrong. Only two of the sixteen standards for calculating "Habitat Units" are even remotely related to the value of these areas to black-tailed jackrabbit.

The conversion of occupied area to "Habitat Units," based on the standards listed here, is a misapplication of HEP. The extent of habitat loss to the species is on the order of 119 acres. The use of improperly-defined "Habitat Units" to quantify this loss implies that 15 acres of ideal vernal pool/grassland could support as many black-tailed jackrabbits as 119 acres of non-native grassland. This is not possible; 15 acres is substantially smaller than the smallest recorded home range for the species (256 acres).⁶¹

Surveys determining the area occupied by black-tailed jackrabbit may underestimate the area currently occupied. Research indicates that jackrabbits may move from 2 to 10 miles during a day, from shrub cover where the species conceals itself during the day, to foraging habitat in the late afternoon and evening.⁶² The EIS/R does not provide sufficient survey information to establish if the grasslands and disturbed areas to the west of the southern runways provide only foraging habitat, and whether other locations (e.g., El Segundo Dunes) are already occupied at different times of the day. This is also suggested by studies of home range. In a study of big sagebrush and black greasewood, black-tailed jackrabbit ranges were larger (256-768 acres)⁶³ than the presumed occupied area at LAX (119 acres). This raises the question whether the species actually occupies a greater area at LAX, especially during the night and crepuscular periods when no surveys were undertaken.

61. Smith, G.W. 1990. Home range and activity patterns of black-tailed jackrabbits. *Great Basin Naturalist* 50(3):249-256. This study found home ranges of 0.4-1.2 square miles for big sagebrush and black greasewood communities in northern Utah. Many factors may allow higher densities at LAX, such as more forage provided by dense non-native grasses and forbs, but there is no evidence that 15 acres of even the best habitats could compensate for the loss of 119 acres.

62. Dunn, J.P., J.A. Chapman, and R.E. Marsh, 1982, Jackrabbits: *Lepus californicus* and allies. Pp. 124-125 in J.A. Chapman, and G.A. Feldhamer (eds.). *Wild mammals of North America: biology, management and economics*. Baltimore: The Johns Hopkins University Press.

63. Smith, G. W. 1990. Home range and activity patterns of black-tailed jackrabbits. *Great Basin Naturalist* 50(3):249-256.

64. EIS/R, Tables 4.10-2, 4-630.

65. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 463.

Response:

Please see Topical Response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP) and Response to Comment AS00005-17 regarding impacts to and mitigation for San Diego black-tailed jackrabbit.

AL00033-392

Comment:

Loggerhead shrike (*Lanius ludovicianus*). The same difficulties found quantifying habitat of black-tailed jackrabbit are found with description of impacts to loggerhead shrike. According to the EIS/R, the species currently occupies 171.86 acres that would be unusable following implementation of any of the project alternatives. (Such precision in habitat quantification is illusory; the EIS/R extrapolates occupied area by vegetation type, providing an estimate of habitat area that may differ from the area actually utilized.) Similarly, the EIS/R claims that this impact equals 22.88 "Habitat Units," suggesting that roughly 23 acres of optimum habitat could mitigate for the loss of 172 acres of occupied habitat. This is

false, and grossly underestimates the impacts to the species. No data are provided that link vegetation type to shrike density, as would be necessary to support this claim. The HEP standards are no more relevant to loggerhead shrike than they are to black-tailed jackrabbit. Unless an actual Habitat Suitability Index is developed for loggerhead shrike, all discussion of direct impacts should refer to the area of occupied habitat destroyed, not to the hypothetical "Habitat Units." It is furthermore unclear whether the area of the Westchester Southside Project was surveyed, and whether these impacts are included.

Response:

A modified habitat evaluation procedure (HEP) was used to evaluate the quality of habitat of the biotic communities. As discussed in Topical Response TR-BC-1, this method is referred to as a Mitigation Land Evaluation Procedure (MLEP). According to the MLEP, the loggerhead shrike was observed and determined to occupy 58.16 acres (5.82 habitat units) of disturbed/bare ground and 113.71 acres (17.06 habitat units) of non-native grassland/ruderal. Implementation of all alternatives would result in displacement of loggerhead shrike and loss of 171.86 acres (22.88 habitat units) of habitat. This is considered a significant impact under CEQA, as was stated in the Draft EIS/EIR. As described in Topical Response TR-BC-1, the MLEP takes into consideration not only the relative amount of habitat but also the quality of habitat. This procedure is an assessment of overall ecosystem function and value, rather than a specific species-habitat analysis. A habitat unit is the product of the habitat quality value and the acreage of available habitat. Once a parcel of habitat has been converted to habitat units, it can be interchanged with other habitat units because of the standardized method of habitat quality assessment. The 22.8 habitat units currently occupied by the shrike represent low quality habitat and will be replaced through the restoration of at least 22.8 habitat units to high quality habitat for the shrike. Response to Comment AS00005-18 discusses restoration of the 104-acre northern portion of the Los Angeles/El Segundo Dunes that would become high quality habitat available to the loggerhead shrike. This restored area and remaining approximately 200-acre El Segundo Blue Butterfly Habitat Restoration Area would provide adequate habitat for loggerhead shrike.

With respect to the Westchester Southside Project, this area was surveyed for loggerhead shrike and these impacts were included in the analysis for the Draft EIS/EIR. The memorandum stating the results of the loggerhead shrike surveys is included in Technical Report 7, Biological Resources Memoranda for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR. This memorandum reports surveys for loggerhead shrike were conducted on April 1, April 17, April 29, May 13, May 27, June 10 and June 24, 1998. The survey area included the El Segundo Dunes and the north and south airfields, including the Westchester Southside Project area. Therefore, the Westchester Southside Project was surveyed for loggerhead shrike and included in the impact analysis. Loggerhead shrike observations and possible nest locations were mapped on Figure 4.10-5 of the Draft EIS/EIR. The memorandum confirms that loggerhead shrike breed within the El Segundo Dunes and possibly breed on the north and south airfield, including the Westchester Southside Project area. Repeated observations of loggerhead shrikes throughout the spring survey period on both the north and south airfields may also indicate potential nesting.

AL00033-393

Comment:

Burrowing owl (*Athene cunicularia*). Surveys located burrowing owls within the project boundaries, though found no direct evidence of breeding. The EIS/R claims that the species "was determined not to breed within the Master Plan boundaries."⁶⁴ This contradicts the previous assessment made by EIS/R consultant Jim Jennings, who concluded that "there is the potential that they may still breed in the project area."⁶⁵ Because burrowing owl densities fluctuate from year to year, burrowing owls were observed in the project area, and potential burrow sites were found, the conservative approach would be to implement measures to ensure the conservation of the species. This species has recently lost much of its local habitat and if extirpated from the project site will disappear from west Los Angeles as a whole.

64. EIS/R, Tables 4.10-2, 4-630.

65. EIS/R, Technical Report 7. Biological Resources Memoranda for the Record on Floral and Faunal Surveys, p. 463.

3. Comments and Responses

Response:

Winter burrowing owl surveys were conducted in 1998 and found three individuals within the Los Angeles/El Segundo Dunes and none within the rest of the Master Plan areas. These individuals were only present for a portion of the winter season. No owls were found during protocol-directed spring surveys in 1998. These findings do not contradict the assessment of consultant Jim Jennings, who concluded that "there is the potential that they may still breed in the project area." There is extremely limited potential habitat for the species at the northwest corner of the northern airfield where a ground squirrel population persists. However, focused surveys conducted according to CDFG protocols for the species found no breeding owls within the Master Plan boundaries or the Los Angeles/El Segundo Dunes. Suitable burrows within the Master Plan boundaries are limited based on a general lack of ground squirrels. Also, LAX airport operations actively control ground squirrels within airport operations areas to comply with FAA safety standards. Based on these findings, it was concluded that the species only winters within the Los Angeles/El Segundo Dunes and is absent within the Master Plan boundaries.

AL00033-394

Comment:

Western spadefoot toad (*Spea hammondi*). The EIS/R reports that the proposed project alternatives will destroy four seasonal ponds occupied by western spadefoot toads on the south airfield.⁶⁶ These populations number at least several hundred adults and all would be destroyed by the various project alternatives. The EIS/R estimates occupied area as 8.97 acres of ephemeral wetted areas and adjacent upland habitats. Spadefoot toads require upland habitats surrounding their aquatic habitat.⁶⁷ It is unclear how this area was determined for the EIS/R. Critically important in the analysis is that the species is found in four separate areas. Even though the areas are close to each other, the existing configuration of habitat patches is important to reduce risk to the species from a catastrophic event (e.g., chemical spill, disease). Depending on the separation of the pools, there may still be genetic exchange among the populations in each. These risk dynamics should be considered when evaluating the impact on the species and potential mitigation measures. Loss of the LAX population of western spadefoot toad would cause a significant restriction of the range of the species.

66. Id. at 248.

67. Ruibal, R., L. Trevis, and V. Roig. 1969. The terrestrial ecology of the spadefoot toad *Scaphiopus hammondi*. *Copeia* 572-584.

Response:

Western spadefoot toad populations occur in the following three locations on the AOA: a man-made basin near the hot-drill site, a road-side ditch along the perimeter road that parallels Imperial Highway east of the electric power step-down station, and a plastic-lined ditch paralleling the perimeter road east of Pershing Drive. These locations are characterized as highly disturbed areas where there is risk of contamination from road materials, leaks, and spills. Their relocation to a more natural setting poses less of a risk than leaving them in their current location. As 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, identification of a relocation site shall be completed in consultation with the USFWS and the CDFG. Preparations at any relocation site shall include a confirmation by a permitted biologist that both the site and its waterways are safe from predators.

Since 1990, there have been sightings of western spadefoot toad in the following counties: Butte, Placer, Yolo, Sacramento, San Joaquin, Calaveras, Alameda, Stanislaus, Madera, Merced, San Benito, Fresno, Monterey, Kings, Tulare, San Luis Obispo, Kern, Santa Barbara, Ventura, Los Angeles, Orange, Riverside, and San Diego. (Please see <http://sacramento.fws.gov>.) The relocation of tadpoles to a suitable site will compensate for the loss on a local level and will provide compensatory habitat within the region and therefore not significantly diminish the range of the species.

AL00033-395

Comment:

Riverside fairy shrimp (*Branchinecta sandiegoensis*). LAX represents the only known coastal population of Riverside fairy shrimp in Los Angeles County. Loss of this population, which is spread among nine

sites on the western portion of the property, would be a significant impact. The EIS/R asserts that because the sites where fairy shrimp cysts were found do not have characteristic vernal pool plants, no suitable habitat is found for the species. This conclusion is false - fairy shrimp require vernal pool hydrology, not vernal pool plants, for their existence. This condition would exist, were the management practices at LAX to remove standing water in these pools. It is indeed LAWA's own management scheme that prevents Riverside fairy shrimp from completing its life cycle; LAWA, therefore, should incur liability for "take" of the species under the Endangered Species Act. LAWA fails to recognize that once the presence of fairy shrimp cysts was detected in the vernal pools at LAX, the airport should have ceased its activities that inhibited the life cycle of the species. Instead, the proposal is to destroy all of the areas currently occupied.

The description of acreage for this species does not seem to include the size of the cachements necessary to fill the "ephemerally wetted areas." These areas are necessary to formulate appropriate mitigation measures and evaluate impacts.

The EIS/R is insistent that "there are no extant vernal pools within the [Airport Operations Area]."68 This statement is meant within the definition of vernal pools as a vegetation type. However, the term "vernal pool" may be used to refer to pools with standing water during the winter and spring, regardless of the presence of certain plant species. As defined by the U.S. Fish and Wildlife Service, "a vernal pool is a natural habitat of the Mediterranean climate region of the Pacific coast covered by shallow water for extended periods during the cool season but completely dry for most of the warm season drought."69 The definition of the term is hydrological, not botanical. The EIS/R should therefore explicitly disclose that the statement "no vernal pools" refers to a botanical definition. Given the near complete destruction of vernal pools in Los Angeles County,70 even loss of sites with vernal pool hydrology and any remnant species (plant or invertebrate) represents a significant impact. The EIS/R emphasizes that Riverside fairy shrimp habitat is degraded through the presence of exotic plant species, presumably to suggest how much better mitigation sites will be than current conditions. However, the degradation of the habitat by exotic plant species is irrelevant to the quality of the pool as habitat for Riverside fairy shrimp. Other degradation to the habitat results directly from LAWA's management;71 this degradation is avoidable.

68. EIS/R, p. 4-691.

69 . Zedler, P.H. 1987. The ecology of southern California vernal pools: a community profile. U.S. Fish and Wildlife Service Biological Report 85(7.11), p 1.

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

71. EIS/R, p. 4-699.

Response:

The scientific name for Riverside fairy shrimp is *Streptocephalus woottoni*. *Branchinecta sandiegoensis* is the scientific name for the San Diego fairy shrimp. The San Diego fairy shrimp is not present at LAX. With regard to LAWA's management practice to remove standing water on the airfield, Title 14, CFR Part 39 mandates that the airport operations area be maintained in such a condition as to minimize or eliminate wildlife usage, which includes eliminating standing water. As required under Section 7 of the Endangered Species Act, upon discovery of the Riverside fairy shrimp cysts at LAX, the FAA initiated consultation with the USFWS in June 1999 for operations and maintenance issues regarding the 1.3 acres of atypical wetlands containing the embedded cysts. As a result of Section 7 consultation among LAWA, FAA, and USFWS, the USFWS has issued a Draft Biological Opinion, which 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.

AL00033-396

Comment:

3.2 Indirect Impacts

As a whole, indirect impacts are not well described in the EIS/R. Those that are described are dismissed with little or no data offered in support, leaving the probability of much greater indirect impacts from the project alternatives than those disclosed.

3. Comments and Responses

Response:

The Supplement to the Draft EIS/EIR fully described and analyzed all of the reasonable foreseeable indirect impacts likely to result from implementation of each of the four build Alternatives. The conclusions of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR were supported using the available relevant data from the results of fieldwork undertaken on the Los Angeles/El Segundo Dunes and the results of published literature. Potential indirect impacts examined in the Supplement to the Draft EIS/EIR include those to sensitive species due to changes in light, noise, and air emissions as was discussed in 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. For a discussion of the impacts from air pollution on the El Segundo blue butterfly, please see Topical Response TR-ET-1. For a discussion of the impacts of landscaping adjacent to the El Segundo Dunes, please see Response to Comment AS00005-15.

AL00033-397

Comment:

3.2.1 Light

Night lighting has an effect on bird species composition in an area. A study in Sacramento showed that American crows (*Corvus brachyrhynchos*) roost in areas with high nighttime lighting levels.⁷² It is hypothesized that artificial lighting allows them to reduce predation from owls.⁷³ Crows are native, but they are also aggressive, and artificially increased population levels can be detrimental to other native bird species, including such sensitive species as loggerhead shrike. Artificial night lighting has also been shown to affect the behavior of nocturnal frogs, reducing their visual acuity and ability to consume prey, an impact that may befall those amphibians found within Master Plan boundaries.⁷⁴ Many larval forms of arthropods are positively phototactic (e.g., attracted to light, even artificial light), which poses a threat to the many sensitive insect species found on the El Segundo Dunes.⁷⁵ Artificial lighting results in increased mortality of moths and other nocturnal insects.⁷⁶ Night lighting can also affect kestrels as seen from observation of lesser kestrel (*Falco naumanni*), but also applicable to American kestrel (*Falco sparverius*), found on the El Segundo Dunes.⁷⁷ In fact, artificial night lighting affects singing and foraging time of many bird species.⁷⁸ Increased lighting even affects gastropods, which would include the sensitive Trask's snail (*Helminthoglypta traskii*).⁷⁹

These effects may seem to be relatively innocuous, except that species that extend their activity periods into nighttime are often exposed to drastically increased predation threats. In a study of butterfly larvae, a higher growth rate associated with longer photoperiod (as would be caused by artificial light) resulted in significantly higher predation on the butterfly larvae from the primary parasitoid species.⁸⁰ Similar tradeoffs will likely occur for the El Segundo blue butterfly with increased lighting on the El Segundo Dunes. While the increased light may increase larval development, the time of activity may also increase predation and parasitism.

The conclusion in the EIS/R that the increased levels of night lighting will have no effect on the El Segundo blue butterfly is completely unsupported by current scientific knowledge of the mechanisms of such effects on ecological systems. The EIS/R concentrates on the adult form of the El Segundo blue butterfly, which only constitutes a minute fraction of the lifecycle of the organism, and ignores published scientific literature documenting the tradeoffs of increased lighting on larval forms of butterflies. Furthermore, the EIS/R includes no discussion of bat species that may forage on the El Segundo Dunes. Many bat species found in Los Angeles County are considered sensitive species, and their foraging patterns are affected by lighting levels. Some faster-flying species congregate at streetlights, while slower-flying species avoid them.⁸¹ The EIS/R should document the bat species foraging within the project site and evaluate the impacts of lighting and other development on them.

The increased nighttime light levels on the El Segundo Dunes constitute a significant adverse impact, and should be avoided. One method to decrease the impacts of nighttime lighting is to use low pressure sodium lamps in place of other lighting types. Yellow light from these sources has less ecological impact. Other possible mitigation measures include using full cut-off lighting fixtures and mandating operational controls.

⁷² . Gorenzel, W.P., and T.P. Salmon. 1995. Characteristics of American Crow urban roosts in California Journal of Wildlife Management 59(4):638-645.

- 73 . Brody, J.E. 1997. The too-common crow is getting too close for comfort. New York Times, May 27.
- 74 . Buchanan, B.W. 1993. Effects of enhanced lighting on the behavior of nocturnal frogs. *Animal Behavior* 45(5):893-899.
75. Summers, C.G. 1997. Phototactic behavior of *Bemisia argentifolii* (Homoptera: Aleyrodidae) crawlers. *Annals of the Entomological Society of America* 90(3):372-379.
- 76 . Frank, K.D. 1988. Impact of outdoor lighting on moths: an assessment. *Journal of the Lepidopterists' Society* 42(2):63-93. Kolligs, D. 2000. Ecological effects of artificial light sources on nocturnally active insects, in particular on butterflies (Lepidoptera). *Faunistisch-Oekologische Mitteilungen Supplement*(28):1-136.
77. Negro, J.J., J. Bustamante, C. Melguizo, J.L. Ruiz, and J.M. Grande. 2000. Nocturnal activity of Lesser Kestrels under artificial lighting conditions in Seville, Spain. *Journal of Raptor Research* 34(4):327-329.
78. Outen, A. 1998. The possible ecological implication of artificial lighting. Hertfordshire, UK: Hertfordshire Biological Records Centre. Bergen, F., and M. Abs. 1997. Etho-ecological study of the singing activity of the blue tit (*Parus caeruleus*), great tit (*Parus major*) and chaffinch (*Fringilla coelebs*). *Journal fuer Ornithologie* 138(4):451-467. Derrickson, K.C. 1988. Variation in repertoire presentation in northern mockingbirds. *Condor* 90(3):592-606. Hoetker, H. 1999. What determines the time-activity budgets of avocets (*Recurvirostra avosetta*)? *Journal fuer Ornithologie* 140(1):57-71. Frey, J.K. 1993. Nocturnal foraging by Scissor-Tailed Flycatchers under artifical light. *Western Birds* 24(3):200. Hill, D. 1992. The impact of noise and artificial light on waterfowl behavior: a review and synthesis of available literature. British Trust for Ornithology Research Report No. 61.
79. Lamiot, F. 1998. Impacts ecologiques de l'eclairage nocturne. Premier Congres europeen sur la protection du ciel nocturne, June 30-May 1, Paris.
80. Gotthard, K. 2000. Increased risk of predation as a cost of high growth rate: an experimental test in a butterfly. *Journal of Animal Ecology* 69(5):896-902.
81. Rydell, J., and H.J. Baagoe. 1996. Bats & streetlamps. *Bats* 14(4):10-13.

Response:

The impacts of light on sensitive and state- and federally listed fauna were addressed in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Supplement to the EIS/EIR. Although there is the potential for an increase in light emissions, a conservative approach was used when determining changes in ambient lighting. The source of the light would potentially be the West Terminal Area (Alternative A, B, C), navigational aids (all build alternatives), or the parking structure (Alternative D). Light from navigational aids would be directed upwards. The distance of light spillover from the West Terminal Area and the parking structure would be limited and would not affect a significant portion of the Los Angeles/EI Segundo Dunes. The potential increase of 0.34 footcandles is the ambient light change and not the change in light on the ground within the Dunes.

The EI Segundo blue butterfly larvae occur in the soil and at the base of the coast buckwheat plants thereby being shielded from any significant increase in light. It is not anticipated that the increase in light would have a significant impact on the larvae.

No state- or federally listed or sensitive bat species occur or have the potential to occur within the Master Plan boundaries, therefore, no bat species were included in the analysis.

AL00033-398

Comment:

3.2.2 Noise

The effects of airport noise on the fauna of the project area are not considered at all. Perhaps this results from the noise analysis, which improperly chooses 1996 - prior to the introduction of quieter airplanes - as the baseline for noise impacts, rather than what noise conditions would be in the absence of the proposed project. Through this careful choice of baseline, the EIS/R argues that there would be virtually no change in the noise levels on the EI Segundo Dunes. However, this is not the case. Noise would be more constant under increased passenger capacity - more planes would be traveling in and out of the airport. Increased noise levels on the EI Segundo Dunes will have significant adverse effects on the wildlife found there, effects that are evident from the available scientific literature.

3. Comments and Responses

The use of a weighted average to describe noise levels (CNEL) precludes and obfuscates analysis of actual noise impacts. From the standpoint of wildlife, and indeed human physiological responses, it is relevant to know what maximum noise levels are experienced, and at what duration. While the average noise levels described in the EIS/R offer some indication of which areas are louder than others, maximum noise levels are necessary to evaluate potential hearing loss, startle reactions in animals, barriers to vocal communication, and other significant impacts to the fauna of the El Segundo Dunes.

The body of research on the effects of noise on vertebrates shows that chronic noise, even at low levels, is associated with elevated stress hormone levels, higher blood pressure, faster heart rates, and other physiological effects.⁸² As a result, birds, mammals and other vertebrates may show anatomical differences (smaller body size, enlarged adrenal glands) from prolonged exposure to noise. Species that use vocalizations to communicate may be excluded altogether from noisy areas. The effects of noise on birds and mammals in particular are relevant to the EIS/R.

82. Mancini, K.M., D.N. Gladwin, R. Vilella, and M.G. Cavendish. 1988. Effects of aircraft noise and sonic booms on domestic animals and wildlife: a literature synthesis. U.S. Fish and Wildlife Service National Ecology Research Center, Ft. Collins, Colorado. NERC-88/29. 88 pp. Such effects are found in humans too; children exposed to chronic noise greater than 60dB "experienced marginally higher resting systolic blood pressure, greater heart rate reactivity to test, and higher overnight cortisol levels, which are signs of modestly elevated physiological stress" (Environmental News Network. 24 May 2001. Noisy neighborhoods harmful to children's health).

Response:

Impacts of noise on sensitive and listed flora and fauna were addressed in 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.

AL00033-399

Comment:

Birds. Of 45 bird species investigated in woodlands in The Netherlands, 33 showed significantly depressed breeding density in response to increased noise levels near roads. All species in the small passerine families Sylviidae, Fringillidae, and Emberizidae were affected by noise.⁸³ This research also showed that noise effects followed a threshold model.⁸⁴ This means that up to a certain noise level, no decrease in density is observed. When noise increases beyond that threshold level, bird density decreases dramatically in the area between the location at which that threshold is met and the road. The decreased density over the area with noise greater than the threshold level ranges from 30% to 100% and is known as the "decrease factor".⁸⁵

These two variables, the threshold value and the decrease factor, describe the impact of noise on breeding birds. Empirical measurement of the threshold value in woodlands shows that for all bird species combined the threshold value is 42-52 dB(A), with individual species exhibiting thresholds as low as 36 dB(A) and as high as 58 dB(A).⁸⁶ Furthermore, years with overall low population densities showed lower threshold levels.

Similar research has been conducted for grasslands. Overall, this research shows that breeding bird habitat is degraded at noise levels as low as 36 dB(A). Minimum noise levels on the El Segundo Dunes are 70 dB(A) CNEL,⁸⁷ a quantification that does not even provide maximum noise levels. There is no question therefore that noise from LAX operations affects breeding bird densities on the El Segundo Dunes.

83. Reijnen, R., R. Foppen, and G. Veenbaas. 1997. Disturbance by traffic of breeding birds: evaluation of the effect and considerations in planning and managing road corridors. *Biodiversity and Conservation* 6:567-581.

84. Reijnen, R., R. Foppen, C. ter Braak, and J. Thissen. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal of Applied Ecology* 32:187-202.

85. *Id.* at 192.

86. Reijnen, R., R. Foppen, C. ter Braak, and J. Thissen. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal*

of Applied Ecology 32: 187-202. Reijnen, R., and R. Foppen. 1995. The effects of car traffic on breeding bird populations in woodland. IV. Influence of population size on the reduction of density close to a highway. *Journal of Applied Ecology* 32:481-491. Reijnen, R., R. Foppen, and H. Meeuwssen. 1996. The effects of traffic on the density of breeding birds in Dutch agricultural grasslands. *Biological Conservation* 75:255-260.

87. EIS/R, Figures 4.2-15, 4.2-19, 4.2-23.

Response:

Impacts of noise on sensitive and state- and federally listed avian species were addressed in 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. Literature was reviewed to obtain thresholds of noise specific to the sensitive fauna occurring within the Master Plan boundaries. Incomplete and contradictory information was found regarding noise impacts to passerines such as the loggerhead shrike, which is present at LAX. The literature synthesis produced by the U.S. Fish and Wildlife Service provides information on poultry, waterbirds, raptors, and songbirds. The effects include alarm responses with return to normal behavior within 10 seconds, lower hatching and fledging success, and nest abandonment. None of the species included in this literature synthesis were similar enough to the loggerhead shrike to be able to determine effects from increases in noise. For other species present at LAX, the most compatible species information available was used. 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." The literature cited in this comment refers to birds in different families and in a different geographic region than the bird species considered by the noise analysis and therefore is not considered in the Supplement to the Draft EIS/EIR.

AL00033-400

Comment:

Mammals. Chronic noise is a problem for native mammals on the El Segundo Dunes, as it is for humans in surrounding neighborhoods. The description of one study on the effect of airport noise on a small mammal illustrates one example of this problem:

Only a few studies of the physiological effects of noise on rodents have involved wild animals. A field study by Chesser et al. (1975) involved two populations of house mice near the end of a runway at Memphis International Airport. Adult mice also were collected from a rural field 2.0 km from the airport field. Background noise levels at both fields were 80-85 dB. Noise levels of incoming and outgoing aircraft at the airport field averaged 110 dB, with the highest reading reaching 120 dB. Total body weights and adrenal gland weights of mice from the fields were measured. Additional mice were captured from the rural field, placed in the laboratory, and exposed to 1 minute of 105-dB recorded jet aircraft noise every 6 minutes to determine if noise was the causative factor. Control mice were not subjected to noise. After 2 weeks, the adrenals were removed and weighed. Adrenal gland weights of male and female mice from the airport field were significantly greater than those of mice from the rural field. The noise-exposed mice in the laboratory study had significantly greater adrenal gland weights than the control mice. After ruling out stress factors, such as population density, Chesser et al. (1975) concluded that noise was the dominant stressful factor causing the adrenal weight differences between the two feral populations.⁸⁸

While house mice are of no regulatory concern, native mammals on the El Segundo Dunes include some native small mammals (harvest mouse, *Reithrodontomys megalotis*, desert wood rat, *Neotoma lepida*) which are locally significant. Impacts of noise to the habitat quality of the El Segundo Dunes for native mammals should be evaluated.

88. Mancini, K.M., D.N. Gladwin, R. Villella, and M.G. Cavendish. 1988. Effects of aircraft noise and sonic booms on domestic animals and wildlife: a literature synthesis. U.S. Fish and Wildlife Service National Ecology Research Center, Ft. Collins, Colorado. NERC-88/29.88 pp.

Response:

Impacts of noise on sensitive and state- and federally listed mammals were addressed in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the

3. Comments and Responses

Supplement to the Draft EIS/EIR. Literature, including the literature cited in the comment, was reviewed to obtain thresholds of noise specific to the sensitive fauna occurring within the Master Plan boundaries.

AL00033-401

Comment:

Reptiles and Amphibians. Spadefoot toads may be induced to emerge from their burrows in response to loud noises (95 dB(A) recordings of motorcycle noise in one experiment).⁸⁹ Fringe-toed lizards are rendered deaf after 9 minutes exposure to 95 dB(A) noise in the same study. Some snakes will show alert behavior in response to airplanes flying overhead.⁹⁰

The EIS/R should evaluate the effects of noise on the biota of the El Segundo Dunes. It is likely that if the noise baseline were set at current conditions rather than before the implementation of quieter planes, this analysis would reveal significant impacts on the ability of the El Segundo Dunes to support populations of some species of birds, mammals, and other vertebrates. Such significant impacts should be identified and mitigated.

89. Brattstrom, B.H., and M.G. Bondello. 1983. Effects of off-road vehicle noise on desert vertebrates. Pp. 167-206 in R.H. Webb and H.G. Wilshore, eds. Environmental effects of off-road vehicles. Impacts and management in arid regions. New York: Springer-Verlag.

90. Yahya, S.A. 1978. Hearing ability of brown tree snake (*Oedrelaphis tristis*). Journal of the Bombay Natural History Society 75:930-931.

Response:

Impacts of noise on sensitive and state- and federally listed flora and fauna were addressed in 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. The 1996 environmental baseline was used to complete the analysis; however, information regarding noise levels in 2000 is provided and compared to the alternatives in Tables S4.10-2 Regular Grid Point Assessment - Aircraft Lmax (decibels) and S4.10-3 Regular Grid Point Assessment - Aircraft Time above 95 Decibels in Minutes in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR. Utilizing the 2000 environmental conditions would not change the results of the impact analysis. Literature, including the document cited in the comment, was reviewed to obtain thresholds of noise specific to the sensitive fauna occurring within the Master Plan boundaries.

AL00033-402

Comment:

3.2.3 Pollution

The discussion in the EIS/R about pollution effects on the El Segundo blue butterfly deserves comment. The EIS/R makes the statement, "Monitoring results indicate that current levels of vanadium are not adversely affecting the El Segundo blue butterfly population at the Habitat Restoration Area since counts for the year 2000 showed a significant increase in the population when compared to 1999."⁹¹ Many factors influence butterfly abundance from year to year; changes from 1999 to 2000 provide no information about the effect of pollution on the butterfly. This statement is indicative of a fundamental misunderstanding of the process of deductive reasoning. The reality is that we have no idea what effect pollution has on the populations of sensitive species on the El Segundo Dunes, including the El Segundo blue butterfly. Population trends cannot be derived from two years of data, and are even difficult with ten years of measurements.⁹²

91. EIS/R, Appendix J1. Biological Assessment Technical Report, p. 91.

92. Mattoni, R., T. Longcore, and V. Novotny. 2000. Arthropod monitoring for fine scale habitat analysis: a case study of the El Segundo dunes. Environmental Management 25(4):445-452.

Response:

Please see Topical Response TR-ET-1 regarding population trends for the El Segundo blue butterfly.

AL00033-403

Comment:

3.2.4 Landscaping

The EIS/R does not assess the detrimental impacts of landscaping adjacent to the El Segundo Dunes. LAWA has planted invasive exotic species as landscape plants in the past, resulting in a greater load of exotic seed rain on the El Segundo Dunes.⁹³ Exotic landscaping material, and associated irrigation, can cause significant adverse effects on the biological resources of the El Segundo Dunes.

Installation of permanent irrigation in new areas along Pershing Drive would result in an expansion of the invasive exotic arthropod community on the El Segundo Dunes. Water sources promote population increases of non-native Argentine ants (*Linepithema humile*), European earwigs (*Forficula auricularia*), and other exotic species, which displace native insect species, an effect that has recently been documented to extend 200 m into native habitats.⁹⁴ Argentine ants are found on the El Segundo Dunes already, but the explosion in numbers associated with permanent irrigation will wreak havoc on native arthropod communities. This is shown by consistent decreases in native arthropod diversity in response to increased Argentine ant abundance.⁹⁵ Argentine ants would displace native ants surrounding the project site. This extirpation reverberates up the food chain, as some native reptiles (e.g., coast horned lizard, *Phrynosoma coronatum*, found on the El Segundo Dunes) preferentially feed on native ants and decline in their absence.⁹⁶

The EIS/R should require as a mitigation measure that in areas adjacent to the El Segundo Dunes, all landscaping plants be limited to locally native species, and that irrigation be limited to winter only.

93. Kowsky, K. 24 April 1995. Plant-life dispute blooms at airport; environmentalist sees exotic plants at LAX as threat to survival of endangered butterfly. Los Angeles Times, B-1. Gregor, I. 1 April 2000: Seeds of trouble: airport landscaping project has environmental groups up in arms. Daily Breeze, B-1.

94. Holway, D.A. 1998. Factors governing rate of invasion: a natural experiment using Argentine ants. *Oecologia* 115(1-2):206-212. Suarez, A.V., D.T. Bogler, and T.J. Case. 1998. Effects of fragmentation and invasion on native ant communities in coastal southern California. *Ecology* 79(6):2041-2056.

95. Erickson, J.M. 1971. The displacement of native ant species by the introduced Argentine ant *Iridomyrmex humilis* (Mayr). *Psyche* 78:257-266. Cole, B.J. 1983. Assembly of mangrove ant communities: patterns of geographic distribution. *Journal of Animal Ecology* 52:339-348. Human, K.G., and D.M. Gordon. 1996. Exploitation and interference competition between the invasive Argentine ant, *Linepithema humile*, and native ant species. *Oecologia* 105(3):405-412. Human, K.G., and D.M. Gordon. 1997. Effects of Argentine ants on invertebrate biodiversity in Northern California conservation Biology 11(5):1242-1248. Holway, D.A. 1998. Effect of Argentine ant invasions on ground-dwelling arthropods in northern California riparian woodlands. *Oecologia* 116(1-2):252-258. Kennedy, T.A. 1998. Patterns of an invasion by Argentine ants (*Linepithema humile*) in a riparian corridor and its effects on ant diversity. *American Midland Naturalist* 140(2):343-350. Longcore, T.R. 1999. Terrestrial arthropods as indicators of restoration success in coastal sage scrub. Ph.D. Thesis, Department of Geography, University of California, Los Angeles.

96. Suarez, A.V., J.Q. Richmond, and T.J. Case. 2000. Prey selection in horned lizards following the invasion of Argentine ants in southern California. *Ecological Applications* 10:711-725.

Response:

Please see Response to Comment AS00005-15 regarding landscaping adjacent to native dune and grassland communities.

AL00033-404

Comment:

3.3 Cumulative Impacts

The analysis of cumulative impacts is woefully inadequate and is inconsistent with previous conclusions reached by the City of Los Angeles in environmental impact reports. The discussion of cumulative

3. Comments and Responses

impacts in Sections 4.10 and 4.11 of the EIS/R consists of a description of the Master Plan area and the following statement:

Areas surrounding the study area consist largely of developed areas with little or no habitat value. However, two biologically significant open spaces, the Ballona Wetlands and the Ballona Bluffs, remain extant within the vicinity of the study area.⁹⁷

However, in the Final Environmental Impact Report for the West Bluffs Project - a project to build residences on the last open space on the Ballona Bluffs - the City of Los Angeles found:

The contribution of the proposed project to impacts on plant and animal life from ongoing development in the region is not considered to be significant, due to the disturbed nature and correspondingly low resource value of the project site.⁹⁸

The current EIS/R is inconsistent with the above statement. To the contrary, the current EIS/R states that:

The cumulative impacts on biotic communities from development of the LAX Master Plan Improvements, and other proposed projects in the area, most notably the Playa Vista Master Plan Project and the Catellus residential proposal on the Ballona Bluffs, are considered significant due to the limited amount of extant natural habitat in the vicinity of the study area, particularly wetlands.⁹⁹

The EIS/R then argues that implementation of the LAX Master Plan will not contribute to these cumulative impacts. The City of Los Angeles seems to claim that whichever project is under review does not contribute to cumulative impacts, yet once approved, the City's subsequent environmental review documents acknowledge that projects did contribute to cumulative impacts. The reality is that both the Catellus West Bluffs Project and the LAX Master Plan will contribute to significant cumulative impacts on natural resources.

Upland foraging habitat for grassland songbirds and raptors will be nearly eliminated by the combination of the LAX Master Plan, the West Bluffs Project, Playa Vista Phase I, and the potential Playa Vista Phase II. The Ballona Creek watershed (with the exception of the Baldwin Hills) will no longer support many bird species as a result of the cumulative impacts of these developments. Western meadowlark, white-tailed kite, California horned lark, loggerhead shrike, sharp-shinned hawk, northern harrier, Cooper's hawk, and American kestrel will experience significant declines in suitable habitat as a result of these cumulative impacts. Peregrine falcon will experience significant losses of foraging habitat. Many birds associated with the Ballona Wetlands forage in upland habitats, especially during the winter and spring rains. For example, great blue heron and snowy egret forage in the ephemeral wetlands at LAX and the West Bluffs site. If all of these projects are completed, all remnants of vernal pools in the northern portion of the former Los Angeles Coastal Prairie will be obliterated. Vernal pool hydrology at the West Bluffs site and at LAX would be destroyed, yet the EIS/R claims that no significant cumulative impacts will result from the project.

This is the end of the line for open space in west Los Angeles. The City of Los Angeles must recognize that the current project, plus the others previously approved by the City, have significant, irreversible, cumulative impacts on biological resources.

97. EIS/R, pp. 4-663, 4-706.

98. City of Los Angeles. October 1998. EIR No. 91-0675. West Bluffs Project Section IV.D.3.

99. EIS/R, p. 4-664.

Response:

Evaluation of whether an impact on biological resources qualifies as significant is based on both the resource itself and how it fits into a regional context. The No Action/No Project Alternative and four build alternatives were analyzed in the context of whether each would contribute to a cumulative loss of habitat or cumulative impacts to a species. Cumulative impacts to biotic communities and sensitive species were addressed in Section 4.10, Biotic Communities (subsection 4.10.7), and Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsection 4.11.7) of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, respectively. The EIS/EIR states that implementation of the LAX Master Plan would not contribute to cumulative impacts because there would be no net loss of habitat value as a result of Master Plan improvements as the recommended mitigation measures are adequate

to reduce impacts to below the level of significance. Therefore, if approved, Master Plan improvements would not contribute to cumulative impacts to biotic communities. With respect to sensitive species, habitat loss under the build alternatives would contribute to a cumulative impact to the Riverside fairy shrimp and El Segundo blue butterfly; however, there would be no net loss in habitat acres or habitat value as a result of Master Plan improvements because recommended mitigation measures are adequate to reduce impacts to below the level of significance.

Mitigation for the loss of biotic resources in the Ballona Wetlands has also been included in the Playa Vista Master Plan EIS/EIR. In review of the West Bluffs Project Subsequent Final Environmental Impact Report, Section IV.D., Plant Life and Animal Life, the EIR states the proposed project's contribution to cumulative impacts to plant and animal resources is not considered to be significant, due to the disturbed nature and correspondingly low resource value of the project site.¹ However, LAVA understands and has disclosed the potential significant cumulative impacts associated with the implementation of the LAX Master Plan and surrounding developments.

¹ Catellus Residential Group, October 1998. West Bluffs Project Subsequent Final Environmental Impact Report (EIR number 91-0675, State Clearinghouse No. 92041046.). Prepared by: Planning Consultants Group. Contact: 5 Park Plaza, Suite 400, Irvine, CA 92714.

AL00033-405

Comment:

4.0 Mitigation Measures

The mitigation measures that rely on the "modified Habitat Evaluation Procedure" are insufficient to offset the significant impacts that would result from the build alternatives. The use of "Habitat Units" in mitigation measures MM-BC-2, MM-BC-4, MM-BC-5, MM-BC-6, and MM-BC-7 is fundamentally flawed.

The all-purpose mitigation measure "Conservation of Faunal Resources" (MM-BC-4) is completely inadequate to address impacts to sensitive species from the project alternatives. The conversion to "Habitat Units" is spurious; all mitigation must replace lost habitat with an equal or greater area.

Response:

Please see Topical Response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP), including mitigation measures resulting from the HEP.

AL00033-406

Comment:

4.1 Lewis' Evening Primrose

Mitigation for Lewis' evening primrose does not ensure that a replacement population of the species will be created, only that more individuals will be grown on the El Segundo Dunes, where the species is already found. In addition to establishing a numerical goal for the number of individuals to be replaced, mitigation should ensure the area occupied by the species will increase by at least the 2.5 acres that would be lost. Because there is a risk-spreading benefit in the disjunct configuration of the impacted population, the mitigation site should be geographically distinct from currently occupied sites.

Response:

Please see Response to Comment AS00005-14 regarding mitigation for impacts to Lewis' evening primrose and Response to Comment AL00033-389 regarding the geographic distribution of Lewis' evening primrose.

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AL00033-407

Comment:

4.2 Western Spadefoot Toad

Mitigation for the western spadefoot toad ignores the geographic configuration of the impacted population(s). These toads are found in four distinct ephemeral wet areas on the LAX property, all of which would be destroyed by the build alternatives. Division of the population into separate, hydrologically distinct pools with different cachements is a benefit to the population. Mitigation for these losses cannot be achieved through creation of 1.24 acres of ideal habitat (the "Habitat Units"), but rather must consist of four separate pools and associated cachements of at least 9 acres.

The choice of mitigation location is important as well. The top choice would be on the areas of the former Los Angeles Coastal Prairie west of Pershing Drive. However, the EIS/R claims that allowing a vernal pool in this area would encourage bird life as well, and would therefore pose a hazard to aircraft.

If off-site mitigation is necessary, the first choice should be the West Bluffs property, currently subject to development by the Catellus Corporation. The West Bluffs site has vernal pool hydrology and is the only candidate site within a reasonable distance of LAX. Distant sites such as Madrona Marsh and potentially California State University Dominguez Hills (where spadefoot toads possibly persist in a vernal pool but are subject to imminent extirpation from construction), should be utilized only in addition to a more proximate site. If no proximate sites are secured (e.g., the West Bluffs property is unobtainable), then the conclusion of the EIS/R must be that the impacts to the species cannot be mitigated to a less than significant level. Without the LAX population, or a possible West Bluffs replacement, the range of the species in the region will be significantly diminished, even with more distant offsite mitigation.

Response:

Please see Response to Comment AL00033-394 regarding impacts to and mitigation for western spadefoot toad.

AL00033-408

Comment:

4.3 Riverside Fairy Shrimp

A similar analysis applies to the proposed mitigation for the loss of habitat for the Riverside fairy shrimp. The species is currently found in at least nine areas affected by the build alternatives. The proposed mitigation is for "no more" than 1.3 acres of replacement habitat.¹⁰⁰ To the contrary, loss of this occupied habitat should be mitigated by provision of nine pools with associated upland cachement areas to support vernal pool hydrology. While the mitigation measure suggests one location with 0.75 habitat value (i.e. restoration of vernal pool plants and other vernal pool characteristics), it is more important to the fairy shrimp that multiple locations be acquired. Population models for species found in habitat patches (e.g., metapopulations) show that persistence is enhanced not by density at a single site - although patch size is important - but by maximizing the number of occupied patches.¹⁰¹ To trade occupied sites for other biological values such as presence of sensitive plant species decreases the long-term persistence possibilities for the fairy shrimp. Certainly full vernal pool restoration would be a noble conservation goal, but it does not mitigate the impacts to the Riverside fairy shrimp. The potential mitigation sites should be chosen by proximity to LAX. The West Bluffs site could provide one, possibly two pools. Additional pools should be identified to mitigate fully the impacts to the species.

100. EIS/R, p. 4-708.

101. Hanski, I. 2000. Metapopulation ecology. London: Oxford University Press.

Response:

Please see Topical Response TR-ET-2 regarding Riverside fairy shrimp mitigation. With regard to the West Bluff site, the West Bluff of the Ballona wetland ecosystem was eliminated for relocation of the cysts due to the significantly high cost associated with acquiring the properties for purpose of relocating

the embedded cysts. The identification of the relocation site was determined through Section 7 consultation between the FAA, LAWA, and the 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. The USFWS has issued a Draft Biological Opinion pursuant to Section 7 of the Federal Endangered Species Act. The Draft Biological Opinion issued by the USFWS is included as Appendix F-E of this Final EIS/EIR.

AL00033-409

Comment:

4.4 San Diego Black-tailed Jackrabbit

As discussed above, the proposed mitigation for the San Diego black-tailed jackrabbit is insufficient to offset the losses to the species. The loss of 119 acres of occupied habitat must be offset by the provision of at least 119 acres of additional habitat. The EIS/R provides no evidence to show that the species can be supported at similar densities in the Habitat Restoration Area on the dunes, nor that the "Habitat Units" of restoration on the dunes will make the area more suitable for jackrabbits. Black-tailed jackrabbits require mixed grasses, forbs, and shrubs for food; dune scrub may provide less preferred forage than exotic grassland. The Habitat Restoration Area therefore may support lower densities of the species than currently occupy the 119 acres of exotic grassland. Furthermore, the EIS/R provides no estimate of the size of the population to be impacted, or the diel¹⁰² patterns of movement exhibited by the species, information that is necessary to formulate an effective mitigation measure. Any release program on the El Segundo Dunes must be accompanied by a humane control program for the exotic red fox (*Vulpes vulpes*).

102. "Diel" refers to a 24-hour period, a full day and night.

Response:

Please see Response to Comment AS00005-17 regarding impacts to and mitigation for San Diego black-tailed jackrabbit.

AL00033-410

Comment:

4.5 Loggerhead Shrike

The EIS/R proposes to mitigate for loss of occupied loggerhead shrike habitat (172 acres) with restoration on the El Segundo Dunes in the form of 22.88 "Habitat Units." Implicit in this proposal is the assumption that the density of loggerhead shrikes on the El Segundo Dunes can be increased to accommodate those displaced by the loss of 172 acres of occupied habitat. The EIS/R provides no information about densities of loggerhead shrike to support this implicit assumption. To the contrary, because the El Segundo Dunes are already occupied with breeding loggerhead shrikes, and the shrike's use of habitat is not tied to whether the vegetation is native or not (or to the arbitrary habitat standards of the HEP), restoration on the El Segundo Dunes is not likely to appreciably increase the density of shrikes found there. Mitigation for this impact must be found elsewhere, in the form of 172 acres of shrike habitat. Loggerhead shrike are found at the West Bluffs site, but the site is only 44 acres and so could only offer partial mitigation for impacts at LAX. Other additional mitigation sites include properties covered under the Playa Vista master plan, or in the Baldwin Hills. However, if 172 acres of shrike habitat in addition to the El Segundo Dunes cannot be identified and acquired as mitigation, then the significant impact to this species cannot be mitigated to a less than significant level. The impacts are certainly not mitigated by the proposal to provide 23 extra "Habitat Units" in currently occupied habitat.

Response:

Please see Response to Comment AS00005-18 and AL00033-392 regarding impacts to and mitigation for loggerhead shrike.

3. Comments and Responses

AL00033-411

Comment:

4.6 Los Angeles Coastal Prairie

Prescriptions for restoration of Valley Needlegrass Grassland described in MM-BC-5, MM-BC-6, and MM-BC-7 are not consistent with evidence of the historic vegetation in the area, which Mattoni and Longcore have described as Los Angeles Coastal Prairie. The prescription is for a needlegrass dominated habitat, with four common subshrubs. First, five plant species are insufficient to restore this habitat type; the actual plant diversity of the habitat was significantly higher. Second, the relative abundance of species is nothing approaching historical conditions. A transect along a historic photograph of the Coastal Prairie (or "meadow" as described by Pierce¹⁰³), shows the following coverage: *Lupinus bicolor* (39%), *Camissonia bistorta* (18%), *Phacelia stellaris* (14%), *Lotus strigosus* (8%), *Festuca megalura* (4%), *Cryptantha intermedia* (1%), and open (16%).¹⁰⁴ A mitigation measure should bear at least some resemblance to the vegetation type that it proposes to emulate. Furthermore, the standard of 10% native cover for successful restoration is outrageous. The claim that this is defensible because 10% is deemed significant for the identification of a native grassland by the California Department of Fish and Game is equally stunning. Ten percent cover represents the most degraded grasslands, not a standard to achieve in restoration. If the success criterion for grassland mitigation were followed, the vegetation created would score very low on the "modified" HEP touted in the EIS/R.

103. Pierce, W.D. 1938. The fauna and flora of the El Segundo sand dunes: 1. General ecology of the dunes. *Bulletin of the Southern California Academy of Sciences* 37(3):93-97.

104. Mattoni, R., and T.R. Longcore, 1997. The Los Angeles Coastal Prairie, a vanished community. *Crossosoma* 26(2):71-102, at 87.

Response:

historic and present plant community composition of the Los Angeles/El Segundo Dunes was thoroughly examined in preparation of the Draft EIS/EIR, and references cited were footnoted in Section 4.10, Biotic Communities, including W.D. Pierce and D. Pool (1938) and R. Mattoni and T.R. Longcore (1997). Additional literature cited in the Draft EIS/EIR describing plant community composition of the Los Angeles/El Segundo Dunes were available for public review through Landrum and Brown, Inc. in Los Angeles, California.

Grassland within the Los Angeles/El Segundo Dunes is considered historically a part of a larger area referred to as the Los Angeles Coastal Prairie. Present day grassland is now limited to the deflation plain area behind the coastal dune system. The Los Angeles Coastal Prairie was an instance of "valley needlegrass grassland" as classified by Holland (1986).¹ The prairie community has been the most altered since surveys conducted by Pierce and his colleagues in 1938. Heavy construction and seeding with an improper seed mix have resulted in a significant shift in plant community composition from a forb-dominated meadow to a buckwheat shrub scrub that is dense with ice plant and annual grasses. As a result, 70 percent of forb species restricted to this habitat were extirpated.² Only two native species were present during vegetation transect surveys conducted on the deflation plain in 1998, Lewis' evening primrose (*Camissonia lewissii*) and deerweed (*Lotus scoparius*). Three native species were present in 1999, dune primrose (*Camissonia chieranthifolia*), popcorn flower (*Cryptantha clevelandii*), and deerweed (*Lotus scoparius*). Native species diversity on the deflation plain is significantly lower today than it was historically. The five species selected for restoration efforts described in Section 4.10, Biotic Communities, of the Draft EIS/EIR, are examples of characteristic species of a valley needlegrass grassland community. Restoration plantings are not necessarily restricted to these five species. 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/El Segundo Dunes. Species were selected for planting based on their presence within the Master Plan boundaries (locally adapted ecotypes). These species would serve as the primary seed resource for the planting stock.

Planting densities were derived from criteria adopted by California Department of Fish and Game (CDFG) that define significant native grassland as having at least 10-percent native cover. These densities will achieve an initial 10 percent native cover such that the restoration area can be

immediately considered a native grassland community. Over the following 5 years, intense weed abatement, maintenance, and monitoring (as was described in mitigation measure MM-BC-5) will be conducted to ensure growth and dispersal of natives across the restoration site. At the end of 5 years, cover of species must be at least 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.

1 Environmental Science Associates in association with Sapphos Environmental, Inc. and Rudolf H. T. Mattoni, July 23, 1992. Long-term Habitat Management Plan for Los Angeles Airport/EI Segundo Dunes. Prepared for City of Los Angeles, Environmental Affairs Department.

2 Rudolf, H. T. Mattoni, July 1, 1990. Species Diversity and Habitat Evaluation Across the EI Segundo Sand Dunes at LAX. Prepared for Board of Airport Commissioners, Los Angeles

AL00033-412

Comment:

4.7 Restoration Performance Criteria

The performance criteria for the restoration efforts are all exceedingly weak. The only quantifiable standard for revegetation performance is attainment of native cover, the highest of which is 45%. Ecologists have developed many measures of habitat quality that are available to define performance standards for revegetation, including many measures of plant diversity and plant structure.¹⁰⁵ Wetland mitigation must meet stringent standards quantifying wetland functions and values.¹⁰⁶ Terrestrial arthropods have been used to assess the performance of revegetation in recreating native habitats.¹⁰⁷ The performance criteria for restoration should provide more ecological information than simply percent native cover, especially when so many measures are readily available. Without true ecological assessment of restored areas, the success of the mitigation will be forever unknown.

105. Magurran, A.E. 1988. Biological diversity and its measurement. Princeton: Princeton university Press, 179 pp.

106. Rheinhardt, R.D., M.M. Brinson, and P.M. Farley. 1997. Applying wetland reference data to functional assessment, mitigation, and restoration. *Wetlands* 17(2):195-215.

107. Mattoni, R., T. Longcore, and V. Novotny. 2000. Arthropod monitoring for fine scale habitat analysis: a case study of the EI Segundo dunes. *Environmental Management* 25(4):445-452. Bisevac, L., and J.D. Majer. 1999. Comparative study of ant communities of rehabilitated mineral sand mines and heathland, Western Australia. *Restoration Ecology* 7(2):117-126. Holl, K.D. 1996. The effect of coal surface mine reclamation on diurnal lepidopteran conservation. *Journal of Applied Ecology* 33(2):225-236. Longcore, T.R. 1999. Terrestrial arthropods as indicators of restoration successful coastal sage scrub. Ph.D. Thesis, Department of Geography, University of California, Los Angeles. Parameter, R.R., and J.A. Macmahon. 1987. Early successional patterns of arthropod recolonization on reclaimed strip mines in southwestern Wyoming [USA]: the ground-dwelling beetle fauna (Coleoptera). *Environmental Entomology* 16(1):168-177. Wheeler, C.P., W.R. Cullen, and J.R. Bell. 2000. Spider communities as tools in monitoring reclaimed limestone quarry landforms. *Landscape Ecology* 15(5):401-406. Williams, K.S. 1993. Use of terrestrial arthropods to evaluate restored riparian woodlands. *Restoration Ecology* 1:107-116. Williams, K.S. 1997. Terrestrial arthropods as ecological indicators of habitat restoration in southwestern North America. Pp. 238-258 in K.M.N.R.W. Urbanska and P. J. Edwards (eds.). *Restoration ecology and sustainable development; First International Conference, Zurich, Switzerland*. Cambridge: Cambridge University Press.

Response:

As was described in Section 4.10, Biotic Communities (subsection 4.10.8) of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, performance criteria for restoration efforts described in mitigation measure MM-BC-5 include, but are not limited to, the attainment of native cover as determined by quantitative monitoring using the point-intercept method. The point-intercept method includes the determination of species diversity, percent cover by species, as well as density and frequency of species in the vegetation. This method is also particularly useful in measurements of canopy structure, whereby the height of each plant species intercepting a point is recorded.¹ In addition to quantitative monitoring, LAWA shall also conduct qualitative monitoring including, but not limited to, the assessment

3. Comments and Responses

of overall plant health and soil conditions. Should monitoring discern any failure in performance criteria, or the need for site maintenance, LAWA shall conduct weed abatement and undertake replacement planting such that performance criteria are met. As was described in Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsection 4.11.8), of the Supplement to the Draft EIS/EIR, wetland mitigation efforts will be undertaken by LAWA, or its designee, in consultation with the U.S. Fish and Wildlife Service (USFWS). Mitigation measure MM-ET-1 reflects the results of ongoing Section 7 consultation among LAWA, Federal Aviation Administration (FAA), and USFWS. Development of a Riverside Fairy Shrimp Wetland Habitat Restoration Program and a program to monitor the progress of vernal pool creation will be undertaken by LAWA, in consultation with USFWS. It is the intent of LAWA to create high-quality habitat to which soils containing embedded cysts of the Riverside fairy shrimp can be relocated, and to monitor and maintain the functions and values of that habitat for the presence of Riverside fairy shrimp (see Table S4.11-2). Please see the following Responses to Comments for additional information regarding mitigation measures and performance criteria: AF00003-4, AS00005-13, AS00005-14, AS00005-19.

1 Bullock, James. 1996. Plants, in W. J. Sutherland (ed.) Ecological Census Techniques. Cambridge University Press, Cambridge, UK.

AL00033-413

Comment:

4.8 Raptor "Nursery Sites"

Insufficient information about the impact to raptors using mature trees is provided to allow assessment of whether the mitigation measure (MM-BC-3) would be effective for replacement of mature trees. The location of this mitigation would be important, and the destruction of nearly all of the open space used for foraging by raptors may render "nursery sites" extraneous, with no raptors to use them.

Response:

Please see Memorandum for the Record 1067-001.M19 Subject: "1996 Breeding Birds of Prey Survey at the Los Angeles International Airport" in Technical Report 7, Biological Resources Technical Report, of the Draft EIS/EIR for a description of the surveys undertaken within the Master Plan boundaries and the species of raptors observed. No breeding sites or nests were observed during surveys; however, the American kestrel was observed on site and has the potential to nest in palm trees on site. The trees to be impacted are landscape trees in a residential area. These trees would be replaced in-kind with landscape trees at a ratio of 2:1 to mitigate for the potential nesting sites of the American kestrel.

Proposed Master Plan Improvements would not result in the destruction of nearly all open space used by foraging raptors as mentioned in the comment. Approximately 307 acres of open space would remain within the Los Angeles/EI Segundo Dunes and the Habitat Restoration Area.

AL00033-414

Comment:

5.0 California Coastal Act

None of the build alternatives in the Master Plan would be consistent with the California Coastal Act. First, there would be many impacts to the environmentally sensitive habitat area on the El Segundo Dunes through the indirect effects of increased construction, light, landscaping, pollution, and road construction. The mitigation measures proposed are insufficient to mitigate for these significant disruptions of habitat values. Even though the development is designed to occur outside the coastal zone boundary, Section 30240(b) of the Coastal Act provides that:

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.¹⁰⁸

Second, the EIS/R does not discuss impacts to marine biological resources, which could occur as a result of runoff into and jet fuel dumping over the ocean. Impacts to marine biological resources should be described and appropriate changes implemented before preparation of a final EIS/R.

108. California Public Resources Code § 30240(b)

Response:

All build alternatives were evaluated qualitatively with respect to (1) the goals of the California Coastal Act (CCA) (Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR), (2) the Coastal Zone Management Act (Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR), and (3) State CEQA Guidelines (Section 4.14, Coastal Zone Management and Coastal Barriers, Section 4.10, Biotic Communities, Section 4.11, Endangered and Threatened Species of Flora and Fauna, and Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR).

None of the build alternatives was found to have a significant impact to the coastal zone or coastal access according to coastal zone management thresholds derived from the goals of the CCA (Section 4.14, Coastal Zone Management and Coastal Barriers (subsections 4.14.4, 4.14.6-4.14.8), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR). All build alternatives are therefore consistent with the CCA. Potential impacts to marine biological resources as a result of jet fuel leakage, run-off, or pollution were addressed in Section 4.14, Coastal Zone Management and Coastal Barriers (subsection 4.14.6.3), and Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR and Supplement to the EIS/EIR. In summary, design safeguards employed to prevent fuel leakage from pipelines would ensure the protection of natural or artificial coastal resources. In addition, the potential for water runoff (storm water) to affect water quality by washing pollutants into nearby ocean waters shall be mitigated to below levels of significance through implementation of Master Plan Commitment HWQ-1 (Section 4.7, Hydrology and Water Quality, of the Supplement to the Draft EIS/EIR). Master Plan Commitment HWQ-1 was modified in the Supplement to the Draft EIS/EIR to include management of dry weather discharges (subsection 4.7.5). Also added to HWQ-1 was a class of dry weather BMPs (hydrodynamic devices) that will be considered during development of the detailed drainage plan for the selected alternative. Dry weather runoff (the result of outdoor maintenance activities) would have no significant water quality impacts because many existing maintenance facilities would be relocated off site. Therefore, it has been determined that no significant impacts to marine biological resources would occur under any build alternative (Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR).

Alternatively, potential impacts to designated sensitive habitat or threatened and endangered species within the coastal zone were addressed in Sections 4.10, Biotic Communities, and 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Thresholds of significance for determining impacts to the Los Angeles/EI Segundo Dunes were adapted from criteria and guidelines contained in the Coastal Zone Management Act and were consistent with Appendix G of the State CEQA Guidelines. Significant impacts to the Los Angeles/EI Segundo Dunes from construction activities would be mitigated to below levels of significance through implementation of construction avoidance and ongoing maintenance and management efforts within the dunes (MM-BC-1), habitat restoration (MM-ET-2), and dust control (MM-ET-3). Please see Response to Comment AS00005-6 for additional information on the potential impacts of road construction.

Impacts from light emissions to sensitive floral and faunal species in the Los Angeles/EI Segundo Dunes, including the EI Segundo blue butterfly were addressed in Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsections 4.11.6.2, 4.11.6.3, and 4.11.6.4), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Responses to Comments AF00003-10 and AL00033-397 for additional information regarding light emission effects on biotic communities and sensitive species.

Impacts from pollution (i.e., jet exhaust) to sensitive floral and faunal species in the Los Angeles/EI Segundo Dunes, including the EI Segundo blue butterfly, were addressed in Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsections 4.11.2 and 4.11.6), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Analysis of the effects of jet exhaust emissions determined no significant impact to sensitive species under each build alternative. Please see Response to Comment AL00033-178 for additional information regarding air pollution effects on biotic communities and

3. Comments and Responses

sensitive species. Impacts from landscaping on the El Segundo Dunes are addressed in Response to Comment AS00005-15.

AL00033-415

Comment:

6.0 Conclusion

The EIS/R treatment of biological resources represents the result of significant effort and expenditure on the part of the preparers. Unfortunately, the resulting analysis is deeply flawed, unscientific, and improperly reaches the conclusion that the mitigation measures would reduce impacts to a less than significant level. To the contrary, implementation of any of the three build alternatives would be catastrophic for the biological resources on the project site and result in a significant local and cumulative impact on sensitive species. If approved and implemented, the Master Plan will permanently degrade the diversity and abundance of native wildlife in west Los Angeles. The last refuges of birds and mammals depending on large open spaces will be erased from the landscape.

Response:

Please see Topical Response TR-BC-1 regarding the modified Habitat Evaluation Procedure (HEP). Environmental consequences of the No Action/No Project Alternative and each build alternative were discussed in Section 4.10, Biologic Communities (subsection 4.10.6), and Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsection 4.11.6), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. If implementation of proposed Master Plan improvements would result in a significant impact to a biotic community or sensitive species, the impact would be mitigated to levels below significance (see subsections 4.10.9 and 4.11.9). Please see Response to Comment AL00033-404 regarding cumulative impacts.

AL00033-416

Comment:

HAZARDOUS MATERIALS

There are a number of contaminated properties in the areas that would be disturbed by construction. (DEIR, Table 4.23-1 and Figs. 4.23-1, 4.23-4, 4.23-5, 4.23-6.) The DEIR acknowledges that this contamination could result in significant impacts and recommends two Master Plan Commitments, HM-1 and HM-2, to mitigate these impacts. (DEIR, p. 4-979/980.) However, the DEIR fails to discuss all of the impacts of this contamination. Further, these two mitigation measures are not adequate to mitigate the impacts to a less than significant level.

Response:

Please see Responses to Comments AL00033-417 through AL00033-437 below regarding specific comments regarding Hazardous Materials.

AL00033-417

Comment:

I. IMPACTS NOT EVALUATED

I.A. Impacts Of Construction At Contaminated Sites Are Significant

The DEIR identifies a number of contaminated sites and concludes that additional contamination may be discovered during construction. The DEIR also admits that disturbance of contaminated soils and groundwaters during construction "could pose a risk of exposure to construction workers or the environment." (DEIR, p. 4-989, 4-993, 4-994. However, the DEIR does not evaluate what those impacts would actually be, instead arguing without any analysis that these impacts would be fully mitigated by Master Plan Commitments HM-1 and HM-2 and existing laws and regulations.

However, as discussed in Comment II, these measures are not adequate to mitigate significant impacts from construction at contaminated sites. Further, existing laws and regulations do not address construction at contaminated sites. These measures do not require that all contamination is remediated prior to the start of construction, and they provide no means to identify undiscovered contamination during construction, creating a situation in which construction workers could be adversely exposed to contaminated soils and groundwaters. Thus, significant exposures are possible and unmitigated.

Workers are exposed to contaminated soils and vapors during construction through ingestion, inhalation, and dermal absorption. Contaminants present in disturbed soils could cause cancer and temporary or permanent damage to the eyes, ears, skin, internal organs, or the nervous and circulation system of workers.

Dusts are generated and inhaled by construction workers during all phases of construction, but particularly during grading, excavation, and utility and pipeline trenching. In addition to dust, vapors may also be released during construction, particularly in areas with hydrocarbon contamination, as here. As a result of construction activities, such as grading and excavation, vapors could migrate to the surface and be inhaled by workers. Hydrocarbon and petroleum vapors would be expected to contain substantial amounts of benzene, a carcinogen and toluene, a neurotoxin, among others.

Workers' exposed skin (i.e., face, neck, hands, arms, and sometimes torso and thighs, particularly if loose-fitting clothing is worn) frequently becomes coated with wet muddy soil during construction. Contaminants, particularly fat-soluble compounds like polynuclear aromatic hydrocarbons ("PAHs") that are commonly present in petroleum-contaminated soil, can migrate from the soil through the skin and into the body.¹ Construction workers also commonly accidentally ingest dirt, transferred from dirty hands or tools. Dirt ingestion is often the major exposure route for construction workers.

Construction workers are also likely to encounter toxic chemicals from buried structures such as pipelines during earthmoving activities. Inadvertent discovery of buried pipelines during soil removal could pose a possible explosion hazard or result in the release of stored materials, such as fuels or solvents. Hazardous fumes, mists, or vapors, such as pockets of methane, could also be encountered. Removal activities could pose both health and safety risks.

Construction work would be carried out adjacent to sites undergoing active remediation. Remediation workers at adjacent contaminated properties undergoing remediation would be protected by personal protective equipment ("PPE") while construction workers would not be protected by PPE unless specifically required by a mitigation measure.

These types of impacts are normally addressed prior to construction by performing a health risk assessment using the results from site assessments. The DEIR does not evaluate the impact of site contamination on workers, instead recommending two mitigation measures that are not adequate. (Comment II.) The health risks of working in contaminated soil are typically significant and require mitigation.

Finally, construction would take place at an active airport. The highest health risks from aircraft engines typically occur relatively close to the runways due to mechanical turbulence created by taxiing and takeoff that mixes the exhaust plume to the ground. The DEIR only evaluated public health impacts outside of the boundary of the airport and ignored these impacts to workers.

¹ Thomas E. McKone, Dermal Uptake of Organic Chemicals from a Soil Matrix, *Risk Analysis*, v. 10, no. 3, pp. 407-31, 1990; R.A. Howd and T. E. McKone Dermal Uptake of Chemicals at Hazardous Waste Sites, *The Toxicologist*, v. 11, 1991, pp. 193-102; Ronald C. Wester and others, Percutaneous Absorption of [¹⁴C] DDT and [¹⁴C] Benzo(a)pyrene from Soil, *Fundamental and Applied Toxicology*, v. 15, 1990, pp. 510-516; Thomas J. Franz, Absorption of Petroleum Products Across the Skin of the Monkey and Miniature Pig, American Petroleum Institute, Annual Report, March 15, 1979 to March 14, 1980; D. Goon, N.S. Hatoum, J.D. Jernigan, S.L. Schmitt, and P.J. Garvin, Pharmacokinetics and Oral Bioavailability of Soil-Adsorbed Benzo(a)pyrene (BaP) in Rats, *The Toxicologist*, v. 10, no. 1, February 1990, p. 218; D. Goon, N.S. Hatoum, M.J. Klan, J.D. Jernigan, and R.G. Farmer, Oral Bioavailability of "Aged" Soil-Adsorbed Benzo(a)pyrene (BaP) in Rats, *The Toxicologist*, v. 11, no. 1, February 1991, p. 345; John C. Kissel and David R. McAvoy, Reevaluation of the Dermal Bioavailability of 2,3,7,8-TCDD in Soil, *Hazardous Waste & Hazardous Materials*, v. 6, no. 3, 1989, pp. 231-240; T.A. Roy, J.J. Yang, A.J. Krueger, and C.R. Mackerer, In Vitro Percutaneous Absorption of Benzo(a)pyrene (BaP) from Crude Oil Sorbed on Soil Using Rat and Human Skin, *The Toxicologist*, v. 12, no. 1, February 1992, p.

3. Comments and Responses

114; In Vitro and In Vivo Percutaneous Absorption of Benzo(a)pyrene from Petroleum Crude-Fortified Soil in the Rat, Bulletin of Environmental Contamination and Toxicology, v. 43, 1989, pp. 207-214.

Response:

Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction (page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR), describes LAWA's commitment to identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities will be performed. If warranted, as determined by the regulatory agency with jurisdiction, LAWA will conduct remediation prior to initiation of construction. In addition, LAWA will require all construction contractors to prepare site-specific Health and Safety Plans prior to initiation of grading or excavation which would identify the potential waste types to be encountered, potential hazards of concern, disposal methods, required protective equipment, decontamination procedures and provide other information regarding hazardous conditions that may arise during soil moving operations.

The Health and Safety Plan will incorporate all available site data including existing soil and groundwater contamination and known hazards. If previously undetected contamination is encountered during earth moving operations, provisions for identification, evaluation, and management are included within the Health and Safety Plans. Again, the regulatory agency with jurisdiction will be involved with evaluation of the site hazards and if warranted, LAWA will conduct remediation prior to initiation of construction. However, with proper mitigation, construction activities can occur on sites undergoing remediation.

The points of exposure for construction workers stated within the comment (i.e., dermal, ingestion, inhalation of dust or toxic fumes, etc.) are valid. However, they will be mitigated by the proper use of personal protective equipment described in the site specific Health and Safety Plan. In addition, as necessary air monitoring equipment will be used to monitor for potential hazards during earth moving activities. The use of monitoring equipment is also included within the site-specific Health and Safety Plans.

Diagrams of existing electrical, piping, and any other subsurface structures are reviewed prior to any earth moving or excavation activities by any reputable contractor to decrease the likelihood of unintentional impact. The potential for encountering subsurface objects during earth moving activities is not unique to this project. The state of California has a service identified as Underground Service Alert (USA) that requires all contractors digging or drilling on public property notify this central notification system which notifies all applicable utility services with lines in the area identified for digging. However, if an underground object is encountered during earth moving activities creating a hazardous environment, provisions for emergency response are also described within the site-specific Health and Safety Plans.

The risks for the worker performing construction activities at sites adjacent to those undergoing remediation are minimal. The primary exposure pathway potentially of issue is inhalation, however, monitoring activities as described within the site-specific Health and Safety Plans, are designed to manage elevated concentrations so levels of concern are never reached either on the site undergoing remediation or neighboring sites.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed the potential impacts to construction workers due to aircraft exhaust in Section 4.24.1, Human Health Risk Assessment, and Technical Reports 14a and S-9a. On-airport workers were assessed for worst-case locations and airport activity was not predicted to cause exceedances of California occupational standards for workplace air.

AL00033-418

Comment:

I.B. Significance Thresholds Not Adequate

The DEIR recommends the use of OSHA permissible exposure limits to evaluate the exposure of workers to hazardous materials. (DEIR, p. 4-978.) The DEIR itself does not make any attempt to use these PELs to evaluate worker health impacts, instead recommending that they be used in future assessments, thus precluding public review. (DEIR, p. 4-979.) Regardless, the advocated use of PELs

is not adequate to evaluate the health impacts of working in and near potentially contaminated soils and groundwaters.

These standards are not intended to apply to contaminated soils and do not address ingestion and dermal exposure. (AICGH 1976,1986.2) Most of the health risks to construction workers are through the dermal and ingestion routes, not the inhalation route. The relative contribution of each exposure route depends upon the chemicals included in the assessment. In petroleum-contaminated soils, less than about 5% of the cancer risk and 50% of the noncancer risk is typically due to inhalation. The balance is due to ingestion of soil and dermal contact. The only way to evaluate all three exposure routes is through a health risk assessment, as discussed in Comment I.A. The DEIR has not prepared a health risk assessment, and the proposed mitigation measures do not require the use of a health risk assessment. Therefore, it is unlikely that the significant impacts of working in contaminated soil would be identified and mitigated.

Further, it is well known that most of the OSHA exposure levels, such as those advocated here to protect construction workers, were established more than three decades ago and reflect levels of exposure that were achievable in industry at the time, not levels that are health protective. (Roach and Rappaport 1990.3) It is well known that serious health impacts occur from short-term exposures to dust concentrations that are substantially below occupational exposure standards and ambient air quality standards.⁴

2 American Conference of Governmental Industrial Hygienists (ACGIH), Documentation of the Threshold Value Limits, 3rd Ed., Cincinnati, Ohio, 1976; ACGIH, Documentation of the Threshold Limit Values and Biological Exposure Indices, 5th Ed., 1986.

3 S.A. Roach and S.M. Rappaport, But They Are Not Threshold: A Critical Analysis of the Documentation of Threshold Limit Values, American Journal of Industrial Medicine, v. 17, 1990, pp. 727-753.

4 C.A. Pope III, Respiratory Disease Associated with Community Air Pollution and a Steel Mill, Utah Valley, American Journal of Public Health, v. 79, no. 5, pp. 623-628; C. A. Pope III, Respiratory Hospital Admissions Associated with PM10 Pollution in Utah, Salt Lake, and Cache Valleys, Archives of Environmental Health v. 46, no. 2, 1991 pp. 90-97; C.A. Pope III and others, Respiratory Health and PM10 Pollution. A Daily Time Series Analysis, American Review of Respiratory Disease v. 144, no. 3, 1991, pp. 668-674; J. Schwartz, D. Slater, T.V. Larson, W.E. Pierson, and J.Q. Koenig, Particulate Air Pollution and Hospital Emergency Room Visits for Asthma in Seattle, American Review of Respiratory Disease, v. 147, 1993, pp. 826-831; Joel Schwartz and Douglas W. Dockery, Increased Mortality in Philadelphia Associated with Daily Air Pollution Concentrations, American Review of Respiratory Disease, v. 145, no. 3, 1992, pp. 600-604; B.D. Ostro and S. Rothschild, Air Pollution and Acute Respiratory Morbidity: An Observational Study of Multiple Pollutants, Environmental Research, v. 50, 1989, Pp. 238-247; J. Schwartz and A. Marcus, Mortality and Air Pollution in London: A Time Series Analysis, American Journal of Epidemiology, v. 131, no. 1, 1990, pp. 185-194; USEPA, Air Quality Criteria for Particulate Matter, Volumes I-III April 1996.

Response:

Thresholds of significance were identified in Section 4.23, Hazardous Materials (subsection 4.23.4.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, to evaluate the significance of hazardous materials impacts that may potentially be caused by the build alternatives. To single out OSHA PELs neglects to recognize the remaining thresholds of significance identified in this section. The complete list of thresholds of significance identified consists of the following:

1. An unauthorized and uncontrolled release of a hazardous material that created a hazard to the public or the environment.
2. Exposure of workers to hazardous materials in excess of OSHA's permissible exposure limits.
3. Handling of acutely hazardous materials within ¼ mile of a school.
4. Contamination of soil or groundwater or prevention of clean up of sites that are currently undergoing soil or groundwater remediation.

3. Comments and Responses

5. Impairment of the effective implementation of an adopted emergency response plan.

6. An exceedance in the capacity of regional treatment, storage, and disposal facilities due to project-related increases in hazardous waste generation.

The first threshold of significance "An unauthorized and uncontrolled release of a hazardous material that created a hazard to the public or the environment" addresses the issue of the use of health risk assessment to evaluate risks. It is necessary to perform some type of health risk evaluation in order to determine whether a release constitutes a hazard to the public or the environment. The fourth threshold of significance indicates that contamination of soil or groundwater would constitute a significant impact; this impact would be addressed to protect the health and safety of the people and the environment. Master Plan commitments to address hazardous materials impacts are discussed below.

The Master Plan commitments identified in subsection 4.23.5 indicate that the lead agency(ies) with jurisdiction will be notified if any hazardous materials threshold of significance is exceeded, for example, if soil or groundwater are contaminated with hazardous materials. The Draft EIS/EIR and Supplement to the Draft EIS/EIR indicated that immediate and effective measures will be taken to protect the health and safety of the public and workers and the environment. The lead agency(ies) have the authority to require performance of a health risk assessment if deemed necessary. The lead agency(ies) also have the authority to require the development of health risk-based cleanup goals to address the contaminated soil or groundwater. The Draft EIS/EIR and Supplement to the Draft EIS/EIR also indicated that all construction contractors will be required to prepare site-specific Health and Safety Plans prior to initiation of grading or excavation. These Health and Safety Plans will outline measures to address worker exposure to potential contamination encountered at the site.

The thresholds of significance referenced in this comment are intended to address the possibility of an uncontrolled release of hazardous materials. Health risk evaluations are dependent upon the type and concentration of chemicals released; therefore, a health risk assessment performed for a theoretical release would be entirely conjecture and the information could, at best, be used to identify possible measures to deal with the potential release. However, it is unnecessary to perform a theoretical health risk assessment to identify these types of measures. The handling of hazardous materials (i.e., transport, storage, use, and disposal) is subject to strict local, state, and federal regulatory requirements designed to protect people and property from injury and damage.

Regarding the relative contribution of each exposure route to risk - as noted, this depends upon the chemicals evaluated in the assessment. Please note that toxicity criteria are not available for petroleum. Therefore, risk assessments performed for petroleum-contaminated soils would be performed for petroleum constituents detected in the impacted medium. The potential contribution of each exposure route to total risk would depend upon the impacted medium, the chemicals of concern, and which exposure pathways were complete.

Please note that the Draft EIS/EIR and Supplement to the Draft EIS/EIR did use State of California Occupational Safety and Health Administration (Cal/OSHA) PELs to evaluate worker health impacts. Please refer to Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.4.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Exceedance of Cal/OSHA PELs is identified as a threshold of significance. Cal/OSHA PELs are enforceable regulatory limits on the amount or concentration of a substance in air. They may also contain a skin designation. Cal/OSHA PELs are reviewed every two years. Exposure limits are revised as new information is learned regarding health effects of exposure. These values represent the current enforceable standard in California for protection of workers in the work place.

Cal/OSHA PELs are used to evaluate potential risks to workers resulting from estimated future emissions associated with the build alternatives and the No Action/No Project Alternative. This is possible because the scenarios addressed in Section 4.24.1, Human Health Risk Assessment, do not deal with uncontrolled releases. The potential concentration in an impacted medium can be estimated based on information regarding airport operations and chemical emission factors.

AL00033-419

Comment:

I.C. Other Sources Of Contamination

There are a number of sources of contamination that are likely to be present in areas that would be developed that were not disclosed in the DEIR and that could result in significant impacts to construction workers and off-site receptors during development of LAX. These are discussed below.

Response:

Please see Responses to Comments AL00033-420 through AL00033-422 below regarding specific comments regarding potential sources of contamination.

AL00033-420

Comment:

I.C.1. Lead From Freeways, Parking Lots, And Aviation Gasoline

The project includes new construction along freeways, surface streets, and airport parking lots that historically have carried large volumes of traffic. These include I-405, I-105 (Imperial Highway), Westchester Parkway, and Pershing Drive. (DEIR, TR 1, Figs. 3-7, 3-8, 3-11, 3-12, 3-15, 3-16.) It is well known that particulates from vehicle exhaust have deposited along roadways, resulting in very high concentrations of metals, including lead, cadmium, nickel, and zinc. The highest concentrations typically occur within 50 feet of the road shoulder, due to the deposition of larger particles. Lead concentrations within this zone of over 5,000 ppm have been reported. Elevated concentrations of lead and other metals can also occur up to 500 feet from the roadway due to deposition of smaller particles.⁵

Aviation gasoline is used in spark-ignition engines, which reached their development peak in the 1939 to 1945 war years, but are still in use in smaller aircraft. Organic lead compounds have historically been used and continue to be used in aviation gasoline.⁶ For example, up to 0.07% organic lead additives are present in ExxonMobil aviation gasoline.⁷ Organic lead was first introduced into gasolines in 1923 as an antiknock agent. Overall use of lead additives increased steadily in the following decades (except during World War II).⁸ The soils along current and/or former runways at LAX can additionally be expected to contain high concentrations of lead, via the same mechanism described above for busy roadways.

Thus, very high concentrations of lead and other metals are likely present in some of the surface soils that would be disturbed by construction. The DEIR did not address this issue. These areas should be identified, sampled, and remediated prior to the start of construction because they may pose a significant health hazard to construction workers.

5 J.V. Lagerwerff and A.W. Specht, Contamination of Roadside Soil and Vegetation with Cadmium, Nickel, Lead, and Zinc, *Environmental Science & Technology*, v. 4, no. 7, July 1970, pp. 583-586; M.A.Q. Khan and W.F. Coello, Lead Content of Soils Along Chicago's Eisenhower and Loop-Terminal Expressways, *Archives of Environmental Contamination and Toxicology*, v. 1, no. 3, 1973, pp. 209-223; G.L. Wheeler and G.L. Rolfe, The Relationship Between Daily Traffic Volume and the Distribution of Lead in Roadside Soil and Vegetation, *Environmental Pollution*, v. 18, no. 4, April 1979, pp. 265-274.

6 George V. Dyroff (Ed.), *Manual on Significance Tests for Petroleum Products*, ASTM Report, 6th Ed., 1993.

7 ExxonMobil, Material Safety Data Sheet, Aviation Gasoline, Exxon Product Code 113000 - 00039, August 10, 1999. (Available by fax from 800-298-4007.)

8 S.A. Stout, J.M. Davidson, K.J. McCarthy, and A.D. Uhler, Gasoline Additives - Usage of Lead and MTBE, *Soil & Groundwater Cleanup* February/March 1999.

3. Comments and Responses

Response:

Master Plan Commitment HM-2, as was described on page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR, states that LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials during construction. As part of this program, LAWA will identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities are to be performed. To identify contaminated materials and the nature and extent of contamination, soil borings and groundwater samples may be required. The details of the assessment will be based on chemicals previously identified or that have a potential to be present at the site based on historical site usage. Therefore, if lead has the potential to be present in areas where earth moving activities are to be performed, samples will be collected and analyzed to assess the potential risk to workers.

AL00033-421

Comment:

I.C.2. Cooling Towers

Historically, hexavalent compounds, i.e., chromates, were used as corrosion inhibitors in cooling towers. Hexavalent chromium is one of the most potent carcinogens known. These compounds deposited downwind of the towers, resulting in high soil concentrations. A number of recent high profile toxic tort cases have involved this historical use, including the well-known case against PG&E. Cooling towers are present at LAX, but the DEIR did not disclose their location or discuss this potential source of soil contamination and hence worker exposure. The EIR should be revised to show the location of these cooling towers. If proximate to any areas that would be disturbed by construction, nearby soils should be sampled for hexavalent chromium and contaminated soils excavated prior to the start of construction.

Response:

Cooling towers are present at the LAX Central Utility Plant (CUP) identified on Figure 4.24.3-1 in Section 4.24.3, Safety, of the Draft EIS/EIR. As was indicated on pages 4-1056 and 4-1061 in Section 4.24.3, Safety, of the Draft EIS/EIR, the cooling tower water is treated with sodium hypochlorite solution (liquid bleach) and sulfuric acid to prevent biological growth and scaling. Hexavalent compounds (i.e., hexavalent chromium) were never used. Operations at the facility are highly regulated to prevent incidents and accidents and the CUP complies with all relevant federal, state, and local safety regulations to minimize the risk of an upset.

AL00033-422

Comment:

I.C.3. Historical Pesticide Use

Pesticides likely have been used to control weeds in undeveloped areas that are proposed for development. These include a number of pesticides that could pose serious health threats to workers. Arsenical pesticides, for example, were widely used to control weeds from the early 1900's until the end of World War II. Arsenic, which is a potent skin carcinogen, may be present in currently undeveloped areas of the site. Likewise, DDT was used historically to control weeds. The EIR should be revised to require that soils in undeveloped areas be sampled for pesticides that were most likely used to control weeds

Response:

Master Plan Commitment HM-2, as was described on page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR, requires LAWA to identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities are to be performed. Samples will be collected and analyzed for chemicals previously identified or that have a potential to be present at the site based on historical site usage. Therefore, if pesticides were or were believed to have been used in areas where earth moving activities are to be performed, samples will be collected and analyzed to assess the potential risk to workers.

AL00033-423

Comment:

II. MITIGATION MEASURES ARE NOT ADEQUATE

The mitigation measures recommended in the DEIR are not adequate to protect construction workers at or near contaminated sites. The mitigation measures required at other contaminated sites slated for development are much more extensive than those required here. A typical example is the Southern Pacific Railyard site, a 265-acre former railyard located in Sacramento. This site was used from the 1860s until the 1990s for locomotive maintenance and refurbishing. The EIR to redevelop the site required that contamination be remediated prior to construction. It further acknowledged that "previously unidentified pockets of contamination could be discovered during construction" and required the following mitigation measures to protect construction workers (City of Sacramento 12/93,9 pp. 4.13-61/62):

- Each parcel had to be cleaned up at the time of development to protect construction workers;
- A Health and Safety Plan had to be prepared prior to construction that included personal protective equipment and on-site continuous air quality monitoring during construction;
- Reconnaissance sampling was required during construction in all areas where excavation would occur, unless covered by a final Remedial Action Plan;
- An environmental site inspector, reporting to the City and oversight agency, had to be present during construction to detect previously undiscovered contamination.

An excerpt from this EIR is included in Exhibit 1.

In contrast, the DEIR's analysis of contaminated properties is plagued with circular reasoning that fails to mitigate significant impacts.

First, the DEIR admits that known contamination poses a risk to construction workers and the environment. As mitigation, it recommends mitigation measure HM-1 which requires that contaminated sites be remediated prior to the start of construction. However, a careful reading of this measure indicates that remediation need not be completed prior to construction if it is "not possible," which leads back to the original impact, sans mitigation. The DEIR neglects to analyze the impacts if remediation is not possible.

Second, the DEIR admits that currently undiscovered contamination may be present that would pose a risk to construction workers if unremediated. As mitigation (HM-2), the DEIR recommends that undiscovered contamination be remediated if discovered. However, the DEIR provides no means for discovering contamination. Therefore, unless the contamination is gross, construction workers and others may be adversely exposed.

Each of these issues is discussed below.

9 City of Sacramento, Final Environmental Impact Report, Railyards Specific Plan and Richards Boulevard Area Plan, Prepared by EIP Associates, December 1993.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR described the areas of known contamination and impacts of construction of each of the Master Plan alternatives in Section 4.23, Hazardous Materials (subsection 4.23.6). In cases where impacts to remediation are significant, LAWA will implement Master Plan Commitment HM-1, Ensure Continued Implementation of Existing Remediation Efforts, to provide for site remediation in accordance with federal, state and local requirements. The commitment would provide for additional monitoring or additional measures to stop migration and when construction is completed, remediation reinstated, if required by the agency with jurisdiction. Only if it is determined during the pre-construction evaluation that construction will preclude reinstatement of the remediation effort, LAWA will obtain approval to initiate construction from the agency with jurisdiction.

3. Comments and Responses

The agency has the opportunity to respond and either require remediation be completed prior to construction or approve an alternative remedial method if existing contamination warrants remedial action. In order to comply with the CEQA Thresholds of Significance requirements stated in Section 4.23, Hazardous Materials (subsection 4.23.4.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA is required to ensure any particular build alternative would not have a significant impact to "contamination of soil or groundwater or prevention of clean up of sites that are currently undergoing soil or groundwater remediation." As necessary with concurrence from the agency with jurisdiction, remediation will be completed in the proposed areas of construction.

Master Plan Commitment HM-2 (page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR) provides for development of a coordinated program to identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities will be performed. Provisions for the identification, segregation, handling and disposal of contaminated materials will be incorporated with the contractor bid documents. All construction contractors will be required to prepare a site-specific Health and Safety Plan prior to the initiation of grading or excavation. The site-specific Health and Safety Plan will include requirements for identification of contamination by the use of field monitoring equipment and protection of workers by use of protective equipment. Both provisions of HM-2 are designed to be the means to discover previously unidentified contamination and to protect workers from exposure.

AL00033-424

Comment:

II.A. Mitigation Measure HM-1

The site contains a number of contaminated properties that require remediation, many of which are adjacent to or within areas that would be developed. The purpose of HM-1 is to "ensure continued implementation of existing remediation efforts" by working with tenants and others "to ensure that, to the extent possible, remediation is complete prior to the construction." (DEIR, p. 4-979.) However, if it is not feasible to complete remediation prior to the start of construction, it is evident that the DEIR advocates a full-steam-ahead approach.

If remediation cannot be completed, construction would proceed by ripping out existing wells, piping and other infrastructure associated with in-progress remediation and replacing it later, e.g., "Due to the extent of excavation needed for the proposed improvements, it is likely that part, or all, of the remediation systems in operation at these two facilities would have to be removed during construction. This would entail destruction of the extraction wells and removal of underground piping and aboveground tanks." (DEIR, p. 4-986.) It is evident from statements throughout Section 4.23 that the site would be developed, regardless of the status of remediation, e.g.

"To the extent possible, remediation of pre-existing contamination will be completed prior to construction." (p. 4-960.)

"For sites currently on LAX property, LAWA will work with tenants to ensure that, to the extent possible, remediation is complete prior to the construction." (p. 4-979.)

"LAWA will assess the projected time required to complete the remediation activities, and will coordinate with the land owner and the agency with jurisdiction to ensure that remediation is completed prior to scheduled demolition and construction activities, if possible." (p. 4-979.)

"Implementation of this commitment would ensure that remediation projects would be completed to the extent possible and necessary before construction Master Plan improvements..."(p. 4-986.)

"Implementation of Master Plan commitment HM-1...would ensure that remediation projects at LAX and in the acquisition areas would be completed to the extent possible, and as necessary, before construction Master Plan improvements..." (p. 4-990.)

Response:

Master Plan Commitment HM-1, as was described on pages 4-599 and 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR, states LAWA's commitment to continue

remediation on sites with existing soil and groundwater contamination affected by the proposed construction. The commitment states that if it is determined during the pre-construction evaluation that construction will preclude reinstatement of remediation effort, LAWA will obtain approval to initiate construction from the agency with jurisdiction. LAWA is also committed to implement temporary measures during construction to stop migration of contamination in the event that remedial efforts are interrupted. In addition, Master Plan Commitment HM-1 states that if any threshold of significance listed in Section 4.23, Hazardous Materials, (subsection 4.23.4.1), is exceeded, LAWA will take immediate and effective measures to ensure the health and safety of the public and workers, and to protect the environment. The commitment thus states the mechanism to safely move forward with construction on sites where remediation of soil and groundwater contamination is not complete.

AL00033-425

Comment:

Performing construction work in contaminated areas with or without in-progress remediation poses a number of very complex regulatory problems and will likely result in significant environmental impacts that have not been anticipated by the DEIR. The DEIR is wholly silent on the impacts that would arise and the mitigations that would be imposed if it is not possible to complete all remediation prior to the start of construction.

Response:

It is unclear in the comment what "very complex regulatory problems" resulting in environmental impacts would arise by performing construction in areas of contaminated soil or groundwater that were not addressed by the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The Draft EIS/EIR and Supplement to the Draft EIS/EIR described the potential for interruption of remedial efforts and measures that would be employed to mitigate the impacts of the interruption under each Master Plan alternative in Section 4.23, Hazardous Materials (subsection 4.23.6) of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In addition, LAWA has committed to mitigate any adverse impact of construction to the remedial effort within Master Plan Commitment HM-1 as was described on pages 4-599 and 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR.

AL00033-426

Comment:

Further, the DEIR advocates removing on-going remediation infrastructure and replacing it after construction, but only obtaining agency approval if construction "precludes reinstatement of the remediation effort." (DEIR, p. 4-979.) Remediation is typically initiated after a long, complex and expensive site investigation, pursuant to a cleanup and abatement order from a regulatory agency. Any disturbance of on-going remediation, not just disturbances that could not be reinstated, would require agency approval. Further, we doubt that regulatory approvals could be obtained for any interference with on-going remediation. The DEIR has presented no information that any lead agency would be receptive to disruption of mandated remediation.

Remediation of contaminated sites is nearly always completed before construction commences. Regulatory agencies generally do not allow construction to proceed at a contaminated property nor do they allow in-place remediation infrastructure to be removed so that construction can take place because the potential impacts to offsite receptors, construction workers, and the environment are potentially significant. The site would not be designated for remediation if an oversight agency had not already concluded that impacts were significant.

Response:

Master Plan Commitment HM-1 (pages 4-599 and 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR), states that LAWA will obtain approval to initiate construction from the agency with jurisdiction if it is determined that construction will preclude reinstating remediation. Provisions such as increased monitoring and/or temporary remedial measures to stop migration described as part of HM-1 would successfully allow for construction and continued protection of human health and the environment.

3. Comments and Responses

AL00033-427

Comment:

This proposal of halting remediation so that construction can proceed is wholly unacceptable for the following reasons.

Response:

Please see Responses to Comments AL00033-428 through AL00033-432 below regarding specific comments regarding remediation of contamination.

AL00033-428

Comment:

First, construction workers, particularly excavation workers, can be exposed to contamination during the construction process, resulting in significant health impacts. This is particularly critical here because the DEIR failed to perform any analysis of the impacts of existing, known contamination on construction workers, instead simply concluding that the impact would not be significant if mitigation measures HR-1 and HR-2 are adopted. However, the advocated mitigation measures explicitly allow existing contamination to remain, allowing workers to be exposed to contaminated soils. These impacts have not been evaluated and are likely to be significant.

Response:

Site-specific Health and Safety Plans will be required for all soil grading and excavation activities (as described in Master Plan Commitment HM-2 provided on page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR) to mitigate exposure to workers during construction. These measures are designed to be employed in areas of contaminated soils and take into account exposure pathways and documented exposure limits designated by the National Institute for Occupational Safety and Health (NIOSH), and the American Conference of Governmental Industrial Hygienists. These limits have been adopted by the Occupational Safety and Health Administration (OSHA). If these limits cannot be achieved by typical measures, work will be discontinued until the workers' safety can be attained. The regulatory agency with jurisdiction will be involved with evaluation of the site hazards and if warranted, LAWA will conduct remediation prior to initiation of construction. Also please see Response to Comment AL00033-417.

AL00033-429

Comment:

Second, deferring remediation until after the site is developed could substantially interfere with the success of future assessment and remediation of the site. Structures and utilities could limit future site assessment by restricting locations where wells could be drilled and samples collected. Development could also limit acceptable remediation options by blocking needed access.

Response:

Master Plan Commitments HM-1 and HM-2 (pages 4-599 and 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR) state that LAWA will obtain approval to initiate construction from the agency with jurisdiction if it is determined that construction will preclude reinstating remediation. If warranted by the extent of the contamination, as determined by the regulatory agency with jurisdiction, LAWA will conduct remediation prior to initiation of construction. Therefore, it will ultimately be up to the agency with jurisdiction to determine the level of acceptable remediation.

AL00033-430**Comment:**

Third, deferring remediation until after the site is developed could result in the release of malodors during site construction that could impact on-site or off-site receptors. Most of the contaminated properties are contaminated with petroleum hydrocarbons. These types of sites typically release foul odors unless special precautions are taken to limit odors. These precautions would ordinarily not be taken during construction.

Response:

Master Plan Commitment HM-2 on page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR, states that LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials during construction. As part of this program, LAWA will identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities are to be performed. The assessment will determine if provisions are required to control air emissions of hazardous materials including malodors.

AL00033-431**Comment:**

Fourth, the final land use may not be compatible with the residual contamination that is not remediated prior to construction, resulting in adverse exposure of site occupants. Many of the contaminated properties have high concentrations of volatile organic compounds in soils and/or groundwaters. If occupied structures are built over these areas, soil gas vapors could migrate into the overlying structures, exposing occupants. Similarly, if occupied facilities are located adjacent to active remediation sites, commercial workers could be adversely exposed to contaminated wind-blown dusts and vapors.

Response:

Master Plan Commitment HM-1 (pages 4-599 and 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR) states that LAWA will obtain approval to initiate construction from the agency with jurisdiction if it is determined that construction will preclude reinstating remediation. Remedial standards are set by the agency with jurisdiction with regard to potential future land use(s) (i.e., potential exposure of future site occupants, including but not limited to commercial workers, is taken into account in the regulatory agencies' determination of appropriate clean-up standards for contaminated sites).

The content of the second portion of this comment addressing concerns of exposure to workers at facilities located adjacent to active remediation sites, is similar to that of comment AL00033-417; please refer to Response to Comment AL00033-417.

AL00033-432**Comment:**

Finally, the construction process itself could spread existing site contamination, making it more difficult to fully remediate after development. First, construction dewatering may be required. Because groundwaters in some areas of the site are currently contaminated, dewatering could smear and spread out this existing contamination, drawing it into areas that are not currently contaminated. Second, foundation support piles, drilled from the surface to various depths, would likely be required. Piles installed where contaminants are present could create a vertical conduit, allowing chemicals to move along the pile into deeper groundwater zones and degrading them. Third, permeable backfills and other zones are used in utility trenches, road base, drainage layers, and other structures. Contaminated soil vapors and shallow groundwaters could migrate along these permeable aggregate and soil fills and be spread throughout the site.

3. Comments and Responses

Response:

Master Plan Commitment HM-2 (page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR) states that LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials during construction. As part of this program, LAWA will identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities are to be performed. The results of the investigation will be taken into account during construction activities, and if determined by the agency with jurisdiction, remediation will be conducted prior to initiation of construction in order to ensure the health and safety of the public and workers, and to protect the environment.

AL00033-433

Comment:

In sum, remediation of hazardous waste contaminants is nearly always completed before the start of construction. Master Plan commitment HM-1 should be modified to explicitly require the remediation of all contaminated properties prior to the start of construction.

Response:

The content of this comment is a summation of the points made in comments AL00033-428 through AL00033-432; please see Responses to Comments AL00033-428 through AL00033-432 above.

AL00033-434

Comment:

II.B. Mitigation Measure HM-2

The DEIR recognizes that currently undiscovered contamination may be encountered during construction, e.g., "It is likely that additional contamination is present at LAX that has not yet been discovered." (DEIR, p. 4-982.) "During construction of these projects, contaminated soils could be unearthed, potentially exposing construction workers to hazardous materials." (DEIR, p. 4-983.) "In addition, it is possible that, during other construction activities for implementation of Alternative A, previously unidentified soil and/ or perched groundwater contamination could be encountered." (DEIR, p. 4-989, 4-993.)

The impact of encountering contaminated soil during construction is addressed by requiring that all such discovered contamination be remediated in accordance with applicable regulations in mitigation measure HM-2. (DEIR, pp. 4-979/980.) However, the DEIR is silent on how undiscovered contamination would be discovered. Untrained workers should not be expected to identify and be exposed to potentially significant levels of contamination. Further, the DEIR is silent on whether construction would be halted while the required assessment and remediation are completed.

These are serious deficiencies because most contamination cannot be identified without the aid of a surveillance and monitoring program carried out by trained personnel. Observation can only identify the grossest indicators of contamination, such as buried tanks and pipelines, zones containing fragments of landfilled material, oily deposits, or highly odoriferous materials. Most contamination does not leave a trail of observable clues. There are numerous contaminants that are likely to be present at LAX that cannot be identified by appearance and smell, including metals, organic solvents, and benzene, toluene, ethylbenzene, and xylene ("BTEX"). Therefore, HM-2 could leave significant contamination undetected, exposing workers and subsequent site occupants with no warning. This is a significant impact that was not considered in the DEIR.

Normally, the accidental discovery of contaminated soils is addressed by preparing a Phase II Site Assessment of areas not previously characterized and implementing a construction monitoring program. The Health and Safety Plan recommended in the DEIR is not a replacement for either of these two important elements.

Response:

Please refer to Response to Comment AL00033-423.

AL00033-435**Comment:****II.B.1. Phase II Site Assessment**

The site contains a number of contaminated parcels and may contain more. Normally, to assure that construction workers are protected from undiscovered contamination in previously uncharacterized areas, soil and soil gas sampling is conducted prior to the start of construction. The resulting data are used to prepare a health risk assessment to evaluate impacts to construction workers. If significant risks are found, cleanup levels are set to protect construction workers and the site is remediated before the start of construction. Because Phase II Site Assessments ordinarily require public review, these tasks are normally completed as part of CEQA compliance.

To help minimize the chance that workers will be exposed to undiscovered contamination, HM-2 should be modified to require a Phase II site assessment at all sites that have not been previously adequately characterized. Many cities require sampling prior to construction in areas with a long history of industrial use. The City of San Francisco, for example, requires building permit applicants proposing to disturb 50 cubic yards of soil to assess the soil for possible hazardous waste. Where hazardous wastes are found in excess of standards, the permit applicant is required to submit a site mitigation plan and certify its completion prior to issuance of a building permit.¹⁰

The magnitude of the proposed construction, coupled with the extensive known contamination, justifies assessment of sites that have not yet been adequately characterized. This program should include surface and subsurface soil sampling and groundwater sampling for EPA 6010 metals, EPA 8024 volatile organic compounds, EPA 8260 semivolatile organics compounds, pesticides, and gasoline and diesel fractions of total petroleum hydrocarbons. The resulting data should be screened using EPA preliminary remediation goals, or other similar cleanup levels developed by other state agencies, e.g., City of Oakland, Regional Water Quality Control Board. If screening levels are exceeded, a health risk assessment should be conducted to evaluate the impact of site contamination on construction workers, off-site receptors, and future site occupants.

¹⁰ San Francisco Public Works Code, Article 20, Sec. 1000 et seq., "Analyzing the Soil for Hazardous Waste."

Response:

Master Plan Commitment HM-2 (page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR) states that LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials during construction. As part of this program, LAWA will identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities are to be performed. To identify the nature and extent of contamination, soil borings and groundwater samples may be required. The details of the assessment will be based on chemicals previously identified or that have a potential to be present at the site based on historical site usage. At minimum, the type of and physical limits of the contamination within the areas of proposed construction would be assessed prior to grading or excavation. If warranted by the extent of contamination, as determined by the regulatory agency with jurisdiction, LAWA will conduct remediation prior to initiation of construction. At minimum, this information will be used within the site-specific Health and Safety Plan to be generated prior to grading or excavation activities. The site-specific Health and Safety Plans will provide the necessary information to the construction workers to safely handle hazardous materials that may be present at the site. The measures listed within Master Plan Commitment HM-2 are more than adequate to assess the conditions of the soil and groundwater at the site prior to construction and provide for regulatory oversight as appropriate.

AL00033-436**Comment:****II.B.2. Construction Monitoring Program**

3. Comments and Responses

To help identify undiscovered contamination during construction, HM-2 should be modified to require a construction monitoring program. This program would include continuous visual surveillance and monitoring of soils and gases during any construction activities that disturbed soil, e.g., grading, excavating by a trained professional.

The program should require that a registered (REA II) Environmental Professional ("EP") or comparably qualified and registered individual use both a handheld photoionization detector ("PID") and a flame ionization detector ("FID") to monitor gases emitted by each load of excavated soil. A minimum of one sample should be collected from every 1,000 yd³ of excavated soil and analyzed on-site using a mobile lab, or sent off-site for analysis on an expedited schedule (24 hr turnaround) for all contaminants identified during the Phase II Site Assessment.

In addition, perimeter monitoring should be conducted throughout excavation and grading for PM₁₀ and all of the contaminants identified during the Phase II. Thresholds of concern should be established and reporting procedures should be developed to determine when a problem has been identified and how to report and investigate it.

If any evidence of contamination is identified, HM-2 should explicitly require that all construction be immediately suspended until the finding is thoroughly investigated and remediated to the satisfaction of the responsible regulatory agency. The EP should be empowered to shutdown the Project and assure that it remain shutdown until any identified problem is fully investigated and remediated to the satisfaction of the EP and oversight agencies.

The EP should be continuously on-site during all earth moving activities and must personally inspect unearthed soils. The EP must be independent of the Construction Manager, whose goal is to complete the project on time and within budget, not protect construction workers. The EP should work under the direction of the local oversight agency.

Other agencies have required similar measures in EIRs to protect construction workers when building projects on formerly contaminated sites. These include redevelopment of the Southern Pacific Railyard (City of Sacramento 12/93,10/94.11), the new federal courthouse in Sacramento (City of Sacramento 199412), and the Padres Ballpark in San Diego. (City of San Diego 10/99 and CCRP 7/99.13 A copy of the Environmental Oversight Plan that was implemented during the construction of the new federal courthouse in Sacramento to comply with a CEQA mitigation measure is included in Exhibit 1. The Sacramento plan was much more comprehensive than the one recommended here.

11 City of Sacramento, Final Environmental Impact Report, Railyards Specific Plan and Richards Boulevard Area Plan, Prepared by EIP Associates, December 1993; City of Sacramento, Final Supplemental Environmental Impact Report, Railyards Specific Plan and Richards Boulevard Area Plan, Prepared by EIP Associates, October 1994.

12 City of Sacramento, Final Environmental Impact Statement/Environmental Impact Report, Sacramento Federal Building United States Courthouse, City of Sacramento California, June 10, 1994.

13 City of San Diego, Master Workplan, Portion of the East Village Redevelopment Area Environmental Remediation, Volume I, Prepared by Centre City Development Corporation on Behalf of the Redevelopment Agency of San Diego, July 23, 1999, Appendix C and Centre City Development Corporation (CCRP), Final Subsequent Environmental Impact Report Ballpark, and Ancillary Development Projects and Associated Plan Amendments, October 1999.

Response:

As discussed above, Master Plan Commitment HM-2, as was described on page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR, states that LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials during construction. As part of this program, LAWA will identify the nature and extent of contamination in all areas where excavation, grading and pile-driving activities are to be performed. If warranted by the extent of contamination, as determined by the regulatory agency with jurisdiction, LAWA will conduct remediation prior to initiation of construction. The information will be used within the site-specific Health and Safety Plan to be generated prior to grading or excavation activities. The site-specific Health and Safety Plans will provide the necessary information to the construction workers to safely handle hazardous materials that may be present at the site including air monitoring procedures, personal protective equipment and

emergency notification and reporting procedures. The Health and Safety Plans will be completed in accordance with federal, state and local hazardous materials requirements.

Further detail of the site monitoring and hazardous materials handling requirements is not required for the purpose of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The Draft EIS/EIR and Supplement to the Draft EIS/EIR are overall program-level documents to investigate, analyze and disclose the potential impacts of the proposed action and alternatives to enable the FAA, City of Los Angeles and all responsible agencies to evaluate the potential environmental impacts associated with project approval. Any required guidance documents such as those described within Master Plan Commitment HM-2, will be completed as the Master Plan improvements move closer to construction, and after a specific Master Plan alternative has been selected.

AL00033-437

Comment:

II.C. Additional Mitigation Measures

The above comments identify new potentially significant impacts that have not been either discussed or mitigated in the DEIR. The DEIR should be revised to include analyses and recommend mitigation measures for these impacts. The following commonly required measures are feasible and should be included in HM-1 and HM-2:

- All utility and construction workers should receive 40 hrs of OSHA health and safety training. The Hazardous Waste Operations and Emergency Response ("HAZWOPER") regulations at 29 CFR § 1910.120 and Title 8 CCR § 5192 (FSA 10/14/99, p. 6) specifically cover workers at hazardous waste sites. However, these regulations would not normally apply to routine construction activities.
- Deed restrictions should be used to limit future property uses for all properties that are not remediated to single-family residential use standards.
- Perimeter air monitoring coupled with periodic risk assessments should be required throughout remediation and construction to assure that the public and workers are not adversely exposed.
- Site Health and Safety Plans and Risk Management Plans should be required for all construction sites that establish policies and procedures to protect workers and the public from unanticipated potential hazards. These may include, for example, the use of monitoring equipment during construction, emergency response procedures, personal protection equipment, and provisions for odor control.
- All utility corridors should be remediated to standards protective of utility workers before infrastructure improvements are made.
- Buffer zones should be required between active remediation sites and adjacent construction sites and/or occupied properties.
- Where migration of contaminated soil gases and groundwater in porous trench backfills is a potential hazard, impermeable barriers should be used to limit migration. These may include plugs of clay, cement, or a cement/bentonite mixture or use of in-place barrier collars around pipes.
- Sump pumps should preferentially be used for localized dewatering of shallow groundwaters to avoid widespread effects on groundwater flow patterns and distribution of contaminants in adjacent groundwaters. Deeper excavations should be encircled with interlocked sheetpiles to limit groundwater flow into the excavation.

Response:

Master Plan Commitment HM-2, as described on page 4-600 in Section 4.23, Hazardous Materials, of the Supplement to the Draft EIS/EIR, states that LAWA require all construction contractors to prepare site-specific Health and Safety Plans prior to initiation of grading or excavation. The site-specific Health and Safety Plans will provide the necessary information to the construction workers to safely handle hazardous materials that may be present at that particular site including air monitoring procedures, personal protective equipment, worker training and medical monitoring requirements, and emergency

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notification and reporting procedures. The Health and Safety plans will be completed in accordance with federal, state and local hazardous materials requirements. Further detail of the site monitoring and hazardous materials handling requirements will vary from site to site and their detailed discussion is not required for the purpose of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Any required guidance documents described within Master Plan Commitment HM-2, will be completed as the Master Plan improvements move closer to construction, and after a specific Master Plan alternative has been selected.

AL00033-438

Comment:

Terminal Building Capacity

The terminal concept for Alternative C offers new and spacious facilities. While the report indicates the passenger capacity of the new facilities is 89 MAP, it is likely that the expansion could handle more for several reasons. First, squeezing and crowding is always possible, just as the current facilities handle more passengers than designed.

Response:

Alternative C does provide increased terminal capacity to serve 89 MAP. Please refer to 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.

AL00033-439

Comment:

Second, significant changes are expected in passenger handling, such as boarding passes issued through the internet before passengers arrive at the airport, Southwest Airlines kiosk check-in that requires less space, Alaska Airlines mobile check-in personnel similar to car rental companies, enhanced passenger loading devices that reduce gate time and turnaround. Even remote passenger and baggage check-in such as Hong Kong's method allows for less space being occupied in a given area within the new terminal. National Airlines will check baggage at the departure airport and transfer it to their affiliated hotels in Las Vegas. With new techniques, the planned facilities are likely to handle more than the 89 MAP design target.

Response:

The most constraining component at an airport defines the capacity of the entire airport. The most constraining factor with Alternative C is the airfield, not the terminal as explained in Response to Comment AL00022-102. It is possible that the terminal facilities could serve more than 89.6 MAP (at a lower level of service than is desired) if there were no other constraints at the airport. In addition, the new security regulations implemented due to the terrorist attacks of September 11, 2001, terminals have gotten more congested and space requirements have increased.

AL00033-440

Comment:

Aircraft Load Factors

The traffic and utilization factors envision similar load factors as today and the use of larger aircraft. Therefore, the aircraft movements stay within the capacity of the runway system without the addition of runways or large increases in annual aircraft operations.

However, by observation of current airline boarding areas it is apparent that many flights depart with greater loads or even full with overbooking as is the case with the United Shuttle. As demand increases the load factor would logically increase to accommodate more passengers within the same aircraft and same terminal space. This would result in a higher MAP throughput that impacts ground vehicle traffic and emissions.

Response:

The load factor varies by day of the week and by time of the day. An aircraft is virtually full during the peak hours, but the load factor during the off-peak hours is low. The average load factors projected in the Master Plan are reasonable and considered the fluctuation. A high average load factor will not be a reasonable assumption since it is not sustainable.

AL00033-441

Comment:

Cargo Capacity and Night Aircraft Operations

Expansion of cargo facilities and removal and replacement of older cargo areas and buildings will improve efficiency in the handling of cargo. Larger volumes can be handled within fewer square feet of facilities. It appears that the analysis utilizes a 1:1 replacement method that does not recognize the greater throughput of modern cargo handling systems; therefore, more cargo than indicated may be processed in the new facilities.

If so, there would be a need for more cargo flights, which often occur at night and include some of the older aircraft. This potential effect is not reflected in the reported noise contours and emissions.

Response:

Comment noted. Please see Topical Response TR-MP-1 regarding cargo night operations, Topical Response TR-N-5 regarding nighttime aircraft operations, and Topical Response TR-N-6 regarding noise increases, in particular Subtopical Responses TR-N-6.2 and TR-N-6.3.

AL00033-442

Comment:

An Overlooked Alternative

While the report offers choices for development and different configurations, it does not explore options that fall between "nothing" and more complete accommodation of aviation needs. It is recognized that Los Angeles International Airport fills an important role in offering international services for passengers and cargo. The airport is a major crossroad for international and domestic passengers as they arrive and depart from the United States.

In order to maintain and optimize this role, another alternative should be analyzed. An "Optimum International Role" alternative which we will call "C+" would provide a focus of vital international traffic at LAX coupled with an increasing regional role for the traffic that can be readily accommodated at neighboring regional airports. This alternative would have LAX as the primary international airport supplemented by an increased focus on Ontario and El Toro for passengers and March and Southern California Logistics Airports for all cargo international flights.

As mitigation for the impacts of LAX expansion and to enforce the 89 MAP limit at the reported level of service, the airlines and users through their lease and use agreements would buy-in and partner the Optimum International Role concept. The expansion would take place only after the airlines and users formally agree to the concept. International cargo would be handled at LAX without constraint as long as it is belly cargo only. No all cargo flights would use LAX, since that activity would transfer to the other regional airports such as March and Southern California Logistics Airports.

International airline passengers would be handled at LAX, and the airline ticketing and reservation process would give priority and waitlist clearance to passengers using domestic flights to connect with international flights at LAX, and vice versa. Remaining space available would be allocated to domestic only passengers after the airlines determine international needs have been met.

Other airports in the region would handle the overflow of LAX domestic passengers as well as passengers that may more conveniently use those airports due to their proximity and improved service resulting from this C+ optimization scheme.

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This method would focus on the use of LAX for those activities that really need to occur at LAX and provide the greatest benefit and usefulness to those persons and businesses near LAX. Further, it allows for suitable development and service enhancement at the regional airports with increased convenience to those users.

Response:

Please see Response to Comment AL00033-37 regarding the commentor's proposed Optimum International Role Alternative.

AL00034 Salek, Sima Lennox School District 9/21/2001

AL00034-1

Comment:

Although the Lennox School District has undertaken the task of providing this response, it believes it to be procedurally incorrect and financially unfair for a school district of extremely encumbered financial resources to be burdened with the costs of conducting the initial research and analysis required to be in the EIS/EIR, but omitted.

Response:

Comment noted.

AL00034-2

Comment:

Based upon its review and analysis, the Lennox School District respectfully submits the EIS/EIR fails to satisfy the requirements of CEQA or NEPA. Accordingly, the Lennox School District respectfully requests LAWA substantially revise its EIS/EIR to specifically address the impacts of the proposed expansion alternatives discussed herein as well as provide for proposed mitigation at the Lennox schools for the benefit of the disproportionately affected children in attendance.

Response:

Please see Responses to Comments AL00034-3 through AL00034-63 regarding the specific concerns raised in the commentor's letter.

AL00034-3

Comment:

It is the position of the Lennox School District that any expansion of LAX will result in a significantly diminished educational environment for children within Lennox.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts to schools in Section 4.1, Noise, Section 4.2, Land Use, and Section 4.27, Schools.

AL00034-4

Comment:

In addition, the EIS/EIR does not consider the new security directives resulting from the September 11, 2001 terrorist attack that will affect traffic, parking, security and other airport operations. Thus, the Lennox School District requests that the EIS/EIR be revised and recirculated.

Response:

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, includes a specific emphasis

on safety and security provisions, including considerations that have come to the forefront relative to airport planning and operations following the terrorists attacks of September 11, 2001. The Supplement to the Draft EIS/EIR addressed the environmental impacts associated with Alternative D. As noted in the Supplement to the Draft EIS/EIR, the design of Alternatives A, B, and C can be refined to incorporate security provisions pursuant to federal requirements.

AL00034-5

Comment:

DISCUSSION
PART ONE
THE ENVIRONMENTAL JUSTICE ANALYSIS OF THE EIS/EIR VIOLATES CEQA

All of the alternatives presented by LAWA in its EIS/EIR disproportionately impact minorities. The students of the Lennox School District receive an unfair share of the burdens of LAX expansion, including educational and health impairments.

Had LAWA considered a regional solution as an alternative, including the use of El Toro, it would have found that the impact to minorities is much more equitable on a par with non-minority communities. An increase in regional airport capacity to meet demand would not disproportionately impact minorities if LAX expansion was capped and other regional airports absorbed most of the increased demand. Thus, the EIS/EIR is obligated to consider a regional solution as an alternative.

Response:

All LAX Master Plan alternatives were selected in accordance with the requirements identified in the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Please see Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for a detailed discussion of the alternative selection process. Detailed information concerning the environmental justice considerations for Alternative D can be found in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-EJ-3 regarding environmental justice and regional context. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-4 regarding Orange County air transportation demand, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. Regarding the comment about use of the former Marine Corps Air Station (MCAS) El Toro in Orange County, the potential use of that facility as a commercial airport is no longer considered to be an alternative for addressing regional aviation 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. Also, 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. The city of Los Angeles has no authority to develop a civilian airport at the former MCAS El Toro.

AL00034-6

Comment:

1. The EIS/EIR Is Bound By Environmental Justice Considerations.

LAWA is mandated by federal and state law to identify and address environmental justice issues in its environmental review. Executive Order 12898 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.)

State law similarly requires consideration of environmental justice issues in environmental impact reports. (California Public Resources Code § 72000.) The California Environmental Protection Agency

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is obligated 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." (Id.)

Thus, the EIS/EIR must (1) identify disproportionate, adverse environmental and health effects on minority and low income populations and (2) present mitigation measures to alleviate the unfair effects of its project alternatives upon minority and low income populations.

Response:

Comment noted. Full disclosure of the environmental effects of the Master Plan alternatives and of measures that address disproportionate environmental effects on minority and/or low-income populations was provided in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, 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. 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.

AL00034-7

Comment:

2. All Alternatives Considered Unfairly and Disproportionately Burden Minority Schools.

All of the alternatives presented by the EIS/EIR provide regional benefits by accommodating increased Southern California passenger and cargo load. (EIS/EIR, Purpose and Need, Section 2.1.) All of the alternatives, however, impose heavily concentrated burdens upon the area around LAX; burdens almost exclusively imposed upon minority communities. (EIS/EIR, Environmental Justice, Section 4.4.3.6, p. 4-430, Tables 4.4.3-2 to 4.4.3-7.)

The EIS/EIR admits that the alternatives presented disproportionately burden minority communities under federal and state environmental justice standards. (Id.) The EIS/EIR's own figures show that the minority and low income communities are the main areas impacted by airport expansion. The runway extension to the east, a provision common to all three alternatives, almost exclusively affects a minority population.

The Lennox School District is primarily a minority, low-income district. (EIS/EIR, Environmental Justice Technical Report, Figures 1 and 2, Table 3.) The student population of Lennox is over 95% Latino. (Lennox Demographic Information, Exhibit 1.) According to the 1990 United States census, the Lennox community is 93% Latino, 4% African-American, 2% Pacific Islander and 1% other. (Id.)

The median annual household income of \$25,353 in Lennox is by far the lowest of the entire Los Angeles South Bay region, and is substantially below the state average. The United States Secretary of Labor has indicated that the Lennox area has one of the highest unemployment levels of the nation. (Id.)

The Lennox School District exists in the geographic area identified by the EIS/EIR as unfairly, disproportionately affected by LAX expansion. (EIS/EIR, Environmental Justice, Section 4.4.3.6, p. 4-430, Tables 4.4.3-2 to 4.4.3-7.) The EIS/EIR admits, "Impacts on public schools associated with aircraft noise exposure would fall on schools that are located predominately within minority and/or low income communities." (EIS/EIR, Environmental Justice, Section 4.4.3.5, p. 4-423.) The EIS/EIR proposes significant, unmitigated and disproportionate educational and health impacts on the students of the Lennox School District.

Response:

See Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, regarding the Environmental Justice Program and mitigation proposals that address disproportionate environmental effects on minority and low-income communities, including school facilities. In particular please note Mitigation Measures MM-LU-1, MM-LU-3, and MM-LU-4, which address the impact of noise on schools. Please see Topical Response TR-HRA-4 regarding human health mitigation strategies and Response to Comment AL00034-38 regarding aircraft noise impacts and mitigation measures as they relate to schools in the Lennox School District.

AL00034-8

Comment:

- a. Significant impact of increased noise on education in Lennox schools.

All of the alternatives analyzed have significant negative impacts on the education of students in the Lennox School District. On July 12, 2001, Lennox Superintendent Dr. Bruce McDaniel observed that 14 airplanes flew over Jefferson School in 15 minutes. This is one plane every 1.07 minutes. Prior observations have confirmed this frequency of overflights at Jefferson School.

LAX expansion will only increase the number of airplanes flying over Lennox schools. These overflights interrupt teaching time. Accordingly, the impact of LAX expansion will clearly impact Lennox schools.

Table A5-7 of the Noise Technical Report of the EIS/EIR presents data which provides an indication of the time that the increased airplane overflights will take out of each school day. (See Part Three, *infra.*) Whelan School is anticipated to lose nearly an hour of learning time every day under Alternative C -- the preferred alternative. (EIS/EIR, Noise Technical Report, Table A5-7.) This amounts to approximately 185 hours, or 26 full school days, of lost education for students every school year. This is a significant impact that requires mitigation.

Lennox Middle School will lose nearly an entire period of teaching time a day (41.8 minutes) under Alternative B. (Id.) This is an increase of 33.6 minutes of lost educational time every day over the environmental baseline. Alternative B will take approximately one school day away from the education of over 2,000 students every two weeks just at this one school.

Response:

The commentor accurately describes a portion of the forecasts provided in the Draft EIS/EIR. However, the number of minutes that noise above various thresholds are expressed over a 24-hour period by the supplemental data provided in the document's Appendix D, not over a eight hour school day. Thus the total teaching time lost to aircraft noise would be much less. Until recently, CEQA levels of significance for aircraft noise have been based upon 65 CNEL, consistent with Federal standards. However, the California Court of Appeal has recently ruled that single event noise is of concern and should be addressed in CEQA documentation. The Supplement to the Draft EIS/EIR prepared for this project extensively addressed the effects of single aircraft events on school disruption (see Appendix S-C1, Supplemental Aircraft Noise Technical Report and Section 4.1, Noise, of the Supplement to the Draft EIS/EIR) by providing indications of the amount of time various schools experience interior noise levels above 55 and 65 decibel thresholds during an 8-hour school day. Interior noise levels were selected for evaluation because classroom settings are typically inside.

The more detailed analysis of single event noise relative to school disruption that was completed in conjunction with the Supplement to the Draft EIS evaluated the impacts at individual schools in the local area. As indicated in Table S31 of Appendix S-C1, the average number of minutes per average school day that Jefferson Elementary School would be exposed to aircraft noise levels exceeding 84 dBA (i.e., the exterior noise threshold of significance that would produce interior noise levels of 55 dBA) would range from 6 seconds under Alternatives A and 3.1 minutes under Alternative B. Whereas, Whelan Elementary School would be exposed to aircraft noise levels exceeding 84 dBA (i.e., the exterior noise threshold of significance that would produce interior noise levels of 55 dBA) would range from 1.9 minutes under Alternatives B and 6.1 minutes under Alternative D. Lennox Middle School would be exposed to aircraft noise levels exceeding 84 dBA (i.e., the exterior noise threshold of significance that would produce interior noise levels of 55 dBA) would range from 0 minutes under Alternatives C & D and 8.7 minutes under Alternative B. Schools significantly impacted by single event noise impacts will receive sound insulation to reduce interior noise levels to the applicable threshold noise level, unless the school is subject to an existing aviation easement. Please see the following portions of the Supplement to the Draft EIS/EIR: Appendix S-C, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report, regarding extensive evaluation of single-event noise impacts on school disruption. In addition please see Topical Response TR-LU-3 regarding Aircraft Noise Mitigation Program.

3. Comments and Responses

AL00034-9

Comment:

b. Significant impacts of increased noise on students.

As noted by the World Health Organization, noise interference with speech comprehension results in a large number of personal disabilities, handicaps and behavioral changes. Children in the process of language and reading acquisition are noted to be particularly vulnerable. Problems with behavior, concentration, fatigue, uncertainty and lack of self-confidence, irritation, misunderstandings and a decrease in work capacity have been reported by researchers, (World Health Organization, Environmental Health Information, Guidelines for Community Noise, "Adverse Health Effects of Noise," Section 3, April 2001, Exhibit 2.)

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.

AL00034-10

Comment:

A study conducted in 1976 in Highline School District looked at the relationship between school test scores for school grades 3-7 and 5-10 for children attending schools exposed to high levels of aircraft noise and other children attending quiet schools. (Maser, A. L., Sorensen, P.H., Kryter, K.D., and Lukas, J.S. Effects of Intrusive Noise on Classroom Behavior: Data From a Successful Lawsuit. West. Psychol. Assoc. San Francisco. April 1978, Exhibit 3.) While high academic-aptitude students in schools exposed to aircraft noise scored as well in standardized tests as their counter-parts in quiet schools, middle and especially low academic-aptitude students in noisy schools showed progressive deterioration in tests with continued school attendance relative to the students of equal aptitude in quiet schools. (Id.)

Response:

Comment noted. Please see Response to Comment AL00034-9.

AL00034-11

Comment:

A study of the impact of various levels of freeway noise on reading test scores highlighted the cumulative adverse effect of noise exposure on school children. (Lukas, J.S., DuPree, R.B. and Swing, J.W. Effects Of Noise On Academic Achievement And Classroom Behavior. FHWA/CA/DOHS-81/01 Office of Noise Control, California Dept. Of Health Services, Sacramento. 1981.) An apparent degradation in reading achievement with classroom noise that was noted for third-graders, was accelerated by the sixth grade. (Id.)

Response:

Comment noted. Please see Response to Comment AL00034-9.

AL00034-12

Comment:

Other research has demonstrated the link between chronic exposure to aircraft noise and many adverse effects including learning, motivational deficits, a significant decrease in total quality of life, increase in psychophysiological stress and susceptibility to helplessness. (Gary Evans and Lorraine Maxwell, "Chronic Noise Exposure and Reading Deficits. The Mediating Effects of Language Acquisition." Environment and Behavior, Vol. 29 No.5 September 1997 [learning deficits], Exhibit 4; Cohen S.,

Krantz, D.S., Evans G.W., Stokols D., and Kelly S., "Aircraft noise and children: Longitudinal and cross-sectional evidence on adaptation to noise and the effectiveness of noise abatement." J. Pers. Soc. Psychol. 40,331-345, 1981 [learning deficits]; Monika Bullinger et al., The Psychological Cost of Aircraft Noise for Children, 1998/99 [quality of life decrease], Exhibit 5; Gary W. Evans, Monika Bullinger and Staffan Hygge, "Chronic Noise Exposure and Physiological Response: A Prospective Study of Children Living Under Environmental Stress." Psychological Science, Vol.9, No. 1, January 1998 (psychophysiological stress), Exhibit 6; World Health Organization, Guidelines, supra. [helplessness].)

Response:

Please see Response to Comment AL00017-52. The types of noise-related health effects identified in the above studies are consistent with the information presented in the Draft EIS/EIR and Technical Report 14b. The studies, however, do not provide any scientific evidence or other basis for determining the nature, extent, or significance of noise-related health effects due to any of the Master Plan alternatives. However, 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. Regarding school disruption, mitigation is provided under Mitigation Measures MM-LU-3 and MM-LU-4 in the form of study of aircraft noise levels that result in classroom disruption and sound insulation for schools determined by the study or interim noise measurements to be significantly impacted. Schools in the Lennox School District are subject to the aviation easements, as well as prior noise mitigation payments, and so are not eligible for further mitigation. Please see Section 4.1, Noise, and Section 4.2, Land Use, of this Final EIS/EIR for a description of the various mitigation measures, derived from those contained within the Supplement to the Draft EIS/EIR, proposed to address significant noise impacts on sensitive surrounding land uses.

AL00034-13

Comment:

A 1980 study showed elevated blood pressure of children attending schools under the LAX flight paths compared to children in quiet schools. (Cohen S., Krantz, D.S., Evans G.W. and Stokols D., "Physiology, motivational, and cognitive effects of aircraft noise on children: Moving from the laboratory to the field." American Psychologist, 35:231-243. 1980.)

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

AL00034-14

Comment:

The EIS/EIR does not suggest that conditions resulting from an expansion of LAX will result in different circumstances than those discussed in the above-referenced studies.

Response:

As stated in the Draft EIS/EIR, "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 to each alternative. Such speculation is contrary to the purpose and requirements of NEPA and CEQA. Please see Response to Comment AL00017-52.

AL00034-15

Comment:

c. Significant impacts of increased pollution on students.

3. Comments and Responses

As noted by the United States Environmental Protection Agency ("USEPA"), exposure to ambient criteria and toxic pollutants resulting from anthropogenic emissions can result in a wide variety of health impacts. (USEPA, *The Benefits and Costs of the Clean Air Act, 1970 to 1990*. Prepared for U.S. Congress, October 1997, Exhibit 7.) Short-term health impacts can include eye, nose, and throat irritation; losses in hand-eye coordination (compensatory tracking); vigilance (detection of infrequent events); visual system sensitivity; and increased asthma attacks. (Seinfeld, John H., *Atmospheric Chemistry and Physics of Air Pollution*. John Wiley & Sons, New York, 1986.) Long-term exposures can result in increased mortality, susceptibility to pulmonary bacterial infection, irritation of the alveoli, emphysema, chronic bronchitis, reduced pulmonary function, losses in IQ, and cancer. (Id. and USEPA, *Benefits*, supra.)

Furthermore, there is good reason to believe that children could be more vulnerable to these effects. Because of growing concerns regarding children's increased susceptibility to environmental contaminants, the California Legislature passed the Children's Environmental Health Protection Act (SB 25), which requires the California Environmental Protection Agency ("Cal/EPA") to specifically consider children in setting Ambient Air Quality Standards and developing criteria for Toxic Air Contaminants ("TACs"). The law will require Cal/EPA to specifically evaluate available information on children's increased susceptibility to each of the TACs, and develop a list of up to five TACs that potentially have disproportionate impacts on infants and children.

As stated by Cal/EPA, children are considered to be at increased risk because of the rapid growth and development of their nervous, immune and reproductive systems, and because their organs and tissues are rapidly maturing. (Cal/EPA, *Air Pollution and Children's Health*. Fact Sheet by Office of Environmental Health Hazard Assessment, March 2001, Exhibit 8.) In addition, children experience greater exposure to ambient pollutants relative to their body weight, and children's specific activity patterns may contribute to an increased exposure to toxicants resulting from increased exercise and sporting activities. (Id.) Asthma has also been identified as a major problem in children, and some of the chemical emissions from LAX have been identified by Cal/EPA as resulting in an exacerbation of asthma (e.g., formaldehyde and acrolein). (Id.)

Furthermore, recent studies suggest that particulate matter ("PM") may exacerbate asthma and cause coughs and other respiratory symptoms in children. (Id.) Recent studies also suggest that prolonged exposure to PM may also affect the growth and functioning of children's lungs. (Id.) Researchers found that as children grow up in smoggier areas, there is a notable lag in lung function growth. (Id.)

Response:

The EPA report cited in the comment "The Benefits and Costs of the Clean Air Act, 1970 to 1990" was prepared to assess the effect of the Clean Air Act on the public health, economy, and environment. The analysis reviewed two regulatory scenarios. The "control scenario" reflected actual conditions resulting from the historical implementation of the 1970 and 1977 Clean Air Acts. The "no control" scenario reflected expected conditions based on the assumption that, absent the passage of the 1970 Clean Air Act, the scope, form, and stringency of air pollution control programs would have remained as they were in 1970. The "no control" scenario represented a baseline against which to measure the benefits of the effects of the Clean Air Act. The difference between the public health, air quality, and economic and environmental conditions resulting from these two scenarios represent the benefits and costs of the Act's implementation from 1970 to 1990 (USEPA, 1997). Results of the analysis indicated that the benefits of the Clean Air Act greatly outweighed the associated costs. Direct benefits of the Clean Air Act include reduced incidence from the baseline condition of a number of adverse human health effects, such as the health effects cited in the comment. The ambient air quality standards (AAQS) developed under the Clean Air Act, which have resulted in the benefits noted in the report, are thresholds of significance in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. National and state AAQS are set at levels to protect the health of even the most sensitive populations. Sensitive populations 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).

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 AAQS were used in the Air Quality Assessment section of the Draft EIS/EIR and Supplement to 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. Changes in AAQS, such as the recent revision of the AAQS for particulate matter, will be reflected in the SIP.

TAPs 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 TAPs through its air toxics program. TAPs are evaluated using risk assessment; estimated risks and hazards are compared to cancer and hazard thresholds to determine whether an impact is significant. As with AAQS, toxicity criteria developed for TAPs are protective of even the most sensitive subpopulations. Please see Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding Human Health Risk Assessment.

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

USEPA. 1997. The Benefits and Costs of the Clean Air Act, 1970 to 1990.

AL00034-16

Comment:

In April 2000, the South Coast Air Quality Management District ("SCAQMD") determined that Lennox had the highest concentrations of pollution of all communities neighboring LAX. (SCAQMD, Air Monitoring Study in the Area of Los Angeles International Airport, April 2000, Exhibit 9.) SCAQMD conducted testing for particulate matter ("PM") and volatile organic compounds ("VOCs") at fourteen sites around LAX. (Id.) SCAQMD found that the concentrations of these pollutants were highest on the east side of the airport, particularly at Felton School in Lennox. (Id.) As stated in the SCAQMD report:

"Samples collected in the initial study both north and south of the airport typically showed lower concentrations of VOCs than did samples collected east of LAX. This trend held for all mobile source related compounds except benzene, for which the areas east and south of the airport showed comparable values." (Id. at p. 11.)

The report goes on to state:

"Using benzene and 1,3 butadiene as the indicators of mobile source activity, clear trends in the west-to-east data emerge. Background sites to the north and south of LAX showed lower levels of VOCs than did sampling locations to the east of these sites. The background sites, on average, were also consistent with respect to the levels of contaminants found. VOC levels were elevated at all locations on the east side of Aviation Blvd. Levels were typically 2 to 3 times higher on average than they were at background locations." (Id. at p. 12.)

This pollution has a direct correlation to levels of respiratory illness in Lennox School District students. In fact, UCLA doctors conducting the UCLA Health Fair in Lennox have indicated that a higher percentage of children in Lennox have asthma and other respiratory ailments than in any other Los Angeles area community the Health Fair has visited.

SCAQMD found a strong correlation between airport activity and the pollutant levels found in Lennox. (Id.) LAX expansion will only exacerbate these problems. More children would have asthma and allergies than would without the LAX expansion. Children may have an increased risk of heart attacks and death.

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.

3. Comments and Responses

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.

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."

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.

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. 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. Again, simple observations of adverse effects cannot be used to establish a link between these effects and any source, including airport emissions.

AL00034-17

Comment:

Because of the anticipated environmental and related health impact of noise and pollution on the schools, students could potentially fall behind in their schooling, one class grade or more. Several students could have an impaired ability to retain information as a result of the impact. These students may not be able to grasp as much as other students and would not be able to process more advanced concepts in high school that build upon what they were supposed to, but did not, learn in elementary school.

Children in Lennox schools may have permanent learning disabilities that limit their career choices and quality of life. Students may have shorter lifespans and worse general physical health than other children at other non-impact schools. Students may have lifelong psychological weaknesses that would affect every aspect of their lives.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the

Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. 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 analysis for the LAX Master Plan. Such information and analysis are based upon the availability of new or updated information since publication of the Draft EIS/EIR in January 2001. The objective of the Human Health Risk Assessment was to determine the increased incremental health risk, if any, associated with the implementation of Master Plan alternatives for people working at the airport, and for people living, working, or attending school in communities near the airport.

Please refer to Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.6, Environmental Consequences, and Subsection 4.24.1.9, Level of Significance After Mitigation), of the Supplement to the Draft EIS/EIR for discussions of acute and chronic hazards for all build alternatives and the No Action/No Project Alternative. As described in these sections, health risks (cancer, non-cancer chronic and non-cancer acute) for the majority of nearby residents and school children would be lower for Alternative D than for 1996 baseline, Year 2000 conditions and the No Action/No Project Alternative. Alternative D provides for airfield improvements that would enable aircraft to move more efficiently, thereby reducing air pollutant emissions from aircraft operating in taxi/idle mode. This alternative also provides substantial improvements to the on-airport and off-airport surface transportation systems, thereby reducing air pollutant emissions from motor vehicles. Additionally, Alternative D, unlike the No Action/No Project Alternative, includes Master Plan commitments and mitigation measures to reduce air pollutant emissions. Please also see Topical Responses TR-HRA-2 and TR-HRA-3 regarding airport emissions and link with adverse health effects and human health impacts.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise.

The fundamental design of the LAX airfield substantially reduces noise impacts on local communities by taking advantage of the airport's ocean side location and predominant wind conditions. Roughly 95 percent of aircraft takeoffs at LAX and nearly all late-night takeoffs and landings are over the ocean, placing much of the 65 CNEL exposure pattern over the ocean away from populated areas. The four Master Plan build alternatives have been designed to continue this noise reduction advantage, taking maximum feasible advantage of the ocean takeoff noise impact reduction benefits. The aircraft noise analysis estimated that in 2015, three of the Master Plan development alternatives, Alternatives A, C, D, and the No Action/No Project Alternative would reduce the total number of people exposed to aircraft noise above 65 decibels of CNEL compared to the 1996 baseline and Year 2000 conditions. Alternative D would expose fewer people than the No Action/No Project Alternative by 1,300 people.

The keystone of aircraft noise mitigation measures at LAX is the LAWA sound insulation and property acquisition program which, to date, has expended or committed approximately \$400 million. This Aircraft Noise Mitigation Program (ANMP) would be expanded to include all areas significantly impacted by the proposed project.

Based on a recent California State Court decision interpreting CEQA, the Supplement to the Draft EIS/EIR analyzed potential school disruption caused by "single events." There are no regulatory standards or conclusive scientific evidence that define the threshold of significance relative to the effect of single event noise, as related to school disruption. In light of the 2001 CEQA court case ruling, LAWA developed, for the Supplement to the Draft EIS/EIR, thresholds of significance for single event noise effects based on careful review of existing literature and studies pertaining to single event noise effects. For the Supplement to the Draft EIS/EIR, LAWA established three thresholds of significance that consider the degree of speech intelligibility at various noise levels (in decibels), the amount of time during the school day that these threshold levels would be exceeded, and the interior noise levels for the peak hour of operation during the school day. Based on these thresholds of significance all future alternatives show significant single event impacts; however, as is the case with the CNEL comparisons, Alternative D would result in the fewest total impacts, in terms of disruptions of schools by single events.

LAWA has an established agreement with most public and a few private schools in the airport environs related to the amount of cumulative noise that may be generated from airport operations over each facility. Where those cumulative noise levels are exceeded (measured in decibels of CNEL) addition of the facility to the list of sound insulation eligibility may be warranted. Prior to the determination of sound treatment eligibility, however, a new study of the relationship between specific aircraft noise levels and childhood learning abilities would be undertaken by LAWA as part of the continuing environmental monitoring process obligated under CEQA. When that study is complete, the potential for additions to

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the sound insulation program for schools would be revisited as part of LAWA's continuing environmental management responsibilities.

AL00034-18

Comment:

Lennox School District is a disadvantaged, minority district. It already bears more than its fair share of harmful noise and life-threatening pollution. Each alternative of the LAX expansion would increase the noise and pollution exposure of Lennox students.

Response:

Section 4.2, Land Use, of the Draft EIS/EIR considers impacts on public schools associated with aircraft noise exposure. The distribution of impacts and effects on minority and low-income populations were considered in Section 4.4, Environmental Justice, of the Draft EIS/EIR. As indicated on page 4-423 of the Draft EIS/EIR, impacts on public schools associated with aircraft noise exposure would fall on schools that are located predominantly within minority and/or low-income communities, including Lennox students. As stated 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" pursuant to CEQA. In response to comments received on the Draft EIS/EIR and the events of September 11, 2001, Alternative D has been added as a build alternative designed to serve a future level of activity comparable to the No Action/No Project Alternative. Alternative D is described and analyzed in the Supplement to the Draft EIS/EIR. Please see Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR which provided new analysis and mitigation that addressed the potential for classroom disruption. More specifically, refer to Mitigation Measures MM-LU-3 and MM-LU-4. Also see the analyses presented in Section 4.4.3, Environmental Justice, Section 4.6, Air Quality, and Section 4.24, Human Health and Safety, of the Supplement to the Draft EIS/EIR.

AL00034-19

Comment:

The EIS/EIR only considers alternative configurations of LAX expansion from which to select a project. All of these alternatives, however, have devastating effects on the students of Lennox. Other alternatives exist that would not adversely, disproportionately affect the health and well-being of Lennox students. In order to comply with CEQA, LAWA is required to evaluate alternative methods of accommodating increased passenger and cargo traffic that do not have this significant and unjust environmental impact. (California Public Resources Code §§ 21002, 21002.1.)

Response:

Please see Response to Comment AL00034-5, regarding alternatives and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00034-20

Comment:

3. The EIS/EIR Violates CEQA By Failing to Consider Alternatives that Equitably Distributes Burden Among Populations.

Because of the significant and unmitigatable impact of all of the alternatives on minority and low impact communities, other alternatives must be explored. This is particularly true in light of the evidence that alternatives exist that do not disproportionately impact minority and low-income communities.

Regional approaches exist that could accommodate the increased passenger and cargo load. Studies indicate that, unlike the alternatives considered in the EIS/EIR, these alternatives do not disproportionately impact minorities and low-income communities. As Manuel Pastor, Jr. and Jim Sadd stated in Environmental Justice and the Expansion of Los Angeles International Airport, Occidental

College Environmental Science and Studies Program for Communities for a Better Environment Los Angeles (November 2000):

"[A] very large expansion of LAX expansion and/or a failure to convert El Toro to commercial use will pose significantly more burdens for minority populations in Southern California. By contrast, the most equitable scenario involves capping demand at LAX, shifting traffic to Ontario and the Inland Empire airports, and maximizing use of El Toro." (p. 1, Exhibit 10.)

Utilizing El Toro and other regional airports is reasonably considered to be feasible. (California Public Resources Code § 21061.1.) This is duly evidenced by the fact that the Southern California Association of Governments included the regional distribution of future air traffic in the adopted 2001 Regional Transportation Plan.

California Public Resources Code § 21002 states, in pertinent part:

"The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

California law requires the EIS/EIR to consider feasible alternatives that would substantially lessen the significant environmental effects of the project. LAWA failed to do so. An alternative that utilizes other airports in the Southern California region would have a more equitable-distribution of burdens among populations. The EIS/EIR, however, fails to consider a feasible regional alternative. Therefore, no current configuration of the proposed project should be approved. (Id.)

Response:

Please see Response to Comment AL00034-5 and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00034-21

Comment:

4. The EIS/EIR Violates CEQA By Failing to Provide Mitigation Measures for the Significant Environmental Justice Impacts.

The EIS/EIR is required to mitigate the environmental justice burden imposed by its alternatives to the extent feasible. (California Public Resources Code § 21002, 21002.1.) The EIS/EIR, however, fails to describe any mitigation measures to alleviate its impacts on schools. Instead, it proclaims that it will work with impacted communities to develop mitigation measures.

Response:

Mitigation measures addressing potential impacts on schools were provided in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Notably, see Section 4.4.2, Land Use (subsection 4.4.2.8), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. While mitigation measures were accounted for and discussed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the reason this section 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 minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

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

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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.

AL00034-22

Comment:

The Environmental Justice Task Force identified in the report, although potentially helpful, does nothing to satisfy the CEQA requirements for mitigation of identifiable impacts. (EIS/EIR, Environmental Justice, Section 4.4.3.1.) The EIS/EIR also discusses its current residential soundproofing program as a mitigation technique. (EIS/EIR, Environmental Justice, Section 4.4.3.5.) This program also has no mitigation effect upon schools.

Response:

LAWA's residential soundproofing program is an existing program proceeding independent of the LAX Master Plan, it is not mitigation being proposed to address the project. Mitigation measures addressing the environmental issues of concern were included in Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR. As relates to environmental justice, see Section 4.4.3, Environmental Justice (subsection 4.4.3.7), where under the heading "Aircraft Noise/Land Use Mitigation Measures," mitigation measures are summarized that address the relationship between learning and the disruptions caused by aircraft noise (MM-LU-3) and a mitigation measure, MM-LU-4, that would provide additional sound insulation for schools shown by MM-LU-3 to be significantly impacted by aircraft noise.

AL00034-23

Comment:

Feasible mitigation programs exist that would address the noise issues in minority and low income schools. Sound insulation can alleviate noise impacts inside classrooms. A working example of this is the Moffet School within the Lennox School District. This school, built with noise mitigation as a key component, is able to provide a decent learning environment despite its proximity to LAX.

To the extent that the significant noise impacts in Lennox schools are unmitigatable, LAWA can rebuild or relocate those schools. As the EIS/EIR states, "One public school in the Lennox Elementary School District would be exposed to outdoor noise levels that would remain significant after mitigation unless acquisition or relocation of the school is undertaken." (EIS/EIR, Schools, Section 4.27, p. 4-1219.) The impacts on Felton School, the identified school, can admittedly be alleviated by relocation; the EIS/EIR does not, however, state that it will do so. (See "Part Two", *infra*.) Particularly in light of its acknowledgment of its ability to mitigate its impact of Felton School, LAWA is obligated by CEQA to state its willingness to do so.

Response:

Please see Response to Comment AL00034-38 for a detailed discussion of impacts on schools within the Lennox School District. As shown in Table 47 in Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR, under Alternative B, Felton Elementary school would experience a 1.5 dB or greater increase within the 65 CNEL or greater noise contour. This noise increase would be considered significant. Mitigation to reduce aircraft noise impacts on residential and noise-sensitive uses was presented in subsection 4.2.8 of the Draft EIS/EIR as Mitigation Measure MM-LU-1, Implement Revised Aircraft Noise Mitigation Program. This mitigation would only apply to those impacted schools without existing aviation easements. Please see Response to Comment AL00034-45 regarding aviation

easements, prior noise mitigation payments and other provisions of the "Settlement Agreement" which resolve land use incompatibility and noise mitigation issues associated with airport operations and the Lennox School District. Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR included mitigation measures addressing noise and air quality. Also, in recognition of disproportionately high and adverse aircraft noise effects and potential air quality and human health effects on minority and low-income communities, benefits were also included in this section to help offset these effects. Please see Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Final EIR regarding mitigation measures and benefits that address disproportionately high and adverse effects on minority and low-income communities, as refined based on input gathered during circulation of the Supplement to the Draft EIS/EIR.

As further described in Section 4.2, Land Use of the Supplement to the Draft EIS/EIR and in Response to Comment AL00034-38, under LAWA staff's new preferred Alternative D, Felton Elementary school would not be newly exposed to significant noise levels as defined by: outdoor noise levels of 75 CNEL, the 65 CNEL noise contour, an increase of 1.5 dB within the 65 CNEL or greater contour, or single event noise levels that result in classroom disruption. Therefore, under Alternative D there would be no impact on this facility.

AL00034-24

Comment:

The same mitigation analysis that must be conducted for noise impacts must be conducted for air quality and other significant impacts of the proposed project upon minority and low-income populations, including Lennox.

To the extent feasible, LAWA is obligated to mitigate its impacts on the Lennox School District. (14 California Code of Regulations § 15126.4.) The EIS/EIR fails to do so. The failure to include such mitigation measures in the body of the EIS/EIR violates CEQA. (Id.) Accordingly, this EIS/EIR is fatally inadequate and must be revised to comply with CEQA.

Response:

Please see Section 4.4.3, Environmental Justice, of the Final EIR, including the Environmental Justice Program provided in subsection 4.4.3.7 which includes mitigation measures and benefits that address noise, air quality and other impacts of the project, including impacts on schools. Also see Response to Comment AL00034-38 regarding impacts on schools within the Lennox School District under the Master Plan alternatives and Response to Comment AL00034-35 regarding aviation easements, prior noise mitigation payments, and other provisions of the "Settlement Agreement."

Under LAWA staff's new preferred Alternative D, Felton Elementary school would not be newly exposed to significant noise levels and therefore no impact would occur on this facility. Please see subsection 4.6.8 of the Supplement to the Draft EIS/EIR and Topical Response TR-AQ-3 regarding air quality impacts and proposed mitigation measures.

AL00034-25

Comment:

PART TWO

THE EIS/EIR IMPROPERLY RELIES UPON AND OVER ESTIMATES THE EFFECT OF THE SETTLEMENT AGREEMENT

The EIS/EIR states in one volume:

"In the mid-1970's, the City of Los Angeles . . . [settled] a noise lawsuit. Under the terms of the settlements, each school in the public . . . systems that had participated in the lawsuit agreed to allow an aviation easement, deeming the school to be compatible with the airport under Title 21." (EIS/EIR, Land Use, Section 4.2, pp. 4-95, 4-96.)

Over a thousand pages later, the EIS/EIR states:

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"One public school in the Lennox Elementary School District would be exposed to outdoor noise levels that would remain significant after mitigation unless acquisition or relocation of the schools is undertaken." (EIS/EIR, Schools, Section 4.27, p. 4-1219.)

In a separate volume, and after thousands of consecutive pages, the EIS/EIR states:

"As presented in Technical Report 1, Land Use, eight public schools would be exposed to significantly high levels of noise by 2015 within the Inglewood Unified School District and Lennox Elementary School District. For those impacted schools not already considered compatible pursuant to California Code of Regulations, Title 21, mitigation in the form of sound insulation or acquisition and relocation would be provided." (EIS/EIR, Schools Technical Report, Section 17, p. 15.)

In these brief comments, located volumes apart, and without reference to one another, the EIS/EIR addresses and dismisses further consideration of the impacts upon the Lennox schools solely based upon the existence of the 1970's Settlement Agreement. (Amended Judgment and Final Order in Condemnation, Exhibit 11; the operative "Judgment and Final Order" is actually entitled Amended Judgment and Final Order in Condemnation, and referred to herein as "Settlement Agreement".)

Reading between the lines and volumes, what is apparent from these two statements is that LAWA has no intention of providing mitigation in any form to the Lennox schools as part of the expansion. As set forth below, this short shrift approach (1) fails to even consider the entirety of the terms of the Settlement Agreement; (2) fails to consider other surcharges which would be caused by an expansion not provided for by the express grant of the aviation easement in the Settlement Agreement; and (3) inappropriately avoids and dismisses a proper CEQA analysis.

Response:

The Lennox School District (District) schools were included in the analysis of cumulative and single event aircraft noise impacts. Since publication of the Draft EIS/EIR, a Supplement to the Draft EIS/EIR was prepared which evaluated an additional Master Plan alternative (Alternative D), incorporated information on Year 2000 conditions, and provided new analysis of single event aircraft noise levels that result in classroom disruption. This information was provided in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analysis provided in 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. Thresholds used to identify significant interior noise levels that result in classroom disruption included: 55 dBA Lmax, 65 dBA Lmax, and 35 Leq(h). As indicated in Section 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 significant aircraft noise impacts on schools. Under these measures, mitigation is provided to schools to further evaluate noise thresholds and to provide sound insulation for schools determined to be significantly impacted by single event and cumulative noise levels that result in classroom disruption.

See Response to Comment AL00034-38 for additional information regarding school facilities that would be subject to significant aircraft noise impacts under the Master Plan alternatives.

As to consideration of the document referred to by the commentor as the "Settlement Agreement," the Amended Judgment and Final Order entered by the Los Angeles Superior Court (Court) in January 1980, is provided as Attachment 4 of this Final EIS/EIR for review. Below is a brief description of some of the provisions of this document; however, the entirety of the "Settlement Agreement" and its exhibits were considered in preparation of the environmental analysis and should be reviewed for a more detailed and complete understanding. In the "Settlement Agreement," the Court:

(a) Established aviation easements for noise, vibrations and fumes from LAX operations (Aviation Easements); and

(b) Required payment of \$20,942,298 to five school districts, of which \$2,528,764.67 was assigned to the Lennox School District; and ordered that the Lennox School District use the full \$2,528,764.67 Noise Payment "to complete necessary construction or structural modifications of their facilities so as to reduce the noise levels in the classrooms resulting from the operation of commercial jet aircraft to and from and at Los Angeles International Airport," and to construct new facilities "in such a manner as to

exclude in the classroom any objectionable levels of noise created by the operation of [LAX] to the extent of the easements granted herein." (Noise Mitigation Payment.)

The "Settlement Agreement" states that "the purpose of the air easements granted hereunder for noise, vibrations and fumes over [the District's schools] running to the benefit of the [City] is for the purpose of resolving all questions between the parties arising out of the defendant City's operation of ... [LAX] and the consequent overflight or fly-by of jet aircraft with the attendant consequences of noise, vibrations and fumes with [the District's schools].

As to the comment on surcharges, LAWA has reason to conclude that the projected sound levels are well within the aviation easement limits and do not create a surcharge, based on the full provisions of the "Settlement Agreement." For example, the aviation easements are defined with "specific levels of noise exposure that will be permitted within the scope of the air easements." As ordered by the Court, the "criterion or quantitative measure of noise exposure used for the purpose of describing and establishing the air easements granted herein shall be the Community Noise Equivalent Level (CNEL) methodology." The aviation easements allow up to + 2 dB above 1970 aircraft noise levels and an additional +0.5 dB above the specified noise limits before the noise level is deemed to be a surcharge on the aviation easement. The aviation easements were awarded based on 1970 aircraft noise impacts with additional surcharge allowances for future construction and growth. The aircraft noise impacts in 1970 were much more extensive than identified under the 1996 baseline or Year 2000 conditions or projected to occur under the Master Plan alternatives. No schools within the Lennox Unified School District are projected to exceed the specified noise limits to the aviation easements under Alternatives A, B, C, or D.

Accordingly, the aviation easements and noise mitigation payment and other provisions of the "Settlement Agreement" resolve land use incompatibility issues and noise impacts at Lennox School District schools.

See also Response to Comment AL00035-23 regarding the "Settlement Agreement."

AL00034-26

Comment:

1. The EIS/EIR Fails to Consider All Possible Surcharges on the Aviation Easements.

In Section 4.2 of the EIS/EIR, Land Use, "Existing Incompatible Land Uses" are addressed. When discussing the historically high noise levels affecting the Lennox School District, the EIS/EIR refers to and relies solely upon the Settlement Agreement which granted LAWA an aviation easement over the referenced schools. (EIS/EIR, Land Use, Section 4.2, p. 4-95, fn. 72.) The EIS/EIR concludes:

"Easements for individual schools are considered burdened (incompatibility found) only if the school site's CNEL exceeds the 1970 level for each location by 0.5 CNEL. It is generally acknowledged that these increases have not occurred, since 65 and higher CNEL contours have been generally reduced since 1970 to the present."

This conclusion is incomplete and misstates the Settlement Agreement. The Settlement Agreement provides that the purpose of the air easements granted to LAWA are for "noise, vibrations and fumes" over the schools. (Settlement Agreement, page 3, lines 18-21). The Settlement Agreement further provides:

"Vibration and fume levels are not quantitatively described for the purpose of the distribution of the air easements but it is agreed that those levels of vibration and fumes which accompany the agreed-to CNEL values shall not be a burden of the easements." (Settlement Agreement, page 11, lines 1-5.)

Thus, upon its terms, the aviation easement may be burdened not only by an excess of the stipulated CNEL, but also by vibrations and/or fumes in excess of the 1970 values. Putting aside the question of whether vibration or fume levels may be quantitatively linked to CNEL values, the EIS/EIR does not address whether any expansion would result in a vibration and/or fume surcharge upon the aviation easement.

3. Comments and Responses

Response:

The avigation easements awarded by the Court under the terms of the "Settlement Agreement" expressly include vibrations and/or fumes from LAX operations. Please see Response to Comment AL000034-25, as well as Topical Response TR-N-8 regarding noise-based vibration effects, and Response to Comment PC00045-4 regarding fumes. See also Response to Comment AL00035-24.

AL00034-27

Comment:

2. The Impacts of the LAX Expansion Will Constitute a Surcharge on the Avigation Easements.

Under California law, the extent of an easement is determined by the terms of its grant. (California Civil Code § 806.) As stated by the California Supreme Court, an owner of an easement may not increase the use of the easement in any manner that imposes a new or greater burden on the servient tenement without the consent of the servient owner. (Colegrove W. Co. v. City of Hollywood (1907) 151 Cal. 425,429.) Further, "...it is well settled that 'both parties have the right to insist that so long as the easement is enjoyed it shall remain substantially the same as it was at the time the right accrued, entirely regardless of the question as to the relative benefit and damage that would ensue to the parties by reason of a change in the mode and manner of its enjoyment. [Citation omitted.]'" (Whalen v. Ruiz (1953) 40 Cal.2d 294,302.)

In fact, "California courts have set their faces firmly against . . . increases in the burden upon the servient tenement." (Wall v. Rudolph (1961) 198 Cal.App.2d 684,694.) Accordingly, "The requirement that the easement involve only a limited use or enjoyment of the servient land is a corollary of the nonpossessory character of the interest. If a conveyance purported to transfer to A an unlimited use or enjoyment of [a parcel of land], it would be in effect a conveyance of ownership to A [of the parcel of land], not of an easement." (Id., at p. 697; emphasis in original.)

The avigation easement granted by the Lennox School District to LAWA anticipated an increase in aircraft operations at LAX up to 40,000,000 passengers annually. (Settlement Agreement, Exhibit F, paragraph B.) The expansion alternatives discussed in the EIS/EIR predict an increase in aircraft operations to accommodate at least 89,600,000 passengers annually. (EIS/EIR, Alternatives, Table 3-2.) Moreover, the amount and frequency of airplane traffic will also necessarily increase under the proposed expansion to accommodate the predicted increase in cargo to a total of 2,275,236 tons per year. (Id.)

Response:

The avigation easements awarded by the Court cover all aircraft operations at LAX. The Court established the avigation easements "for the purpose of resolving all questions between the parties arising out of the defendant City's operation of " [LAX] and the consequent overflight or fly-by of jet aircraft with the attendant consequences of noise, vibrations and fumes with [the District's schools]. The Court, in awarding the Avigation Easements, did not state that the Easements were restricted to operations carrying a certain number of passengers per year. Rather, the Court defined the Avigation Easements by "specific levels of noise exposure that will be permitted within the scope of the air easements." Due to changes in aircraft standards, noise exposure levels have declined since 1970 notwithstanding any increase in the number of passengers per year. Accordingly, the noise exposure limits for the avigation easements are not projected to be exceeded by any of the LAX Master Plan build alternatives. No schools within Lennox School District are expected to exceed the specified noise limits to the avigation easements under the LAX Master Plan buildout alternatives.

With respect to the passenger level and increase in cargo level referenced in the comment, these levels were forecast for Master Plan Alternative C. Under LAWA Staff's new preferred Alternative D, passenger levels and cargo levels are less than those previously forecast under Alternatives A, B, and C. As stated in Section 3.2 of the Supplement to the Draft EIS/EIR, Alternative D forecasts a passenger level of 78.9 million annual passengers (MAP) and a cargo level of 3.1 million annual tons (MAT), which are nearly equivalent to the 78.7 MAP and 3.1 MAT forecasts under the No Action/No Project Alternative.

Although passenger levels have increased under 1996 baseline and Year 2000 conditions from 1970 levels of 40 MAP, and are projected to increase under the Master Plan alternatives from 1970 levels or

40 MAP, the Amended Judgment and Final Order (referred to in the above comment as the "Settlement Agreement") provides a broad grant of aviation easement which expressly states that it can be surcharged only by unreasonably exceeding specified CNEL limits. The CNEL limits that would result in a surcharge, in turn, are greater than the noise levels associated with use of 1970 aircraft at either 1970 passenger levels or 40 MAP. The aviation easements are defined to allow a 2 dB increase above 1970 aircraft noise levels and at least an additional 0.5 dB above the specified noise limits before the aviation easement is considered surcharged. Therefore, the burden of the aviation easement is determined by noise levels, rather than passenger levels. Moreover, since 1970 aircraft noise levels were much more extensive than identified under 1996 baseline or Year 2000 conditions or than projected to occur under the Master Plan alternatives, the aviation easements would not be surcharged as a result of Master Plan implementation. Increased airport operations do not directly correlate to increased noise levels, as further described in Subtopical Response TR-N-6.2. Please also see Response to Comment AL00035-25.

AL00034-28

Comment:

An acute example of the impacts from the anticipated increase in flight frequency may be found in Table A5-7 of the Noise Technical Report in the EIS/EIR. As a result of LAX operations measured in 1996, speech is interrupted at Lennox Middle School for 8.2 minutes per day. If LAX expands its operations under Alternative B, speech is projected to be interrupted at Lennox Middle School for 41.8 minutes a day. This increase accumulates to teaching being suspended every day for nearly a class period a day, or considering it another way, every student having nearly one day of school eliminated approximately every week.

Response:

The Aircraft Time Above 75 decibels is based over a 24-hour period, not over a 8-hour school day. Thus the total time above 75 dB during school hours would be much less. Please see the following portions of the Supplement to the Draft EIS/EIR: Appendix S-C, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report, regarding extensive evaluation of single-event noise impacts on school disruption. The more detailed analysis of single event noise relative to school disruption that was completed in conjunction with the Supplement to the Draft EIS evaluated the impacts at individual schools in the local area. As indicated in Table S31 of Appendix S-C1, the average number of minutes per average school day that Lennox Middle School would be exposed to aircraft noise levels exceeding 84 dBA (i.e., the exterior noise threshold of significance that would produce interior noise levels of 55 dBA) would range from 0 under Alternatives C and D to 8.7 under Alternative B. In addition, please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program. Schools significantly impacted by aircraft noise impacts will receive sound insulation to reduce interior noise levels to the applicable threshold noise level, unless the school is subject to an existing aviation easement.

Schools without aviation easements that are determined to be subject to significant aircraft noise impacts are eligible for mitigation. Mitigation Measure MM-LU-1 provides mitigation for schools determined to be significantly impacted by aircraft noise, excluding schools with aviation easements. Mitigation may take the form of sound insulation or relocation. Further mitigation is provided under MM-LU-3 and MM-LU-4 in the form of study of single event or cumulative noise levels that result in classroom disruption.

AL00034-29

Comment:

Thus, even if the "noise, vibration and fume" levels resulting from the proposed expansion are less than what they were in 1970, the increase in frequency of air traffic through the aviation easement will constitute a material surcharge upon the easement. This will, at the least, require the Lennox School District's consent, and realistically also require further mitigation in the form of additional sound attenuation measures at each of the affected school sites.

3. Comments and Responses

Response:

See Response to Comments AL00034-25, AL00034-26, and AL00034-27 above. Please also see Subtopical Response TR-N-3.3 regarding increase in frequency of air traffic under the Master Plan alternatives. This increase in air traffic was considered in the noise modeling approach used to predict noise levels that would result from development of the No Action/No Project Alternative and Alternatives A, B, C, and D. As noted previously, Alternative D would result in comparable airport activity as the No Action/No Project Alternative. As described in Response to Comment AL00034-25, above, the Supplement to the Draft EIS/EIR includes a new analysis of noise impacts on schools as a result of single event or cumulative noise levels that result in classroom disruption and provides mitigation measures to address schools newly exposed to high aircraft noise levels. Please also see Response to Comment AL00035-27.

AL00034-30

Comment:

The EIS/EIR admits that its noise impacts upon Felton School would be significant and unmitigatable. (EIS/EIR, Schools, Section 4.27, p. 4-1219.) To interpret this impact as within the scope of that allowed by the Settlement Agreement would violate established easement law and would be repugnant to public policy.

Response:

Felton School would be exposed to outdoor noise levels greater than 75 CNEL only under Alternative B, which is not LAWA Staff's preferred alternative. Furthermore, as described in Response to Comment AL00034-35, as a result of the aviation easement and prior noise mitigation payment this school is considered compatible with the airport. As described under Response to Comment AL00034-38, below, Felton School would not be newly exposed to high single event noise levels that result in classroom disruption under any of the alternatives.

AL00034-31

Comment:

Therefore, the EIS/EIR must further consider, and LAWA must mitigate, the impact upon the existing or future incompatible land use resulting from any expansion, as the Judgment and Final Order will not, as suggested, conclusively control the question given the anticipated substantial surcharge upon the aviation easement and resulting burden to the servient tenement, Lennox School District schools.

Response:

Please see Response to Comments AL00034-25, AL00034-27, and AL00034-29. The use of an aviation easement to achieve land use compatibility is supported by Compliance with Federal Obligations by the Naples Airport Authority, F.A.A. No. 16-01-15 (March 10, 2003); California Code of Regulation Title 21, Sections 5014 and 5037; and the 2001 Caltrans Airport Land Use Handbook, pp. 3-25, 7-36. Title 21 and the 2001 Caltrans Handbook are further described in Section 4.2, Land Use of the Draft EIS/EIR and Supplement to the Draft EIS/EIR with supporting technical data and analysis provided in Technical Report 1 of the Draft EIS/EIR and Technical Report S-1 of the Supplement to the Draft EIS/EIR. See also Response to Comment AL00035-28.

AL00034-32

Comment:

3. The Existence of the Settlement Agreement is Irrelevant to Whether LAWA Must Comply With CEQA.

The California Environmental Quality Act ("CEQA") is a state environmental law applicable to public agency decisions to authorize projects that could have an adverse impact on the environment. The purpose of the CEQA Environmental Impact Report requirement is to provide the information needed to make informed decisions in the selection and authorization of projects. (California Public Resources Code §§ 21001(g), 21002, 21061; 14 California Code of Regulations § 15121.)

The appropriate project alternatives, significant impacts and related mitigation measures must be analyzed in the EIS/EIR. (California Public Resources Code §§ 21002.1, 21100.) In this instance, the EIS/EIR must identify measures that would mitigate the impacts of the various alternatives on Lennox School District in general and impacted school facilities in particular. (Id.) Without this analysis, the selection process is flawed and an informed decision cannot be made.

The Settlement Agreement between the City of Los Angeles and various school districts does not affect this state mandated analysis. The EIS/EIR claims that the Settlement Agreement operates to mitigate significant impacts upon schools and students. (EIS/EIR, Land Use, Section 4.2.) This claim is in direct contradiction to the requirements of CEQA. (14 California Code of Regulations § 15126.4.)

CEQA requires LAWA to conduct and publicly disclose its analysis of impacts upon affected schools and of measures that can mitigate those impacts, if any. (Id.) Thus, to comply with CEQA, the EIS/EIR must be revised to conduct a thorough analysis of impacts upon schools and of measures that can be taken to mitigate those impacts. (Id.)

Response:

Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided extensive analyses of significant impacts pertaining to noise and land use compatibility. Supporting technical data and analysis are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C1 and Technical Report S-1 of the Supplement to the Draft EIS/EIR. The analysis of noise impacts for all Master Plan alternatives, as well as the No Action/No Project Alternative, included schools subject to the Amended Judgment and Order referred to in the comment as the "Settlement Agreement." For example, these impacts are presented for LAWA Staff's new preferred Alternative D in Table S51 of the Supplemental Land Use Technical Report (summarizing schools significantly impacted by high noise levels or significant noise increases) and Table S4.2-18 (summarizing schools significantly impacted by single event and cumulative noise levels). Response to Comment AL00034-38 provides additional information regarding the Lennox schools that would be newly exposed to significant noise levels.

Please see Response to Comment AL00034-25 for a description of the noise mitigation payment ordered by the Court to mitigate noise and other impacts of aircraft operations in Lennox classrooms, the aviation easements previously awarded by the Court with respect to the Lennox schools, and the full provisions of the "Settlement Agreement." See also Response to Comment AL00035-29.

AL00034-33

Comment:

PART THREE

THE NOISE ANALYSIS OF THE EIS/EIR IS INADEQUATE¹

1. The EIS/EIR Under-Predicts Noise Impacts To Lennox School District Facilities.

a. The EIS/EIR should use year 2000 for the Environmental Baseline not 1996 (which includes phased-out noisier "Stage 2" aircraft).

From Table 4 of the Noise Technical Report, it is evident that the 1996 "baseline" condition used for the EIS/EIR includes noisier "Stage 2" aircraft. Phase-out of these noisier aircraft was completed at the end of 1999 under the directive of the FAA. The "environmental baseline" is not therefore representative of the current conditions, which have benefitted from the enforced phase-out of noisy Stage 2 aircraft.

1 For the purpose of these comments our use of the terms "Decibel", "dB" and "dB(A)" are all intended to mean A-weighted decibels.

Response:

Please see Topical Response TR-N-1, regarding noise modeling approach in particular Subtopical Response TR-N-1.3. Please see Appendix S-C, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft

3. Comments and Responses

EIS/EIR regarding analysis of single-event noise impacts. Please also see Topical Response TR-GEN-1 regarding the environmental baseline.

AL00034-34

Comment:

b. The Noise Analysis Appears To Under-Predict Aircraft Noise and Impacts In Lennox.

The noise model used for all noise analysis appears to under-predict aircraft noise in Lennox. Since "new exposure to CNEL 65" is used as a threshold of significance to assess aircraft noise impact, the study's under-predication of noise levels leads to an under-prediction of impact.

It is understood that the EIS/EIR's aircraft noise predictions for "environmental baseline" and future scenarios were not corrected for noise monitoring results. The comparison of computed and measured noise levels based upon 1996 conditions presented in Table 6 of the Aircraft Noise Technical Report showed that for all three of the Noise Management Bureau's noise monitoring sites in Lennox, the model under-predicted actual measured noise levels. Thus, the report's reliance on under-predicted data results in an under-assessment of the real aircraft noise impact.

Accordingly, the EIS/EIR should include analysis of the anticipated noise impact upon Lennox schools based upon actual noise monitoring data.

Response:

The commentor describes a portion of the forecasts provided in the Draft EIS/EIR and is correct that noise monitoring was not correlated with the alternatives. 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 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 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. According to the 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 difference is acknowledged and described in Topical Response TR-N-1, in particular Subtopical Response TR-N-1.1, INM calculated noise levels compared to noise levels measured in the field and Subtopical Response TR-N-1.2 and in detail 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, and Section 2.1.7, Relationship of 2000 Contours to 4th Quarter 2000 Report Contours, in Appendix S-C1, Supplemental Aircraft Noise Technical Report of the Supplement to the Draft EIS/EIR.

AL00034-35

Comment:

2. The Final EIS/EIR Should Include Supplementary Analysis to Assess the Impact of the Project Alternatives on Interference with Speech Communication in Classrooms.

The Final EIS/EIR should include supplementary analysis, using noise parameters more appropriate to the assessment of aircraft noise impact on schools, including use of "time above" ("TA") metrics, to assess the impact of the project alternatives on interference with speech communication in classrooms.

The Health Effects of Noise Technical Report acknowledges the potential impact of aircraft noise on schools with the following statements:

"Speech communication interference may reduce understanding of conversations in classrooms and classroom teaching"

"Adequate speech communication is important in classroom... settings"

The EIS/EIR, however, fails to include any specific analysis to assess the severity of impact on speech interference at schools resulting from the Project Alternatives.

Speech interference is basically a masking process in which simultaneous, interfering noise (aircraft noise in this case) renders speech incapable of being understood. The fact that occurrence of speech interference in the classroom is a function of several variables including the loudness of the speaker's voice, speaker-to-listener distance and the level of sound insulation provided by the school building, complicates the identification of a definitive outdoor aircraft noise level that would result in speech interference in the classroom.

The Health Effects of Noise Technical Report suggests that "some interference with classroom activities can be expected at outdoor levels of 77 to 85dBA." According to the report, however, this statement is based upon an assumed speech level of 65 dB, which the report describes as "the level of normal conversation." Conversational speech has a sound level of approximately 65 dB(A) (or less) at a distance of 1 meter (3.281 feet) from the speaker. The report therefore apparently fails to consider the fact that the level of the teacher's voice will be at a significantly lower level at the rear of the classroom, due to the reduction of sound level with increasing distance from a source. As a result, the Lennox School District is of the opinion that speech interference in classrooms is likely to occur with outdoor noise levels significantly less than 85dB(A).

The World Health Organization states that for speech to be intelligible when listening to complicated messages, such as in schools, interfering noise should not exceed 35 dB(A). (World Health Organization, Guidelines, supra.) Even assuming the classrooms in question operate with closed windows and doors (which would assume the existence of air-conditioning in the classrooms) and have been provided with sound attenuation to achieve a minimum noise level reduction of 25dB (as required under the Land Use Compatibility Guidelines of the Federal Aviation Regulations for schools exposed to aircraft noise in the CNEL 65 to 70. range), this would suggest that any occurrence of outdoor noise levels exceeding 60dB(A) is likely to result in speech interference within classrooms.

The EPA identified a peak noise level of 45dB(A) as being a threshold above which interference with typical conversational speech becomes noticeable. (USEPA, Information On Levels Of Environmental Noise Requisite To Protect Public Health And Welfare With An Adequate Margin Of Safety. EPA Report 550/9-74-004, 1974, Exhibit 12.) Applying similar logic, and again assuming 25 dB sound insulation, this would suggest speech disturbance would be noticeable for typical conversational speech when outdoor noise levels exceed 70dB(A).

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 review of numerous studies and research related to school disruption from aircraft noise referenced in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and associated Appendices and Technical Reports, LAWA developed three thresholds of significance to analyze the significance of aircraft noise impacts on schools for the four build alternatives. The development and application of these thresholds relative to the four build alternatives were presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR and Section 6.2.1 of Appendix S-C1, Supplemental Aircraft Noise Technical Report. Additionally, because current studies of aircraft noise and the ability of children to learn may not have resulted in development of a statistically reliable predictive model of the relative effect of changes in aircraft noise levels in learning, Mitigation Measure MM-LU-3 provides for further comprehensive study of any such measurable relationship.

AL00034-36

Comment:

It should be emphasized that the noise thresholds for speech interference discussed above are instantaneous sound pressure levels. The duration and severity of speech interference cannot be

3. Comments and Responses

predicted from CNEL values. This is because CNEL values are derived by time-averaging the high noise levels occurring during potentially disruptive events with sound levels during quiet periods without aircraft activity. In addition, in the derivation of CNEL levels, penalties are added to noise levels occurring during the evening time and at night. Consequently a noise analysis conducted solely in terms of CNEL levels cannot be used to quantify the impact associated with increased speech interference in classrooms.

By selecting a threshold for external noise, above which the occurrence of speech-disturbance in classrooms is likely, and by calculating the cumulative length of time per day that the threshold is exceeded, the likely impact of aircraft noise upon speech interference in the classroom can be quantified. This daily cumulative duration for which noise exceeds a certain threshold is known as a "time above" metric.

The value of TA metrics is acknowledged on page 2 of the Noise Technical Report. The TA measure is described as "helpful in determining the exposure of certain noise uses (schools, sleeping quarters, religious facilities) to extended periods of noise at various levels that may be disruptive to the activity occurring there." The Noise Technical Report presents results of some TA analysis, including Table A5-7, which presents time above 75 Decibels. The body of the EIS/EIR, however, contains no noise impact analysis using TA.

Reviewing the range of thresholds for speech interference discussed above, it appears likely that an external noise level exceeding 75 dB(A) at a school will result in speech interference within classrooms. Table 1 below, presents "time above" data for Lennox schools extracted from Table A5-7 of the Noise Technical Report.

School	Env. Baseline	No Project	Alt A	Alt. B	Alt. C
Felton School (PBS035)	46.0	45.5	31.6	49.4	47.5
Whelan School (PBS035)	52.1	51.7	47.0	33.5	56.1
Jefferson School (PBS055)	26.0	26.3	14.1	45.3	26.5
Buford School (PBS019)	41.6	38.2	44.7	25.8	42.9
Lennox Middle School (PBS091)	8.2	5.2	7.7	41.8	5.2
Moffet School (PBS 102)	0.5	0.7	1.2	30.1	0.7

Table 1 Aircraft Noise Time Above 75 Decibels In Minutes, for the year 2015.

The results presented in Table 1 suggest that even with the elevated 1996 "baseline" used in the report, the cumulative duration of speech interference in classrooms per day, for every Lennox School will increase from "baseline" levels under at least one project alternative scenario.

Two likely causes of the predicted increase in the duration of speech interference in Lennox classrooms are:

(a) With reference to Table 4.1-7 of the EIS/EIR, in 2015, the forecast number of operations by heavy jets more than doubles compared to the environmental baseline under Alternatives A, B and C. The EIS/EIR concedes on p. 4-56 that the substitution of heavier aircraft for existing lighter aircraft would increase loudness of individual events. This is also consistent with the FAA's policy, which generally permits higher noise levels to be produced by heavier aircraft.

(b) This increase in the noise level associated with individual events would be compounded by the extension of runways to the east by 2,650 feet or more under Project Alternatives A, B and C. Moving runway ends eastwards would presumably lead to reduced aircraft altitude for some aircraft using these runways when flying over Lennox schools.

Response:

The Aircraft Time Above 75 decibels is based over a 24-hour period, not over a 8-hour school day. Thus the total time above 75 dB during school hours would be much less. Please see the following portions of the Supplement to the Draft EIS/EIR: Appendix S-C, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report, regarding extensive evaluation of single-event noise impacts on school disruption. The more detailed analysis of single

event noise relative to school disruption that was completed in conjunction with the Supplement to the Draft EIS evaluated the impacts at individual schools identified by the commentor. As indicated in Table S31 of Appendix S-C1, the average number of minutes per average school day that would be exposed to aircraft noise levels exceeding 84 dBA (i.e., the exterior noise threshold of significance that would produce interior noise levels of 55 dBA) would be far less than those identified by the commentor. The amount of time that Felton Elementary School would be exposed to aircraft noise levels exceeding 84 dBA would range from 1.5 minutes under Alternatives A to 8.8 minutes under Alternative B. Whelan Elementary School would be exposed to aircraft noise levels exceeding 84 dBA ranging from 1.9 minutes under Alternative B to 6.1 minutes under Alternative D. Jefferson Elementary School would be exposed to aircraft noise levels exceeding 84 dBA ranging from 0.1 minutes under Alternative A to 4.6 minutes under Alternative B. Buford Elementary School would be exposed to aircraft noise levels exceeding 84 dBA ranging from 0.3 minutes under Alternatives B to 4.0 minutes under Alternative A. Lennox Middle School would be exposed to aircraft noise levels exceeding 84 dBA ranging from 0 minutes under Alternatives C and D to 8.7 minutes under Alternative B. Moffet Elementary School would not be exposed to aircraft noise levels exceeding 84 dBA under all four build alternatives. Oak Street Elementary School would be exposed to aircraft noise levels exceeding 84 dBA ranging from 4.6 minutes under Alternatives C to 8.6 minutes under Alternative D. Morningside High School would not be exposed to aircraft noise levels exceeding 84 dBA under all four build alternatives. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program. Schools without aviation easements that are determined to be subject to significant aircraft noise impacts are eligible for mitigation. Mitigation measure MM-LU-1 provides mitigation for schools determined to be significantly impacted by aircraft noise, excluding schools with aviation easements. Mitigation may take the form of sound insulation or relocation. Further mitigation is provided under MM-LU-3 and MM-LU-4 in the form of study of single event or cumulative noise levels that result in classroom disruption.

AL00034-37

Comment:

When speech interference occurs in the classroom, possible outcomes include students failing to understand important information from the teacher, loss of concentration during study, or interference with standardized testing. According to Table 1 above, based upon an external speech-interference threshold of 75dB(A), the loss of teaching time in the worst case would accumulate to nearly one hour per school day (Whelan School under Alternative C). The consequences of the predicted increase in the duration of speech interference in Lennox School District classrooms is therefore considered to be a very serious noise impact that does not receive adequate attention in the EIS/EIR.

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.

AL00034-38

Comment:

3. The Noise Mitigation Measures (If Any) Specifically Proposed for Noise Impacted Lennox School District Facilities Are Not Clearly Stated In The EIS/EIR.

According to Title 14 California Code of Regulations, Chapter 3, Guidelines for Implementation of CEQA:

"An EIR shall describe feasible measures which could minimize significant adverse impacts... the discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR." (14 California Code of Regulations § 15126.4.)

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Specific Lennox School District schools for which the Schools Technical Report declares an aircraft noise impact are denoted with an "X" in Table 2 below:

School	Alternative A	Alternative B	Alternative C	No Project
Felton School		X		
Jefferson School		X		
Moffett School		X		
Whelan School				
Lennox Middle School	X	X		
Buford School		X		

TABLE-2. Lennox School District Facilities On Which the EIS/EIR Predicts an Aircraft Noise Impact.

In Section 4.1.9.1 of the EIS/EIR, noise mitigation measures are discussed. These all relate to noise mitigation at source only, and the measures are nearly all dismissed as impractical. Under Section 4.1.8, the EIS/EIR acknowledges that "a significant and unavoidable impact from aircraft noise is expected."

The prospect that LAWA might be proposing to mitigate the significant noise impacts at schools by providing additional sound insulation is raised on pages 11 and 15 in the Schools Technical Report included with the EIS/EIR. The report states:

"For those impacted schools not already considered compatible pursuant to the California Code of Regulations, Title 21, mitigation in the form of sound insulation or acquisition and relocation would be provided."

This idea seems to be dismissed within body of the EIS/EIR itself. On page 4-96, the EIS/EIR states that "63 public schools within 5 school districts.... have aviation easements and are therefore considered to be compatible." The EIS/EIR names Lennox School District among those parties granting these aviation easements. By this statement the EIS/EIR appears to be implying that LAWA does not propose to provide additional sound insulation to the impacted schools as a mitigation measure.

As required by CEQA, the Lennox School District requests a more explicit statement be provided within the final EIS/EIR with respect to what noise mitigation measures are required by any expansion, and what noise mitigation measures LAWA proposes, if any, for Lennox School District schools.

Response:

Mitigation to reduce aircraft noise impacts on residential and noise-sensitive uses was presented in Section 4.2, Land Use (subsection 4.2.8), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR as mitigation measure MM-LU-1. As specified therein, mitigation measure MM-LU-1 would only apply to those impacted schools not already considered compatible pursuant to the California Code of Regulations, Title 21 (it being understood that, in each instance land use compatibility is achieved through application of the aviation easements, the District's noise mitigation obligations apply). Please see Responses to Comments AL00034-25 and AL00034-31 for discussion of land use compatibility effects of the aviation easements, noise mitigation payment and other provisions of the Settlement Agreement. As stated in Section 4.2.8 and mitigation measure MM-LU-1 and Section 4.27, Schools, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, for schools considered incompatible land uses with significant impacts, sound insulation or relocation would be provided. Also under mitigation measure MM-LU-1, prior to the completion of the study referenced in MM-LU-3, schools identified as being newly exposed to significant impacts from high single event noise levels in mitigation measure MM-LU-4, that are not subject to an existing aviation easement, would be incorporated into the ANMP.

Since publication of the Draft EIS/EIR, a Supplement to the Draft EIS/EIR has been prepared to evaluate an additional Master Plan alternative (Alternative D), incorporate information on Year 2000 conditions, and provide additional analysis of single event aircraft noise levels that result in classroom disruption. This information was provided in Section 4.1, Noise, and Section 4.2, Land Use of the Supplement to the Draft EIS/EIR, with supporting technical data and analysis provided in Appendix S-C and Technical Report S-1. Thresholds used to identify significant interior noise levels that result in classroom disruption include: 55 dBA L_{max} , 65 dBA L_{max} , and 35 $L_{eq(h)}$.

Based on the additional information provided in Table S51 of Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, Alternative D would not result in any schools within the Lennox School District being newly exposed to the 65 CNEL or greater contour or an increase of 1.5 dB or greater within the 65 CNEL or greater contour compared to 1996 baseline conditions.

Based on thresholds identified for high single event noise levels that result in classroom disruption, and presented in Section 4.2.6 of the Supplement to the Draft EIS/EIR, Tables 1 lists, by each alternative, the following Lennox School District facilities that would be impacted:

Table 1

**Lennox School District Facilities Newly Exposed to High Single Event Noise Levels
(Compared to 1996 Baseline)**

School	No Action/ No Project	Alternative A	Alternative B	Alternative C	Alternative D
Felton School					
Jefferson School					
Moffett School		X	X		
Whelan School					
Lennox Middle School			X		
Buford School					

Source: Supplement to the Draft EIS/EIR Tables S4.2-6, S4.2-10, S4.2-14, S4.2-18, and S4.2-28.

As indicated in Section 4.2, Land Use (subsections 4.2.6 and 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 study and potentially modify noise thresholds and provide sound insulation for schools determined to be significantly impacted by single event noise levels that result in classroom disruption, excluding schools with aviation easements as described in Response to Comment AL00034-25.

As stated in subsection 4.2.9.1 of the Supplement to the Draft EIS/EIR, significant and unavoidable impacts would remain for those schools newly exposed to 75 CNEL. Within the Lennox School District these schools would include Felton Elementary under Alternative B. As also presented, some school uses would still be exposed to significant single event noise levels, even after implementation of MM-LU-4 when classroom activities take place outdoors.

Based on the information presented in the commentor's Table 2, and Table 1 of this response, Alternatives C and D would not result in an impact to the Lennox School District.

AL00034-39

Comment:

PART FOUR

THE EMISSIONS, MODELING, MITIGATION MEASURES AND HEALTH IMPACT ANALYSIS OF THE EIS/EIR IS INADEQUATE

CEQA requires the EIS/EIR to "identify and focus on" significant environmental effects of proposed projects. (14 California Code of Regulations § 15126.2.) "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects." (Id.) The EIS/EIR also must describe "feasible measures which could minimize significant adverse impacts." (14 California Code of Regulations § 15126.4.) The EIS/EIR fails to adequately do so.

1. The Emissions Estimations in the EIS/EIR Are Inadequate.

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The emissions estimates in the EIS/EIR for jet aircraft and storage and handling of fuels may be underestimated. Correction of this underestimation will result in increased pollutant concentrations that may result in exceedances of the National Ambient Air Quality Standards ("NAAQS") and California Ambient Air Quality Standards ("CAAQS") as well as increases in off-site cancer risks and noncancer hazard indices for off-site populations.

Response:

Please see Topical Response TR-AQ-2 regarding toxic air pollutants and Topical Response TR-AQ-3 regarding air pollution increase.

AL00034-40

Comment:

- a. Jet aircraft emissions may be underestimated.

To estimate particulate matter less than 10 microns ("PM10") emission rates from aircraft for the EIS/EIR, LAWA used information from three sources: 1) fourth edition of AP-42; 2) Whitefield and Hagen Study; and 3) the 1994 California FIP Docket. (EIS/EIR, Technical Report 4, Attachment H.) The emission rate data from these studies are combined; the combined data are plotted for each of the four aircraft operating modes. Based on these plots, a relationship between fuel usage and PM10 emission rate is interpolated.

A review of the data shows the first and second studies to be in approximate agreement; the FIP Docket provides an alternate data set. As there is approximately ten times more FIP Docket data, the data from this study dominate the results. If the FIP Docket data were removed from the combined data set, it is clear that the relationship between fuel usage and the PM10 emission rates would change and the estimated total PM10 emissions from aircraft would also change.

Based on the information presented in the EIS/EIR, it is unclear how the FIP Docket data are used in the PM10 emission rate analysis. It appears that a relationship between PM10 emissions and fuel usage is derived from a graphical representation of a relationship between particulate mass concentration and smoke number (i.e., from a plot of an equation relating PM concentration and smoke number).

There are two issues with this derivation. First, it is not clear how a relationship between fuel usage and PM10 emissions is derived from a plot of particulate mass concentration versus smoke number. Second, because the particulate mass concentration versus smoke number data appear to be simply a plot of some unknown equation, the number of data points taken from this graph seems to be arbitrary. Since the number of points taken from this graph is approximately 10 times greater than the number of data points available from the other two studies, it appears that LAWA may have arbitrarily weighted the combined data set heavily towards the FIP Docket data and away from the AP-42 and Whitfield and Hagen data.

Aircraft emissions of PM10 are potentially underestimated. An increase in PM10 emissions will result in an increase in off-site concentrations of PM10. As noted below, the potential noncancer health impacts associated with these PM10 emissions have not been quantified in the EIS/EIR. Inclusion of additional PM10 emissions may result in exceedance of the noncancer hazard index for off-site populations.

At a minimum, LAWA needs to:

- i. clarify the approach used to develop the FIP Docket data;
- ii. conduct a sensitivity analysis to determine the importance of the FIP Docket data to their results; and
- iii. if necessary, remove arbitrary weighing of FIP Docket data over other data sets, correct the PM10 emission rates, and remodel off-site PM10 concentrations.

Response:

The FIP Docket data, like the other sources of data referenced, was utilized to help develop aircraft PM emission factors in the absence of other, more definitive information. Taken together with the other data, this material represents the most realistic, thorough and up-to-date PM emission data for commercial aircraft currently available. Because these emission factors are based on a.) an aggregate

from all aircraft operational modes (i.e., take-off, landing, climbout, etc.) and b.) a predominately older aircraft fleet (i.e., 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 health risk assessment have under predicted the potential impact of PM emissions from aircraft. Please also see Response to Comment AR00003-53 regarding PM emission factors.

AL00034-41

Comment:

b. Potentially significant evaporative emissions of toxic air contaminants resulting from the storage and handling of organic liquids may not have been quantified.

LAWA does not include volatile organic compound ("VOC") emissions from organic liquid storage and transfer in their Industrial Source Complex Short Term 3 ("ISCST3") modeling of toxic air pollutant emissions. They assume that: 1) storage emissions are almost exclusively from Jet A fuel; 2) emissions of Jet A vapor do not contain significant quantities of the toxic air pollutants modeled; and 3) limited future operations of gasoline fueling would include vapor recovery and therefore result in minimal emissions of air toxics.

There are three problems with this exclusion of VOC emissions. First, diesel fuel and gasoline are used at the airport. LAWA should provide data to show that storage and resulting emissions of these fuels are insignificant. Second, LAWA should provide justification for the assumption of no toxic air pollutants in Jet A vapor. Third, LAWA should provide some screening calculations to validate their assumption that gasoline fueling would result in insignificant emissions of air toxics (especially benzene).

Toxic air emissions from storage and handling of organic liquids may have been underestimated. An increase in toxic air emissions will result in increases in off-site cancer risks and noncancer hazard indices for off-site populations.

At a minimum LAWA needs to:

- i. quantitatively demonstrate that emissions of toxics from storage and handling of diesel fuel and gasoline are insignificant; and
- ii. provide a speciated chemical list for Jet A fuel.

Response:

Please see Topical Response TR-AQ-2 regarding fugitive jet fuel evaporation.

Approximately 2.65 tons per year (tpy) of fugitive VOC emissions in the on-airport stationary source emissions inventory (as provided in Table 25, 1996 environmental baseline, of Appendix G of the Draft EIS/EIR) are from gasoline storage and fueling operations. Fugitive VOC emissions from diesel were substantially less than 1 tpy, and, therefore, were not included. Benzene emissions from gasoline fueling in 1996 were approximately 0.08 tpy. These baseline emission inventories were developed from tenant surveys conducted at LAX, as described in Attachment C of Technical Report 4 of the Draft EIS/EIR. Most gasoline and diesel fueling at LAX is associated with operation of GSE. Since mitigation of GSE, which includes converting GSE to electric power or extremely low emission technology, would substantially reduce the use of conventionally fueled (gasoline and diesel) GSE, fugitive VOC emissions associated with GSE fueling will decrease under all future year build alternatives. Therefore, the incremental risks, associated with gasoline and diesel fueling have not been underestimated.

AL00034-42

Comment:

2. The Modeling Approach of the EIS/EIR Is Inadequate.

The modeling approach presented in the EIS/EIR has several significant flaws that result in underestimation of both criteria and toxic pollutants impacts on nearby receptors. Assumptions made in the modeling of vehicle emissions are not consistent with EPA practice; the methodology used to estimate plume rise is flawed; the assumption of no downwash is not justified; the meteorological data

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used in the modeling is inadequate; the conversion of sulfur dioxide to sulfate is not addressed; and finally, secondary formation of toxic pollutants and deposition effects are ignored. These flaws result in an underestimate of ambient pollutant concentrations.

Correcting these flaws will result in an increase in pollutant concentrations and may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for off-site populations.

Response:

EPA guidance was utilized for all sources for which such guidance was available. The Emissions and Dispersion Modeling System (EDMS) was used for criteria pollutant modeling of aviation sources, and the Industrial Source Complex (ISC) model was used for those sources not addressed in EDMS. EDMS model is required by FAA and USEPA for evaluation of aircraft emissions.

The estimation of plume rise from aircraft is new and unique science, and its validity is subject to opinion. However, plume rise from aircraft does exist and should be accounted for in some way.

Air quality science involving building aerodynamic effects is currently applied to stationary point sources only. Since the number of point sources and their cumulative emissions are small compared to mobile sources, downwash was considered a negligible atmospheric factor.

The meteorological data was obtained using EPA approved guidance and in addition to being onsite has the highest level of quality assurance.

Sulfate is not a regulated air pollutant under the Clean Air Act and thus is not required to be evaluated.

Deposition and toxic air pollutants are evaluated in the Human Health Risk Assessment included in subsection 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Evaluation of secondary formation of toxic air pollutants is beyond the scope of analysis required to demonstrate compliance with the NAAQS or CAAQS.

AL00034-43

Comment:

a. Assumptions made in the modeling of motor vehicle emissions are not consistent with EPA practice.

To estimate pollutant ambient air concentrations resulting from vehicle emissions, LAWA modeled these vehicles as a series of volume sources. A volume source requires specification of both initial lateral and vertical dimensions. The initial lateral dimension of the volume source used to model the vehicle emissions was calculated as the width of the roadway lanes plus three-meter mixing zones on either side, resulting in an initial lateral dimension of at least eight meters. The initial vertical dimension of the volume sources was determined from CALINE mixing height equations, assuming a long-term average wind speed of 3.3 meters per second.

The initial lateral and vertical dimensions chosen to model these volume sources have a strong influence on the resultant downwind pollutant concentrations resulting from vehicle emissions. As the dimensions increase, downwind concentrations decrease. In a recent EPA study, volume sources with an initial lateral dimension of 2.15 meters were used to model vehicles in two major U.S. cities (United States Environmental Protection Agency, Draft Air Dispersion Modeling of Toxic Pollutants in Urban Areas-Guidance, Methodology and Example Applications. Emissions, Monitoring and Analysis Division (MD- 14), Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711, EPA-454/R-99-021, July 1999, Exhibit 13 .)

LAWA either should remodel their volume sources using 2.15 meters or should provide justification for their selection of eight meters. The average wind speed used to calculate the initial vertical dimension should be consistent with the average wind speed used to model the dispersion of the volume sources. LAWA should average the meteorological data set used to model the dispersion of the volume sources to determine the correct average wind speed.

Pollutant concentrations resulting from vehicle emissions may be underestimated. An increase in pollutant concentrations resulting from vehicle emissions may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for off-site populations.

At a minimum LAWA needs to:

- i. either provide justification for their assumption of a three meter mixing zone on each side of the modeled roadways or follow the example set by EPA and assume no additional mixing zone surrounding the roadways;
- ii. if unable to provide justification, vehicle sources will need to be remodeled; and,
- iii. calculate the initial vertical dimension with the correct average wind speed.

Response:

The EPA guidance document to which the commentor refers is still considered Draft. Therefore, it should not yet be quoted as official EPA guidance, nor must studies adhere to its examples. In addition, all assumptions used in the analysis were outlined in the modeling protocol titled LAX Master Plan EIS/EIR Air Quality Modeling Protocol for Criteria Pollutants, which the FAA and LAWA undertook extensive coordination with the South Coast Air Quality Management District (SCAQMD) to receive their review comments on, and concurrence with, the Protocol used in the air quality analyses for the Supplement to the Draft EIS/EIR and the general conformity determination for Alternative D. Vertical and lateral initial dispersion parameters are used to estimate the general size of a volume of pollutant before being advected by wind motions. This value is dependent on the characterization of the source and is thus project specific. The method of calculation of the initial vertical dimension is clearly stated. The vertical and lateral initial dispersion parameters are based solely on the geometry of the source and are irrelevant of wind speed. Therefore, both dispersion parameters and meteorological data are appropriate for these analyses.

AL00034-44

Comment:

- b. The methodology used to estimate plume rise from jet aircraft is questionable and requires further justification.

LAWA determines the plume rise of hot exhaust gas from jet aircraft engines based on a heat balance to determine the heat flux and the equivalent exit velocity that would result. (EIS/EIR, Technical Report 4, p. 19.) To calculate this exit velocity, they make four critical assumptions. First, the jet engine exhaust gas temperature is fixed and unrelated to the heat flux. Second, as the exhaust gas from the jet engine begins to slow (in the horizontal plane) and begins to move vertically upward as a plume, the diameter of the plume (in the vertical plane) may be estimated by the wingspan of the jet.

Third, the temperature of the plume is equal to the jet engine exhaust gas temperature. As there are no ambient heat sources, this implies that the movement of the exhaust gas is adiabatic, isothermal, and there is no rapid expansion of exhaust gas. Finally, the temperature of ambient air is assumed to be 293 Kelvin ("K"). Calculated exit velocity, plume temperature, and plume diameter were then input into ISCST3 to determine plume rise.

There are three problems with this approach. First, the temperature of the plume is assumed equal to the temperature of the exhaust gas. Given isothermal movement, this is only true if the total mass per second of air leaving the jet engines equals the mass per second of air moving up in the plume. LAWA should check their calculations to be sure that this is true, otherwise the plume rise calculations may be in error.

Second, the implied assumptions of isothermal movement and slow expansion of exhaust gas are physically unrealistic. It is likely that exhaust gas will expand rapidly when exiting the jet engine and cooler, ambient air will be entrained into exhaust gas as it moves away from the jet engine. Both of these effects will tend to lower the temperature in the plume. LAWA should perform a sensitivity analysis to determine the quantitative influence of these phenomena on the resulting plume rise.

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Third, the temperature of the ambient air should be consistent with the average temperature data used in the ISCST3 model runs. LAWA should average the temperatures in the meteorological data set used in the model runs to determine the correct average ambient temperature.

Additionally, plume rise may be overestimated. If so, concentrations of NO₂, PM₁₀, and air toxics resulting from aircraft emissions may be underestimated. Increases in concentrations of these pollutants may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations.

At a minimum LAWA needs to:

- i. check their calculations to ensure conservation of mass;
- ii. conduct a sensitivity study to determine the quantitative influence of rapid expansion of exhaust gas and entrainment of ambient air on plume temperature; and,
- iii. calculate the plume rise with the correct average ambient temperature.

Response:

Several models were used to estimate concentrations of air pollutants from airport sources. The models used to analyze aircraft dispersion include the FAA's Emissions and Dispersion Model (EDMS) Version 3.2 and U.S. EPA's Industrial Source Complex Short Term (ISCST3) model. The carbon monoxide (CO), nitrogen dioxide (NO₂) and sulfur dioxide (SO₂) criteria pollutants from aircraft were modeled using EDMS. Particulate matter (PM₁₀) from aircraft was modeled using ISCST3, since EDMS Version 3.2 does not have the ability to analyze PM₁₀ from aircraft sources. EDMS Version 3.2 does not use a plume rise algorithm for aircraft sources. In addition, aircraft were modeled as volume sources in the PM₁₀ analysis conducted using ISCST3, as noted in the Air Quality Modeling Protocol for Criteria Pollutants (Draft EIS/EIR, Technical Report 4, Attachment A). Therefore, plume rise was not considered when modeling the criteria pollutants (CO, NO₂, SO₂, and PM₁₀).

A study of monitored versus modeled concentrations was conducted using data collected off the end of Runway 25R (the monitored data is included in the data presented in the Draft EIS/EIR Technical Report 4, Attachment Y). The results of this comparison (Pehrson, et al. 2001) indicated that EDMS Version 3.2 over-predicted NO₂ and SO₂ concentrations by a factor of 2 to 3 on average, and could over-predict concentrations by more than an order of magnitude when compared on an hour-by-hour basis. Therefore, concentrations of criteria pollutants from aircraft are likely to be over-predicted in the Draft EIS/EIR.

To avoid significantly over-predicting toxic air pollutant (TAP) concentrations, plume rise was considered in the TAP analysis used in the Human Health Risk Assessment. The analysis of plume rise was also included in the modeling protocol (Draft EIS/EIR, Technical Report 4, Attachment A). Since dispersion modeling without consideration of plume rise significantly over-predicts ambient concentrations, it is reasonable to assume that incorporation of plume rise will provide results that are more accurate.

Subsequent to completion of the Draft EIS/EIR, the FAA and National Oceanic and Atmospheric Administration (NOAA) conducted a study (at LAX) to look specifically at aircraft exhaust plume behavior (Wayson, et al. 2003). This study used two NOAA LIDAR systems to "photograph" the plume as it left the engines during taxi and takeoff. The results of this study confirmed that substantial plume rise occurred shortly after the plume left the aircraft. The results of this study have been incorporated into the current version of EDMS which was used to evaluate impacts of Alternative D as presented in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR. As discussed in Section 2.2, Dispersion Modeling, of Appendix S-E of the Supplement to the Draft EIS/EIR, the incorporation of plume-rise substantially reduced the impact of concentrations as modeled with EDMS 4.11 versus EDMS 3.2. The plume rise in EDMS 4.11 is based on the monitored plume-rise from the LIDAR study. No additional inputs regarding temperature are required.

AL00034-45

Comment:

- c. The assumption that building downwash is negligible requires further justification.

LAWA believes that building downwash will not be significant based on their assumption that the nearest receptor is too far off-site. (EIS/EIR, Technical Report 4, p.24.) LAWA should validate this assumption by modeling the most conservative source-receptor geometry, with building downwash included, to ensure this statement is correct. These results should be presented in Technical Report 4.

Off-site impact from airport emissions may be underestimated. If so, concentrations of criteria pollutants and air toxics resulting from airport emissions may be underestimated. Increases in concentrations of these pollutants may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations.

LAWA needs to conduct a sensitivity study to show that building downwash effects are negligible.

Response:

The current state of dispersion modeling science only includes effects of building downwash on point sources (stacks, etc.). In regulatory dispersion modeling, any point source whose release height is not compliant with Good Engineering Practice (GEP) and is within five times the lesser of a building's height or direction-specific projected width would be affected by the wake produced by windflow around the building (U.S. EPA, User's Guide To The Building Profile Input Program, EPA-454/R-93-038, February 8, 1995). In order to be adversely affected, the receptor must also be within this zone of influence, where re-entrainment of the plume would increase predicted concentrations. Due to this re-entrainment and conservation of mass, predicted concentrations outside of this zone are generally lower. Thus, either sources or receptors significantly far from a building would not be affected by the wake produced by the building.

Since the number of point sources and their emissions are small relative to mobile sources (See Attachment V to Technical Report 4 of the Draft EIS/EIR and Attachment N to Technical Report S-4 of the Supplement to the Draft EIS/EIR), any effects due to building downwash would be minimal or non-existent.

The larger sources of emissions, as well as the controlling sources in the dispersion analyses are mobile sources (aircraft, GSE, traffic) and are modeled as areas and volumes (See the EDMS 3.0 and 4.0 User's Guides as well as Attachment A to Technical Report 4 of the Draft EIS/EIR). Area and volume sources are not subject to building downwash effects in any currently approved dispersion model. Thus, the inclusion of building downwash effects in the analyses would have no effect on the final concentrations.

AL00034-46

Comment:

d. The meteorological data set used is inadequate relative to EPA recommendations.

LAWA used the most recent meteorological data collected at LAX. These data consist of hourly surface and upper air data from the LAX meteorological observation station operated by the SCAQMD for the 12-month period beginning March 1, 1996 and ending February 28, 1997.

As recommended by the USEPA, "five years of representative meteorological data should be used when estimating concentrations with an air quality model. (USEPA, Guideline on Air Quality Models (Revised). Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711, EPA-450/2-78-027, 1986, August 1995 update, Exhibit 14.) Consecutive years from the most recent, readily available 5-year period are preferred." Accordingly, LAWA should conduct its air modeling with the most recent five years of data from the LAX station, selecting the most conservative year results as representative of maximum long-term pollutant concentrations resulting from emissions associated with LAX. Furthermore, this five-year data set should be used to estimate average temperature (plume rise), mixing heights (EDMS), and wind speed (volume source height) used in other calculations and analyses.

Pollutant ambient air concentrations may be underestimated. If so, concentrations of criteria pollutants and air toxics resulting from emissions associated with expansion of LAX may be underestimated. Furthermore, the location of the maximum off-site impacts may also change. Increases in

3. Comments and Responses

concentrations of these pollutants may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations.

At a minimum LAWA needs to:

- i. conduct a sensitivity study to determine which year of LAX meteorological data is the most conservative;
- ii. if different from the meteorological data used in their analysis, redo all air modeling with the correct meteorological data; and,
- iii. use the most conservative meteorological data set to estimate meteorological data used in other calculations and analyses.

Response:

This comment refers to an outdated resource. The U.S. EPA's Guideline on Air Quality Models was codified as Appendix W to 40 CFR Part 51 in 1996. Chapter 9.3.1.2.b states that one year or more of site-specific data are preferred. As outlined in the air quality modeling protocol reviewed by SCAQMD, modeling was appropriately performed with one year of onsite data.

The 1996-1997 onsite surface meteorological data was gathered by LAWA and SCAQMD and was the only year obtained. At the time the Draft EIS/EIR air quality analyses were commenced, this dataset was the most recent site-specific data available. To maintain consistency between the air quality analyses in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the identical meteorological data were used in both.

Since the 1981 dataset is neither site-specific nor the most recent year available, the use of the 1981 dataset would contradict federal regulations as outlined in Appendix W to 40 CFR Part 51.

AL00034-47

Comment:

- e. Atmospheric conversion of sulfur dioxide to sulfate may be significant and is not addressed.

LAWA has ignored production of sulfate from sulfur dioxide ("SO₂") due to the complexity of sulfate-formation mechanisms. LAWA assumes that all sulfur emitted by sources remains in the atmosphere as SO₂. This assumption is not conservative; the CAAQS for sulfate is more than six times lower than the CAAQS for SO₂ (6.2 parts per billion by volume ("ppbv") compared to 40 ppbv).

Formation chemistry for conversion of nitrogen oxides ("NO_x") to nitrogen dioxide ("NO₂") is equally complex, if not more so. The Tier 2 Ambient Ratio Method ("ARM") recommended by USEPA in the Guideline on Air Quality Models for converting total NO_x to NO₂ values may be modified to estimate formation of sulfate from SO₂. (USEPA, Guideline, *supra*.) LAWA could gather the most recent years of data on the annual average SO₂-to-sulfate ratio near LAX and use this data to estimate the formation of sulfate.

The concentration of sulfate in ambient air is underestimated. Increases in concentrations of sulfate may result in an exceedance of the CAAQS for sulfate. As exposure to sulfate causes respiratory irritation, this underestimate of ambient sulfate concentration may significantly underestimate the numbers and types of respiratory illnesses that may be observed in nearby populations, particularly young children who may be especially sensitive to respiratory irritants.

At a minimum LAWA needs to develop an approach to model sulfate chemistry and estimate sulfate concentrations.

Response:

To compare the conversion of SO₂ to sulfate to the conversion of NO_x to NO₂ is not accurate. A more analogous comparison would be the atmospheric conversion to ozone. Similar to ozone, sulfates on a project level are difficult to quantify due to the complexity of the atmospheric photochemical reactions, as you have noted, and the large number of variables dictating the formation of this regional pollutant. For these regional pollutants, projects instead monitor and calculate the emissions of their precursor pollutants, in this case SO₂.

Please see Response to Comment AL00033-328 for additional information concerning sulfates.

AL00034-48

Comment:

f. Secondary formation of toxic air pollutants may be significant and is not addressed.

LAWA has ignored the production of several toxic air pollutants formed in the atmosphere due to reactions among other pollutants (i.e., formed by secondary reactions). As outlined in the EPA's guidance on Air Dispersion Modeling of Toxic Pollutants in Urban Areas, these pollutants should be included in any air toxic analysis. (USEPA, Draft Air Dispersion Modeling, *supra*.) The pollutants formed by secondary reactions include formaldehyde, acetaldehyde, and acrolein.

An estimate of concentrations based on secondary reactions is needed and should be added to the ISCST3 output. LAWA should use EPA's OZIPR screening model to estimate the secondary formation of these pollutants. (USEPA, Draft Air Dispersion Modeling, *supra*.) Case studies provided in EPA's guidance document show secondary formaldehyde as the major component of total atmospheric formaldehyde (a ratio of 4 to 1 over primary formaldehyde).

The concentrations of formaldehyde, acetaldehyde, and acrolein in ambient air are underestimated. Increases in concentrations of these pollutants may result in increases in off-site cancer risks and noncancer hazard indices for receptor populations.

At a minimum LAWA needs to model formaldehyde, acetaldehyde, and acrolein chemistry.

Response:

Please see Topical Response TR-AQ-2 regarding secondary pollutant formation

AL00034-49

Comment:

g. The exclusion of deposition effects from the multi-path risk analysis is not justified.

LAWA has neglected to include deposition effects and associated multi-pathway risk analysis based on conclusions presented in the deposition report, included in the EIS/EIR as Attachment Y to Technical Report 4. In this report, LAWA claims that a direct correlation between airport operations and deposition could not be determined.

Nonetheless, LAWA goes on to state, "The limited monitoring duration [less than two weeks] and time of year, while required to meet project schedule requirements, were not optimal for dry deposition monitoring. The limited nature [*italics added*] of this study did not allow for the determination of summertime maximum deposition rates or provide data necessary to perform a mass balance analysis." (EIS/EIR, Technical Report 4, Attachment Y.) LAWA is stating that the study was too short to make any definitive conclusions and further deposition sampling will be required before the deposition impact of airport emissions on off-site soils can be quantified. In other words, the study is incomplete.

If the study is limited and incomplete, there is no rational reason why LAWA should exclude deposition effects and the associated multi-pathway risk analysis. Furthermore, the deposition sampling locations selected for this study appear to be outside of the maximum particulate matter plume predicted by LAWA's ISCST3 modeling, further undercutting the already limited nature of this deposition study. Therefore, pending a more complete deposition study, LAWA should include deposition effects and a multi-pathway risk analysis in the EIS/EIR.

Deposition effects have been improperly excluded from consideration. Soil concentrations of pollutants sorbed to particulate matter have been underestimated. Increases in soil concentrations of these pollutants may result in increases in off-site cancer risks and noncancer hazard indices for receptor populations.

3. Comments and Responses

At a minimum LAWA needs to:

- i. estimate concentrations of pollutants sorbed to particulate matter in soil based on emissions occurring over the duration of the project; and,
- ii. based on these soil concentrations, run a multi-pathway risk analysis to determine the health impacts of these soil concentrations.

Response:

Please see Topical Response TR-AQ-1 regarding deposition of air pollutants.

Screening level deposition modeling was conducted to evaluate whether operations at LAX could result in substantial deposition onto soil using ISCST3, an air dispersion model. Please refer to Section 3.7, TAPs of Concern for Deposition onto Soils, in Technical Report 14a of the Draft EIS/EIR for a summary of this analysis. Deposition modeling for TAPs of concern for LAX suggests no potential significant impacts for either on-site or off-site soils/dust. Potential exposures via direct contact with soils contaminated by deposition resulting from operations at LAX or through ingestion of home-grown produce grown in these soils are not significant exposure pathways.

AL00034-50

Comment:

3. The Health Risk Analysis of the EIS/EIR Is Inadequate.

The flaws in the health risk analysis conducted for the EIS/EIR result in underestimated acute, cancer, and noncancer health impacts. Estimated cumulative cancer risks to school children are underestimated, cumulative cancer risks and noncancer hazards are incorrectly calculated, the significance threshold for noncancer health effects is too high, potential health impacts associated with exposure to lead are improperly calculated, potential health impacts from jet engine particulate emissions are ignored, and acute health impacts are not evaluated. These flaws result in an underestimation of the health impacts to receptors of concern.

Response:

Regarding estimated cumulative cancer risks to school children, please refer to Response to Comment AL00034-51. Regarding calculation of cumulative cancer risks and noncancer hazards, please refer to Response to Comment AL00034-52. Regarding the significance threshold for noncancer health effects, please refer to Response to Comment AL00034-53. Regarding potential health impacts associated with exposure to lead, please refer to Response to Comment AL00034-54. Regarding potential health impacts from jet engine particulate emissions, please refer to Response to Comment AL00034-55.

Please refer to subsection 4.24.1.6, Environmental Consequences, and subsection 4.24.1.9, Level of Significance After Mitigation, in the Human Health Risk Assessment (Section 4.24.1) of the Supplement to the Draft EIS/EIR for discussions of acute hazards for all build alternatives and the No Action/No Project Alternative. Additional detail is provided in Technical Report S-9a, Section 4.1.2, Assessment of Acute Hazards.

AL00034-51

Comment:

a. Estimated cumulative cancer risks to school children have been underestimated due to underestimates in the total number of years children spend in school.

The Human Health Risk Assessment ("HHRA") estimated the potential incremental cancer risks for children attending schools by identifying the school with the highest projected concentrations of toxic air pollutants, and determining the total length of time that children would likely be at school. Children ages 6 to 12 years old were evaluated in the HHRA, since "this age range includes the youngest school ages and it is sufficiently long for analysis of chronic exposures and risks." (EIS/EIR, Technical Report 14A, Attachment B, p. 42.) Accordingly, children in school were assumed to be exposed to emissions from LAX for six years.

Given, however, that children will, in fact, be in school in Lennox from ages 3 to 14 years (preschool through middle school), and that the future development of schools within the impacted area is unknown, it is very likely that children could be exposed to emissions from LAX for an 11 year period (corresponding to preschool through middle school). Thereafter, these children attend neighboring high schools, where they may also receive continued exposure, resulting in a 15 year exposure period. As estimates of cancer risk are directly proportional to the total time that an individual is exposed over the course of the lifetime, the assumption that school children are only exposed for six years is misleading, and results in an underestimate of the potential incremental cancer risks posed by children attending school.

Cancer risks for school children are underestimated. Cancer risks should be recalculated for the school children to account for the potential that children could be exposed to emissions from LAX during their entire pre-school through high school years.

Response:

Please refer to page 4-1004 in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR. School children were evaluated for exposure to toxic air pollutants as an additional potentially sensitive receptor near LAX boundaries. However, risks and hazards for this group were not used to assess levels of significance. Risks and hazards for school children were estimated to be less than those for child and adult residents, who were evaluated based on the assumption that they would live near the airport for 30 years (i.e., from ages 0 to 30 years). Sensitive receptors such as children were accounted for through the use of conservative toxicity criteria designed to protect the most sensitive individuals in the population by the inclusion of margins of safety. In addition, conservative exposure assumptions were used to evaluate potential exposure. For example, the exposed residential population was assumed to be located at the point of maximum contaminant concentrations and to have continuous inhalation exposure for 24 hours per day for the entire exposure period. Estimated health risk and hazards presented in the health risk assessment were considered the worst possible due to the conservative exposure and toxicity criteria used in the evaluation. The assumption was that when child residents are protected (i.e., the level of risk is determined to be less than significant), school children are also protected (i.e., the exposure duration of school children would be less than that of child residents; hence, the relative risk would also be less).

AL00034-52

Comment:

b. Significant flaws in the methods used to calculate cumulative cancer risks and noncancer hazards undermine the conclusions of the EIS/EIR and obscure actual health risks posed by the various alternatives.

The HHRA repeatedly touts the benefits of all build alternatives, stating that with mitigation, ". . . all of the build alternatives would have lower (more favorable) human health impacts than those associated with the No Action/No Project Alternative." (Human Health Risk Assessment, p. 4-999.) Many of the tables and text describing the incremental cancer risks and noncancer hazards actually present negative risks, indicating not only a reduction in risks below those associated with baseline conditions, but a "beneficial impact on LAX-associated cancer risks" (or noncancer hazards). (EIS/EIR, Technical Report 14a, p. 51.) Such statements are not only misleading, they are technically inaccurate.

As an example, some of the negative projected cancer risks calculated for the year 2015 (pre-mitigation) result from projected decreases in diesel emissions that will occur by year 2015. (EIS/EIR, Technical Report 14a, Table 13-Alternative C.) As projected in the HHRA, decreases in concentrations of diesel exhaust are greater than projected increases of some other carcinogenic compounds (e.g., 1,3-butadiene), leading to a conclusion in the EIS/EIR that the total cancer risks, for all chemicals combined, are less than significant for Alternative C, and would result in a beneficial impact on LAX-associated cancer risk for Alternative A.

The fundamental flaw in this logic is the assumption that a decrease in the concentration of one carcinogenic compound can offset the increase the concentration of another carcinogen. If the implementation of a given alternative results in lower concentrations of diesel exhaust than would occur under the baseline conditions, then the incremental contribution of diesel to the total cancer risk drops

3. Comments and Responses

to zero. A net reduction in diesel, however, is not "credited" against the likelihood that the increases in 1,3-butadiene may cause cancer in exposed individuals.

In other words, if the projected incremental cancer risk posed by 1,3-butadiene is 6×10^{-6} , and the projected incremental cancer risk from diesel is presented as -10×10^{-6} (indicating that the concentrations of diesel under the alternative drop below the baseline concentrations), the cumulative risk from both compounds is NOT -4×10^{-6} , as presented in this HHRA, rather it is 6×10^{-6} . Independent of any projected improvement in diesel concentrations, 1,3-butadiene is still projected to cause an increase in cancer risk of 6×10^{-6} .

Potential health impacts have been improperly summed. This fundamental flaw permeates the HHRA, and results in underestimates of the potential health impacts of all alternatives. As currently presented, it is impossible to evaluate each of the alternatives to determine which alternatives may pose a significant health threat, or to ascertain whether the proposed mitigation measures will be sufficient to reduce the health risks to insignificant levels.

The Lennox School District requests that LAWA correct these errors and recalculate the risks for all alternatives.

Response:

The comment is based upon a misunderstanding with regards to how health risks and hazards are summed in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR. For the No Action/No Project Alternative and for each build alternative, cancer risks and non-cancer health hazards were estimated for each chemical of concern. If the risk or hazard for a specific chemical was less than the baseline estimate for that chemical, it was viewed as a beneficial impact, i.e., the risk or hazard has been reduced below baseline conditions. This is expressed as a negative estimate of incremental risk or hazard for that chemical. Risk and hazard for each chemical are, however, summed to get a estimate of total cancer risk or non-cancer health hazard for the alternative. A negative estimate of summed risk or hazard (i.e., considering both beneficial and non-beneficial impacts) indicates that overall the combined risks or hazards for an alternative were less than those estimated for baseline. This comparison was applied consistently between each alternative and baseline; as such, the method reasonably accounts for incremental risks and hazards from exposure to multiple toxic air pollutants.

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. Included in the Supplement to the Draft EIS/EIR was an evaluation of a new alternative, Alternative D, an evaluation of health risks based on exposure duration of 70 years and an evaluation of health risks and hazards measured against Year 2000 conditions. The methodology used to determine beneficial and non-beneficial impacts was the same as that used in the Draft EIS/EIR described above.

AL00034-53

Comment:

c. Basis for significance threshold for noncancer health effects is unclear and five times greater than the threshold typically used by regulatory agencies.

A significant impact relative to human health is defined in the EIS/EIR as a build alternative that would result in a total incremental chronic hazard index ("HI") greater than 5 for any target organ system at any receptor location. (Human Health Risk Assessment, p. 4-1009.) The basis for this significance threshold is unclear, is inconsistent with statements made in the HHRA, and is considerably less protective than acceptable thresholds established by regulatory agencies under various regulatory programs.

As described on page 28 of the EIS/EIR Technical Report 14a, noncancer risk estimates are calculated by dividing the estimated exposure by the "reference dose," often referred to as the acceptable exposure level. The ratio of the exposure to the reference dose is termed the hazard quotient ("HQ"). To assess the overall potential for noncarcinogenic effects posed by more than one chemical, the HQs for each chemical are summed, and the resulting value is referred to as the Hazard Index ("HI").

As stated on page 28, "a HQ greater than one indicates an exposure greater than that considered safe." This conclusion is consistent with thresholds established by USEPA and Cal/EPA under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), and California's Toxic Hot Spots program (AB2588), respectively. Similarly, an overall HI of no greater than one is the threshold that is used by Cal/EPA in determining whether conditions at a Site could potentially result in unacceptable adverse noncancer health effects. Sites for which the multi-chemical HI is greater than one, typically trigger further investigation, and often remediation.

The significance threshold used in this EIS/EIR to evaluate the potential for adverse noncancer health effects is five times higher (i.e., five time less protective) than noncancer thresholds typically used by regulatory agencies under various state and federal regulatory programs. It is unclear how and why a different and less protective standard is being used to evaluate the potential health impacts associated with the various build alternatives. If the more standard noncancer HI threshold of one were used to evaluate the significance of the various alternatives, the conclusions of each of the build alternatives, and the corresponding need for mitigation, would be different than is currently presented.

LAWA should rewrite the discussion of noncancer risks, and clearly identify those alternatives that would be considered significant based on the more appropriate noncancer significance threshold of one.

Response:

The content of this comment is essentially the same as comment AL00033-341; please refer to Response to Comment AL00033-341.

AL00034-54

Comment:

d. The EIS/EIR fails to consider and evaluate the potential health impacts associated with exposure to lead.

As described in the EIS/EIR, lead may be released in significant quantities from LAX. (EIS/EIR, Technical Report 14a, Attachment B, p. 19.) The potential impacts associated with exposure to lead are typically evaluated by using models developed by both USEPA and Cal/EPA to predict the blood-lead level that would result from a given exposure.

Because children are especially sensitive to the neurological effects of low levels of lead exposure, these models are used to estimate the blood-lead levels in children. The results from the model are then compared to the low blood-lead levels that have been demonstrated to result in subtle neurological damage in children, as established by the Center for Disease Control ("CDC"). The models are easy to use, have been used for more than eight years, and are considered the industry standard for evaluating lead exposures and determining whether such exposures could result in unacceptable health impacts.

Although the EIS/EIR notes that LAX may release significant quantities of lead, the EIS/EIR does not evaluate the impacts of such releases in accordance with the standard industry practice. Instead, the EIS/EIR compares the predicted concentrations of lead to the ambient Air Quality Standard, and concludes that, because the concentrations are below the ambient air quality standard, lead is not a toxic air pollutant ("TAP") of concern for the LAX Master Plan.

Such treatment of lead significantly diminishes the public health significance of this TAP, and does not allow for a fair determination as to the public health impacts that may result from the various build alternatives. Any risk assessment submitted to either Cal/EPA or the USEPA would be instantly rejected if conclusions about the public health significance of lead were based solely on a comparison to the Ambient Air Quality Standard.

Further, the EIS/EIR states that a cancer slope factor is not available for lead. We note that the Office of Environmental Health Hazard Assessment ("OEHHA") has released a cancer slope factor for lead. The Cancer Slope Factor, although not yet a promulgated standard, is available, and is being used by OEHHA to establish the No Significant Risk Level ("NSRL") for lead under California's Proposition 65.

3. Comments and Responses

Health impacts resulting from lead may be underestimated. Because of the heightened public awareness to the risks associated with lead exposure and the plethora of information that exists describing the adverse health effects that can result from lead exposure, lead should be evaluated in this EIS/EIR in the most comprehensive manner that is reasonably practicable. Failure to do so is scientifically unjustifiable and is inconsistent with the more rigorous evaluations conducted for other chemicals included in the HHRA.

LAWA should rerun all health risk calculations to determine the human health implications of the increases in lead emissions that will result from all build alternatives.

Response:

No significant sources of lead exist or are proposed at LAX, and further analysis of possible lead emissions presented in the Draft EIS/EIR substantiates this conclusion. Use of the California ambient air quality standard (AAQS) for lead is appropriate as a screening threshold given the lack of significant sources. The carcinogenic health risks of lead are not typically evaluated in risk assessments performed in California. Likewise, EPA's Carcinogen Assessment Group recommends that a numerical estimate of carcinogenic potential not be used. Quantifying lead's cancer risk involves many uncertainties, some of which may be unique to lead. Age, health, nutritional state, body burden, and exposure duration influence the absorption, release, and excretion of lead (EPA, 2002). Health impacts associated with lead exposure are normally evaluated using DTSC's Lead Spread model. Using default or typical values for lead exposure in this model, lead within air at the AAQS would be associated with a small percentage of children with blood levels above the usual target value of 10 ug/dL only if other significant sources of lead exposure, such as a substantial home produce garden and/or higher than usual lead in drinking water is present. Overall, screening (conservative) estimates of lead in air as a result of LAX emissions are 30 times lower than the AAQS, suggesting negligible potential for lead exposure.

Regarding lead emissions, the emissions inventory does include aircraft emissions, and these emissions were used to screen for possible impacts of lead emissions. According to the FAA air quality handbook (Appendix C), the primary but typically insignificant source of lead at airports is the combustion of leaded aviation gasoline (AvGas) in piston-engine aircraft (FAA, 1997). Piston engine planes are the only type of aircraft that use leaded fuel (AvGas). The portion of fuel used for aviation that comprises AvGas is extremely small, approximately 1.9 percent of all aviation fuel (EPA 1998). Storage facilities for AvGas at LAX consist of a single aboveground tank, compared to Jet A fuel, which is stored in large aboveground tanks and numerous smaller above ground and underground tanks.

EPA. 2002. Integrated Risk Information System online database. Lead. Reviewed on September 11, 2002.

EPA. 1998. Bi-National Toxics Strategy. Stakeholder Forum.

FAA. 1997. Air Quality Procedures for Civilian Airports and Air Force Bases. April.

AL00034-55

Comment:

e. Excluding particulate emissions from jet aircraft from the quantitative risk evaluation could significantly underestimate the potential for noncancer health impacts.

Particulate emissions from aircraft were not quantified in the HHRA because "there is insufficient information regarding the nature and toxicity of total petroleum hydrocarbon ("TPH") emissions associated with aircraft and toxicity criteria for these emissions are not available." (EIS/EIR, Technical Report 14a, p. 81.) Particulate matter, in the form of diesel exhaust, is emitted from several ground sources (predominantly trucks and buses). Emissions of diesel exhaust from these ground sources have been included in the HHRA. The EIS/EIR states, however, that because aircraft use a different fuel and a substantially different combustion process than diesel engines, the particulate emissions in jet exhaust are not considered chemically, physically, or toxicologically similar to diesel exhaust. (EIS/EIR, Technical Report 14a, p. 12.) Accordingly, the impact of such emissions have not been quantified in the HHRA.

This is the logic set forth in the EIS/EIR for excluding jet particulate emissions from the HHRA. The argument, however, for not being able to evaluate the toxicological effects of particulate exhaust from jets is flawed. Functionally, the methods used to evaluate the noncarcinogenic toxicity of "diesel" are based entirely on the particulate matter present in diesel exhaust.

According to USEPA, the systemic (non-cancer) toxicity of diesel emissions is due to the insoluble carbon core of diesel particles; when the exhaust is filtered to remove the particulate matter, the remaining exhaust mixture does not produce long-term toxicological effects in laboratory animals. The mechanism of toxicity of the carbon core relates to the deposition of the particles deep in the lung, and the accumulation and aggregation of these particles that result from the inability of the lung's normal clearance mechanisms to effectively remove the particles from the deep regions of the lung. The accumulation of particles sets off a pathogenic sequence that may result in the presence of pulmonary inflammatory, fibrotic, or emphysematous lesions. (USEPA, Integrated Risk Information System, www.epa.gov/iris/ On-line database maintained by USEPA, 2001.)

Because the noncancer toxicity associated with diesel exhaust is believed to be attributable entirely to the insoluble carbon core of the particulate matter, the noncancer toxicity factor would be equally applicable to other sources of particulate matter, such as jet fuel exhaust. If one can estimate the quantity of particulate matter that could be released from the exhaust of a jet engine, then use of the noncarcinogenic toxicity criteria for diesel is a scientifically defensible and appropriate method for evaluating the public health significance of the particulate emissions. Given the significant increase in the air traffic at LAX, failure to quantify potential impact associated with particulate emissions from jet aircraft could represent a significant omission from the estimated noncancer impacts.

Health impacts from particulate matter may be underestimated. LAWA should recalculate all estimates of noncancer risk, and include in the evaluation the potential adverse health effects that can result from exposure to particulate emissions from jet aircraft.

Response:

Quantitative assessment of exposure to particulate matter in jet exhaust in the Draft EIS/EIR 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. A 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 manufacturer have designed engines to avoid significant PM to avoid wear and pitting of turbine blades. Further, PM from jet engines was addressed indirectly in the human health risk assessment since the known toxic components of particulate matter in jet engine exhaust are included in emissions profiles and were included in the selection of TAP or concern, and subsequent assessment of possible cancer risks and noncancer hazards.

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.

The exclusion of particulate matter from aircraft in the analysis of diesel particulate matter 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).

3. Comments and Responses

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 were calculated in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and the Supplement to 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, *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.

AL00034-56

Comment:

f. Potential acute effects from peak exposures to toxic air pollutants were not evaluated.

It is customary and standard for risk assessments to evaluate potential adverse noncancer health effects that can result from short-term, peak exposures. Such short-term higher levels of exposure can result from a combination of physical factors, such as, "worst-case" meteorological conditions combined with peak operational activity at LAX.

Short-term, high level exposures to certain compounds can produce a host of short-term adverse health effects, such as respiratory irritation, and watery and/or itchy eyes. Although acute health effects are typically reversible once the source of the exposure is removed, acute health effects can represent a significant public nuisance, can often trigger allergic reactions in sensitized individuals, and can result in increases in respiratory illnesses.

The EIS/EIR did estimate and evaluate potential worst-case one-hour concentrations of the criteria pollutants. The justification, however, for failing to estimate and evaluate the adverse health impacts associated with one-hour peak concentrations of each of the toxic air pollutants was not provided. Such an omission fails to provide the reviewer with an understanding of the frequency with which the short-term peak exposures may represent a significant health nuisance to the nearby community.

The health impacts of acute exposures were not evaluated. LAWA should include an assessment of the potential adverse health effects that could result from short-term peak exposures.

Response:

Acute hazards due to exposure to TAPs of concern for LAX, which were not addressed in the Draft EIS/EIR, were addressed for all build alternatives and the No Action/No Project Alternative in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.6, Environmental Consequences, and subsection 4.24.1.9, Level of Significance After Mitigation), of the Supplement to the Draft EIS/EIR. Supporting technical detail on the analysis of acute hazards is provided in subsection 4.1.2, Assessment of Acute Hazards, in Technical Report S-9a of the Supplement to the Draft EIS/EIR.

AL00034-57

Comment:

g. The EIS/EIR has not thoroughly considered cumulative effects of pollution on health of children.

3. Comments and Responses

To estimate toxic chemical impacts on off-site residential populations, LAWA has simply estimated emission rates of toxic chemicals from LAX and used an ambient air dispersion model ("ISCST3") to calculate off-site concentrations associated with these emissions. This approach does not include the impact on human health in the Lennox School District of potential background sources such as the 405 and 105 freeways.

By neglecting to include these potential background sources, LAWA has underestimated the cumulative health impacts of toxic chemical emissions on the off-site populations that may be exposed to significant background sources. "An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." (14 California Code of Regulations § 15130.) The methodology used by the EIS/EIR fails to satisfy this requirement.

To understand these cumulative health impacts, LAWA should follow the same approach it used to calculate the human health impacts associated with criteria pollutants. It should calculate the increment above background resulting from the emissions of air toxics at LAX and add this increment to the estimated background concentration of air toxics to determine the total human health risk burden in the Lennox School District.

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 tool 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 TAPs in ambient air for the entire South Coast Air Basin. Thirty Toxic Air Pollutants (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.

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.

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, for a qualitative discussion of potential interactions among TAPs and criteria pollutants.

AL00034-58

Comment:

4. The Mitigation Measures Proposed By The EIS/EIR Are Inadequate.

The mitigation measures proposed in the EIS/EIR have not met all requirements outlined in the SCAQMD CEQA Handbook. Before mitigation measures may be applied to total project emissions they must meet several criteria. The mitigation measures proposed in the EIS/EIR have not demonstrated compliance with three of these criteria.

First, not all mitigation measures are enforceable by a legally binding commitment. Until this is demonstrated, these measures should be eliminated from consideration. Second, several of the mitigation measures do not define a basis for monitoring and enforcement. Without this basis, the mitigation measures should be eliminated from consideration. Finally, the effectiveness of some of the mitigation measures has not been demonstrated.

Furthermore, the CEQA Guidelines require the EIS/EIR to analyze the significant impacts of mitigation measures on the surrounding communities. Title 14 of the California Code of Regulations states, in pertinent part:

"If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." (14 California Code of Regulations § 15126.4(a)(1)(D).)

Several proposed mitigation measures do not satisfy the required criteria and relevant guidelines. Therefore, mitigated emission estimates may be too low. Increases in emissions of mitigated pollutants

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may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations. Furthermore, without mitigation measures, the proposed project Alternative C will result in exceedances of regulatory thresholds for both criteria and toxic pollutants.

At a minimum LAWA needs to:

- i. develop a matrix showing each mitigation measure and how it meets each of the three missing criteria identified above;
- ii. improve documentation of the effectiveness of the selected mitigation measures used to reduce pollutant emissions; and,
- ii. Conduct an analysis of the impacts of the proposed mitigation measures.

Response:

Comment noted. The Supplement to the Draft EIS/EIR contains revised data and the requested matrix relative to feasible mitigation measures and their quantifiable emission reductions in Section 4.6.8.

AL00034-59

Comment:

PART FIVE

THE TRAFFIC IMPACT ANALYSIS IS INADEQUATE

To address traffic impacts of the LAX Master Plan on the Lennox School District, the EIS/EIR should identify those locations where additional traffic might occur and assess the degree to which this additional traffic would cause significant impacts. In this regard it is typical for a traffic study to have clearly defined performance criteria with respect to how the study area is defined and the definition of "significant impact" within the study area.

The EIS/EIR does not appear to discuss the definition of the study area. As far as the Lennox School District is concerned, no roadways within the Lennox School District were analyzed in the EIS/EIR.

It would seem that major roadway facilities in and around Lennox would be affected in some manner by the Master Plan. All of these roadways, directly or indirectly, serve schools within the District. No analysis, however, was carried out east of the I-405 freeway. The traffic study is deficient in not addressing locations in this immediately adjacent area. Even if the impacts are less than significant, there should have been some evaluation in the EIS/EIR showing how the analysis was carried out and indicating findings of significance or no significance on roadways within and around the Lennox School District.

Response:

Please refer to Topical Response TR-ST-2 for a discussion of the study area and identification of facilities analyzed.

AL00034-60

Comment:

PART SIX

THE ENROLLMENT IMPACT ANALYSIS IS MISLEADING

The EIS/EIR analysis of the impact of LAX expansion upon enrollment in Lennox School District schools is inaccurate. The EIS/EIR claims a moderate increase in enrollment will occur as a result of expansion. (EIS/EIR, Schools Technical Report, Section 4.2.1, pp. 14-15.) This is inconsistent, however, with the reality of Lennox demographics.

Lennox is a primarily residential community with very little, if any, room for residential growth. A majority of Lennox families live in severely overcrowded housing conditions. Lennox also has one of the highest

unemployment rates of the nation. Thus, it is highly unlikely that there will be an increase in the residential population of Lennox due to increased employment at LAX.

Additionally, the trend in Lennox has been a replacement of residences with cargo, storage and other warehouse space related to the airport. These industrial spaces replace residences. This results in a decline in student enrollment at Lennox schools. The EIS/EIR analysis of the impact of LAX expansion upon Lennox School District must be revised to reflect the real effect of LAX expansion on Lennox schools.

The decline in student enrollment associated with expansion would result in a severe diminishment of funding to Lennox schools. This loss of funding would be disastrous. The SB 50 school impact fee, intended to mitigate impacts relating to increases in school enrollments, would be inapplicable to Lennox. Thus, the EIS/EIR must identify mitigation measures to alleviate this anticipated impact.

Response:

It would be speculative for LAWA to predict a decrease in school enrollment in Lennox. The potential for increased aircraft activity at LAX to increase demand for industrial uses in adjacent jurisdictions was, however, addressed on pages 4-455 through 4-458 in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), of the Draft EIS/EIR. As indicated on pages 4-456 and 4-458 of the Draft EIS/EIR, if the County chooses to recycle residential uses in favor of industrial development, the change in land use would be subject to discretionary approval and would require environmental review. Regarding funding, if the County were to approve industrial projects that replace residential development, funding would diminish; but, so would the number of students being served in Lennox schools. Furthermore, such new development would be required to pay school impact fees and could be required to otherwise address school impacts through project-specific mitigation pursuant to environmental review under the California Environmental Quality Act. Please see Response to Comment SAL00018-74 regarding school enrollment in Lennox related to Alternative D as presented in the Supplement to the Draft EIS/EIR.

AL00034-61

Comment:

PART SEVEN

THE EIS/EIR VIOLATES CEQA READABILITY REQUIREMENTS

California Public Resources Code § 21003 states, in pertinent part:

"The Legislature further finds and declares that it is the policy of the state that:

"(b) Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public...

"(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment."

The LAX EIS/EIR violates this Code section. First, the document itself is inaccessible. The EIR is 12,000 pages long and costs thousands of dollars to purchase. The CD version, although less expensive, is only accessible to people with computers. Many poorer residents of most highly impacted areas do not have that technology. Additionally, the CD version contains many glitches, so entire sections are impossible to read or print. (See, e.g., EIS/EIR, CD Version Technical Report 4.)

Response:

Comment noted. As indicated in Section 7.3, List of Parties to Whom Sent, copies of the Draft EIS/EIR were widely distributed and made available at several local libraries including, but not limited to, libraries in Lennox, Inglewood, Hawthorne, Lawndale, Gardena, Compton, Torrance, El Segundo, Manhattan Beach, Hermosa Beach, and Redondo Beach, as well as at the LAX Master Plan Reading Room at LAX. The EIS/EIR is clearly organized with extensive use of summaries and explanatory charts and

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diagrams so that it can be useful and understandable to the reader. Please also see Topical Response TR-PO-1 regarding the public outreach program associated with review of the Draft EIS/EIR, as well as with review of the Supplement to the Draft EIS/EIR.

AL00034-62

Comment:

Second, the EIS/EIR is so poorly organized that it is nearly impossible to find all of the pertinent information regarding a topic. Analysis regarding a particular topic is often spread among numerous sections of the "main document." Several of the so-called "technical reports" contain substantive narrative that is not reflected in the report itself. The "appendices" often contain other important information. The document contains no logical explanation as to why its contents are distributed in this manner.

For instance, as expected, the Noise section of the EIS/EIR contains information regarding the noise impacts of LAX expansion upon Lennox schools. However, the Noise Technical Report, thousands of pages later, contains crucial noise impact information that is entirely absent from the Noise section of the main document. In addition, the Noise Technical Report is not contained on the CD entitled "Technical Reports". Instead, it is on the "Appendices" CD, and is actually Appendix "D". The reason for this is entirely unclear.

The Land Use section, a thousand pages from the Noise section and several thousand pages from the Noise Technical Report, essentially states that LAWA will not mitigate noise impacts identified in the Noise section. (EIS/EIR, Land Use, Section 4.2, pp. 4-95,4-96.) These few, critical sentences are not contained in the Noise section of the main document, nor the Noise Technical Report. This illogical placement of this crucial language suggests an intentional decision to obscure information that would raise "red flags" in respondents.

Response:

Comment noted. The format and organization of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR were designed to provide the information and analysis of most use to the general public within the main body of the document, and the supporting data and technical information within the Appendices and Technical Reports. As described on page 11 of the Preface to the Draft EIS/EIR, the Appendices contain material that is considered to be essential in support of the Draft EIS/EIR. Information that supplements the data contained in the Draft EIS/EIR is provided in the Technical Reports. The organization and topics of the various documents are identified on pages 11 through 13 of the Preface, and in the Draft EIS/EIR Table of Contents. The entire document is bound in multiple volumes and set up on the CD in multiple files to facilitate access to, and use of, the individual materials. The EIS/EIR is clearly organized with extensive use of summaries and explanatory charts and diagrams so that it can be useful and understandable to the reader.

AL00034-63

Comment:

PART EIGHT

THE EIS/EIR IS OUTDATED DUE TO THE EVENTS OF SEPTEMBER 11, 2001

The Lennox School District respectfully suggests that the Draft Los Angeles International Airport Master Plan and Draft LAX Expansion Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") prepared by Los Angeles World Airports ("LAWA") must be substantially revised because the world for which they were drafted no longer exists.

The tragic events of September 11, 2001 dramatically and likely permanently altered the use, capacity and public access of all airports, including LAX. While it may be years, if not decades, before the final impact of these horrific acts are understood and quantified, the fact remains that the EIS/EIR was not prepared for such a world of heightened security and restrictions on the public use and access to LAX and the vicinity. The following are just a few of the areas that need to be addressed by the EIS/EIR in light of the recent events:

Capacity What will the capacity restrictions be on future operations of LAX with the imposition of tightened security measures on the flying public?

Traffic How will the current and future access limitations impact adjoining communities? Will the restrictions on public access to the airport and the reliance on outside parking lots (e.g., Lots "B" and "C") adversely impact traffic patterns? How will the airport handle freight and commercial vehicles in light of the restrictions and added security?

Public Safety The specter of future terrorist threats hangs like a pall over all airports, particularly one set in the middle of a hugely populated area such as the Los Angeles basin. The EIS/EIR should provide an updated analysis of the public safety considerations for each of the project alternatives.

The Lennox School District believes that the events of September 11, 2001 are of such a magnitude and nature that the entire configuration of airport expansion presented in the EIS/EIR must be completely reevaluated. The current plan for airport expansion should be reassessed and the EIS/EIR should be thoroughly revised to account for the events of last week.

Response:

Please see Response to Comment AL00034-4 regarding Alternative D-Enhanced Safety and Security Plan.

AL00034-64

Comment:

CONCLUSION

The individual and cumulative impacts of the proposed LAX expansion upon the education, health and safety of its students are of grave concern to the Lennox School District. By law, LAWA must adequately consider and mitigate these impacts in its EIS/EIR. It fails to do so.

The EIS/EIR fails to adequately analyze the environmental justice, noise, pollution, traffic and enrollment impacts of the proposed project upon the Lennox School District. The EIS/EIR fails to propose adequate mitigation measures for these impacts. Furthermore, the EIS/EIR analysis of the cumulative impacts of the LAX expansion upon the Lennox School District is inadequate, both due to its own insufficiency and due to the inadequacy of its analyses of the underlying impacts. (14 California Code of Regulations § 15130.)

For the foregoing reasons, Lennox School District respectfully requests that LAWA revise the EIS/EIR to include alternative projects, further impact analysis and more mitigation information and proposals regarding Lennox School District.

Response:

Please see Responses to Comments AL00034-3 through AL00034-63 for responses to the specific concerns raised in the commentor's letter that provide the basis for the conclusion statement.

AL00035

Salek, Sima

**Inglewood Unified School
District**

9/21/2001

AL00035-1

Comment:

Although the Inglewood Unified School District has undertaken the task of providing this response, it believes it to be procedurally incorrect and financially unfair for a school district of extremely encumbered financial resources to be burdened with the costs of conducting the initial research and analysis required to be in the EIS/EIR, but omitted.

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Response:

Comment noted.

AL00035-2

Comment:

Based upon its review and analysis, the Inglewood Unified School District respectfully submits the EIS/EIR fails to satisfy the requirements of CEQA or NEPA. Accordingly, the Inglewood Unified School District respectfully requests LAWA substantially revise its EIS/EIR to specifically address the impacts of the proposed expansion alternatives discussed herein as well as provide for proposed mitigation at the Inglewood schools for the benefit of the disproportionately affected children in attendance.

Response:

Please see Responses to Comments AL00035-3 through AL00035-66 regarding the specific concerns raised in the commentor's letter.

AL00035-3

Comment:

It is the position of the Inglewood Unified School District that any expansion of LAX as set forth and described in the EIS/EIR will result in a significantly diminished educational environment for children within Inglewood. Therefore, the District is opposed to the project.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts to schools in Section 4.1, Noise, Section 4.2, Land Use, and Section 4.27, Schools.

AL00035-4

Comment:

In addition, the recently initiated security directives which affect traffic, parking, security and other related airport operations were not addressed in the EIS/EIR.

Response:

The comment is essentially the same as Comment AL00034-4. Please see Response to Comment AL00034-4.

AL00035-5

Comment:

DISCUSSION

PART ONE

THE ENVIRONMENTAL JUSTICE ANALYSIS OF THE EIS/EIR VIOLATES CEQA

All of the alternatives presented by LAWA in its EIS/EIR disproportionately impact minorities. The students of the Inglewood Unified School District receive an unfair share of the burdens of LAX expansion, including educational and health impairments.

Had LAWA considered a regional solution as an alternative, including the use of El Toro, it would have found that the impact to minorities is much more equitable on a par with non-minority communities. An increase in regional airport capacity to meet demand would not disproportionately impact minorities if LAX expansion was capped and other regional airports absorbed most of the increased demand. Thus, the EIS/EIR is obligated to consider a regional solution as an alternative.

Response:

The content of this comment is essentially the same as comment AL00034-5; please refer to Response to Comment AL00034-5 and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00035-6

Comment:

1. The EIS/EIR Is Bound By Environmental Justice Considerations.

LAWA is mandated by federal and state law to identify and address environmental justice issues in its environmental review. Executive Order 12898 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.)

State law similarly requires consideration of environmental justice issues in environmental impact reports. (California Public Resources Code Sec. 72000.) The California Environmental Protection Agency is obligated 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." (Id.)

Thus, the EIS/EIR must (1) identify disproportionate, adverse environmental and health effects on minority and low income populations and (2) present mitigation measures to alleviate the unfair effects of its project alternatives upon minority and low income populations.

Response:

The content of this comment is identical to comment AL00034-6; please refer to Response to Comment AL00034-6.

AL00035-7

Comment:

2. All Alternatives Considered Unfairly and Disproportionately Burden Minority Schools.

All of the alternatives presented by the EIS/EIR provide regional benefits by accommodating increased Southern California passenger and cargo load. (EIS/EIR, Purpose and Need, Section 2.1.) All of the alternatives, however, impose heavily concentrated burdens upon the area around LAX; burdens almost exclusively imposed upon minority communities. (EIS/EIR, Environmental Justice, Section 4.4.3.6, p. 4-430, Tables 4.4.3-2 to 4.4.3-7.)

The EIS/EIR admits that the alternatives presented disproportionately burden minority communities under federal and state environmental justice standards. (Id.) The EIS/EIR's own figures show that the minority and low income communities are the main areas impacted by airport expansion. The runway extension to the east, a provision common to all three alternatives, almost exclusively affects a minority population.

The Inglewood Unified School District is primarily a minority, low-income district. (EIS/EIR, Environmental Justice Technical Report, Figures 1 and 2, Table 3) It exists in the geographic area identified by the EIS/EIR as unfairly, disproportionately affected by LAX expansion. (EIS/EIR, Environmental Justice, Section 4.4.3.6, p. 4-430, Tables 4.4.3-2 to 4.4.3-7.) The EIS/EIR admits, "Impacts on public schools associated with aircraft noise exposure would fall on schools that are located predominately within minority and/or low income communities." (EIS/EIR, Environmental Justice, Section 4.4.3.5, p. 4-423.) The EIS/EIR proposes significant, unmitigated and disproportionate educational and health impacts on the students of the Inglewood Unified School District.

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Response:

See Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR regarding the Environmental Justice Program and mitigation proposals that address disproportionate environmental effects on minority and low-income communities, including school facilities. In particular please note Mitigation Measures MM-LU-1, MM-LU-3, and MM-LU-4, which address the impact of noise on schools. Please see Topical Response TR-HRA-4 regarding human health mitigation strategies and Response to Comment AL00035-36 regarding aircraft noise impacts and mitigation measures as they relate to schools in the Inglewood Unified School District.

AL00035-8

Comment:

- a. Significant impact of increased noise on education in Inglewood schools.

All of the alternatives analyzed have significant negative impacts on the education of students in the Inglewood Unified School District. Table A5-7 of the Noise Technical Report of the EIS/EIR presents data which provides an indication of the time that the increased airplane overflights will take out of each school day. (See Part Three, *infra*.)

Oak Street Elementary School is anticipated to lose over an hour of learning time every day under Alternative A. (EIS/EIR, Noise Technical Report, Table A5-7.) This amounts to over 185 hours, or over 26 full school days, of lost education for students every school year. Considering the school year is 175 days long, this amounts to one-seventh (1/7) of each school year that will be taken away from students if Alternative A is implemented. This is a significant impact that requires mitigation.

Inglewood High School will lose one half hour a day in teaching time (32.7 minutes) under Alternative C – the preferred alternative. (Id.) This is an increase of 25.1 minutes of lost educational time every day over the environmental baseline. Alternative C will take approximately one school day away from the education of over 2,000 students every two weeks just at this one school.

In surveys of Inglewood Unified School District teachers and staff, the vast majority stated that the current airplane noise levels substantially interfere with their teaching; that students are frequently distracted by the aircraft noise; that the schools' outdoor activities are frequently disrupted by the aircraft noise; and that aircraft noise is a "significant problem" at their schools. (Gerson/Overstreet Architects, Draft Final Report: Noise Impact Analysis Study and Mitigation Measures, December 5, 2000, Exhibit 1.) These educational impacts will only worsen with LAX expansion.

Response:

The Aircraft Time Above 75 decibels is based over a 24-hour period, not over a 8 hour school day. Thus the total time above 75 dB during school hours would be much less. Please see the following portions of the Supplement to the Draft EIS/EIR: Appendix S-C, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report, regarding extensive evaluation of single-event noise impacts on school disruption. The more detailed analysis of single event noise relative to school disruption that was completed in conjunction with the Supplement to the Draft EIS evaluated the impacts at individual schools in the local area. As indicated in Table S31 of Appendix S-C1, the average number of minutes per average school day that Oak Street Elementary School would be exposed to aircraft noise levels exceeding 84 dBA (i.e., the exterior noise threshold of significance that would produce interior noise levels of 55 dBA) would range from 4.6 minutes under Alternatives C and 8.6 minutes under Alternative D. Inglewood High School would be exposed to aircraft noise levels exceeding 84 dBA (i.e., the exterior noise threshold of significance that would produce interior noise levels of 55 dBA) would range from 0 minutes under Alternatives A, B and D and 1.4 minutes under Alternative C.

There is no standard or criterion for determining what increases in exposure to high noise levels is significant. Although Oak Street Elementary School would be exposed to an increase in the number of events and minutes of exposure to the 55 dBA Lmax threshold, it is unclear whether the increase would be "significant." Under Alternative D, the school would still be exposed to less than 10 minutes of the school day. Although this increase might not be trivial, there is no way of determining whether this impact is "significant" in terms of learning disruption. Mitigation measure MM-LU-1 provides mitigation for schools determined to be significantly impacted by aircraft noise, excluding schools with aviation

easements. Mitigation may take the form of sound insulation or relocation. Further mitigation is provided under MM-LU-3 and MM-LU-4 in the form of study of single event or cumulative noise levels that result in classroom disruption. This exact issue will be addressed in the study conducted under MM-LU-3.

Please see Responses to Comments AL00035-23 through AL00035-36 on the schools in Inglewood Unified School District that would be significantly impacted by cumulative and/or single event noise levels. In addition, please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

AL00035-9

Comment:

b. Significant impacts of increased noise on students, teachers, staff and administration.

As noted by the World Health Organization, noise interference with speech comprehension results in a large number of personal disabilities, handicaps and behavioral changes. Children in the process of language and reading acquisition are noted to be particularly vulnerable. Problems with behavior, concentration, fatigue, uncertainty and lack of self-confidence, irritation, misunderstandings and a decrease in work capacity have been reported by researchers. (World Health Organization, Environmental Health Information, Guidelines for Community Noise, "Adverse Health Effects of Noise," Section 3, April 2001, Exhibit 2.)

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.

AL00035-10

Comment:

A study conducted in 1976 in Highline School District looked at the relationship between school test scores for school grades 3-7 and 5-10 for children attending schools exposed to high levels of aircraft noise and other children attending quiet schools. (Maser, A. L., Sorensen, P.H., Kryter, K.D., and Lukas, J.S. Effects of Intrusive Noise on Classroom Behavior: Data From a Successful Lawsuit. West. Psychol. Assoc. San Francisco. April 1978, Exhibit 3.) While high academic-aptitude students in schools exposed to aircraft noise scored as well in standardized tests as their counter-parts in quiet schools, middle and especially low academic-aptitude students in noisy schools showed progressive deterioration in tests with continued school attendance relative to the students of equal aptitude in quiet schools. (Id.)

Response:

Comment noted. Please see Response to Comment AL00035-9.

AL00035-11

Comment:

A study of the impact of various levels of freeway noise on reading test scores highlighted the cumulative adverse effect of noise exposure on school children. (Lukas, J.S., DuPree, R.B. and Swing, J.W. Effects Of Noise On Academic Achievement And Classroom Behavior. FHWA/CA/DOHS-81/01 Office of Noise Control, California Dept. Of Health Services, Sacramento. 1981.) An apparent degradation in reading achievement with classroom noise that was noted for third-graders, was accelerated by the sixth grade. (Id.)

Response:

Comment noted. Please see Response to Comment AL00035-9.

3. Comments and Responses

AL00035-12

Comment:

Other research has demonstrated the link between chronic exposure to aircraft noise and many adverse effects including learning, motivational deficits, a significant decrease in total quality of life, increase in psychophysiological stress and susceptibility to helplessness. (Gary Evans and Lorraine Maxwell, "Chronic Noise Exposure and Reading Deficits: The Mediating Effects of Language Acquisition." *Environment and Behavior*, Vol. 29 No.5, September 1997 [learning deficits], Exhibit 4; Cohen S., Krantz, D.S., Evans G.W., Stokols D., and Kelly S., "Aircraft noise and children: Longitudinal and cross-sectional evidence on adaptation to noise and the effectiveness of noise abatement." *J. Pers. Soc. Psychol.* 40,331-345,1981 [learning deficits]; Monika Bullinger et al., *The Psychological Cost of Aircraft Noise for Children*, 1998/99 [quality of life decrease], Exhibit 5; Gary W. Evans, Monika Bullinger and Staffan Hygge, "Chronic Noise Exposure and Physiological Response: A Prospective Study of Children Living Under Environmental Stress." *Psychological Science*, Vol.9, No. 1, January 1998 [psychophysiological stress], Exhibit 6; World Health Organization, *Guidelines*, supra. [helplessness].)

Response:

Please see Response to Comment AL00017-52. The types of noise-related health effects identified in the above studies are consistent with the information presented in the Draft EIS/EIR and Technical Report 14b. The studies, however, do not provide any scientific evidence or other basis for determining the nature, extent, or significance of noise-related health effects due to any of the Master Plan alternatives. However, 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. Regarding school disruption, mitigation is provided under Mitigation Measures MM-LU-3 and MM-LU-4 in the form of study of aircraft noise levels that result in classroom disruption and sound insulation for schools determined by the study or interim noise measurements to be significantly impacted. Schools in the Inglewood Unified School District are subject to the aviation easements, as well as prior noise mitigation payments, and so are not eligible for further mitigation. Please see Section 4.1, Noise, and Section 4.2, Land Use, of this Final EIS/EIR for a description of the various mitigation measures, derived from those contained within the Supplement to the Draft EIS/EIR, proposed to address significant noise impacts on sensitive surrounding land uses.

AL00035-13

Comment:

A 1980 study showed elevated blood pressure of children attending schools under the LAX flight paths compared to children in quiet schools. (Cohen S., Krantz, D.S., Evans G.W. and Stokols D., "Physiology, motivational, and cognitive effects of aircraft noise on children: Moving from the laboratory to the field." *American Psychologist*, 35 :231-243. 1980.)

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

AL00035-14

Comment:

The EIS/EIR does not suggest that conditions resulting from an expansion of LAX will result in different circumstances than those discussed in the above-referenced studies.

Response:

The content of this comment is identical to Comment AL00034-14; please see Response to Comment AL00034-14.

AL00035-15

Comment:

c . Significant impacts of increased pollution on students, teachers, staff and administration.

As noted by the United States Environmental Protection Agency ("USEPA"), exposure to ambient criteria and toxic pollutants resulting from anthropogenic emissions can result in a wide variety of health impacts. (USEPA, The Benefits and Costs of the Clean Air Act, 1970 to 1990. Prepared for U.S. Congress, October 1997, Exhibit 7.) Short-term health impacts can include eye, nose, and throat irritation; losses in hand-eye coordination (compensatory tracking); vigilance (detection of infrequent events); visual system sensitivity; and increased asthma attacks. (Seinfeld, John H., Atmospheric Chemistry and Physics of Air Pollution. John Wiley & Sons, New York, 1986.) Long-term exposures can result in increased mortality, susceptibility to pulmonary bacterial infection, irritation of the alveoli, emphysema, chronic bronchitis, reduced pulmonary function, losses in IQ, and cancer. (Id. and USEPA, Benefits, supra.)

Furthermore, there is good reason to believe that children could be more vulnerable to these effects. Because of growing concerns regarding children's increased susceptibility to environmental contaminants, the California Legislature passed the Children's Environmental Health Protection Act (SB 25), which requires the California Environmental Protection Agency ("Cal/EPA") to specifically consider children in setting Ambient Air Quality Standards and developing criteria for Toxic Air Contaminants ("TACs"). The law will require Cal/EPA to specifically evaluate available information on children's increased susceptibility to each of the TACs, and develop a list of up to five TACs that potentially have disproportionate impacts on infants and children.

As stated by Cal/EPA, children are considered to be at increased risk because of the rapid growth and development of their nervous, immune and reproductive systems, and because their organs and tissues are rapidly maturing. (Cal/EPA, Air Pollution and Children's Health. Fact Sheet by Office of Environmental Health Hazard Assessment, March 2001, Exhibit 8.) In addition, children experience greater exposure to ambient pollutants relative to their body weight, and children's specific activity patterns may contribute to an increased exposure to toxicants resulting from increased exercise and sporting activities. (Id.) Asthma has also been identified as a major problem in children, and some of the chemical emissions from LAX have been identified by Cal/EPA as resulting in an exacerbation of asthma (e.g., formaldehyde and acrolein). (Id.)

Furthermore, recent studies suggest that particulate matter ("PM") may exacerbate asthma and cause coughs and other respiratory symptoms in children. (Id.) Recent studies also suggest that prolonged exposure to PM may also affect the growth and functioning of children's lungs. (Id.) Researchers found that as children grow up in smoggier areas, there is a notable lag in lung function growth. (Id.)

Response:

The comment is essentially the same as AL00034-15. Please see Response to Comment AL00034-15.

AL00035-16

Comment:

Because of the anticipated environmental and related health impact of noise and pollution on the schools, students could potentially fall behind in their schooling, one class grade or more. Several students could have an impaired ability to retain information as a result of the impact. These students may not be able to grasp as much as other students and would not be able to process more advanced concepts in high school that build upon what they were supposed to, but did not, learn in elementary school. More children would have asthma and allergies than would without the LAX expansion. Children may have an increased risk of heart attacks and death.

Children in Inglewood schools may have permanent learning disabilities that limit their career choices and quality of life. Students may have shorter lifespans and worse general physical health than other children at other non-impact schools. Students may have lifelong psychological weaknesses that would affect every aspect of their lives.

3. Comments and Responses

Response:

The content of this comment is essentially the same as comment AL00034-17; please refer to Response to Comment AL00034-17.

AL00035-17

Comment:

These adverse health impacts are real. These are the impacts that will disproportionately and significantly affect minority and low income communities.

Response:

Please see Topical Response TR-EJ-1 regarding potential air quality and health impacts on low-income and minority communities.

AL00035-18

Comment:

The EIS/EIR only considers alternative configurations of LAX expansion from which to select a project. All of these alternatives, however, have devastating effects on the students of Inglewood. In order to comply with CEQA, LAWA is required to evaluate alternative methods of accommodating increased passenger and cargo traffic that do not have this significant and unjust environmental impact. (California Public Resources Code §§ 21002, 21002.1.)

Response:

The content of this comment is essentially the same as comment AL00034-19, please refer to Response to Comment AL00034-5 and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00035-19

Comment:

3. The EIS/EIR Violates CEQA By Failing to Consider Alternatives that Equitably Distributes Burden Among Populations.

Because of the significant and unmitigatable impact of all of the alternatives on minority and low impact communities, other alternatives must be explored. This is particularly true in light of the evidence that alternatives exist that do not disproportionately impact minority and low income communities.

Regional approaches exist that could accommodate the increased passenger and cargo load. Studies indicate that, unlike the alternatives considered in the EIS/EIR, these alternatives do not disproportionately impact minorities and low-income communities. As Manuel Pastor, Jr. and Jim Sadd stated in Environmental Justice and the Expansion of Los Angeles International Airport, Occidental College Environmental Science and Studies Program for Communities for a Better Environment Los Angeles (November 2000):

"[A] very large expansion of LAX expansion and/or a failure to convert El Toro to commercial use will pose significantly more burdens for minority populations in Southern California. By contrast, the most equitable scenario involves capping demand at LAX, shifting traffic to Ontario and the Inland Empire airports, and maximizing use of El Toro." (p. 1, Exhibit 9.)

Utilizing El Toro and other regional airports is reasonably considered to be feasible. (California Public Resources Code § 21061.1.) This is duly evidenced by the fact that the Southern California Association of Governments included the regional distribution of future air traffic in the adopted 2001 Regional Transportation Plan.

California Public Resources Code § 21002 states, in pertinent part:

"The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

California law requires the EIS/EIR to consider feasible alternatives that would substantially lessen the significant environmental effects of the project. LAWA failed to do so. An alternative that utilizes other airports in the Southern California region would have a more equitable distribution of burdens among populations. The EIS/EIR, however, fails to consider a feasible regional alternative. Therefore, no current configuration of the proposed project should be approved. (Id.)

Response:

Please see Response to Comment AL00034-5 and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00035-20

Comment:

4. The EIS/EIR Violates CEQA By Failing to Provide Mitigation Measures for the Significant Environmental Justice Impacts.

The EIS/EIR is required to mitigate the environmental justice burden imposed by its alternatives to the extent feasible. (California Public Resources Code § 21002, 21002.1.) The EIS/EIR, however, fails to describe any mitigation measures to alleviate its impacts on schools. Instead, it proclaims that it will work with impacted communities to develop mitigation measures.

Response:

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. While mitigation measures were accounted for and discussed in Section 4.4.3, of 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. 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 minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

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.

3. Comments and Responses

AL00035-21

Comment:

The Environmental Justice Task Force identified in the report, although potentially helpful, does nothing to satisfy the CEQA requirements for mitigation of identifiable impacts. (EIS/EIR, Environmental Justice, Section 4.4.3.1.) The EIS/EIR also discusses its current residential soundproofing program as a mitigation technique. (EIS/EIR, Environmental Justice, Section 4.4.3.5.) This program also has no mitigation effect upon schools.

Response:

The comment is essentially the same as AL00034-22. Please see Response to Comment AL00034-22.

AL00035-22

Comment:

Feasible mitigation programs exist that would address the noise issues in minority and low income schools. Sound insulation can alleviate noise impacts inside classrooms. To the extent that the significant noise impacts in Inglewood schools are unmitigatable, the EIS/EIR should consider relocating those schools.

The same mitigation analysis must be conducted for air quality and other significant impacts of the proposed project upon minority and low-income populations.

To the extent feasible, LAWA is obligated to mitigate its impacts on the Inglewood Unified School District. (14 California Code of Regulations § 15126.4.) The EIS/EIR fails to do so. The failure to include such mitigation measures in the body of the EIS/EIR violates CEQA. (Id.) Accordingly, this EIS/EIR is fatally inadequate and must be revised to comply with CEQA.

Response:

Please see Response to Comment AL00035-36 regarding noise impacts on schools within the Inglewood Unified School District. Please see Response to Comment AL00035-23 and AL00035-28 for discussion of land use compatibility effects of the aviation easements, noise mitigation payment and other provisions of the "Settlement Agreement."

Section 4.4.3, Environmental Justice of the Supplement to the Draft EIS/EIR included mitigation measures addressing noise and air quality. Also, in recognition of disproportionately high and adverse aircraft noise effects and potential air quality and human health effects on minority and low-income communities, benefits were also included to help offset these effects. Please see Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Final EIR regarding mitigation measures and benefits that address disproportionately high and adverse effects on minority and low-income communities, as refined based on input gathered during circulation of the Supplement to the Draft EIS/EIR.

AL00035-23

Comment:

PART TWO

THE EIS/EIR IMPROPERLY RELIES UPON AND OVER ESTIMATES THE EFFECT OF THE SETTLEMENT AGREEMENT

The EIS/EIR states in one volume:

"In the mid-1970's, the City of Los Angeles . . . [settled] a noise lawsuit. Under the terms of the settlements, each school in the public . . . systems that had participated in the lawsuit agreed to allow an aviation easement, deeming the school to be compatible with the airport under Title 21." (EIS/EIR, Land Use, Section 4.2, pp. 4-95, 4-96.)

In a separate volume, and after thousands of consecutive pages, the EIS/EIR states:

"As presented in Technical Report 1, Land Use, four public schools would be exposed to significantly high levels of noise by 2015 within the City of Inglewood. For those impacted schools not already considered compatible pursuant to California Code of Regulations, Title 21, mitigation in the form of sound insulation or acquisition and relocation would be provided." (EIS/EIR, Schools Technical Report, Section 17, p. 11.)

"As presented in Technical Report 1, Land Use, eight public schools would be exposed to significantly high levels of noise by 2015 within the Inglewood Unified School District and Lennox Elementary School District. For those impacted schools not already considered compatible pursuant to California Code of Regulations, Title 21, mitigation in the form of sound insulation or acquisition and relocation would be provided." (EIS/EIR, Schools Technical Report, Section 17, p. 15.)

In these brief comments, located volumes apart, and without reference to one another, the EIS/EIR addresses and dismisses further consideration of the impacts upon the Inglewood schools solely based upon the existence of the 1970's Settlement Agreement. (Amended Judgment and Final Order in Condemnation, Exhibit 10; the operative "Judgment and Final Order" is actually entitled Amended Judgment and Final Order in Condemnation, and referred to herein as "Settlement Agreement".) Reading between the lines and volumes, what is apparent from these two statements is that LAWA has no intention of providing mitigation in any form to the Inglewood schools as part of the expansion. As set forth below, this short shrift approach (1) fails to even consider the entirety of the terms of the Settlement Agreement; (2) fails to consider other surcharges which would be caused by an expansion not provided for by the express grant of the avigation easement in the Settlement Agreement; and (3) inappropriately avoids and dismisses a proper CEQA analysis.

Response:

The Inglewood Unified School District (District) schools were included in the analysis of cumulative and single event aircraft noise impacts. Since publication of the Draft EIS/EIR, a Supplement to the Draft EIS/EIR was prepared which evaluated an additional Master Plan alternative (Alternative D), incorporated information on Year 2000 conditions, and provided new analysis of single event aircraft noise levels that result in classroom disruption. This information was provided in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analysis provided in 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. Thresholds used to identify significant interior noise levels that result in classroom disruption included: 55 dBA Lmax, 65 dBA Lmax, and 35 Leq(h). As indicated in Section 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 significant aircraft noise impacts on schools. Under these measures, mitigation is provided to schools to further evaluate noise thresholds and to provide sound insulation for schools determined to be significantly impacted by single event and cumulative noise levels that result in classroom disruption.

See Response to Comment AL00035-36 for additional information regarding school facilities that would be subject to significant aircraft noise impacts under the Master Plan alternatives.

As to consideration of the document referred to by the commentor as the "Settlement Agreement," the Amended Judgment and Final Order entered by the Los Angeles Superior Court (Court) in January 1980, is provided as Attachment 4 of this Final EIS/EIR for review. Below is a brief description of some of the provisions of this document; however, the entirety of the "Settlement Agreement" and its exhibits were considered in preparation of the environmental analysis and should be reviewed for a more detailed and complete understanding. In the "Settlement Agreement," the Court:

(a) Established avigation easements for noise, vibrations and fumes from LAX operations (Avigation Easements); and

(b) Required payment of \$20,942,298 to five school districts, of which \$5,884,733.66 was assigned to the Inglewood Unified School District; and ordered that the Inglewood Unified School District use the full \$5,884,733.66 Noise Payment "to complete necessary construction or structural modifications of their facilities so as to reduce the noise levels in the classrooms resulting from the operation of commercial jet aircraft to and from and at Los Angeles International Airport," and to construct new facilities "in such

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a manner as to exclude in the classroom any objectionable levels of noise created by the operation of [LAX] to the extent of the easements granted herein." (Noise Mitigation Payment.)

The "Settlement Agreement" states that "the purpose of the air easements granted hereunder for noise, vibrations and fumes over [the District's schools] running to the benefit of the [City] is for the purpose of resolving all questions between the parties arising out of the defendant City's operation of ... [LAX] and the consequent overflight or fly-by of jet aircraft with the attendant consequences of noise, vibrations and fumes with [the District's schools]."

As to the comment on surcharges, LAWA has reason to conclude that the projected sound levels are well within the aviation easement limits and do not create a surcharge, based on the full provisions of the "Settlement Agreement." For example, the aviation easements are defined with "specific levels of noise exposure that will be permitted within the scope of the air easements." As ordered by the Court, the "criterion or quantitative measure of noise exposure used for the purpose of describing and establishing the air easements granted herein shall be the Community Noise Equivalent Level (CNEL) methodology." The aviation easements allow up to + 2 dB above 1970 aircraft noise levels and an additional +0.5 dB above the specified noise limits before the noise level is deemed to be a surcharge on the aviation easement. The aviation easements were awarded based on 1970 aircraft noise impacts with additional surcharge allowances for future construction and growth. The aircraft noise impacts in 1970 were much more extensive than identified under the 1996 baseline or Year 2000 conditions or projected to occur under the Master Plan alternatives. No schools within the Inglewood Unified School District are projected to exceed the specified noise limits to the aviation easements under Alternatives A, B, C, or D.

Accordingly, the aviation easements and noise mitigation payment and other provisions of the "Settlement Agreement" resolve land use incompatibility issues and noise impacts at Inglewood Unified School District schools.

AL00035-24

Comment:

1. The EIS/EIR Fails to Consider All Possible Surcharges on the Aviation Easements.

In Section 4.2 of the EIS/EIR, Land Use, "Existing Incompatible Land Uses" are addressed. When discussing the historically high noise levels affecting the Inglewood Unified School District, the EIS/EIR refers to and relies solely upon the Settlement Agreement which granted LAWA an aviation easement over the referenced schools. (EIS/EIR, Land Use, Section 4.2, p. 4-95, fn. 72.) The EIS/EIR concludes:

"Easements for individual schools are considered burdened (incompatibility found) only if the school site's CNEL exceeds the 1970 level for each location by 0.5 CNEL. It is generally acknowledged that these increases have not occurred, since 65 and higher CNEL contours have been generally reduced since 1970 to the present."

This conclusion is incomplete and misstates the Settlement Agreement. The Settlement Agreement provides that the purpose of the air easements granted to LAWA are for "noise, vibrations and fumes" over the schools. (Settlement Agreement, page 3, lines 18-21). The Settlement Agreement further provides:

"Vibration and fume levels are not quantitatively described for the purpose of the distribution of the air easements but it is agreed that those levels of vibration and fumes which accompany the agreed-to CNEL values shall not be a burden of the easements." (Settlement Agreement, page 11, lines 1-5.)

Thus, upon its terms, the aviation easement may be burdened not only by an excess of the stipulated CNEL, but also by vibrations and/or fumes in excess of the 1970 values. Putting aside the question of whether vibration or fume levels may be quantitatively linked to CNEL values, the EIS/EIR does not address whether any expansion would result in a vibration and/or fume surcharge upon the aviation easement.

Response:

The aviation easements awarded by the Court under the terms of the "Settlement Agreement" expressly include vibrations and/or fumes from LAX operations. Please see Response to Comment AL000035-23, as well as Topical Response TR-N-8 regarding noise-based vibration effects, and Response to Comment PC00045-4 regarding fumes.

AL00035-25

Comment:

2. The Impacts of the LAX Expansion Will Constitute a Surcharge on the Aviation Easements.

Under California law, the extent of an easement is determined by the terms of its grant. (California Civil Code § 806.) As stated by the California Supreme Court, an owner of an easement may not increase the use of the easement in any manner that imposes a new or greater burden on the servient tenement without the consent of the servient owner. (Colegrove W. Co. v. City of Hollywood (1907) 151 Cal. 425, 429.) Further, "... it is well settled that both parties have the right to insist that so long as the easement is enjoyed it shall remain substantially the same as it was at the time the right accrued, entirely regardless of the question as to the relative benefit and damage that would ensue to the parties by reason of a change in the mode and manner of its enjoyment. [Citation omitted.]" (Whalen v. Ruiz (1953) 40 Cal.2d 294, 302.)

In fact, "California courts have set their faces firmly against . . . increases in the burden upon the servient tenement." (Wall v. Rudolph (1961) 198 Cal.App.2d 684, 694.) Accordingly, "The requirement that the easement involve only a limited use or enjoyment of the servient land is a corollary of the nonpossessory character of the interest. If a conveyance purported to transfer to A an unlimited use or enjoyment of [a parcel of land], it would be in effect a conveyance of ownership to A [of the parcel of land], not of an easement." (Id., at p. 697; emphasis in original.)

The aviation easement granted by the Inglewood Unified School District to LAWA anticipated an increase in aircraft operations at LAX up to 40,000,000 passengers annually. (Settlement Agreement, Exhibit F, paragraph B.) The expansion alternatives discussed in the EIS/EIR predict an increase in aircraft operations to accommodate at least 89,600,000 passengers annually. (EIS/EIR, Alternatives, Table 3-2.) Moreover, the amount and frequency of airplane traffic will also necessarily increase under the proposed expansion to accommodate the predicted increase in cargo to a total of 2,275,236 tons per year. (Id.)

Response:

The aviation easements awarded by the Court cover all aircraft operations at LAX. The Court established the aviation easements "for the purpose of resolving all questions between the parties arising out of the defendant City's operation of ... [LAX] and the consequent overflight or fly-by of jet aircraft with the attendant consequences of noise, vibrations and fumes with [the District's schools]." The Court, in awarding the Aviation Easements, did not state that the Easements were restricted to operations carrying a certain number of passengers per year. Rather, the Court defined the Aviation Easements by "specific levels of noise exposure that will be permitted within the scope of the air easements." Due to changes in aircraft standards, noise exposure levels have declined since 1970 notwithstanding any increase in the number of passengers per year. Accordingly, the noise exposure limits for the aviation easements are not projected to be exceeded by any of the LAX Master Plan build alternatives. No schools within Inglewood Unified School District are expected to exceed the specified noise limits to the aviation easements under the LAX Master Plan buildout alternatives.

With respect to the passenger level and increase in cargo level referenced in the comment, these levels were forecast for Master Plan Alternative C. Under LAWA Staff's new preferred Alternative D, passenger levels and cargo levels are less than those previously forecast under Alternatives A, B, and C. As stated in Section 3.2 of the Supplement to the Draft EIS/EIR, Alternative D forecasts a passenger level of 78.9 million annual passengers (MAP) and a cargo level of 3.1 million annual tons (MAT), which are nearly equivalent to the 78.7 MAP and 3.1 MAT forecasts under the No Action/No Project Alternative.

Although passenger levels have increased under 1996 baseline and Year 2000 conditions from 1970 levels of 40 MAP, and are projected to increase under the Master Plan alternatives from 1970 levels or

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40 MAP, the Amended Judgment and Final Order (referred to in the above comment as the "Settlement Agreement") provides a broad grant of avigation easement which expressly states that it can be surcharged only by unreasonably exceeding specified CNEL limits. The CNEL limits that would result in a surcharge, in turn, are greater than the noise levels associated with use of 1970 aircraft at either 1970 passenger levels or 40 MAP. The avigation easements are defined to allow a 2 dB increase above 1970 aircraft noise levels and at least an additional 0.5 dB above the specified noise limits before the avigation easement is considered surcharged. Therefore, the burden of the avigation easement is determined by noise levels, rather than passenger levels. Moreover, since 1970 aircraft noise levels were much more extensive than identified under 1996 baseline or Year 2000 conditions or than projected to occur under the Master Plan alternatives, the avigation easements would not be surcharged as a result of Master Plan implementation. Increased airport operations do not directly correlate to increased noise levels, as further described in Subtopical Response TR-N-6.2.

AL00035-26

Comment:

An acute example of the impacts from the anticipated increase in flight frequency may be found in Table A5-7 of the Noise Technical Report in the EIS/EIR. As a result of LAX operations measured in 1996, speech is interrupted at Inglewood High School for 7.6 minutes per day. If LAX expands its operations under Alternative C, speech is projected to be interrupted at Inglewood High School for 32.7 minutes a day. This increase accumulates to teaching being suspended every day for half of a class period, or considering it another way, every student having one class eliminated every two days or one day of school eliminated approximately every two weeks.

Response:

Please see Response to Comment AL00035-8, for information on Time Above Analysis.

AL00035-27

Comment:

Thus, even if the "noise, vibration and fume" levels resulting from the proposed expansion are less than what they were in 1970, the increase in frequency of air traffic through the avigation easement will constitute a material surcharge upon the easement. This will, at the least, require the Inglewood Unified School District's consent, and realistically also require further mitigation in the form of additional sound attenuation measures at each of the affected school sites.

Response:

See Response to Comments AL00035-23, AL00035-24 and AL00035-25 above. Please also see Topical Response TR-N-3.3 regarding increase in frequency of air traffic under the Master Plan alternatives. This increase in air traffic was considered in the noise modeling approach used to predict noise levels that would result from development of the No Action/No Project Alternative and Alternatives A, B, C, and D. As noted previously, Alternative D would result in comparable airport activity as the No Action/No Project Alternative. As described in Response to Comment AL00035-23, above, the Supplement to the Draft EIS/EIR includes a new analysis of noise impacts on schools as a result of single event or cumulative noise levels that result in classroom disruption and provides mitigation measures to address schools newly exposed to high aircraft noise levels.

AL00035-28

Comment:

Therefore, the EIS/EIR must further consider, and LAWA must mitigate, the impact upon the existing or future incompatible land use resulting from any expansion, as the Judgment and Final Order will not, as suggested, conclusively control the question given the anticipated substantial surcharge upon the avigation easement and resulting burden to the servient tenement, Inglewood Unified School District schools.

Response:

Please see Response to Comments AL00035-23, AL00035-25, and AL00035-27. The use of an aviation easement to achieve land use compatibility is supported by Compliance with Federal Obligations by the Naples Airport Authority, F.A.A. No. 16-01-15 (March 10, 2003); California Code of Regulations Title 21, Sections 5014 and 5037; and the 2001 Caltrans Airport Land Use Handbook, pages 3-25 and 7-36. Title 21 and the 2001 Caltrans Handbook are further described in Section 4.2, Land Use of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analysis provided in Technical Report 1 of the Draft EIS/EIR and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

AL00035-29

Comment:

3. The Existence of the Settlement Agreement is Irrelevant to Whether LAWA Must Comply With CEQA.

The California Environmental Quality Act ("CEQA") is a state environmental law applicable to public agency decisions to authorize projects that could have an adverse impact on the environment. The purpose of the CEQA Environmental Impact Report requirement is to provide the information needed to make informed decisions in the selection and authorization of projects. (California Public Resources Code §§ 21001(g), 21002, 21061; 14 California Code of Regulations § 15121.)

The appropriate project alternatives, significant impacts and related mitigation measures must be analyzed in the EIS/EIR. (California Public Resources Code §§ 21002.1, 21100.) In this instance, the EIS/EIR must identify measures that would mitigate the impacts of the various alternatives on Inglewood Unified School District in general and impacted school facilities in particular. (Id.) Without this analysis, the selection process is flawed and an informed decision cannot be made.

The Settlement Agreement between the City of Los Angeles and various school districts does not affect this state mandated analysis. The EIS/EIR claims that the Settlement Agreement operates to mitigate significant impacts upon schools and students. (EIS/EIR, Land Use, Section 4.2.) This claim is in direct contradiction to the requirements of CEQA. (14 California Code of Regulations § 15126.4.)

CEQA requires LAWA to conduct and publicly disclose its analysis of impacts upon affected schools and of measures that can mitigate those impacts, if any. Id. Thus, the EIS/EIR must be revised to conduct a thorough analysis of impacts upon schools and of measures that can be taken to mitigate those impacts. (Id.)

Response:

Section 4.1, Noise and Section 4.2, Land Use of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided extensive analyses of significant impacts pertaining to noise and land use compatibility. Supporting technical data and analysis are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C1 and Technical Report S-1, of the Supplement to the Draft EIS/EIR. The analysis of noise impacts for all Master Plan alternatives, as well as the No Action/No Project Alternative, included schools subject to the Amended Judgment and Order referred to in the comment as the "Settlement Agreement." For example, these impacts are presented for LAWA Staff's new preferred Alternative D in Table S51 of the Supplemental Land Use Technical Report (summarizing schools significantly impacted by high noise levels or significant noise increases) and Table S4.2-18 (summarizing schools significantly impacted by single event and cumulative noise levels). Response to Comment AL00035-36 provides additional information regarding the Inglewood schools that would be newly exposed to significant noise levels.

Please see Response to Comment AL00035-23 for a description of the noise mitigation payment ordered by the Court to mitigate noise and other impacts of aircraft operations in Inglewood classrooms, the aviation easements previously awarded by the Court with respect to the Inglewood schools, and the full provisions of the "Settlement Agreement."

3. Comments and Responses

AL00035-30

Comment:

PART THREE

THE NOISE ANALYSIS OF THE EIS/EIR IS INADEQUATE¹

1. The EIS/EIR Under-Predicts Noise Impacts To Inglewood Unified School District Facilities.

a. The EIS/EIR should use year 2000 for the Environmental Baseline not 1996 (which includes phased-out noisier "Stage 2" aircraft).

From Table 4 of the Noise Technical Report, it is evident that the 1996 "baseline" condition used for the EIS/EIR includes noisier "Stage 2" aircraft. Phase-out of these noisier aircraft was completed at the end of 1999 under the directive of the FAA. The "environmental baseline" is not therefore representative of the current conditions, which have benefitted from the enforced phase-out of noisy Stage 2 aircraft.

1 For the purpose of these comments our use of the terms "Decibel", "dB" and "dB(A)" are all intended to mean A-weighted decibels.

Response:

Please see Topical Response TR-GEN-1 and Subtopical Response TR-N-1.3 regarding the use of 1996 baseline noise levels from which to measure increased benefits associated with proposed alternative for the environmental analysis in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00035-36 regarding Inglewood Unified School District facilities newly exposed to high noise levels compared to Year 2000 conditions.

AL00035-31

Comment:

b. The noise analysis appears to under-predict aircraft noise and impacts in Inglewood.

The noise model used for all noise analysis appears to under-predict aircraft noise in Inglewood. Since "new exposure to CNEL 65" is used as a threshold of significance to assess aircraft noise impact, the study's under-prediction of noise levels leads to an under-prediction of impact.

It is understood that the EIS/EIR's aircraft noise predictions for "environmental baseline" and future scenarios were not corrected for noise monitoring results. The comparison of computed and measured noise levels based upon 1996 conditions presented in Table 6 of the Aircraft Noise Technical Report showed that for all six of the Noise Management Bureau's noise monitoring sites in Inglewood, the model under-predicted actual measured noise levels by 1.4 to 3.5dB. The noise impacts presented in the EIS/EIR for Inglewood schools, therefore, are significantly under-predicted.

Taking just one example, the EIS/EIR declares no noise impacts under any project scenario for Claude Hudnall Elementary School. From data presented in the Noise Technical Report, there will be a noise increase compared to the report's 1996 "baseline" of 2.1 dB, 1.8dB and 2.1 dB in 2015 under Alternatives A, B and C respectively. All of these predicted noise level increases would exceed the report's threshold of significance if the resulting noise level were at CNEL 65 or above. The report's calculated 1996 baseline level for this school is, however, only CNEL 60.6. LAWA's 4th quarter noise contours, based upon measured aircraft noise levels, show Claude Hudnall Elementary School only marginally outside of the CNEL 65 contour. Based upon the predicted aircraft noise level increases presented in the report, it seems inconceivable that the actual (measured) aircraft noise levels in 2015 (rather than the under-predicted levels contained in the EIS/EIR) would not be at CNEL 65 or above. Thus, in this case and others, the report's reliance on under-predicted data results in an under-assessment of the real aircraft noise impact.

Accordingly, the EIS/EIR should include analysis of the anticipated real noise impact upon Inglewood schools.

Response:

The commentor describes a portion of the forecasts provided in the Draft EIS/EIR and is correct that noise monitoring was not correlated with the alternatives. 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 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 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. According to the 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 difference is acknowledged and described in Topical Response TR-N-1, in particular Subtopical Response TR-N-1.1, INM calculated noise levels compared to noise levels measured in the field and Subtopical Response TR-N-1.2 and in detail 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, and Section 2.1.7, Relationship of 2000 Contours to 4th Quarter 2000 Report Contours, in Appendix S-C1, Supplemental Aircraft Noise Technical Report of the Supplement to the Draft EIS/EIR. The commentor quotes noise level increases from Table A5-3 Regular and Special Grid Point Assessment-Aircraft CNEL, Comparison of All Alternatives to Baseline, however, as the commentor indicates, the Claude Hudnall Elementary School is located outside of the 65 dB CNEL impact area.

AL00035-32**Comment:**

c . The EIS/EIR has overlooked several Inglewood Unified School District facilities.

The Inglewood Unified School District facilities listed Table 1 below have not received proper consideration in the EIS/EIR.

LOCATION**COMMENT**

W. Claude Hudnall

Figure 19 of the Noise Technical Report shows this location to the north (and west) of Inglewood High and predicts significantly lower noise levels here than for Inglewood High School and no noise impact. Inglewood Unified School District's map locates this school at approximately equal latitude with Inglewood High School. As a result, a noise impact would be expected at this location.

Child Development Center/ Head Start
10409 Tenth Ave., Inglewood CA 90303

This is not considered in the EIS/EIR.

Stadium of The Stars

This is not considered in the EIS/EIR.

Table 1: Inglewood Unified School District Facilities That Require (Re)-Consideration in the Final EIS/EIR.

Response:

Please see Response to Comment AL00035-36 for a summary of all Inglewood Unified School District facilities that would be impacted by significant high noise levels. The Draft EIS/EIR and Supplement to the Draft EIS/EIR adequately considered the Inglewood Unified School District facilities, as discussed below.

3. Comments and Responses

Figure 19 of Appendix D, Noise Technical Report, of the Draft EIS/EIR, identifies the W. Claude Hudnall Elementary School, located at 331 W. Olive St., as Grid Cell ID code PBS048. The Grid Cell ID code is used to identify individual sites for additional evaluation, including schools. Noise impacts on school facilities, including Hudnall Elementary are described in Section 4.1, Noise, and Section 4.2, Land Use, and Appendix D, Noise Technical Report, and Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR. The correct location of Hudnall Elementary School is shown on all figures that identify noise-sensitive uses. Hudnall Elementary occupies a site on the north side of Olive Street between Eucalyptus Avenue and Inglewood Avenue. The Inglewood High School occupies a site approximately 700 feet to the east. The Hudnall Elementary site and the northern portion of the Inglewood High site are on the same latitude, as indicated in the comment. However, the Inglewood High site extends over a much larger area and approximately 600 feet further south than the Hudnall Elementary site. As an example of how aircraft noise resulting from the development of Alternative B would affect these facilities, Figure 4.2-17 of the Draft EIS/EIR shows the Alternative B 2015 65 CNEL contour. This contour passes over the southern half of the Inglewood High site and does not pass over any portion of the Hudnall Elementary site. Although approximately one-half of the Inglewood High site is exposed to the 65 CNEL contour the entire site was identified as an impacted school newly exposed to the 65 CNEL and exposed to a 1.5 CNEL increase within the 65 CNEL. As a result, in this worst-case scenario under Alternative B, there would be a significant noise impact to Inglewood High and no significant noise impact to Hudnall Elementary. Under Alternatives A, B, and C compared to 1996 baseline conditions, no impact on Hudnall Elementary as a result of being newly exposed to the 65 CNEL or exposed to an increase of 1.5 CNEL within the 65 CNEL was identified in the Draft EIS/EIR.

Sections 4.1, Noise, and Section 4.2, Land Use, and 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, present a discussion of LAWA Staff's new preferred alternative, Alternative D, including comparison against Year 2000 conditions, and new analysis of schools newly exposed to interior noise levels that result in classroom disruption. As presented in Section 4.2.6 of the Supplement to the Draft EIS/EIR, under Alternatives A, B, C, and D compared to Year 2000 conditions, no impact on Hudnall Elementary as a result of being newly exposed to the 65 CNEL or exposed to an increase of 1.5 CNEL within the 65 CNEL was identified. Similarly, under Alternative D, Hudnall Elementary would not be exposed to these high noise levels compared to 1996 baseline conditions. However, as shown in Tables S4.2-10 and S4.2-14 of the Supplement to the Draft EIS/EIR, under Alternatives A and B, Hudnall Elementary would be newly exposed to high single event noise levels that would result in classroom disruption compared to 1996 baseline and Year 2000 conditions.

Regarding the Child Development Center/Head Start, this facility is located on the same site as Clyde Woodworth Elementary, and therefore noise impacts were fully analyzed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Regarding the Stadium of the Stars facility, no address was provided by the commentor and the Inglewood Unified School District and City of Inglewood Parks, Recreation and Community Services were not aware of this facility when contacted (personal communication, July 16, 2003).

AL00035-33

Comment:

2. The Final EIS/EIR Should Include Supplementary Analysis to Assess the Impact of the Project Alternatives on Interference with Speech Communication in Classrooms.

The Final EIS/EIR should include supplementary analysis, using noise parameters more appropriate to the assessment of aircraft noise impact on schools, including use of "time above" ("TA") metrics, to assess the impact of the project alternatives on interference with speech communication in classrooms.

The Health Effects of Noise Technical Report acknowledges the potential impact of aircraft noise on schools with the following statements:

"Speech communication interference may reduce understanding of conversations in classrooms and classroom teaching"

"Adequate speech communication is important in classroom... settings"

The EIS/EIR, however, fails to include any specific analysis to assess the severity of impact on speech interference at schools resulting from the Project Alternatives.

Speech interference is basically a masking process in which simultaneous, interfering noise (aircraft noise in this case) renders speech incapable of being understood. The fact that occurrence of speech interference in the classroom is a function of several variables including the loudness of the speaker's voice, speaker-to-listener distance and the level of sound insulation provided by the school building, complicates the identification of a definitive outdoor aircraft noise level that would result in speech interference in the classroom.

The Health Effects of Noise Technical Report suggests that "some interference with classroom activities can be expected at outdoor levels of 77 to 85dBA." According to the report, however, this statement is based upon an assumed speech level of 65 dB, which the report describes as "the level of normal conversation." Conversational speech has a sound level of approximately 65 dB(A) (or less) at a distance of 1 meter (3.281 feet) from the speaker. The report therefore apparently fails to consider the fact that the level of the teacher's voice will be at a significantly lower level at the rear of the classroom, due to the reduction of sound level with increasing distance from a source. As a result, the Inglewood Unified School District is of the opinion that speech interference in classrooms is likely to occur with outdoor noise levels significantly less than 85dB(A).

The World Health Organization states that for speech to be intelligible when listening to complicated messages, such as in schools, interfering noise should not exceed 35dB(A). (World Health Organization, Guidelines, supra.) Even assuming the classrooms in question operate with closed windows and doors (which would assume the existence of air-conditioning in the classrooms) and have been provided with sound attenuation to achieve a minimum noise level reduction of 25dB (as required under the Land Use Compatibility Guidelines of the Federal Aviation Regulations for schools exposed to aircraft noise in the CNEL 65 to 70 range), this would suggest that any occurrence of outdoor noise levels exceeding 60dB(A) is likely to result in speech interference within classrooms.

The EPA identified a peak noise level of 45dB(A) as being a threshold above which interference with typical conversational speech becomes noticeable. (USEPA, Information On Levels Of Environmental Noise Requisite To Protect Public Health And Welfare With An Adequate Margin Of Safety. EPA Report 550/9-74-004, 1974, Exhibit 11.) Applying similar logic, and again assuming 25dB sound insulation, this would suggest speech disturbance would be noticeable for typical conversational speech when outdoor noise levels exceed 70dB(A).

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 review of numerous studies and research related to school disruption from aircraft noise referenced in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and associated Appendices and Technical Reports, LAWA developed three thresholds of significance to analyze the significance of aircraft noise impacts on schools for the four build alternatives. The development and application of these thresholds relative to the four build alternatives were presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR and Section 6.2.1 of Appendix S-C1, Supplemental Aircraft Noise Technical Report. Additionally, because current studies of aircraft noise and the ability of children to learn may not have resulted in development of a statistically reliable predictive model of the relative effect of changes in aircraft noise levels in learning, Mitigation Measure MM-LU-3 provides for further comprehensive study of any such measurable relationship.

AL00035-34

Comment:

It should be emphasized that the noise thresholds for speech interference discussed above are instantaneous sound pressure levels. The duration and severity of speech interference cannot be predicted from CNEL values. This is because CNEL values are derived by time-averaging the high noise levels occurring during potentially disruptive events with sound levels during quiet periods without aircraft activity. In addition, in the derivation of CNEL levels, penalties are added to noise levels

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occurring during the evening time and at night. Consequently a noise analysis conducted solely in terms of CNEL levels cannot be used to quantify the impact associated with increased speech interference in classrooms.

By selecting a threshold for external noise, above which the occurrence of speech-disturbance in classrooms is likely, and by calculating the cumulative length of time per day that the threshold is exceeded, the likely impact of aircraft noise upon speech interference in the classroom can be quantified. This daily cumulative duration for which noise exceeds a certain threshold is known as a "time above" metric.

The value of TA metrics is acknowledged on page 2 of the Noise Technical Report. The TA measure is described as "helpful in determining the exposure of certain noise uses (schools, sleeping quarters, religious facilities) to extended periods of noise at various levels that may be disruptive to the activity occurring there." The Noise Technical Report presents results of some TA analysis, including Table A5-7, which presents time above 75 Decibels. The body of the EIS/EIR, however, contains no noise impact analysis using TA.

Reviewing the range of thresholds for speech interference discussed above, it appears likely that an external noise level exceeding 75 dB(A) at a school will result in speech interference within classrooms. Table 2 below, presents "time above" data for Inglewood schools extracted from Table A5-7 of the Noise Technical Report.

School	Env. baseline	No Project	Alt. A	Alt. B	Alt. C
Beulah Payne Elementary -PBS017	3.6	9.0	13.8	2.1	5.0
Albert Monroe Middle/ Clyde					
Woodworth Elementary PBS026	9.4	9.8	12.6	19.3	10.1
Hillcrest Continuation School - PBS047	31.5	39.8	45.9	47.6	43.5
Claude Hudnall Elementary School - PBS048	1.9	1.4	4.0	6.7	6.8
Inglewood High -PBS050	7.6	11.1	16.1	30.3	32.7
Kelso Elementary PBS059	32.5	42.6	44.8	43.0	38.3
Oak St Elementary PBS105	42.1	53.6	63.9	51.0	50.4
Morningside High PBS- 140	12.6	12.8	19.7	18.6	13.8

Table 2 - Aircraft Noise Time Above 75 Decibels In Minutes, for the year 2015.

The results presented in Table 2 suggest that even with the elevated 1996 "baseline" used in the report, the cumulative duration of speech interference in classrooms per day, for every Inglewood Unified School will increase from "baseline" levels under nearly every project alternative scenario.

Two likely causes of the predicted increase in the duration of speech interference in Inglewood classrooms are:

(a) With reference to Table 4.1-7 of the EIS/EIR, in 2015, the forecast number of operations by heavy jets more than doubles compared to the environmental baseline under Alternatives A, B and C. The EIS/EIR concedes on p. 4-56 that the substitution of heavier aircraft for existing lighter aircraft would increase loudness of individual events. This is also consistent with the FAA's policy, which generally permits higher noise levels to be produced by heavier aircraft.

(b) This increase in the noise level associated with individual events would be compounded by the extension of runways to the east by 2,650 feet or more under Project Alternatives A, B and C. Moving runway ends eastwards would presumably lead to reduced aircraft altitude for some aircraft using these runways when flying over Inglewood schools.

Response:

The Aircraft Time Above 75 decibels is based over a 24-hour period, not over an eight hour school day. Thus the total time above 75 dB during school hours would be much less than suggested in the comment. Appendix S-C1, Supplemental Aircraft Noise Technical Report, and Section 4.1, Noise, of

the Supplement to the Draft EIS/EIR extensively address single-event noise impacts on school disruption.

LAWA developed thresholds of significance to be used in the Supplement to the Draft EIS/EIR's CEQA analysis of single event aircraft noise impacts of the four build alternatives for the LAX Master Plan, based on review of numerous studies and research related to school disruption from aircraft noise referenced in the Supplement. One of these thresholds is that an exterior noise level during school hours sufficient to result in interior noise levels of 55 dBA Lmax would be sufficient to result in a momentary disruption of speech intelligibility in classroom teaching situations. As shown in Table S31 of Appendix S-C1, Supplemental Aircraft Noise Technical Report, the average number of minutes during the average school day that the schools listed in the comment would be exposed to significant noise levels is substantially less than indicated in the comment. Additionally, please see Response to Comment AL00034-36 regarding Time-Above metrics.

AL00035-35**Comment:**

When speech interference occurs in the classroom, possible outcomes include students failing to understand important information from the teacher, loss of concentration during study, or interference with standardized testing. According to Table 2 above, based upon an external speech-interference threshold of 75dB(A), the loss of teaching time in the worst case would accumulate to more than one hour per school day (Oak Street Elementary under Alternative A). The consequences of the predicted increase in the duration of speech interference in Inglewood Unified School District classrooms is therefore considered to be a very serious noise impact that does not receive adequate attention in the EIS/EIR.

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.

AL00035-36**Comment:**

3. The Noise Mitigation Measures (If Any) Specifically Proposed for Noise Impacted Inglewood Unified School District Facilities Are Not Clearly Stated In The EIS/EIR.

According to Title 14 California Code of Regulations, Chapter 3, Guidelines for Implementation of CEQA:

"An EIR shall describe feasible measures which could minimize significant adverse impacts . . . the discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR." (14 California Code of Regulations § 15126.4.)

Specific Inglewood Unified School District schools for which the Schools Technical Report declares an aircraft noise impact are denoted with an "X" in Table 3 below:

School	Alternative A	Alternative B	Alternative C	No Project
Beulah Payne Elementary	X	X	X	X
Albert Monroe Middle		X		
Clyde Woodworth Elementary		X		
Hillcrest Continuation	X	X	X	X

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School				
Inglewood High	X	X	X	X
Kelso Elementary	X	X		
Oak St. Elementary	X	X		
Morningside High		X		

TABLE - 3. Inglewood Unified School District Facilities On Which the EIS/EIR Predicts an Aircraft Noise Impact.

In Section 4.1.9.1 of the EIS/EIR, noise mitigation measures are discussed. These all relate to noise mitigation at source only, and the measures are nearly all dismissed as impractical. Under Section 4.1.8, the EIS/EIR acknowledges that "a significant and unavoidable impact from aircraft noise is expected."

The prospect that LAWA might be proposing to mitigate the significant noise impacts at schools by providing additional sound insulation is raised on pages 11 and 15 in the Schools Technical Report included with the EIS/EIR. The report states:

"For those impacted schools not already considered compatible pursuant to the California Code of Regulations, Title 21, mitigation in the form of sound insulation or acquisition and relocation would be provided."

This idea seems to be dismissed within body of the EIS/EIR itself. On page 4-96, the EIS/EIR states that "63 public schools within 5 school districts . . . have aviation easements and are therefore considered to be compatible." The EIS/EIR names Inglewood Unified School District among those parties granting these aviation easements. By this statement the EIS/EIR appears to be implying that LAWA does not propose to provide additional sound insulation to the impacted schools as a mitigation measure.

As required by CEQA, the Inglewood Unified School District requests a more explicit statement be provided within the final EIS/EIR with respect to what noise mitigation measures, if any, LAWA proposes for Inglewood Unified School District schools.

Response:

Mitigation to reduce aircraft noise impacts on residential and noise-sensitive uses is presented in the Section 4.2.8 of the Draft EIS/EIR as mitigation measure MM-LU-1. As specified therein, mitigation measure MM-LU-1 would only apply to those impacted schools not already considered compatible pursuant to the California Code of Regulations, Title 21 (it being understood that, in each instance land use compatibility is achieved through application of the aviation easements, the District's noise mitigation obligations apply). Please see Responses to Comments AL00035-23 and AL00035-28 for discussion of land use compatibility effects of the aviation easements, prior noise mitigation payment and other provisions of the Settlement Agreement. As stated in Section 4.2.8 and mitigation measure MM-LU-1 and Section 4.27, Schools, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, for schools considered incompatible land uses with significant impacts, sound insulation or relocation would be provided. Also under mitigation measure MM-LU-1, prior to the completion of the study referenced in MM-LU-3, schools identified as being newly exposed to significant impacts from high single event noise levels in mitigation measure MM-LU-4, that are not subject to an existing aviation easement, would be incorporated into the ANMP.

Since publication of the Draft EIS/EIR, a Supplement to the Draft EIS/EIR has been prepared to evaluate an additional Master Plan alternative (Alternative D), incorporate information on Year 2000 conditions, and provide additional analysis of single event aircraft noise levels that result in classroom disruption. This information was provided in Section 4.1, Noise and Section 4.2, Land Use of the Supplement to the Draft EIS/EIR. Thresholds used to identify significant interior noise levels that result in classroom disruption include: 55 dBA Lmax, 65 dBA Lmax, and 35 Leq(h).

Based on the additional information provided in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, under Alternative D Beulah Payne Elementary School, Hillcrest Continuation School, and Inglewood High School would be newly exposed to the 65 CNEL or greater contour or experience an increase of 1.5 dB or greater within the 65 CNEL or

3. Comments and Responses

greater contour compared to 1996 baseline conditions. Therefore, as shown on Table 1, the following schools would be significantly impacted by cumulative noise events:

Table 1

**Inglewood Unified School District Facilities Newly Exposed to Significant Cumulative Noise Event Levels
(Compared to 1996 Baseline Conditions)**

School	No Action/ No Project	Alternative A	Alternative B	Alternative C	Alternative D
Beulah Payne Elementary	x	X		x	X
Albert Monroe Middle			X		
Clyde Woodworth Elementary			X		
Hillcrest Continuation School	x	x	X	X	x
Inglewood High	x	X	X	X	x
Kelso Elementary		X	X		
Oak St. Elementary		X	X		

Source: Supplement to the Draft EIS/EIR Supplemental Land Use Technical Report Tables S11, S21, S31, S41, and S53.

Based on thresholds identified for high single event noise levels that result in classroom disruption, and presented in Section 4.2.6 of the Supplement to the Draft EIS/EIR, Table 2 lists, by alternative, the Inglewood Unified School District facilities that would be impacted:

Table 2

**Inglewood Unified School District Facilities Newly Exposed to High Single Event Noise Levels
(Compared to 1996 Baseline)**

School	No Action/ No Project	Alternative A	Alternative B	Alternative C	Alternative D
Beulah Payne Elementary	X	X		X	X
Albert Monroe Middle			X		
Clyde Woodworth Elementary			X		
Crozier Middle		X	X		
Hillcrest Continuation School					
Hudnall Elementary		X	X		
Inglewood High		X	X	X	X
Kelso Elementary					
Oak St. Elementary					
Morningside High	X	X	X	X	X
Warren Lane Elementary				X	
Worthington Elementary		X	X		

Source: Supplement to the Draft EIS/EIR Tables S4.2-6, S4.2-10, S4.2-14, S4.2-18, and S4.2-28.

As indicated in Section 4.2, Land Use (subsections 4.2.6 and 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 study and potentially modify noise thresholds and provide sound insulation for schools determined to be significantly impacted by single event noise levels that result in classroom disruption, excluding schools with aviation easements as described in Response to Comment AL00035-23.

As stated in Section 4.2.9.1 of the Supplement to the Draft EIS/EIR, significant and unavoidable impacts would remain for those schools newly exposed to 75 CNEL. No schools would be newly exposed to the 75 CNEL within the Inglewood Unified School District. As also presented, some school uses would still be exposed to significant single event noise levels, after implementation of MM-LU-4, when classroom activities take place outdoors.

3. Comments and Responses

Based on the information presented in the commentor's Table 3 and Tables 1 and 2 of this response, Alternatives C and D would result in the fewest noise impacts on the Inglewood Unified School District.

AL00035-37

Comment:

4. The Project Alternatives Included In The EIS/EIR Do Not Appear To Satisfy CEQA or NEPA Requirements.

According to Title 14 California Code of Regulations, Chapter 3, Guidelines for Implementation of CEQA:

"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." (15 California Code of Regulations § 15126.6(a).)

Referring to Table 3, significant impacts are predicted for at least three Inglewood Unified School District schools under each alternative considered, including the "No Action/ No Project" alternative. No alternative has been considered that would avoid or substantially lessen the noise impact upon Inglewood schools as required by CEQA.

According to the Council for Environmental Quality, a NEPA analysis:

" . . . shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. . . [including]. . . reasonable alternatives not within the jurisdiction of the lead agency."

In this context, a proper NEPA analysis should include at least one alternative whereby a significant noise impact was avoided in Inglewood schools by diverting the proposed increased heavy jet traffic to other airports.

In conclusion, the Inglewood Unified School District requests the preparation of the final EIS/EIR address the comments provided above.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR. CEQA does not require that the alternatives evaluated in an EIR avoid or substantially lessen every significant effect of a project. Rather, Section 15126.6 of the CEQA Guidelines states that an EIR must evaluate feasible alternatives that would "avoid or substantially lessen one or more of the significant effects." Moreover, the same section also states that "an EIR need not consider every conceivable alternative to a project." Please see Response to Comment AL00035-36 regarding aircraft noise impacts on Inglewood schools under the No Action/No Project Alternative and Alternatives A, B, C, and D.

AL00035-38

Comment:

PART FOUR

THE EMISSIONS, MODELING, MITIGATION MEASURES AND HEALTH IMPACT ANALYSIS OF THE EIS/EIR IS INADEQUATE

CEQA requires the EIS/EIR to "identify and focus on" significant environmental effects of proposed projects. (14 California Code of Regulations § 15126.2.) "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects." (Id.) The EIS/EIR also must describe "feasible measures which could minimize significant adverse impacts." (14 California Code of Regulations § 15126.4.) The EIS/EIR fails to adequately do so.

1. The Emissions Estimations in the EIS/EIR Are Inadequate.

The emissions estimates in the EIS/EIR for jet aircraft and storage and handling of fuels may be underestimated. Correction of this underestimation will result in increased pollutant concentrations that may result in exceedances of the National Ambient Air Quality Standards ("NAAQS") and California Ambient Air Quality Standards ("CAAQS") as well as increases in off-site cancer risks and noncancer hazard indices for off-site populations.

Response:

Please see Topical Responses TR-AQ-2 and TR-AQ-3 regarding air toxics and pollutant concentrations.

AL00035-39

Comment:

a. Jet aircraft emissions may be underestimated.

To estimate particulate matter less than 10 microns ("PM10") emission rates from aircraft for the EIS/EIR, LAWA used information from three sources: 1) fourth edition of AP-42; 2) Whitefield and Hagen Study; and 3) the 1994 California FIP Docket. (EIS/EIR, Technical Report 4, Attachment H.) The emission rate data from these studies are combined; the combined data are plotted for each of the four aircraft operating modes. Based on these plots, a relationship between fuel usage and PM10 emission rate is interpolated.

A review of the data shows the first and second studies to be in approximate agreement; the FIP Docket provides an alternate data set. As there is approximately ten times more FIP Docket data, the data from this study dominate the results. If the FIP Docket data were removed from the combined data set, it is clear that the relationship between fuel usage and the PM10 emission rates would change and the estimated total PM10 emissions from aircraft would also change.

Based on the information presented in the EIS/EIR, it is unclear how the FIP Docket data are used in the PM10 emission rate analysis. It appears that a relationship between PM10 emissions and fuel usage is derived from a graphical representation of a relationship between particulate mass concentration and smoke number (i.e., from a plot of an equation relating PM concentration and smoke number).

There are two issues with this derivation. First, it is not clear how a relationship between fuel usage and PM10 emissions is derived from a plot of particulate mass concentration versus smoke number. Second, because the particulate mass concentration versus smoke number data appear to be simply a plot of some unknown equation, the number of data points taken from this graph seems to be arbitrary. Since the number of points taken from this graph is approximately 10 times greater than the number of data points available from the other two studies, it appears that LAWA may have arbitrarily weighted the combined data set heavily towards the FIP Docket data and away from the AP-42 and Whitfield and Hagen data.

Aircraft emissions of PM10 are potentially underestimated. An increase in PM10 emissions will result in an increase in off-site concentrations of PM10. As noted below, the potential noncancer health impacts associated with these PM10 emissions have not been quantified in the EIS/EIR. Inclusion of additional PM10 emissions may result in exceedance of the noncancer hazard index for off-site populations.

At a minimum, LAWA needs to:

- i. clarify the approach used to develop the FIP Docket data;
- ii. conduct a sensitivity analysis to determine the importance of the FIP Docket data to their results; and
- iii. if necessary, remove arbitrary weighing of FIP Docket data over other data sets, correct the PM10 emission rates, and remodel off-site PM10 concentrations.

Response:

The content of this comment is essentially the same as comment AL00034-40; please see Response to Comment AL00034-40.

3. Comments and Responses

AL00035-40

Comment:

b. Potentially significant evaporative emissions of toxic air contaminants resulting from the storage and handling of organic liquids may not have been quantified.

LAWA does not include volatile organic compound ("VOC") emissions from organic liquid storage and transfer in their Industrial Source Complex Short Term 3 ("ISCST3") modeling of toxic air pollutant emissions. They assume that: 1) storage emissions are almost exclusively from Jet A fuel; 2) emissions of Jet A vapor do not contain significant quantities of the toxic air pollutants modeled; and 3) limited future operations of gasoline fueling would include vapor recovery and therefore result in minimal emissions of air toxics.

There are three problems with this exclusion of VOC emissions. First, diesel fuel and gasoline are used at the airport. LAWA should provide data to show that storage and resulting emissions of these fuels are insignificant. Second, LAWA should provide justification for the assumption of no toxic air pollutants in Jet A vapor. Third, LAWA should provide some screening calculations to validate their assumption that gasoline fueling would result in insignificant emissions of air toxics (especially benzene).

Toxic air emissions from storage and handling of organic liquids may have been underestimated. An increase in toxic air emissions will result in increases in off-site cancer risks and noncancer hazard indices for off-site populations.

At a minimum LAWA needs to:

- i. quantitatively demonstrate that emissions of toxics from storage and handling of diesel fuel and gasoline are insignificant; and
- ii. provide a speciated chemical list for Jet A fuel.

Response:

The comment is essentially the same as Comment AL00034-41. Please see Response to Comment AL00034-41.

AL00035-41

Comment:

2. The Modeling Approach of the EIS/EIR Is Inadequate.

The modeling approach presented in the EIS/EIR has several significant flaws that result in underestimation of both criteria and toxic pollutants impacts on nearby receptors. Assumptions made in the modeling of vehicle emissions are not consistent with EPA practice; the methodology used to estimate plume rise is flawed; the assumption of no downwash is not justified; the meteorological data used in the modeling is inadequate; the conversion of sulfur dioxide to sulfate is not addressed; and finally, secondary formation of toxic pollutants and deposition effects are ignored. These flaws result in an underestimate of ambient pollutant concentrations.

Correcting these flaws will result in an increase in pollutant concentrations and may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for off-site populations.

Response:

The content of this comment is essentially the same as Comment AL00034-42. Please see Response to Comment AL00034-42.

AL00035-42

Comment:

- a. Assumptions made in the modeling of motor vehicle emissions are not consistent with EPA practice.

To estimate pollutant ambient air concentrations resulting from vehicle emissions, LAWA modeled these vehicles as a series of volume sources. A volume source requires specification of both initial lateral and vertical dimensions. The initial lateral dimension of the volume source used to model the vehicle emissions was calculated as the width of the roadway lanes plus three-meter mixing zones on either side, resulting in an initial lateral dimension of at least eight meters. The initial vertical dimension of the volume sources was determined from CALINE mixing height equations, assuming a long-term average wind speed of 3.3 meters per second.

The initial lateral and vertical dimensions chosen to model these volume sources have a strong influence on the resultant downwind pollutant concentrations resulting from vehicle emissions. As the dimensions increase, downwind concentrations decrease. In a recent EPA study, volume sources with an initial lateral dimension of 2.15 meters were used to model vehicles in two major U.S. cities (United States Environmental Protection Agency, Draft Air Dispersion Modeling of Toxic Pollutants in Urban Areas - Guidance, Methodology and Example Applications. Emissions, Monitoring and Analysis Division (MD- 14), Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711, EPA-454/R-99-021, July 1999, Exhibit 12.)

LAWA either should remodel their volume sources using 2.15 meters or should provide justification for their selection of eight meters. The average wind speed used to calculate the initial vertical dimension should be consistent with the average wind speed used to model the dispersion of the volume sources. LAWA should average the meteorological data set used to model the dispersion of the volume sources to determine the correct average wind speed.

Pollutant concentrations resulting from vehicle emissions may be underestimated. An increase in pollutant concentrations resulting from vehicle emissions may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for off-site populations.

At a minimum LAWA needs to:

- i. either provide justification for their assumption of a three meter mixing zone on each side of the modeled roadways or follow the example set by EPA and assume no additional mixing zone surrounding the roadways;
- ii. if unable to provide justification, vehicle sources will need to be remodeled; and,
- iii. calculate the initial vertical dimension with the correct average wind speed.

Response:

The comment is essentially the same as Comment AL00034-43. Please see Response to Comment AL00034-43.

AL00035-43

Comment:

- b. The methodology used to estimate plume rise from jet aircraft is questionable and requires further justification.

LAWA determines the plume rise of hot exhaust gas from jet aircraft engines based on a heat balance to determine the heat flux and the equivalent exit velocity that would result. (EIS/EIR, Technical Report 4, p. 19.) To calculate this exit velocity, they make four critical assumptions. First, the jet engine exhaust gas temperature is fixed and unrelated to the heat flux. Second, as the exhaust gas from the jet engine begins to slow (in the horizontal plane) and begins to move vertically upward as a plume, the diameter of the plume (in the vertical plane) may be estimated by the wingspan of the jet.

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Third, the temperature of the plume is equal to the jet engine exhaust gas temperature. As there are no ambient heat sources, this implies that the movement of the exhaust gas is adiabatic, isothermal, and there is no rapid expansion of exhaust gas. Finally, the temperature of ambient air is assumed to be 293 Kelvin ("K"). Calculated exit velocity, plume temperature, and plume diameter were then input into ISCST3 to determine plume rise.

There are three problems with this approach. First, the temperature of the plume is assumed equal to the temperature of the exhaust gas. Given isothermal movement, this is only true if the total mass per second of air leaving the jet engines equals the mass per second of air moving up in the plume. LAWA should check their calculations to be sure that this is true, otherwise the plume rise calculations may be in error.

Second, the implied assumptions of isothermal movement and slow expansion of exhaust gas are physically unrealistic. It is likely that exhaust gas will expand rapidly when exiting the jet engine and cooler, ambient air will be entrained into exhaust gas as it moves away from the jet engine. Both of these effects will tend to lower the temperature in the plume. LAWA should perform a sensitivity analysis to determine the quantitative influence of these phenomena on the resulting plume rise.

Third, the temperature of the ambient air should be consistent with the average temperature data used in the ISCST3 model runs. LAWA should average the temperatures in the meteorological data set used in the model runs to determine the correct average ambient temperature.

Additionally, plume rise may be overestimated. If so, concentrations of NO₂, PM₁₀, and air toxics resulting from aircraft emissions may be underestimated. Increases in concentrations of these pollutants may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations.

At a minimum LAWA needs to:

- i. check their calculations to ensure conservation of mass;
- ii. conduct a sensitivity study to determine the quantitative influence of rapid expansion of exhaust gas and entrainment of ambient air on plume temperature; and,
- iii. calculate the plume rise with the correct average ambient temperature.

Response:

The comment is essentially the same as Comment AL00034-44. Please see Response to Comment AL00034-44.

AL00035-44

Comment:

- c. The assumption that building downwash is negligible requires further justification.

LAWA believes that building downwash will not be significant based on their assumption that the nearest receptor is too far off-site. (EIS/EIR, Technical Report 4, p.24.) LAWA should validate this assumption by modeling the most conservative source-receptor geometry, with building downwash included, to ensure this statement is correct. These results should be presented in Technical Report 4.

Off-site impact from airport emissions may be underestimated. If so, concentrations of criteria pollutants and air toxics resulting from airport emissions may be underestimated. Increases in concentrations of these pollutants may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations.

LAWA needs to conduct a sensitivity study to show that building downwash effects are negligible.

Response:

The comment is essentially the same as Comment AL00034-45. Please see Response to Comment AL00034-45.

AL00035-45

Comment:

- d. The meteorological data set used is inadequate relative to EPA recommendations.

LAWA used the most recent meteorological data collected at LAX. These data consist of hourly surface and upper air data from the LAX meteorological observation station operated by the SCAQMD for the 12-month period beginning March 1, 1996 and ending February 28, 1997.

As recommended by the USEPA, "five years of representative meteorological data should be used when estimating concentrations with an air quality model. (USEPA, Guideline on Air Quality Models (Revised). Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711, EPA-450/2-78-027, 1986, August 1995 update, Exhibit 13.) Consecutive years from the most recent, readily available 5-year period are preferred." Accordingly, LAWA should conduct its air modeling with the most recent five years of data from the LAX station, selecting the most conservative year results as representative of maximum long-term pollutant concentrations resulting from emissions associated with LAX. Furthermore, this five-year data set should be used to estimate average temperature (plume rise), mixing heights (EDMS), and wind speed (volume source height) used in other calculations and analyses.

Pollutant ambient air concentrations may be underestimated. If so, concentrations of criteria pollutants and air toxics resulting from emissions associated with expansion of LAX may be underestimated. Furthermore, the location of the maximum off-site impacts may also change. Increases in concentrations of these pollutants may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations.

At a minimum LAWA needs to:

- i. conduct a sensitivity study to determine which year of LAX meteorological data is the most conservative;
- ii. if different from the meteorological data used in their analysis, redo all air modeling with the correct meteorological data; and,
- iii. use the most conservative meteorological data set to estimate meteorological data used in other calculations and analyses.

Response:

The comment is essentially the same as Comment AL00034-46. Please see Response to Comment AL00034-46.

AL00035-46

Comment:

- e. Atmospheric conversion of sulfur dioxide to sulfate may be significant and is not addressed.

LAWA has ignored production of sulfate from sulfur dioxide ("SO₂") due to the complexity of sulfate-formation mechanisms. LAWA assumes that all sulfur emitted by sources remains in the atmosphere as SO₂. This assumption is not conservative; the CAAQS for sulfate is more than six times lower than the CAAQS for SO₂ (6.2 parts per billion by volume ("ppbv") compared to 40 ppbv).

Formation chemistry for conversion of nitrogen oxides ("NO_x") to nitrogen dioxide ("NO₂") is equally complex, if not more so. The Tier 2 Ambient Ratio Method ("ARM") recommended by USEPA in the Guideline on Air Quality Models for converting total NO_x to NO₂ values may be modified to estimate formation of sulfate from SO₂. (USEPA, Guideline, supra.) LAWA could gather the most recent years of data on the annual average SO₂-to-sulfate ratio near LAX and use this data to estimate the formation of sulfate.

The concentration of sulfate in ambient air is underestimated. Increases in concentrations of sulfate may result in an exceedance of the CAAQS for sulfate. As exposure to sulfate causes respiratory

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irritation, this underestimate of ambient sulfate concentration may significantly underestimate the numbers and types of respiratory illnesses that may be observed in nearby populations, particularly young children who may be especially sensitive to respiratory irritants.

At a minimum LAWA needs to develop an approach to model sulfate chemistry and estimate sulfate concentrations.

Response:

The comment is essentially the same as Comment AL00034-47. Please see Response to Comment AL00034-47.

AL00035-47

Comment:

f. Secondary formation of toxic air pollutants may be significant and is not addressed.

LAWA has ignored the production of several toxic air pollutants formed in the atmosphere due to reactions among other pollutants (i.e., formed by secondary reactions). As outlined in the EPA's guidance on Air Dispersion Modeling of Toxic Pollutants in Urban Areas, these pollutants should be included in any air toxic analysis. (USEPA, Draft Air Dispersion Modeling, *supra*.) The pollutants formed by secondary reactions include formaldehyde, acetaldehyde, and acrolein.

An estimate of concentrations based on secondary reactions is needed and should be added to the ISCST3 output. LAWA should use EPA's OZIPR screening model to estimate the secondary formation of these pollutants. (USEPA, Draft Air Dispersion Modeling, *supra*.) Case studies provided in EPA's guidance document show secondary formaldehyde as the major component of total atmospheric formaldehyde (a ratio of 4 to 1 over primary formaldehyde).

The concentrations of formaldehyde, acetaldehyde, and acrolein in ambient air are underestimated. Increases in concentrations of these pollutants may result in increases in off-site cancer risks and noncancer hazard indices for receptor populations.

At a minimum LAWA needs to model formaldehyde, acetaldehyde, and acrolein chemistry.

Response:

Please see Topical Response TR-AQ-2 regarding secondary pollutant formation.

AL00035-48

Comment:

g. The exclusion of deposition effects from the multi-path risk analysis is not justified.

LAWA has neglected to include deposition effects and associated multi-pathway risk analysis based on conclusions presented in the deposition report, included in the EIS/EIR as Attachment Y to Technical Report 4. In this report, LAWA claims that a direct correlation between airport operations and deposition could not be determined.

Nonetheless, LAWA goes on to state, "The limited monitoring duration [less than two weeks] and time of year, while required to meet project schedule requirements, were not optimal for dry deposition monitoring. The limited nature [*italics added*] of this study did not allow for the determination of summertime maximum deposition rates or provide data necessary to perform a mass balance analysis." (EIS/EIR, Technical Report 4, Attachment Y.) LAWA is stating that the study was too short to make any definitive conclusions and further deposition sampling will be required before the deposition impact of airport emissions on off-site soils can be quantified. In other words, the study is incomplete.

If the study is limited and incomplete, there is no rational reason why LAWA should exclude deposition effects and the associated multi-pathway risk analysis. Furthermore, the deposition sampling locations selected for this study appear to be outside of the maximum particulate matter plume predicted by LAWA's ISCST3 modeling, further undercutting the already limited nature of this deposition study.

Therefore, pending a more complete deposition study, LAWA should include deposition effects and a multi-pathway risk analysis in the EIS/EIR.

Deposition effects have been improperly excluded from consideration. Soil concentrations of pollutants sorbed to particulate matter have been underestimated. Increases in soil concentrations of these pollutants may result in increases in off-site cancer risks and noncancer hazard indices for receptor populations.

At a minimum LAWA needs to:

- i. estimate concentrations of pollutants sorbed to particulate matter in soil based on emissions occurring over the duration of the project; and,
- ii. based on these soil concentrations, run a multi-pathway risk analysis to determine the health impacts of these soil concentrations.

Response:

The content of this comment is identical to Comment AL00034-49; please refer to Response to Comment AL00034-49.

AL00035-49

Comment:

3. The Mitigation Measures Proposed By The EIS/EIR Are Inadequate.

The mitigation measures proposed in the EIS/EIR have not met all requirements outlined in the SCAQMD CEQA Handbook. Before mitigation measures may be applied to total project emissions they must meet several criteria. The mitigation measures proposed in the EIS/EIR have not demonstrated compliance with three of these criteria.

First, not all mitigation measures are enforceable by a legally binding commitment. Until this is demonstrated, these measures should be eliminated from consideration. Second, several of the mitigation measures do not define a basis for monitoring and enforcement. Without this basis, the mitigation measures should be eliminated from consideration. Finally, the effectiveness of some of the mitigation measures has not been demonstrated. As a detailed analysis of mitigation measure effectiveness is beyond the scope of this analysis, we have analyzed a subpart of the traffic congestion control measure, the proposed I-405/Arbor Vitae interchange (see Appendix A), to illustrate that a much greater effort must be undertaken to adequately document the effectiveness of the mitigation measures presented in the EIS/EIR.

Furthermore, the CEQA Guidelines require the EIS/EIR to analyze the significant impacts of mitigation measures on the surrounding communities. Title 14 of the California Code of Regulations states, in pertinent part:

"If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." (14 California Code of Regulations § 15126.4(a)(1)(D).)

Several proposed mitigation measures do not satisfy the required criteria and relevant guidelines. Therefore, mitigated emission estimates may be too low. Increases in emissions of mitigated pollutants may result in exceedances of the NAAQS and CAAQS as well as increases in off-site cancer risks and noncancer hazard indices for receptor populations. Furthermore, without mitigation measures, the proposed project Alternative C will result in exceedances of regulatory thresholds for both criteria and toxic pollutants.

At a minimum LAWA needs to:

- i. develop a matrix showing each mitigation measure and how it meets each of the three missing criteria identified above;

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- ii. improve documentation of the effectiveness of the selected mitigation measures used to reduce pollutant emissions; and,
- iii. Conduct an analysis of the impacts of the proposed mitigation measures.

Response:

Comment noted. The Supplement to the Draft EIS/EIR contains revised data and the requested matrix relative to feasible mitigation measures and their quantifiable emission reductions in Section 4.6.8.

AL00035-50

Comment:

4. The Health Risk Analysis of the EIS/EIR Is Inadequate.

The flaws in the health risk analysis conducted for the EIS/EIR result in underestimated acute, cancer, and noncancer health impacts. Estimated cumulative cancer risks to school children are underestimated, cumulative cancer risks and noncancer hazards are incorrectly calculated, the significance threshold for noncancer health effects is too high, potential health impacts associated with exposure to lead are improperly calculated, potential health impacts from jet engine particulate emissions are ignored, acute health impacts are not evaluated and the health impacts of cumulative pollution exposure are not adequately considered. These flaws result in an underestimation of the health impacts to receptors of concern.

Response:

The content of this comment is essentially the same as comment AL00034-50; please refer to Response to Comment AL00034-50.

AL00035-51

Comment:

- a. Estimated cumulative cancer risks to school children have been underestimated due to underestimates in the total number of years children spend in school.

The Human Health Risk Assessment ("HHRA") estimated the potential incremental cancer risks for children attending schools by identifying the school with the highest projected concentrations of toxic air pollutants, and determining the total length of time that children would likely be at school. Approximately 20 schools were identified as being within one mile of LAX; Oak Street Elementary School was identified as one of the schools where the highest concentrations of Toxic Air Pollutants ("TAPS") released from LAX were predicted.

Children ages 6 to 12 years old were evaluated in the HHRA, since "this age range includes the youngest school ages and it is sufficiently long for analysis of chronic exposures and risks." (EIS/EIR, Technical Report 14a, Attachment B, p. 42.) Accordingly, children in school were assumed to be exposed to emissions from LAX for six years.

Given, however, that children will, in fact, be in school from ages 5 to 18 years (kindergarten through 12th grade), and that the future development of schools within the impacted area is unknown, it is very likely that children could be exposed to emissions from LAX for a 13 year period (corresponding to kindergarten through 12th grade). As estimates of cancer risk are directly proportional to the total time that an individual is exposed over the course of the lifetime, the assumption that school children are only exposed for six years is misleading, and results in an underestimate of the potential incremental cancer risks posed by children attending school.

Cancer risks for school children are underestimated. Cancer risks should be recalculated for the school children to account for the potential that children could be exposed to emissions from LAX during their entire pre-school through high school years.

Response:

The content of this comment is essentially the same as Comment AL00034-51; please see Response to Comment AL00034-51.

AL00035-52**Comment:**

b. Significant flaws in the methods used to calculate cumulative cancer risks and noncancer hazards undermine the conclusions of the EIS/EIR and obscure actual health risks posed by the various alternatives.

The HHRA repeatedly touts the benefits of all build alternatives, stating that with mitigation, "...all of the build alternatives would have lower (more favorable) human health impacts than those associated with the No Action/No Project Alternative." (Human Health Risk Assessment, p. 4-999.) Many of the tables and text describing the incremental cancer risks and noncancer hazards actually present negative risks, indicating not only a reduction in risks below those associated with baseline conditions, but a "beneficial impact on LAX-associated cancer risks" (or noncancer hazards). (EIS/EIR, Technical Report 14a, p. 51.) Such statements are not only misleading, they are technically inaccurate.

As an example, some of the negative projected cancer risks calculated for the year 2015 (pre-mitigation) result from projected decreases in diesel emissions that will occur by year 2015. (EIS/EIR, Technical Report 14a, Table 13-Alternative C.) As projected in the HHRA, decreases in concentrations of diesel exhaust are greater than projected increases of some other carcinogenic compounds (e.g., 1,3-butadiene), leading to a conclusion in the EIS/EIR that the total cancer risks, for all chemicals combined, are less than significant for Alternative C, and would result in a beneficial impact on LAX-associated cancer risk for Alternative A.

The fundamental flaw in this logic is the assumption that a decrease in the concentration of one carcinogenic compound can offset the increase the concentration of another carcinogen. If the implementation of a given alternative results in lower concentrations of diesel exhaust than would occur under the baseline conditions, then the incremental contribution of diesel to the total cancer risk drops to zero. A net reduction in diesel, however, is not "credited" against the likelihood that the increases in 1,3-butadiene may cause cancer in exposed individuals.

In other words, if the projected incremental cancer risk posed by 1,3-butadiene is 6×10^{-6} , and the projected incremental cancer risk from diesel is presented as -10×10^{-6} (indicating that the concentrations of diesel under the alternative drop below the baseline concentrations), the cumulative risk from both compounds is NOT -4×10^{-6} , as presented in this HHRA, rather it is 6×10^{-6} . Independent of any projected improvement in diesel concentrations, 1,3-butadiene is still projected to cause an increase in cancer risk of 6×10^{-6} .

Potential health impacts have been improperly summed. This fundamental flaw permeates the HHRA, and results in underestimates of the potential health impacts of all alternatives. As currently presented, it is impossible to evaluate each of the alternatives to determine which alternatives may pose a significant health threat, or to ascertain whether the proposed mitigation measures will be sufficient to reduce the health risks to insignificant levels.

The Inglewood Unified School District requests that LAWA correct these errors and recalculate the risks for all alternatives.

Response:

The content of this comment is essentially the same as Comment AL00034-52. Please see Response to Comment AL00034-52.

AL00035-53**Comment:**

c. Basis for significance threshold for noncancer health effects is unclear and five times greater than the threshold typically used by regulatory agencies.

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A significant impact relative to human health is defined in the EIS/EIR as a build alternative that would result in a total incremental chronic hazard index ("HI") greater than 5 for any target organ system at any receptor location. (Human Health Risk Assessment, p. 4-1009.) The basis for this significance threshold is unclear, is inconsistent with statements made in the HHRA, and is considerably less protective than acceptable thresholds established by regulatory agencies under various regulatory programs.

As described on page 28 of the EIS/EIR Technical Report 14a, noncancer risk estimates are calculated by dividing the estimated exposure by the "reference dose," often referred to as the acceptable exposure level. The ratio of the exposure to the reference dose is termed the hazard quotient ("HQ"). To assess the overall potential for noncarcinogenic effects posed by more than one chemical, the HQs for each chemical are summed, and the resulting value is referred to as the Hazard Index ("HI").

As stated on page 28, "a HQ greater than one indicates an exposure greater than that considered safe." This conclusion is consistent with thresholds established by USEPA and Cal/EPA under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), and California's Toxic Hot Spots program (AB2588), respectively. Similarly, an overall HI of no greater than one is the threshold that is used by Cal/EPA in determining whether conditions at a Site could potentially result in unacceptable adverse noncancer health effects. Sites for which the multi-chemical HI is greater than one, typically trigger further investigation, and often remediation.

The significance threshold used in this EIS/EIR to evaluate the potential for adverse noncancer health effects is five times higher (i.e., five times less protective) than noncancer thresholds typically used by regulatory agencies under various state and federal regulatory programs. It is unclear how and why a different and less protective standard is being used to evaluate the potential health impacts associated with the various build alternatives. If the more standard noncancer HI threshold of one were used to evaluate the significance of the various alternatives, the conclusions of each of the build alternatives, and the corresponding need for mitigation, would be different than is currently presented.

LAWA should rewrite the discussion of noncancer risks, and clearly identify those alternatives that would be considered significant based on the more appropriate noncancer significance threshold of one.

Response:

The content of this comment is essentially the same as comment AL00033-341; please refer to Response to Comment AL00033-341.

AL00035-54

Comment:

d. The EIS/EIR fails to consider and evaluate the potential health impacts associated with exposure to lead.

As described in the EIS/EIR, lead may be released in significant quantities from LAX. (EIS/EIR, Technical Report 14a, Attachment B, p. 19.) The potential impacts associated with exposure to lead are typically evaluated by using models developed by both USEPA and Cal/EPA to predict the blood-lead level that would result from a given exposure.

Because children are especially sensitive to the neurological effects of low levels of lead exposure, these models are used to estimate the blood-lead levels in children. The results from the model are then compared to the low blood-lead levels that have been demonstrated to result in subtle neurological damage in children, as established by the Center for Disease Control ("CDC"). The models are easy to use, have been used for more than eight years, and are considered the industry standard for evaluating lead exposures and determining whether such exposures could result in unacceptable health impacts.

Although the EIS/EIR notes that LAX may release significant quantities of lead, the EIS/EIR does not evaluate the impacts of such releases in accordance with the standard industry practice. Instead, the EIS/EIR compares the predicted concentrations of lead to the ambient Air Quality Standard, and

concludes that, because the concentrations are below the ambient air quality standard, lead is not a toxic air pollutant ("TAP") of concern for the LAX Master Plan.

Such treatment of lead significantly diminishes the public health significance of this TAP, and does not allow for a fair determination as to the public health impacts that may result from the various build alternatives. Any risk assessment submitted to either Cal/EPA or the USEPA would be instantly rejected if conclusions about the public health significance of lead were based solely on a comparison to the Ambient Air Quality Standard.

Further, the EIS/EIR states that a cancer slope factor is not available for lead. We note that the Office of Environmental Health Hazard Assessment ("OEHHHA") has released a cancer slope factor for lead. The Cancer Slope Factor, although not yet a promulgated standard, is available, and is being used by OEHHHA to establish the No Significant Risk Level ("NSRL") for lead under California's Proposition 65.

Health impacts resulting from lead may be underestimated. Because of the heightened public awareness to the risks associated with lead exposure and the plethora of information that exists describing the adverse health effects that can result from lead exposure, lead should be evaluated in this EIS/EIR in the most comprehensive manner that is reasonably practicable. Failure to do so is scientifically unjustifiable and is inconsistent with the more rigorous evaluations conducted for other chemicals included in the HHRA.

LAWA should rerun all health risk calculations to determine the human health implications of the increases in lead emissions that will result from all build alternatives.

Response:

The content of this comment is identical to Comment AL00034-54; please refer to Response to Comment AL00034-54.

AL00035-55

Comment:

e. Excluding particulate emissions from jet aircraft from the quantitative risk evaluation could significantly underestimate the potential for noncancer health impacts.

Particulate emissions from aircraft were not quantified in the HHRA because "there is insufficient information regarding the nature and toxicity of total petroleum hydrocarbon ("TPH") emissions associated with aircraft and toxicity criteria for these emissions are not available." (EIS/EIR, Technical Report 14a p. 81.) Particulate matter, in the form of diesel exhaust, is emitted from several ground sources (predominantly trucks and buses). Emissions of diesel exhaust from these ground sources have been included in the HHRA. The EIS/EIR states, however, that because aircraft use a different fuel and a substantially different combustion process than diesel engines, the particulate emissions in jet exhaust are not considered chemically, physically, or toxicologically similar to diesel exhaust. (EIS/EIR, Technical Report 14a, p. 12.) Accordingly, the impact of such emissions have not been quantified in the HHRA.

This is the logic set forth in the EIS/EIR for excluding jet particulate emissions from the HHRA. The argument, however, for not being able to evaluate the toxicological effects of particulate exhaust from jets is flawed. Functionally, the methods used to evaluate the noncarcinogenic toxicity of "diesel" are based entirely on the particulate matter present in diesel exhaust.

According to USEPA, the systemic (non-cancer) toxicity of diesel emissions is due to the insoluble carbon core of diesel particles; when the exhaust is filtered to remove the particulate matter, the remaining exhaust mixture does not produce long-term toxicological effects in laboratory animals. The mechanism of toxicity of the carbon core relates to the deposition of the particles deep in the lung, and the accumulation and aggregation of these particles that result from the inability of the lung's normal clearance mechanisms to effectively remove the particles from the deep regions of the lung. The accumulation of particles sets off a pathogenic sequence that may result in the presence of pulmonary inflammatory, fibrotic, or emphysematous lesions. (USEPA, Integrated Risk Information System, www.epa.gov/iris/ On-line database maintained by USEPA, 2001.)

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Because the noncancer toxicity associated with diesel exhaust is believed to be attributable entirely to the insoluble carbon core of the particulate matter, the noncancer toxicity factor would be equally applicable to other sources of particulate matter, such as jet fuel exhaust. If one can estimate the quantity of particulate matter that could be released from the exhaust of a jet engine, then use of the noncarcinogenic toxicity criteria for diesel is a scientifically defensible and appropriate method for evaluating the public health significance of the particulate emissions. Given the significant increase in the air traffic at LAX, failure to quantify potential impact associated with particulate emissions from jet aircraft could represent a significant omission from the estimated noncancer impacts.

Health impacts from particulate matter may be underestimated. LAWA should recalculate all estimates of noncancer risk, and include in the evaluation the potential adverse health effects that can result from exposure to particulate emissions from jet aircraft.

Response:

The content of this comment is identical to Comment AL00034-55; please refer to Response to Comment AL00034-55.

AL00035-56

Comment:

f. Potential acute effects from peak exposures to toxic air pollutants were not evaluated.

It is customary and standard for risk assessments to evaluate potential adverse noncancer health effects that can result from short-term, peak exposures. Such short-term higher levels of exposure can result from a combination of physical factors, such as "worst-case" meteorological conditions combined with peak operational activity at LAX.

Short-term, high level exposures to certain compounds can produce a host of short-term adverse health effects, such as respiratory irritation, and watery and/or itchy eyes. Although acute health effects are typically reversible once the source of the exposure is removed, acute health effects can represent a significant public nuisance, can often trigger allergic reactions in sensitized individuals, and can result in increases in respiratory illnesses.

The EIS/EIR did estimate and evaluate potential worst-case one-hour concentrations of the criteria pollutants. The justification, however, for failing to estimate and evaluate the adverse health impacts associated with one-hour peak concentrations of each of the toxic air pollutants was not provided. Such an omission fails to provide the reviewer with an understanding of the frequency with which the short-term peak exposures may represent a significant health nuisance to the nearby community.

The health impacts of acute exposures were not evaluated. LAWA should include an assessment of the potential adverse health effects that could result from short-term peak exposures.

Response:

Acute hazards due to exposure to TAPs of concern for LAX, which were not addressed in the Draft EIS/EIR, were addressed for all build alternatives and the No Action/No Project Alternative in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.6, Environmental Consequences, and subsection 4.24.1.9, Level of Significance After Mitigation), of the Supplement to the Draft EIS/EIR. Supporting technical detail on the analysis of acute hazards is provided in subsection 4.1.2, Assessment of Acute Hazards, in Technical Report S-9a of the Supplement to the Draft EIS/EIR.

AL00035-57

Comment:

g. The EIS/EIR has not thoroughly considered cumulative effects of pollution on health of children.

To estimate toxic chemical impacts on off-site residential populations, LAWA has simply estimated emission rates of toxic chemicals from LAX and used an ambient air dispersion model ("ISCST3") to calculate off-site concentrations associated with these emissions. This approach does not include the

impact on human health in the Inglewood Unified School District of potential background sources such as the 405 and 105 freeways.

By neglecting to include these potential background sources, LAWA has underestimated the cumulative health impacts of toxic chemical emissions on the off-site populations that may be exposed to significant background sources. "An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." (14 California Code of Regulations § 15130.) The methodology used by the EIS/EIR fails to satisfy this requirement.

To understand these cumulative health impacts, LAWA should follow the same approach it used to calculate the human health impacts associated with criteria pollutants. It should calculate the increment above background resulting from the emissions of air toxics at LAX and add this increment to the estimated background concentration of air toxics to determine the total human health risk burden in the Inglewood Unified School District.

Response:

The comment is essentially the same as Comment AL00034-57. Please see Response to Comment AL00034-57.

AL00035-58

Comment:

PART FIVE

THE TRAFFIC IMPACT ANALYSIS IS INADEQUATE

To address traffic impacts of the LAX Master Plan on the Inglewood Unified School District, the EIS/EIR should identify those locations where additional traffic might occur and assess the degree to which this additional traffic would cause significant impacts. In this regard it is typical for a traffic study to have clearly defined performance criteria with respect to how the study area is defined and the definition of "significant impact" within the study area.

The EIS/EIR does not appear to discuss the definition of the study area. As far as the Inglewood Unified School District is concerned, few roadways within the District were analyzed in the EIS/EIR. Only five locations were identified for analysis actually within the District, these being on the far west side in the vicinity of the I-405 freeway.

It would seem that major roadway facilities such as Century Boulevard, Arbor Vitae Street and Manchester Boulevard would be affected in some manner by the Master Plan. All of these roadways, directly or indirectly, serve schools within the District, and no analysis was carried out east of the I-405 freeway. The traffic study is deficient in not addressing locations in this immediately adjacent area. Even if the impacts are less than significant, there should have been some evaluation in the EIS/EIR showing how the analysis was carried out and indicating findings of significance or no significance on roadways within the Inglewood Unified School District.

Response:

Please refer to Topical Response TR-ST-2 for a discussion of the study area and identification of facilities analyzed.

AL00035-59

Comment:

PART SIX

THE ENROLLMENT IMPACT ANALYSIS IS MISLEADING

The EIS/EIR briefly discusses the impacts of LAX expansion on the Inglewood Unified School District. The EIS/EIR anticipates adding nearly 2% to the student population to the Inglewood Unified School District. In this analysis, it also asserts that these extra students are probably anticipated in the school

3. Comments and Responses

facility assumptions and that therefore the impact of this addition will be minimal. In making this assertion, the EIS/EIR states:

"[T]he maximum enrollment estimate for any one district between 1996/97 and 2015 would be 287 students within the Inglewood School District, which would represent less than two percent of the District's 1996/97 enrollment. While such increases could contribute to capacity deficits in some schools, these levels of enrollment increase are expected to be within facility planning assumptions for these districts. Project enrollment contributing to any overcrowding within these districts [sic] schools would be less than significant, and addressed through payment of school impact fees for new residential and commercial development within their boundaries." (EIS/EIR, Schools Technical Report, Section 4.2.1, pp. 14-15.)

In fact, the analysis and conclusion of the EIS/EIR is based upon a flawed premise. First, the enrollment impacts were not anticipated by the Inglewood Unified School District in its school facilities plan. Second, the Inglewood Unified School District already has an overcrowding crisis in its schools. A 2% increase in the student population in the Inglewood Unified School District would be a significant cumulative impact. Third, the EIS/EIR must address and mitigate the project's significant cumulative impacts upon Inglewood Unified School District. It has failed to do so.

The 2% growth attributable to the LAX expansion project is not anticipated in the school facility plan. Nobody, not even LAWA, knows the future configuration of LAX yet. LAWA clearly engaged in an intricate analysis of its chosen expansion alternatives and their anticipated residential, commercial and industrial effects in order to determine that the population of Inglewood Unified School District would increase by 2%.

The Inglewood Unified School District could not have, and did not, calculate the number of students that would be added as a result of LAX expansion as proposed in the EIS/EIR. (Inglewood Unified School District, "School Facilities Needs Analysis," Facilities Planning & Finance Analysis, pp. 58-59, Exhibit 14, Appendix B.) Because Inglewood Unified School District did not account for this increased enrollment in its facility plan, a key premise of the EIS/EIR's enrollment impact analysis is incorrect.

Response:

The Draft EIS/EIR addressed cumulative and induced growth impacts on schools in subsection 4.27.7, Cumulative Impacts, with supporting data and analysis provided in Technical Report 17. Increases in enrollment in Inglewood Unified School District would be addressed through payment of school impact fees associated with the construction of new housing and new commercial and industrial development. As stated on page 4-1232 of the Draft EIS/EIR, "...cumulative impacts would, however, be addressed through payment of school impact fees by LAWA and, where new households and new commercial and industrial development is constructed, throughout the region." In accordance with Senate Bill 50 (SB 50), the maximum fees amounts allowed by the bill are deemed to provide full and complete school facilities mitigation for purposes of CEQA. As further stated on page 4-1232 of the Draft EIS/EIR: "Payment of these fees in accordance with state law would mitigate and avoid significant cumulative impacts."

The statement in the Draft EIS/EIR that potential increases in student population indirectly attributable to the LAX Master Plan are expected to be within the facility planning assumptions of affected school districts is based on the finding that growth induced by LAX is well within SCAG's regional growth forecasts. As further discussed in the Draft EIS/EIR, Section 4.5, Induced Socio-Economic Impacts, SCAG's forecasts are based on input from local jurisdictions, such as the City of Inglewood, and therefore they account for growth that is anticipated under local general plan land use elements. While the District facility plan does not specifically call out the LAX Master Plan as one of numerous factors potentially contributing to enrollment growth, if the District relies on SCAG's forecasts or City general plan buildout assumptions in its facility planning, the estimated 287 students should be well within the District's planning parameters. It should also be noted that the 287 student figure is a high side estimate for the most intensive alternative (Alternative B). The estimate assumes that each new LAX employee would move into the area and would occupy a newly constructed household. In reality, it is likely that the majority of new employees, if they do not already live in the area, would move into existing households that are already generating student enrollment.

Regarding the statement that the analysis is based on a flawed premise because it does not account for existing overcrowding of schools in Inglewood, please note that Section 4.27 of the Draft EIS/EIR and

Technical Report 17, Schools, acknowledge that indirect increases in school enrollment associated with the LAX Master Plan could contribute to existing capacity deficits. Nonetheless, as stated above, enrollment impacts are considered less than significant due to payment of school impact fees with new residential and commercial/industrial development.

Please see Response to Comment SAL00017-69 regarding school enrollment in the Inglewood Unified School District related to Alternative D as presented in the Supplement to the Draft EIS/EIR.

AL00035-60

Comment:

Inglewood Unified School District schools are already overcrowded. Many of the schools were built in the 1950s and 1960s. Most schools have several portable trailers serving as temporary classrooms. These trailers take up the empty space on their lots, sometimes covering entire playgrounds.

In fact, Inglewood Unified School District's current enrollments "significantly exceed [by 4,876 students] existing school capacity." (Id., pp. 59, 67.) Therefore, a 2% increase over the 1996/97 school year from LAX expansion would constitute a significant growth inducing impact upon the already burdened Inglewood school system.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed cumulative and induced growth impacts on schools in subsection 4.27.7, Cumulative Impacts. Increases in enrollment in the Inglewood Unified School District would be addressed through payment of school impact fees associated with the construction of new housing and new commercial and industrial development. As stated on page 4-1232 of the Draft EIS/EIR, "...cumulative impacts would, however, be addressed through payment of school impact fees by LAWA and, where new households and new commercial and industrial development is constructed, throughout the region." In accordance with Senate Bill 50 (SB 50), the maximum fees amounts allowed by the bill are deemed to provide full and complete school facilities mitigation for purposes of CEQA. As further stated on page 4-1232 of the Draft EIS/EIR: "Payment of these fees in accordance with state law would mitigate and avoid significant cumulative impacts. In addition, please see Response to Comment AL00035-59 regarding the estimated two percent enrollment increase in Inglewood Unified School District and issues associated with school capacity. Please see Response to Comment SAL00017-69 regarding enrollment and potential changes in school capacity under Alternative D, as presented in the Supplement to the Draft EIS/EIR.

AL00035-61

Comment:

This increase in enrollment will not be mitigated by the provisions of SB 50. Because the expansion does not take place within Inglewood Unified School District boundaries, development fees will not be directly generated by LAX expansion.

Response:

Inglewood Unified School District (IUSD) is among the 31 other school districts, in addition to Los Angeles Unified School District (LAUSD), that would experience indirect project-related enrollment increases. The indirect enrollment increases would result from new employees at LAX with children that choose to move into the boundaries of IUSD and then occupy newly constructed housing units.

While it is true that LAX would not directly generate development fees for IUSD, if new residential and commercial/industrial development as a result of the LAX Master Plan were to occur within Inglewood, then it would be subject to the provisions of SB 50, with payment of school impact fees to IUSD addressing the enrollment effects of the indirect growth.

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AL00035-62

Comment:

Moreover, the EIS/EIR fails to address whether the anticipated 287 additional students will reside in existing housing or new housing. If the increased student population resides in existing housing, development fees will not be generated to mitigate the impact from the enrollment growth.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed enrollment impacts on Inglewood Unified School District in Section 4.27, Schools. These effects are also addressed for Alternatives A, B and C in Technical Report 17, Schools Technical Report, of the Draft EIS/EIR. As indicated in Table 3 on page 15 of Technical Report 17 of the Draft EIS/EIR, enrollment is estimated to increase by 287 students under Alternatives A and B, and by 156 students under Alternative C. As stated on page 4-1229 of the Draft EIS/EIR, the estimated maximum increase of 287 students represent less than two percent of District's 1996/97 enrollment. This increase could contribute to capacity deficits in some schools, however, the increase is expected to be within facility planning assumptions for the District. As described in Section 4.27, Schools (subsection 4.26.6.3 and 4.26.7.1), of the Supplement to the Draft EIS/EIR, under Alternative D there would be an overall decline in enrollment due to a forecasted decrease in airport employment over time.

Regarding whether the additional students under Alternatives A, B and C would reside in existing or new housing, the analysis uses a high side estimate that assumes all on-airport employees would move into newly constructed housing rather than existing housing. These new households within the District would produce a net increase in enrollment and generate school impact fees to the District. Employees that would move into existing housing would not produce a net increase in enrollment (new students moving into existing housing would replace students that resided there in the past) and, therefore, impact fees would not be appropriate.

AL00035-63

Comment:

LAWA is obligated to consider cumulative impacts in the EIS/EIR "when the project's incremental effect is cumulatively considerable. . ." (14 California Code of Regulations § 15130.) An unanticipated 2% increase in the student population at the deteriorating, overcrowded schools in the Inglewood Unified School District is significant. This significant cumulative growth inducing impact must be addressed, and mitigation measures identified, in the EIS/EIR. (14 California Code of Regulations § 15130(b)(2) and (3).)

Response:

LAWA does consider cumulative impacts and induced growth impacts on schools in subsection 4.27.7, Cumulative Impacts, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Supporting technical data and analyses related to Alternatives A, B, and C is provided in Technical Report 17 of the Draft EIS/EIR. Increases in enrollment in Inglewood Unified School District were evaluated in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and were considered to be addressed through payment of school impact fees associated with the construction of new housing and new commercial and industrial development to the extent it relates indirectly to increases in LAX employment. As stated on page 4-1232 of the Draft EIS/EIR, "...cumulative impacts would, however, be addressed through payment of school impact fees by LAWA and, where new households and new commercial and industrial development is constructed, throughout the region." Under Senate Bill 50 (SB 50), the maximum fees amounts allowed by the bill are deemed to provide full and complete school facilities mitigation for purposes of CEQA. As further stated on page 4-1232 of the Draft EIS/EIR: "Payment of these fees in accordance with state law would mitigate and avoid significant cumulative impacts." Regarding the two percent increase in student enrollment, see Response to Comment AL00035-59.

Regarding cumulative impacts and induced growth impacts associated with Alternative D, as described in subsection 4.27.7 of the Supplement to the Draft EIS/EIR, impacts would similarly be less than significant, although importantly, Alternative D would result in a decrease in enrollment due to

productivity increases over time that would reduce levels of on-airport employment at LAX. Please see Response to Comment SAL00017-69 regarding influences on enrollment under Alternative D.

AL00035-64

Comment:

PART SEVEN

THE EIS/EIR IS OUTDATED DUE TO THE EVENTS OF SEPTEMBER 11, 2001

The Inglewood Unified School District respectfully suggests that the Draft Los Angeles International Airport Master Plan and Draft LAX Expansion Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") prepared by Los Angeles World Airports ("LAWA") are irrelevant and inadequate because the world for which they were drafted no longer exists.

The tragic events of September 11, 2001 dramatically and likely permanently altered the use, capacity and public access of all airports, including LAX. While it may be years, if not decades, before the final impact of these horrific acts are understood and quantified, the fact remains that the EIS/EIR was not prepared for such a world of heightened security and restrictions on the public use and access to LAX and the vicinity. The following are just a few of the areas that need to be addressed by the EIS/EIR in light of the recent events:

Capacity What will the capacity restrictions be on future operations of LAX with the imposition of tightened security measures on the flying public?

Traffic How will the current and future access limitations impact adjoining communities? Will the restrictions on public access to the airport and the reliance on outside parking lots (e.g., Lots "B" and "C") adversely impact traffic patterns? How will the airport handle freight and commercial vehicles in light of the restrictions and added security?

Public Safety The specter of future terrorist threats hangs like a pall over all airports, particularly one set in the middle of a hugely populated area such as the Los Angeles basin. The EIS/EIR should provide an updated analysis of the public safety considerations for each of the project alternatives.

The Inglewood Unified School District believes that the events of September 11, 2001 are of such a magnitude and nature that the very concept and foundation of airport expansion must be completely re-evaluated. To blindly and stubbornly pursue any expansion under these circumstances, and in light of the current uncertainty and confusion, is unreasonable. The entire concept of airport expansion should be taken off the table until the events of this last week have been fully assessed and evaluated.

Response:

Please see Response to Comment AL00034-4 regarding Alternative D - Enhanced Safety and Security Plan.

AL00035-65

Comment:

PART EIGHT

THE EIS/EIR VIOLATES CEQA READABILITY REQUIREMENTS

California Public Resources Code § 21003 states, in pertinent part:

"The Legislature further finds and declares that it is the policy of the state that:

"(b) Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public...

3. Comments and Responses

"(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment."

The LAX EIS/EIR violates this Code section. First, the document itself is inaccessible. The EIS/EIR is 12,000 pages long and costs thousands of dollars to purchase. The CD version, although less expensive, is only accessible to people with computers. Many poorer residents of most highly impacted areas do not have that technology. Additionally, the CD version contains many glitches, so entire sections are impossible to read or print. (See, e.g., EIS/EIR, CD Version Technical Report 4.)

Response:

The comment is essentially the same as Comment AL00034-61; please refer to Response to Comment AL00034-61.

AL00035-66

Comment:

Second, the EIS/EIR is so poorly organized that it is nearly impossible to find all of the pertinent information regarding a topic. Analysis regarding a particular topic is often spread among numerous sections of the "main document." Several of the so-called "technical reports" contain substantive narrative that is not reflected in the report itself. The "appendices" often contain other important information. The document contains no logical explanation as to why its contents are distributed in this manner.

For instance, as expected, the Noise section of the EIS/EIR contains information regarding the noise impacts of LAX expansion upon Inglewood schools. However, the Noise Technical Report, thousands of pages later, contains crucial noise impact information that is entirely absent from the Noise section of the main document. In addition, the Noise Technical Report is not contained on the CD entitled "Technical Reports". Instead, it is on the "Appendices" CD, and is actually Appendix "D". The reason for this is entirely unclear.

The Land Use section, a thousand pages from the Noise section and several thousand pages from the Noise Technical Report, essentially states that LAWA will not mitigate noise impacts identified in the Noise section. (EIS/EIR, Land Use, Section 4.2, pp. 4-95, 4-96.) These few, critical sentences are not contained in the Noise section of the main document, nor the Noise Technical Report. This illogical placement of this crucial language suggests an intentional decision to obscure information that would raise "red flags" in respondents.

Response:

The comment is essentially the same as Comment AL00034-62. Please see Response to Comment AL00034-62.

AL00035-67

Comment:

CONCLUSION

The individual and cumulative impacts of the proposed LAX expansion upon the education, health and safety of its students are of grave concern to the Inglewood Unified School District. By law, LAWA must adequately consider and mitigate these impacts in its EIS/EIR. It fails to do so.

The EIS/EIR fails to adequately analyze the environmental justice, noise, pollution, traffic and enrollment impacts of the proposed project upon the Inglewood Unified School District. The EIS/EIR fails to propose adequate mitigation measures for these impacts. Furthermore, the EIS/EIR analysis of the cumulative impacts of the LAX expansion upon the Inglewood Unified School District is inadequate, both due to its own insufficiency and due to the inadequacy of its analyses of the underlying impacts.

The EIS/EIR is inadequate and outdated in light of the events of September 11, 2001.

For the foregoing reasons, the Inglewood Unified School District respectfully requests that LAWA revise the EIS/EIR to include alternative projects, further impact analysis and site specific mitigation information and proposals regarding the impacts on the Inglewood Unified School District.

Response:

Please see Responses to Comments AL00035-3 through AL00035-66 for responses to specific concerns raised in the commentor's letter that provide the basis for the conclusion statement.

AL00036 Sheehan, Lari County of Los Angeles 9/24/2001

AL00036-1

Comment:

On July 13, 2001, the County of Los Angeles Board of Supervisors formally submitted its final comments on the Draft Environmental Statement/Environmental Impact Report (Draft EIS/EIR) for the Proposed Master Plan Improvements at Los Angeles International Airport (LAX) in anticipation of the July 25, 2001 comment period deadline. Subsequently, the comment period was extended to September 24, 2001. In accordance with this extension, the County of Los Angeles formally submits the additional attached comments.

These comments were originally to have been presented by representatives of Mayor Michael D. Antonovich at public hearings at Palmdale (September 19, 2001) and Ontario (September 20, 2001), and representatives of Supervisor Don Knabe at the public hearing in San Pedro (September 15, 2001). All of these hearings were subsequently cancelled and have not been rescheduled. The County objects to the public comment period being closed without the aforementioned hearings having been conducted.

Response:

Comment noted. The FAA and LAWA are committed to the public input process. The review period on the Draft EIS/EIR was appropriately extended until after rescheduled public hearings. Please see Topical Response TR-PO-1 for public hearing dates.

AL00036-2

Comment:

As stated by Supervisor Antonovich, Mayor of the County of Los Angeles, at the public hearing on June 9, 2001, Regional Airport Alternatives should have been evaluated in the EIS/EIR Cumulative Assessment of the five county study area. The development and expansion of other airports in the Southern California Region is critical to effective and efficient growth of air travel for the region. The Southern California Region market is very large and relies on air travel to support business, government, and personal needs of the people in the region. All of this air travel demand should not be burdened on Los Angeles International Airport and the residents in the adjacent area.

The Southern California Regions five county air market area has a combined population of 16.6 million. This population is larger than all states except for New York and Texas. This metropolitan market can presently accommodate scheduled passenger air service at seven airports: Los Angeles International Airport, Burbank Airport, and Long Beach Airport in Los Angeles County; John Wayne Airport in Orange County; Ontario International Airport in San Bernardino County; Palm Springs Airport in Riverside County; and Oxnard Airport in Ventura County. The Metropolitan Area also has Palmdale Regional Airport, which had air service in the early 1990's, and four airports that were previously military bases that can accommodate passenger and cargo air service.

In the year 2000, the operating airports in the Southern California region accounted for 72.2 million domestic passengers and 17.4 million international passengers for a total of almost 90 million passengers on scheduled flights. Of this total, Los Angeles International Airport accounted for 67.3 million passengers or 75% of the total passengers for the Metropolitan Area.

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While LAX is the Southern California "hub" airport, the Region's other airports are convenient to residents and businesses located in the growth areas outside metropolitan Los Angeles. Except for Palm Springs Airport, the regional airports can provide air service to highly populated market catchment areas ranging from 600,000 for Palmdale Airport, 700,000 for Oxnard Airport, 2 million for Long Beach Airport, 2.5 million for Burbank Airport, 2.8 million for Orange County (John Wayne) Airport, and 3.5 million for Ontario International Airport (Source: Catchment area population figures were forecasted by Tri-star using data from Sales Management's, "Survey of Buying Power").

Over the years, passenger demand has been very responsive to air service at the regional airports in the Southern California Region. For example, last year Burbank Airport, Ontario International Airport, and Orange County Airport accounted for 58% of all passengers flying to and from the San Francisco Bay Area and Sacramento. LAX accounted for 42% of the passengers to these destinations. The regional airports also produced approximately half of the passengers to and from Portland, Oregon; Seattle, Washington; Phoenix, Arizona; Las Vegas, Nevada; and Dallas/Ft. Worth, Texas. Passengers will respond if good air service is provided at the regional airports!

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.

AL00036-3

Comment:

The Southern California Regional Airport Authority, which is a Joint Powers Agreement between the Counties of Los Angeles, Orange, Riverside, and San Bernardino, and the City of Los Angeles, has recently been reactivated to promote the goal of developing and implementing a regional approach to airport demand and capacity. This Authority, along with other government entities and airport managers in the Southern California Region, have an excellent opportunity at this time to develop a policy and related implementation program to best meet the present and future air travel needs of the region. We believe that this can be best accomplished by the development of new and additional air service at regional airports, like the one here at Palmdale Regional Airport, and others like Ontario International Airport and Long Beach Airport.

Response:

Comment noted. 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 Southern California Regional Airport Authority (SCRAA) back to inactivity. 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 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.

AL00036-4**Comment:**

The aviation consultants retained by the County of Los Angeles have estimated that the current passenger demand for the Palmdale Regional Airport market area ranges from 900,000 to 1.6 million annual passengers. This demand is presently being handled at Los Angeles International Airport and at Burbank Airport.

The studies prepared by the County's aviation consultants indicate that the Palmdale Regional Airport has the passenger demand at the present time to support regional jet service to San Francisco, Sacramento, San Jose, Salt Lake City, Denver, Phoenix, Las Vegas, and Dallas/Ft. Worth. The target airlines include United Express (an affiliate of United Airlines), American Eagle (a subsidiary of AMR and sister company of American Airlines), Delta Connection (a part of Delta Air Lines), Horizon Air (a sister company of Alaska Airlines), and America West Express (the commuter part of America West Airlines).

The studies indicate a passenger demand large enough to support 31 daily flights to these key markets with seven flights to San Francisco, five flights to Las Vegas and Phoenix, four flights to Salt Lake City, three flights to Dallas and Denver, and two flights each to Sacramento and San Jose. This level of air service should be sufficient to meet the local travel demand. As passenger demand increases, the airlines can either add additional flights or start replacing the regional jets with standard twin jets like the B-737 and MD-80 aircraft. The agreement with the Air Force allowing for joint use at Palmdale Regional Airport allows for a maximum of 50 daily flights, which could accommodate between 2 million and 4.5 million passengers annually depending on aircraft size.

The County of Los Angeles, the City of Palmdale, and Los Angeles World Airports are jointly in the process of recruiting airlines to provide air service at Palmdale Regional Airport. An extensive presentation package has been developed and sent to the target airlines. A team representing the three entities will be meeting with the target airlines in the next two months to persuade the target airlines to tell the Palmdale Airport story and start air service at Palmdale in 2002.

It has been estimated that the new air service at Palmdale Airport will create \$19.4 million in annual visitor expenditures, over \$800,000 in new income to travel agents, \$6.5 million in fees to the airport and airline expenditures, and have a total revenue impact to the Antelope Valley of \$64.5 million with seventeen daily flights to key markets.

Response:

This is not a comment on the contents of the Draft EIS/EIR.

AL00036-5**Comment:**

Expansion of air service at the other airports in the region will also be a benefit to the air traveler. For example, Long Beach Airport presently accounts for approximately 300,000 annual passengers and has recently signed an agreement with Jet Blue Airways to operate 27 daily flights with A-320 aircraft to various cities. Jet Blue started service at Long Beach to New York City Kennedy Airport on August 29th. When all 27 daily flights are implemented, Long Beach Airport will increase its annual passengers by 2.7 million. Long Beach is continuing to recruit regional jet service, which could produce an additional 500,000 passengers for the airport.

Response:

Comment noted. Also please refer to Topical Response TR-RC-1 regarding the Master Plan's role in a regional approach to meeting demand.

3. Comments and Responses

AL00036-6

Comment:

The development of new passenger flights here at Palmdale Regional Airport, along with the expansion of flights at Ontario International Airport and Long Beach Airport, can result in approximately 5.7 million passengers using these airports, passengers who most likely would have used LAX. Other airports in the region (Burbank and John Wayne) can handle additional flights and passengers and some of the ex-military airfields can be developed as commercial airports for passengers and cargo.

Response:

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. 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 impacts in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendices D and G and Technical Reports 1, 2, 3 and 4 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-1, S-2, and S-4 of the Supplement to the Draft EIS/EIR.

AL00036-7

Comment:

Closing Statement

The information presented today on these airports clearly supports for the need to develop a detailed evaluation of the Regional Airport Alternatives in the Los Angeles World Airport Master Plan. And with the reactivation of the Southern California Regional Airport Authority, there is strong desire and support to promote the implementation of a program to develop new and additional air service at the other airports in the Region.

Response:

Comment noted. Please see Response to Comment AL00036-3.

AL00036-8

Comment:

Even though there is a strong passenger demand for more air service at the regional airports in the Southern California region, the airlines are reluctant to expand air service at these airports unless they believe that the passenger demand or competitive situation requires new or additional air service. The SCRAA will actively work with the airports and airlines in presenting the opportunities for new or expanded air service at the regional airports. The airlines are looking for profit opportunities and the regional airports have historically been very profitable.

Response:

Please see Topical Response TR-RC-1 regarding the Master Plan's role in a regional approach to meeting demand and Topical Response TR-RC-5 regarding the role of airline economics in shifting operations to regional airports.

AL00036-9

Comment:

We believe these regional markets exist and that the LAX EIS/EIR is seriously flawed in failing to evaluate the regional alternative to concentrating growth at LAX. With the recent reactivation of the SCRAA, the presence of several candidate airports to shoulder this regional demand, and a chorus of voices at the local, State, and Federal level supporting a regional solution to Southern California's airport demand, this is a particularly opportune time to pursue this vision and avoid the overwhelmingly negative impacts of overtaxing LAX and the surrounding communities.

Response:

As indicated above, 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.

AL00036-10

Comment:

As stated by Supervisor Antonovich, Mayor of the County of Los Angeles, at the public hearing on June 9, 2001, Regional Airport Alternatives should have been evaluated in the EIS/EIR Cumulative Assessment of the five county study area. The development and expansion of other airports in the Southern California Region is critical to effective and efficient growth of air travel for the region. The Southern California Region market is very large and relies on air travel to support business, government, and personal needs of the people in the region. All of this air travel demand should not and cannot be burdened primarily on Los Angeles International Airport and the residents in the adjacent area.

The Southern California Region's five county air market area has a combined population of 16.6 million. This population is larger than all states except for New York and Texas. This metropolitan market presently accommodates scheduled passenger air service at seven airports: Los Angeles International Airport, Burbank Airport, and Long Beach Airport in Los Angeles County; John Wayne Airport in Orange County; Ontario International Airport in San Bernardino County; Palm Springs Airport in Riverside County; and Oxnard Airport in Ventura County. The Metropolitan Area also has Palmdale Regional Airport, which had air service in the early 1990's, and four airports that were previously military bases that could accommodate passenger and cargo air service.

In the year 2000, the operating airports in the Southern California region accounted for 72.2 million domestic passengers and 17.4 million international passengers for a total of almost 90 million passengers on scheduled flights. Of this total, Los Angeles International Airport accounted for 67.3 million passengers or 75% of the total passengers for the Metropolitan Area.

While LAX is the Southern California "hub" airport, the Region's other airports are convenient to residents and businesses located in the growth areas outside metropolitan Los Angeles. Except for Palm Springs Airport, the regional airports can provide air service to highly populated market catchment areas ranging from 600,000 for Palmdale Airport, 700,000 for Oxnard Airport, 2 million for Long Beach Airport, 2.5 million for Burbank Airport, 2.8 million for Orange County (John Wayne) Airport, and 3.5

3. Comments and Responses

million for Ontario International Airport (Source: Catchment area population figures were forecasted by Tri-star Marketing Company using data from Sales Management's, "Survey of Buying Power").

Over the years, passenger demand has been very responsive to air service at the regional airports in the Southern California Region. For example, last year Burbank Airport, Ontario International Airport, and Orange County Airport accounted for 58% of all passengers flying to and from the San Francisco Bay Area and Sacramento. LAX accounted for 42% of the passengers to these destinations. The regional airports also produced approximately half of the passengers to and from Portland Oregon, Seattle Washington, Phoenix Arizona, Las Vegas Nevada, and Dallas/Ft. Worth Texas. Passengers will respond if good air service is provided at the regional airports!

Response:

Please see Response to Comment AL00036-2 above.

AL00036-11

Comment:

The Southern California Regional Airport Authority, which is a Joint Powers Agreement between the Counties of Los Angeles, Orange, Riverside, and San Bernardino, and the City of Los Angeles, has recently been reactivated to promote the goal of developing and implementing a regional approach to airport demand and capacity. This Authority, along with other government entities and airport managers in the Southern California Region, have an excellent opportunity at this time to develop a policy and related implementation program to best meet the present and future air travel needs of the region. We believe that this can be best accomplished by the development of new and additional air service at regional airports, like the one here at Ontario International Airport, and others like Palmdale Regional Airport, Long Beach Airport, March Inland Port, and Southern California Logistics.

Response:

Please see Response to Comment AL00036-3.

AL00036-12

Comment:

Ontario International Airport is the most convenient airport for over 20% of the population in the Southern California Region. Last year, Ontario International Airport accounted for 6.7 million airline passengers, approximately 7.5% of the total for the region. Ontario International Airport has nonstop jet service to 18 cities. Studies indicate that Ontario International Airport has a passenger demand potential of 10 to 14 million annual passengers. To achieve this potential, Ontario International Airport will need to entice the airlines to increase flights to several key markets like Atlanta, Georgia; Chicago, Illinois; and New York City. They will also need to add nonstop service to the following cities: Albuquerque, New Mexico; Baltimore, Maryland; Boston, Massachusetts; Detroit, Michigan; Miami and Orlando Florida; Philadelphia, Pennsylvania; Reno, Nevada; Tucson, Arizona; and Washington D.C. The increase in flights and the addition of nonstop service to new cities can produce an additional 2 million annual passengers at Ontario International Airport.

Response:

Comment noted.

AL00036-13

Comment:

Recently, an aviation consultant retained by the County of Los Angeles estimated that the current passenger demand for the Palmdale Regional Airport market area ranges from 900,000 to 1.6 million annual passengers. The Palmdale Regional Airport could accommodate 50 daily flights, which would equate to between 2 million and 4.5 million passengers annually depending on aircraft size. Currently, the County of Los Angeles, the City of Palmdale, and Los Angeles World Airports (LAWA) are jointly in the process of recruiting airlines to provide air service at Palmdale Regional Airport.

Response:

This is not a comment on the contents of the Draft EIS/EIR.

AL00036-14

Comment:

Expansion of air service at the other airports in the region will further benefit the air traveler. For example, Long Beach Airport presently accounts for approximately 300,000 annual passengers and has recently signed an agreement with Jet Blue Airways to operate 27 daily flights with A-320 aircraft to various cities. Jet Blue started service at Long Beach to New York City Kennedy Airport on August 29th. When all 27 daily flights are implemented, Long Beach Airport will increase its annual passengers by 2.7 million. Long Beach is continuing to recruit regional jet service, which could produce an additional 500,000 passengers for the airport.

Response:

Comment noted. Also please refer to Topical Response TR-RC-1 regarding the Master Plan's role in a regional approach to meeting demand.

AL00036-15

Comment:

The addition of more passenger and cargo flights at the regional airports will allow the residents and visitors to Southern California to utilize airports that are closer to their homes and businesses. This will save time and money and reduce congestion and pollution for the metro area. Most regional airports are within 30 minutes of their primary market (Landrum and Brown Study 2000) whereas air passengers today must travel 1 to 1.5 hours to get to LAX. This added travel time is unproductive and adds to the tension and stress of the travel experience which already includes crowded airports, late flights and full aircraft. The traveler will also save money in driving fewer miles and having lower parking cost at the Regional Airports.

It has also been found that businesses will locate near airports that have good air service. Over 75% of the businesses in the Irving Industrial Complex stated that frequent air service at John Wayne Airport in Orange County was a key factor in choosing this location for their businesses; Additional air service at Ontario and the other regional airports, including new air service at Palmdale Airport, will stimulate business near these airports and create new jobs for the host communities.

Response:

Please see Response to Comment AL00036-2 above.

AL00036-16

Comment:

The airlines will not divert flights from LAX to the regional airports or add new service at the regional airports without having assurance that these flights will be profitable. In most cases today, the airlines are requesting incentives to serve new markets. These incentives can include lower airport fees, advertising funds, ticket purchases, and flight guarantees. LAWA is in a position to offer lower fees, provide advertising and promotion support for increased air service at Ontario International Airport and new air service at Palmdale Airport. LAWA is also in a position to stimulate passenger use at these airports by lowering parking fees and having low cost convenient ground transportation.

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.

3. Comments and Responses

An update of the master plan for Ontario is currently underway. The Ontario master plan will recommend the needed improvements to meet the projected demand of 17.6 MAP in 2015. 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.

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 also see Topical Response TR-RC-5 that discusses airline economics and airport choice.

AL00036-17

Comment:

The expansion of flights here at Ontario International Airport, along with the development of new passenger air service at Palmdale Regional Airport and expansion of flights in Long Beach Airport can result in approximately 5.7 million passengers using these airports, passengers who most likely would have used LAX. Other airports in the region (Burbank and John Wayne) can handle additional flights and passengers, and the ex-military airfields should also be considered for development as commercial airports for passengers and cargo.

Response:

Please see Response to Comment AL00036-2 above. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

AL00036-18

Comment:

Los Angeles City Mayor James Hahn has declared his support for a regional aviation system by urging the City's Airport Commission to divert passengers and flights from overcrowded LAX to Ontario International Airport by lowering landing and parking fees, and creating convenient shuttle service between these airports. This is a definite step in the right direction, and we hope the Mayor will continue to promote regional approach to air service by urging the Airport Commission to add air service to Palmdale Regional Airport, and by supporting the efforts of the Southern California Regional Airport Authority.

Response:

Please see Response to Comment AL00036-2 above.

AL00036-19

Comment:

Even though there is a strong passenger demand for more air service at the regional airports in the Southern California region, the airlines will be reluctant to expand air service at these airports unless they believe that the passenger demand or competitive situation requires new or additional air service. The SCRAA will actively work with the airports and airlines in presenting the opportunities for new or expanded air service at the regional airports. The airlines are looking for profit opportunities and the regional airports have historically been very profitable.

Response:

Comment noted. Please see Topical Response TR-RC-1 regarding the Master Plan's role in a regional approach to meeting demand and Topical Response TR-RC-5 regarding the role of airline economics in shifting operations to regional airports.

AL00036-20

Comment:

We believe these regional markets exist and that the LAX EIS/EIR is seriously flawed in failing to evaluate the regional alternative to concentrating growth at LAX. With the recent reactivation of the SCRAA, the presence of several candidate airports to shoulder this regional demand, and a chorus of voices at the local, state, and federal level supporting a regional solution to Southern California's airport demand, this is a particularly opportune time to pursue this vision and avoid the overwhelmingly negative impacts of overtaxing LAX and the surrounding communities.

Response:

Please see Response to Comment AL00036-2 above.

AL00036-21

Comment:

Good Afternoon. I am here to represent the LA County Board of Supervisors. After careful review of the draft EIS/EIR, we have concluded that the problems with the document are so pervasive that its validity is compromised and the only appropriate action is to start the entire process again. We base these conclusions on the following factors:

Response:

Comment noted. Please see Responses to Comments below.

AL00036-22

Comment:

- Air quality is shown to be a significant impact both before and after mitigation. Carbon monoxide concentrations from on-airport sources are predicted to increase as much as 400% and nitrogen dioxide concentrations are forecast to increase by as much as 1,000%. Therefore, the mitigation measures do not appear to be sufficient.

Response:

The Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality. The significance of on-airport CO and NO₂ concentrations for each alternative was presented in subsection 4.6.9, Level of Significance After Mitigation, which shows that predicted air quality impacts from CO and NO₂ are less than significant relative to National and California Ambient Air Quality Standards. As indicated in Table S4.6-22, the predicted CO and NO₂ concentrations do not increase by the values indicated in the comment. See Table S4.6-22 to compare predicted mitigated CO and NO₂ concentrations, baseline concentrations, and National and California Ambient Air Quality Standards.

CEQA does not require that a project's significant adverse environmental impacts be reduced below significance in order for a project to obtain approval. In fact, many, if not most, large-scale projects cannot reduce environmental impacts below significance due to a lack of cost-effective or available technology. CEQA requires that all feasible and cost-effective measures be implemented and enforced and that the Mitigation Monitoring and Reporting Plan be approved by the Lead Agency as part of the EIS/EIR evaluation process. Therefore, the current proposed mitigation measures that have been revised in the Supplement to the Draft EIS/EIR are sufficient, pursuant to CEQA, in mitigating the project's impacts to the maximum extent practical.

AL00036-23

Comment:

- The population that is shown within the 65 CNEL noise contour is half of what LAWA reported in the same period (4th quarter 1996). This undermines the validity of the document and misrepresents the

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impacts of the project. The noise modeling data misrepresents the actual noise contours in the Lennox and Inglewood areas. Examination of the data shows that the noise monitoring sites east of the airport, primarily in Inglewood, consistently show noise levels at nearly 3 decibels higher than the EIS/EIR modeling predictions.

Response:

The commenter is correct in identifying Table 6 in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR as showing that noise levels are under-predicted. Please see Topical Response TR-N-1 regarding the noise modeling approach, and in particular Subtopical Response TR-N-1.2. Please see Response to Comment PC00109-5.

AL00036-24

Comment:

- The document includes operational assumptions that are unreasonable, making analysis of noise impacts speculative and lower than what might occur. For example, it was assumed that new cargo spaces would be less efficient than existing facilities, which fails to acknowledge that new facilities may handle twice the cargo per square foot of existing facilities. The increased trips that will be required to transport and handle the additional cargo will add to the anticipated noise levels in and around LAX. In addition; the gate capacity may be greater than was reported, which could result in an increase in flights that would elevate noise levels in and around the airport. Both of these factors need to be accounted for in the noise analysis.

Response:

The fleet mix forecast associated with future operations (which includes air cargo) is based on the best estimates developed in the Master Plan. Total operations are forecast to grow, depending on the alternative, between 2.4 percent and 18.3 percent. Therefore, new cargo facilities will need to be more efficient, rather than less efficient due to the volume of cargo that is anticipated to increase dramatically. 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 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 will 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 and 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. The capacity of gates at LAX is not the driving factor for additional operations nor additional noise. If each gate were able to accommodate more passengers on each flight, the number of flights necessary to accommodate the total passenger demand would decline, rather than increase since the airlines would be projected to meet the increase in demand by increasing the overall size of its fleet mix. For additional information, please see Topical Response TR-N-1 regarding noise modeling approach, Topical Response TR-N-5 regarding nighttime aircraft operations, and Topical Response TR-N-6 regarding noise increase.

AL00036-25

Comment:

- There are no noise mitigation measures in the document even though noise was determined to have significant impacts. This is contrary to CEQA requirements.

Response:

Comment noted. Please see Topical Responses TR-LU-5 and TR-N-4 regarding noise mitigation. Mitigation measures were prepared in compliance with CEQA requirements, as described on page 4-8

of the Draft EIS/EIR. Aircraft noise mitigation is described in subsection 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise are provided in subsection 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provides mitigation measures for aircraft noise in subsections 4.1.8 and 4.2.8.

AL00036-26

Comment:

- The original scoping did not include the alternative that became the preferred alternative (Alternative C). This fails to provide the public with essential information that they are entitled to and does not meet the level of discourse that the law expects. In addition, considering only 3 alternatives for a project of such magnitude is unusually limited.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Response to Comment AL00022-17 regarding the public notice pertaining to Alternative C. 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). The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment.

AL00036-27

Comment:

- The preferred alternative contains the most significant impacts yet meets the least number of objectives set forth in the EIS/EIR.

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 AL00022-43 regarding Alternative C's fulfillment of the project objective.

AL00036-28

Comment:

- The baselines that were used were inconsistent and outdated, which significantly reduces the impacts of the project. For instance, the document use 1996 as a baseline for traffic, air, and aircraft noise, while using 2000 for biology, earth, and water resources. The shifting from one baseline to another is, at best, confusing; at worst, it confuses the underlying impacts that the EIS/EIR is intended to clarify.

Response:

Please see Response to Comment AL00022-55 regarding the baseline year and Topical Response TR-GEN-1 regarding baseline issues in general.

AL00036-29

Comment:

- The project horizon year is 2015, yet the project cannot be completed before that date. The project schedule anticipates a 16-year development schedule. With development starting in 2002, the earliest the project could be completed would be 2018, 3 years after the horizon year. This skews the potential impacts of the project.

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Response:

Please see Response to Comment AL00033-26 regarding the completion schedule for the proposed build alternatives.

AL00036-30

Comment:

- FAA has released a Benchmark Plan, which, if enacted, would increase the capacity of the runways at LAX. Through the proposed technological and procedural improvements, LAX would go from a capacity of 150 flights per hour to 165 flights per hour, which could increase existing capacity by 13 million annual passengers. In effect, current capacity would go from 67 MAP to 80 MAP without any improvements at LAX. With the proposed improvements, the capacity could go from the proposed 89 MAP to 102 MAP. The impacts of this action need to be considered in both the build and no build alternatives.

Response:

The Master Plan considered technology improvements in the determination of airport capacity (see Chapter II, Section 2.6 of the Draft Master Plan). In general, most technology enhancements that are applicable at LAX have the potential to increase efficiency and safety, reduce controller workload, and/or reduce delays, but typically do not significantly improve sustainable hourly throughput. Some technology and procedural improvements may improve the ability of the controllers to manage bursts of activity but would not likely increase the overall hourly throughput of LAX. Therefore, the Master Plan does not anticipate that the airlines would increase operations in peak hours in response to technology enhancements.

Technology improvements in aviation continue to evolve. It is not known how many and/or which improvements will actually be implemented. For example, the Master Plan considered the application of the Departure Sequencing Program, but the application of this program at LAX has since been canceled by the FAA. In addition, the original FAA schedule for deployment of technology at U.S. airports has changed and implementation is likely to happen later rather than sooner. Because the benefits of technology enhancements are unknown and untested, the Master Plan did not assume increases in capacity from technology improvements.

However, the Master Plan did assume 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. The airside analysis in the Master Plan assumed the following:

- A dual Civet approach before it was implemented.
- Controllers would direct pilots of departing aircraft to taxi correct (use the south airfield runways if the aircraft is departing to a southern fix, use the north runways if the aircraft is departing to a northern fix) as opposed to taxi easy (depart from the runway closest to the gate) in order to maximize departure capacity.
- Controllers would have the flexibility to direct departing aircraft that are scheduled to use the Thermal fix (which is used by a disproportionate portion of departing traffic) to the under-used Dagget fix in order to balance north and south airfield departures and maximize runway capacity.
- The use of Simultaneous Offset Instrument Approaches (SOIA) for the alternatives with a fifth runway (Alternatives A and B) in order to maximize the capacity of the airport and to allow triple independent approaches to LAX in good weather.

Regarding the FAA Benchmark Study, this study served a different purpose than the Master Plan. As stated in the Benchmark Study:

- The FAA has developed capacity benchmarks for 31 of the nation's busiest airports to understand the relationship between airline demand and airport runway capacity and what we in the aviation community can do about it.
- Capacity benchmarks are defined as the maximum number of flights an airport can routinely handle in an hour.
- These benchmarks are estimates of a complex factor that varies widely with weather conditions, runway configurations, and the mix of aircraft types. Capacity benchmarks assume there are no

constraints in the en route system or the airport terminal area. They are useful for broad policy discussions and the development of long-term strategies. The intent of the Benchmark Study was to identify airports that currently have, or are projected to have, high delays and insufficient capacity. To that end, realistically optimistic assumptions regarding the impact of future technology were made in order to be conservative in the determination of future delays.

The capacity increases projected in the FAA Benchmark Study did not take into consideration the impact of fleet mix changes on capacity. All of the Master Plan alternatives assume an increase in aircraft size as compared to existing conditions and the unconstrained forecast (this is especially true for the No Action/No Project Alternative and Alternative C). A fleet mix made up of larger aircraft generally requires more separation between aircraft in the air and therefore reduces the number of arrivals and departures that can be served in an hour.

In addition, the Benchmark Study assumes there are no constraints in the en route system or the airport terminal area. In reality, there are, and will continue to be, constraints in the en route system and terminal area due to Special Use Airspace, terrain, and other factors in the Los Angeles Basin that will constrain the capacity of LAX.

In summary, most technology enhancements that are applicable at LAX have the potential to increase efficiency and safety, reduce controller workload, and/or reduce delays but typically do not significantly improve sustainable hourly throughput. The Master Plan did assume that runway capacity would be maximized to the extent possible within the constraints of the airspace.

Please see Response to Comment PC00599-7 for a discussion on the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (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.

AL00036-31

Comment:

- Finally, the EIS/EIR concludes that short distance flights would go to outlying airports but there is no commitment to ensure it happens. The document either needs to explore the impacts of these flights staying at LAX or needs to include an alternative that properly identifies a plan for a regional solution to redistribute these flights.

Response:

As the hourly scheduled activity at LAX becomes more constrained, delays will increase exponentially and create ripple delays in subsequent hours of the day. When additional flights can no longer be added so as to operate within their required schedule, airlines will likely search for reasonable alternatives to provide additional passenger service. Based on the geographic distribution of passenger demand (homes and businesses) and the shorter travel times to airports like Ontario, Palmdale, Burbank and John Wayne, passengers will choose to fly more often from these other airports and airlines will begin to offer more direct flights more often to desirable locations. Alternative D, evaluated in the Supplement to the Draft EIS/EIR, supports a regional approach to meeting air travel demand. Please refer to Topical Response TR-RC-1 regarding the Master Plan's role in a regional approach to meeting demand.

AL00036-32

Comment:

The regional approach has recently been supported by the FAA and SCAG and several outlying airports have expressed a desire to accommodate additional air traffic. Additionally, the Southern California Regional Airport Authority (which includes the Counties of Los Angeles, Orange, Riverside, and San Bernardino and City of Los Angeles) has recently begun to develop a regional air service strategic master plan that will involve all stakeholders through a collaborative, coordinated process.

3. Comments and Responses

It is time for LAWA to consider an Alternative that encourages regional growth rather than promoting unconstrained expansion on an already heavily impacted site.

Response:

Please see Response to Comment AL00036-9. 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 Southern California Regional Airport Authority (SCRAA) back to inactivity. Riverside County voted in July 2002 to withdraw from SCRAA.

AL00037 Gordon, Mike City of El Segundo 9/21/2001

AL00037-1

Comment:

We submit these comments with the anticipation that Mayor James Hahn will soon abide by his campaign pledge and withdraw the proposed LAX Master Plan. In that light we hope our comments contribute to a deeper understanding about the future of LAX, its relationship to its neighbors and to its regional community. Nevertheless, we feel compelled to adhere to the September 24 public comment deadline since there has been no announcement of an extension.

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. Also, please note that the public comment period for the Draft EIS/EIR was extended to November 9, 2001.

AL00037-2

Comment:

El Segundo and other communities in the vicinity of LAX have long known what much of the world is only now coming to appreciate: LAX has an extraordinary impact on its neighbors.

For the most part, those burdens have grown incrementally over the years as the airport pursued a policy of piecemeal growth, without adequate (or any) environmental review, largely outside of public notice. Neighboring communities that had accepted an LAX of 40 million annual passengers, as projected in the 1981 LAX Interim Plan, now must cope with the burdens created by an airport that has grown to accommodate 68 million annual passengers - with little or no mitigation.

As a consequence, the City of El Segundo and our entire community have approached our review of the proposed LAX Master Plan with some skepticism. It is difficult to trust that an airport expansion plan of such magnitude would accurately describe the environmental burdens the plan would create since those burdens are likely to be so severe.

After reviewing the Draft Environmental Impact Statement/Environmental Impact Report for this plan, we have concluded that our skepticism was well justified. The Draft EIS/EIR prepared by a virtual army of consultants is fraught with errors, exaggerations, missing information, and misleading and unsubstantiated conclusions. It fails to provide any reasonable person with the environmental information necessary to make an informed judgment regarding the merits of the proposed LAX Master Plan. We believe that the Draft EIS/EIR must be rejected.

Response:

Comment noted. Please see Topical Response TR-GEN-3 regarding past and present activity levels at LAX, and mitigation of the impacts associated with those activity levels.

AL00037-3

Comment:

In particular, our review of the LAX Master Plan Draft EIS/EIR indicates that:

1. The Draft EIS/EIR dismisses out of hand the alternative of developing a truly regional airport plan and utilizing the ten other commercially capable airports in Southern California. This despite the fact that all of these airports have significant runway systems and other facilities needed to meet regional aviation demands and require far less investment than LAX to be fully operational. Several of these airports are located in the high growth areas of the region and have strong community support. Ontario International Airport, also owned by Los Angeles World Airports, lies in the heart of Southern California convenient to Los Angeles, San Bernardino, Riverside and Orange Counties. It can immediately accommodate significant new passenger and cargo growth. Yet, the alternative of growing Ontario, or any other airport, is not seriously considered by LAWA, though this option is largely within LAWA's control.

The Draft EIS/EIR ignores studies prepared for the Southern California Association of Governments (SCAG), using the RADAM computer model, the same computer model used by LAWA, demonstrating that a decentralized regional airport system is quite workable from the point of view of regional demand distribution. Other studies prepared by and for SCAG demonstrate that a decentralized regional system will deliver essentially equal regional economic benefits¹, help reduce anticipated regional congestion² as well as ground level air pollution³, and will be vastly superior from an environmental justice ⁴ standpoint. As far as noise impacts alone, SCAG analysis shows that in a decentralized regional airport system with LAX constrained to its current capacity, over 30,000 residents, nearly all minority, will be spared the burden of living within the 65 db noise contour when compared to a system with LAX expanded as proposed by LAWA.

As a result, the SCAG's Regional Council overwhelmingly approved the 2001 Regional Transportation Plan that constrains LAX to its existing facilities and rationally distributes demand to the region's other airports. The Draft EIS/EIR provides scant consideration of this decentralized regional alternative for meeting Southern California's future aviation demand despite its environmental and environmental justice superiority and cheaper costs.

2. The LAX Master Plan and the Draft EIS/EIR dismiss the vigorously expressed desire of the majority of the region to establish competitive service at multiple airports in Southern California. To date, through outreach efforts conducted by the City of El Segundo, over 109 cities, counties, transportation agencies and other entities have clearly expressed their desire⁵ to see a truly regional airport system in Southern California, a system in which LAX will be constrained to operate within the capacity of its current facilities. This support comes from communities and entities all over Southern California: nearly every city in the Inland Empire, cities from the South Bay, Westside, Gateway communities, and the San Gabriel Valley; three County Boards of Supervisors; Councils of Governments from three counties and transportation commissions from two. At SCAG, the federally designated Metropolitan Planning Organization for Southern California, both the Transportation and Communications Committee and the Regional Council voted overwhelmingly to adopt a Regional Transportation Plan that constrains LAX and develops other regional airports. Yet, the Draft EIS/EIR dismisses the regional alternative with little examination.

¹ CIC Research, Inc., Southern California Aviation Industry Impact Analysis, July 11, 2000.

² Southern California Association of Governments (SCAG), Aviation Scenario Evaluation, 2001 RTP Update, p. 42, 73, 74, 75, 78 and SCAG slide presentation by SCAG staff to Joint Meeting of Transportation and Communications Committee and the Energy and Environment Committee, February 21, 2001, p. 35,36,37

³ SCAG slide presentation by SCAG staff to Joint Meeting of Transportation and Communications Committee and the Energy and Environment Committee, February 21, 2001, p.38, 39 and SCAG "Towards an Optimized Aviation Scenario," 2001 RTP Update, p.9,

⁴ SCAG slide presentation by SCAG staff to Joint Meeting of Transportation and Communications Committee and the Energy and Environment Committee, February 21, 2001, p.42

3. Comments and Responses

5 Resolutions Calling for a Regional Airport Plan for Southern California, attached.

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 were evaluated in a Supplement to the Draft EIS/EIR, which was circulated for public review and comment.

Regarding the commentator's assertion that the Draft EIS/EIR did not consider other airports in Southern California, 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. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00037-4

Comment:

3. The analysis of alternatives to the proposed expansion of LAX is inadequate and unreasonably constrained. The analysis considers only alternatives that have more severe environmental consequences than the preferred project, Alternative C, and attempts to make this alternative appear more acceptable than other alternatives under consideration. A reasonable environmental impact analysis must also consider alternatives that have less severe environmental impacts.

Response:

Please see Topical Response TR-ALT-1 regarding range of alternatives analyzed in the Draft EIS/EIR and Supplement to 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. 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 preferred alternative.

AL00037-5

Comment:

4. The Draft EIS/EIR seeks to provide both a rationale and environmental cover for the continued development of LAX as an anti-competitive "fortress hub." By dismissing regional airports as viable alternatives to meet the air travel demand anticipated for Southern California in the future, the Draft EIS/EIR provides poorly cloaked cover for the continued development of LAX as a "fortress hub" airport intended to smother competition from other airports in the region.

The proposed merger of United Airlines and US Airways sparked a series of hearings on Capitol Hill where federal lawmakers were becoming increasingly aware of antitrust issues in the aviation industry. In June 2000, El Segundo Mayor Mike Gordon was invited to testify before the House Judiciary Committee at an oversight hearing on the State of Competition in the Airline Industry. His testimony⁶, and the testimony of others⁷, highlighted the anti-competitive nature of the "fortress hub", its impacts on

aviation in Southern California and its ability to inhibit other air carriers, particularly new entrant carriers, and other communities from gaining a foothold in the air commerce marketplace.

Like other fortress hubs, the proposed expansion of LAX is anti-competitive and will undermine consumer choice in the aviation marketplace. As a result, the ultimate outcome of the LAX expansion for consumers will be reduced aviation choice, reduced quality of service, and higher fares.

6 Testimony of Mike Gordon, Mayor, City of El Segundo Before the Committee on the Judiciary, House of Representatives, United States Congress, Oversight Hearing on the State of Competition in the Airline Industry, June 14, 2000.

7 Testimony of Joseph V. Karaganis, Counsel, Suburban O'Hare Commission, Before the Committee on the Judiciary, House of Representatives, United States Congress, Oversight Hearing on the State of Competition in the Airline Industry, June 14, 2000: Prepared Statement of John Nannes, Deputy Assistant Attorney General, Antitrust Division, United States Department of Justice, Before the Committee on the Judiciary, House of Representatives, United States Congress, Oversight Hearing on the State of Competition in the Airline Industry, June 14, 2000.

Response:

Comment noted. A fortress hub is generally defined as an airport dominated by one airline that stifles competition and controls local airfares. LAX is not a fortress hub. Its largest carrier transported less than 18 percent of the passengers in April 2003. The three largest carriers transported less than half of the passengers.

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 also 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 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-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00037-6

Comment:

5. No worksheet or other documentation is provided that explains the assumptions, provides sample calculations, or otherwise justifies the passenger or cargo activity levels projected for each proposed expansion alternative considered in the Draft EIS/EIR. Such an omission makes it impossible for the public to assess the reasonableness of the projected activity levels for each alternative examined in the Draft EIS/EIR. As a result, it requires an act of faith to accept any of the projected activity levels projected for any of the alternatives, including the projected 89 million annual passengers or the 4.2 million annual tons of cargo projected for 2015 under Preferred Alternative C.

Response:

Please see Chapter III of the Draft LAX Master Plan for a discussion of the methodology and data used in developing the passenger and cargo activity levels used in the Master Plan Alternatives. Please see Chapter IV of the Draft LAX Master Plan for a discussion of the unconstrained activity levels and the design day activity. For further discussion on passenger and cargo activity levels associated with the alternatives addressed in the Draft EIS/EIR, please see Chapter V, Section 3.3, of the Draft 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. Please see Chapter 3 of the Draft Master Plan Addendum regarding activity levels.

3. Comments and Responses

AL00037-7

Comment:

In fact, we believe, projected passenger and cargo activity levels are significantly understated, just as they were in 1981 when the LAX Interim Plan represented to the public that the Department of Airports (now Los Angeles World Airports) was building a 40 million annual passenger airport. Today LAX operates at 68 million annual passengers. Today, as then, projected activity levels, rather than being analytically derived and technically cogent, are mere public relations gambits designed to create the false impression that development of the LAX Master Plan will yield only modest growth outcomes and, therefore, relatively modest additional environmental burdens.

Response:

Comment noted. Please see Chapter V, Section 3.3.2, of the Draft LAX Master Plan for a discussion on the activity levels for each alternative addressed 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. Please see Chapter 3 of the Draft Master Plan Addendum regarding activity levels.

AL00037-8

Comment:

6. The LAX Master Plan Draft EIS/EIR significantly understates many other environmental burdens as well, especially air pollution and traffic congestion, which rely upon projections of passenger and cargo activity levels to generate estimates. Artificially low projections of passenger and cargo activity levels create an artificially low basis for measuring many of the environmental impacts of each expansion alternative, including Preferred Alternative C. Many of the projected environmental impacts, such as trips generated, traffic congestion and ground level air pollution generated, are ultimately derived from an assessment of how many passengers and how much cargo would actually be served by LAX in the future. For such a crucial starting point as projected passenger and cargo activity levels to be itself utterly without justification casts doubt on the veracity, or even reasonableness, of the entire Draft EIS/EIR.

Response:

Comment noted. The basis for the projections of passenger and cargo activity levels used in the Draft EIS/EIR analysis were described in Chapter 1, Regional Context, of the Draft EIS/EIR, with the more detailed, technical data associated with those projections provided within the Draft Master Plan.

AL00037-9

Comment:

7. The No Project Alternative is intentionally designed to create an artificially high floor against which to measure the "build" alternatives. The No Project Alternative revises the estimate of the "capacity" of the current LAX from the 70 million annual passengers LAWA officials previously used when the original 1997 Notice of Preparation was released to a new estimate of 79 million passengers. No worksheets or documentation are provided to justify this new capacity estimate. Thus it is impossible for the public to review or critique the reasonableness of the assumptions, methodology employed, or conclusions of the calculations.

This observation raises the suspicion that projections of "airport capacity" are an arbitrary exercise, the outcome of which is determined by public relations and political objectives rather than by sound analytic methods.

In addition, the No Project Alternative assumes a variety of developments in and around the airport for which there is no reasonable or legal basis, such as Continental City and Northside Project.

The inappropriate assumptions and dubious capacity projections embedded in the description of the No Project Alternative yield a wildly exaggerated view of the environmental future at LAX should the proposed expansion plan be rejected.

By arbitrarily lowering the projected activity levels of the proposed expansion and arbitrarily raising the activity levels of the No Project Alternative, the Draft EIS/EIR falsely implies that the increment of growth proposed for LAX is modest and its incremental increase in environmental burdens is, therefore, acceptable. By adopting a simple strategy of simultaneously raising the floor and lowering the ceiling, the Draft EIS/EIR for the LAX Master Plan masks the real environmental burdens of the proposed expansion and misleads the public and decision makers about the consequences of the expansion of LAX.

Of course, one must wonder, then, why anyone would spend \$12 billion to achieve such a modest increase in passenger and cargo activity levels?

Response:

The original capacity estimate for the No Action/No Project Alternative was based on preliminary analyses using general methodologies. With the addition of a constrained- capacity build alternative (i.e., Alternative C), LAWA developed much more sophisticated methodologies for calculating capacity in a constrained environment. These methodologies were applied to the No Action/No Project Alternative to identify a more accurate capacity estimate. Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. There is no attempt to "mask the real environmental burdens" or to "mislead the public and decision makers about the consequences" of the project by arbitrarily raising the activity levels of the No Action/No Project Alternative. The environmental impacts of the build alternatives are compared to 1996 baseline conditions, not the No Action/No Project Alternative, for purposes of determining significance under CEQA. The comparison of impacts of the build alternatives to the No Action/No Project Alternative under NEPA is provided for disclosure purposes only. Also please refer to Response to Comment AL00033-42 regarding the capacity estimates for the No Action/No Project Alternative.

AL00037-10

Comment:

8. The LAX Master Plan Draft EIR uses highly speculative and unenforceable assumptions about the future air carrier fleet mix likely to provide service at LAX over the next twenty years. This "fleet mix voodoo" yields the unsupportable conclusion that LAX can handle its growth in passenger and cargo activity with a small increase in the number of operations at the airport. Such a conclusion inevitably leads to significantly understating the noise and air pollution impacts from aircraft at an expanded LAX under any of the expansion alternatives being considered.

For example, the Draft EIS/EIR makes assumptions about the penetration rates of Super-Jumbo aircraft, yet the success of this aircraft in the marketplace is by no means assured. Fierce competition is expected between the major aircraft manufacturers seeking to develop the aircraft of the future. Airbus is betting its future on the development of the 550-seat Super Jumbo A-380. Boeing, however, has eschewed the development of a Super Jumbo aircraft and is betting the marketplace of the future prefers speed over size. The Boeing Sonic Cruiser will carry 175-250 passengers but fly at Mach .95, 20% faster than other passenger jets including the Super Jumbos. If Boeing is right, there will be a very different fleet mix outcome than the Draft EIS/EIR assumes.

By jury-rigging favorable assumptions about the fleet mix of the future rather than taking an impartial view of a marketplace in tremendous flux, the Draft EIS/EIR paints an unjustifiably rosy picture about the number and nature of operations at LAX. In fact, the number of operations is likely to be far greater than the Draft EIS/EIR supposes and the burdens the public will experience from overhead flights far greater.

3. Comments and Responses

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 and the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) in evaluating different activity levels. Please also see Response to Comment AL00017-153 for a discussion on New Large Aircraft.

AL00037-11

Comment:

9. The Draft EIS/EIR exaggerates the economic significance of LAX by failing to acknowledge that a regional plan that provided capacity comparable to that of the proposed expansion of LAX would provide comparable economic benefit to the region. This was the conclusion of CIC Research8, Inc. of San Diego in its now widely distributed study prepared for SCAG. CIC's analysis rigorously compared the likely economic outcomes of several aviation scenarios, including scenarios in which LAX was expanded and scenarios in which LAX was constrained. For each of these scenarios, as long as total regional airport capacity was comparable, regional economic benefits would be comparable. CIC's economic analysts concluded that the choices before the region should therefore be driven not by economic considerations but by environmental and regional congestion considerations.

In fact, technical documents prepared by LAWA's own economic consultants in 1995, acknowledge that the "substitution effect" may result in the marketplace simply utilizing other regional airport facilities or transportation technologies in meeting its needs should LAX be constrained.

Passengers, goods, and services are attracted to amenities and markets in Southern California. LAX simply facilitates their movement. Assuming that the supply of capacity at LAX may be constrained by one or more [Master] plan alternatives, it is important to recognize that the impact of such constraints at LAX may be partially or fully offset by shifting activities to another airport in the region (e.g., Burbank, Ontario, etc.) or by developing an alternative means for transporting persons and goods in and out of the region.9 [emphasis added]

8 CIC Research, Inc., Southern California Aviation Industry Impact Analysis, July 11, 2000.

9 HR&A, Technical Memo #2: Conceptual Framework for LAX Master Plan Economic Impact Analysis, Memo to Landrum and Brown, May 5, 1995, p. 3.

Response:

Please see Response to Comment AL00033-113 regarding changed circumstances in the region's system of airports since SCAG adopted the 2001 Regional Transportation Plan, Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand for air transportation, and TR-MP-2 regarding the SCAG 2004 RTP. 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.

AL00037-12

Comment:

10. The environmental justice implications of the expansion of LAX will be severe and are largely unexamined in the Draft EIS/EIR. Communities under the flight path of LAX and in the 65 db CNEL noise contours are overwhelmingly minority, more than 80% by some estimates10. These are the communities which will bear the largest share of the burden of noise and air pollution from an expanded LAX.

10 Manuel Pastor and Jim Sadd, "Environmental Justice and the Expansion of Los Angeles International Airport," report prepared for Communities for a Better Environment, November, 2000, p. 17

Response:

The analyses contained in Section 4.4.3, Environmental Justice, and Appendix F of the Draft EIS/EIR and Section 4.4.3, Environmental Justice, and Appendix D of the Supplement to the Draft EIS/EIR provide extensive information (over 125 pages of narrative, maps and tabular data) pursuant to NEPA and CEQA that fully examines the environmental justice implications of the LAX Master Plan alternatives and their potential for disproportionate effects on minority or low-income communities. Please also see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits, and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00037-13

Comment:

In an analysis of regional aviation alternatives, SCAG determined that a regional plan with LAX expanded to accommodate 94 million annual passengers would place 200,000 persons in the 65 db CNEL noise contours regionally. Of these, an estimated 172,000 would be minority community members. An alternative regional aviation scenario with LAX constrained to its current capacity would place far less, 170,000 persons, in these noise contours. Of these, approximately 142,000 would be minority persons. Expanding LAX would, therefore, mean 30,000 more persons regionally would live in the 65db CNEL noise contours, essentially all from minority communities.¹¹

It is difficult to imagine what advantage LAX officials would hope to gain that would justify such an enormity of environmental injustice.

11 SCAG slide presentation to Joint Meeting of Transportation and Communications Committee and the Energy and Environment Committee, February 21, 2001, p.42

Response:

See pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as analyzed in the Southern California Association of Governments (SCAG) Regional Transportation Plan and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Also note that LAWA Staff's new preferred alternative, Alternative D, has been designed to serve a level of future (2015) activity at LAX to levels comparable to what would occur if the Master Plan were not approved, as represented by the No Action/No Project Alternative. Alternative D has the least aircraft noise impacts among the build alternatives. Alternative D reduces activity at LAX compared to the other build alternatives, potentially shifting the burden of airport expansion to other regional airports. To the extent that other regional airports undertake expansion plans, these plans would be subject to environmental review and would address environmental justice issues pursuant to NEPA and/or CEQA as applicable. See also Section 4.4.3, Environmental Justice, and Topical Responses TR-EJ-1, TR-EJ-2, and TR-EJ-3 regarding the effect of expansion on minority and low-income communities.

AL00037-14

Comment:

11. The LAX Master Plan Draft EIS/EIR provides no reasonable analysis of cumulative traffic impacts that would occur as a result of this project. Traffic impacts that would occur as the result of an expansion of LAX on the I-405 and major arterials such as Lincoln Blvd. through Marina del Rey and Venice; Sepulveda Boulevard through the South Bay and north through Culver City and West Los Angeles; and Manchester and Century Boulevards through Inglewood and other communities are essentially ignored. Yet it is precisely these highway systems which now bear the greatest burden from LAX activity and will likely bear the greatest traffic burdens should LAX be expanded. This omission is especially egregious in light of the huge developments planned or recently completed along each of these corridors. The EIR must, to cite one conspicuous example, assess the cumulative impacts of traffic generated from an expanded LAX along Lincoln or Sepulveda Boulevards in the vicinity of the planned Playa Vista or Marina del Rey developments.

3. Comments and Responses

Response:

Please see Response to Comment AR00003-21 regarding cumulative traffic impacts. Traffic impacts associated with the Playa Vista project were taken into consideration in the analysis of cumulative impacts.

AL00037-15

Comment:

In addition, LAX is expected to contribute through trips to the City of El Segundo's major arterial facilities. However the Master Plan Draft EIS/EIR fails to identify or analyze any impacts whatsoever for key intersections within El Segundo. Nonetheless, it is anticipated that LAX expansion will add 700 PM peak trips to Sepulveda Blvd, 400 PM peak trips on Aviation Blvd. and 100 PM peak trips on El Segundo Blvd.¹² El Segundo's traffic studies indicate that LAX expansion will push three of the City's intersections into Level of Service D and will also worsen several others already forecast to operate at LOS E or LOS F.

The Draft EIS/EIR must identify and analyze impacts to El Segundo's intersections that are already burdened by excessive traffic congestion especially during AM and PM peak hours. Moreover, the document must identify enforceable mitigation measures to offset the additional traffic burdens in El Segundo as a result of LAX expansion.

¹² El Segundo Circulation Element Update Draft Environmental Impact Report, October 13, 2000, attached.

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 Draft EIS/EIR and Supplement to the Draft EIS/EIR analyzed 14 intersections in or immediately adjacent to the City of El Segundo. These intersections are identified in Attachment D to Technical Report 3b. Significant impacts were identified and mitigation measures recommended. Please refer to the Topical Response TR-ST-2, Section 1, for additional discussion of the study area and identification of facilities analyzed.

AL00037-16

Comment:

¹² The LAX Master Plan and Draft EIS/EIR fail to evaluate the most responsible and efficacious ways to remedy runway safety concerns at LAX. Much attention has been paid recently to LAX's dubious distinction as the U.S. airport with the highest number of runway incursions and serious incidents. LAX had 12 incursions in 1998, 10 in 1999, and 8 in 2000. However, this is a distinction only recently acquired, as air traffic congestion at LAX has increased. As recently as 1997 LAX had only three runway incursions. Pressure to increase throughput at the airport has resulted in dangerous increases in pilot and controller error as arriving aircraft seek to cross inboard runways where other aircraft may be taking off.

An FAA-commissioned¹³ study bears out the relationship between the growth in air traffic and increased risk of runway incursions. Moreover, the study calculates the number of fatal runway accidents at US airports that may occur as a result of increased air traffic and unabated incursion rates. The study's conclusion is well stated in a recent USA Today article:

Runway accidents will become the biggest killer in aviation during the next 20 years, according to a study commissioned by the FAA. Massachusetts Institute of Technology professor Arnold Barnett concluded that risks rise exponentially with increased traffic.

Barnett, the George Eastman Professor of Management Science at MIT, predicted that there will be 15 fatal runway collisions involving commercial planes over the next 20 years if nothing is done.¹⁴

Safety risks due to increased operations at LAX and pressure to increase throughput are exacerbated by procedures requiring arriving aircraft to cross inbound runways where other aircraft may be taking off. In the proposed LAX Master Plan, the fundamental problem that arriving aircraft cross active runways in a setting of increasingly congested air traffic activity is utterly unaddressed. Table 3-2, page 12, Chapter 3-Alternatives, of the LAX Master Plan Draft EIS/EIR demonstrates that the LAX of the future will be a more congested airport with delays projected to increase beyond both current levels and levels projected for the No Project Alternative. The growing pressure for increased throughput will reduce margins of safety and increase the likelihood of dangerous errors, even with proposed runway changes.

This is an egregious misordering of priorities, especially when less expensive, more quickly accomplished alternative approaches are available. As recently demonstrated by LAX-specific simulations conducted by NASA FutureFlight Central for the FAA15, the development and use of end-around taxiways at LAX can remedy the problem of runway incursions by eliminating the need for arriving aircraft to cross active outbound runways at a point where there is a risk of collision. Such a system has been proposed as part of the approved Master Plan at Atlanta Hartsfield International Airport, whose dual parallel runway system is similar to that of LAX. While the specific design of the end-around taxiway studied by NASA may not be optimal, and other designs should be considered as well, there is no evidence that any such system was considered in any of the alternatives for the proposed LAX Master Plan or evaluated in the Draft EIS/EIR.

In addition, even were the practice of aircraft crossing runways retained, the overwhelming body of evidence points to operational, technological and procedural improvements as the measures necessary to make a difference in air safety. Assuring a full complement of air traffic controllers in the control tower is foremost among these measures.

13 Prof. Arnold Barnett, Gary Paull, and Joseph Iadaluca, Fatal US Runway Collisions Over the Next Two Decades.

14 Working to Avert Runway Disaster, Alan Levin, USA Today, October 20, 2000, attached.

15 Charting LAX Safety, Ian Gregor, Daily Breeze, July 25, 2001, attached.

Response:

Please see Topical Response TR-SAF-1 regarding aviation safety. As indicated in TR-SAF-1, under each of the Master Plan build alternatives, changes to the taxiway system configuration would be implemented to reduce the potential for runway incursions and to enhance the safety of aircraft operations at LAX. The specific changes to the taxiway system configuration under Alternatives A, B, and C are described and illustrated in Chapter 3, Alternatives, of the Draft EIS/EIR. The specific changes to the taxiway system configuration under Alternative D are described and illustrated in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. LAWA has evaluated the feasibility and potential environmental impacts of using an end-around taxiway to reduce the potential for incursions at the south runway complex. The evaluation found that an end-around taxiway would not provide any substantially greater level of safety than the current proposal for the south runway complex and, moreover, would result in greater air quality and noise impacts due to aircraft having to proceed on an incline when traveling north on the suggested end-around taxiway.

AL00037-17

Comment:

13. The EIS/EIR fails to account for improved security prospects that might be achieved by shifting a significant portion of the cargo proposed to be captured at LAX to specialized regional cargo airports. Our recent national tragedy highlighted the added risks associated with carrying mail and other cargo in the belly of passenger aircraft. As a result of these concerns, the FAA ordered the temporary cessation of cargo shipments in the belly of passenger aircraft. While these events certainly highlight this concern, it is a concern that existed prior to the attack on the World Trade Center and will continue to be a concern in the future. Since the LAX Master Plan envisions a dramatic increase in cargo activity at LAX, most to be carried in the belly of passenger aircraft, it appears that the Master Plan proposes to heighten the risks to passengers without a careful evaluation in the Draft EIS/EIR. We believe that these risks and possible alternatives must be evaluated in the Draft EIS/EIR.

3. Comments and Responses

Southern California, perhaps uniquely in the United States, is blessed with opportunities to avoid these risks by fully utilizing our existing airport assets that aspire to serve as specialized cargo airports such as March Global Port, San Bernardino International, and Southern California Logistics Airport. These alternatives must be examined both to assess the risks related to terrorism, but also the cargo-specific impacts, such as congestion and diesel emissions, inherent in the proposed LAX Master Plan.

Response:

Alternative D, Enhanced Safety and Security Plan, imposes a limitation on expanding the cargo capacity at LAX by limiting the available total cargo space to that which presently is existing. Belly cargo as a component of passenger aircraft will presumably continue and will occur largely at LAX with international passenger service. Also, please see Response to Comment AL00051-93.

AL00037-18

Comment:

Because the Draft EIS/EIR fails on so many fronts to provide credible and sufficient information regarding the environmental impacts of the proposed LAX Master Plan, the Draft EIS/EIR cannot be certified as providing a reasonable basis for decision making with respect to the LAX Master Plan. We urge Los Angeles World Airports to withdraw the proposed expansion of LAX; to immediately begin a process to facilitate the development of a truly regional airport system for Southern California; to expand aviation services at the regional airports owned and operated by LAWA, namely Ontario International and Palmdale Regional Airports; to comprehensively address safety and security issues at LAX; and to address access and congestion issues that currently plague LAX. In such an endeavor Los Angeles World Airports will find that many of the communities that have objected to the proposed expansion of LAX, including El Segundo, will then become motivated partners.

Response:

Comment noted. 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 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 has been 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. Alternative D has replaced Alternative C as the LAWA staff-preferred alternative. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. It should be noted that LAWA is currently in the process of preparing Master Plans for Ontario International and Palmdale Regional airports.

The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment. Together, the Draft EIS/EIR and Supplement to the Draft EIS/EIR contain comprehensive analyses of the potential environmental impacts of the Master Plan alternatives in accordance with the provisions of NEPA and the federal CEQ regulations, as well as with the provisions of CEQA and the State CEQA Guidelines. In particular, safety and security issues were addressed in detail in Section 4.24.3, Safety, of the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14c, and in Chapter 3, Alternatives, and Section 4.24.3 of the Supplement to the Draft EIS/EIR, with supporting information provided in Technical Report S-9b. Access and congestion issues 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 see Topical Response TR-SAF-1 regarding aviation safety.

AL00038 Kim, Yi Hwa Los Angeles Unified School District 9/24/2001

AL00038-1

Comment:

LAUSD RESPONSE TO LOS ANGELES INTERNATIONAL AIRPORT (LAX) MASTER PLAN
DEIS/DEIR
EXECUTIVE SUMMARY

It is expected that all schools located near airports in the Los Angeles area will be impacted by this Master Plan.

Specific District concerns include:

- What are the single-event noise levels expected at District schools?
- What is the impact of the Master Plan (traffic, noise, air quality) on infants and children at the closest District school?
- Will the growth in general aviation operations be proportionally greater at local airports than at LAX?
- How will the increased load of general aviation aircraft at other local and regional airports impact LAUSD schools?
- How will the proposed increased property density affect District schools?
- Could a buffer zone minimize the various impacts on LAUSD schools?
- How can construction noise associated with the Plan be mitigated?
- How will increased vehicle traffic impact the District's transportation program?

Response:

Please see Responses to Comments AL00038-3 through AL00038-26 below.

AL00038-2

Comment:

GENERAL RESPONSE

Throughout this response, the impact on the following schools, at a minimum, must be considered:

Loyola Village Elementary School (ES)
98th Street Elementary School (ES)
Paseo del Rey Elementary/Magnet School
Westchester-Emerson Community Adult School (CAS)
Westchester High School (HS)

Response:

Comment noted.

AL00038-3

Comment:

Noise

In reference to noise impacts, the Notice of Preparation for the LAX Master Plan, on page 34, stated the following: "Further modeling will be conducted to quantify these potential effects including an analysis of single event sound exposure levels." Please identify where in the EIS/EIR this information was provided in relation to single event noise levels at the four schools located close to LAX Northside (Westchester HS, Paseo del Rey Elementary/Magnet School, Westchester-Emerson CAS, and Loyola Village ES) and also in relation to nearby 98th Street ES, and Manhattan Place ES (impacted by Alternative B flight paths). Would any other District schools be impacted by potentially significant single event aviation noise?

3. Comments and Responses

Response:

The statement referenced in the comment is from page 35 of the Notice of Preparation of a Draft Environmental Impact Report for the LAX Master Plan in Appendix A of the Draft EIS/EIR. Single event sound exposure levels were reviewed in Tables A5-4 through A5-9 in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. These tables include information about the Day Night Noise Level (DNL), Maximum Noise Level (Lmax), and duration (in minutes) that each site would be exposed to above various decibel levels.

In response to similar comments received on the Draft EIS/EIR, a Supplement to the Draft EIS/EIR was prepared to provide a more detailed analysis of single event aircraft noise levels, including those that result in classroom disruption. The Supplement to the Draft EIS/EIR also evaluated an additional Master Plan alternative (Alternative D) and incorporated information on Year 2000 conditions. This information was provided in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR. Thresholds used in the Supplement to the Draft EIS/EIR to identify significant interior noise levels that result in classroom disruption include: 55 dBA Lmax, 65 dBA Lmax, and 35 Leq(h).

As stated in Table S9 in Technical Report S-1, Supplemental Land Use Technical Report, four LAUSD schools were exposed to significant single event or cumulative noise levels under 1996 baseline conditions. These schools are the 98th Street Elementary School, Paseo del Rey Elementary/Magnet School, Westchester High School, and Westchester-Emerson Community Adult School. As also shown in Table S9, the LAUSD schools that would continue to be exposed to significant single event or cumulative noise levels under Year 2000 conditions are the 98th St Elementary School and the Westchester-Emerson Community Adult School. As analyzed in Section 4.2.6 of the Supplement to the Draft EIS/EIR, under Alternatives A, C, D and the No Action/No Project Alternative, no LAUSD schools would be newly exposed to significant single event or cumulative noise levels in 2015. Under Alternative B, the only LAUSD school that would be newly exposed is the Century Park Elementary School. As presented in Appendix S-C1, Supplemental Aircraft Noise Technical Report, Loyola Village Elementary School and the Manhattan Place Elementary School are not exposed to significant single event noise levels under 1996 baseline and Year 2000 conditions, and would not be exposed to these noise levels as a result of development of any of the Master Plan alternatives. Under the LAX Master Plan Alternative A, the 98th St Elementary School site is considered as vacant property, as a result of current acquisition and relocation activities within the Manchester Square and Belford areas, which are further described in Topical Response TR-MP-3. Under Alternatives B, C, and D, the 98th Street Elementary School site would be developed as airport-related uses.

As indicated in Section 4.2, Land Use (subsections 4.2.6 and 4.2.8), of the Supplement to the Draft EIS/EIR, mitigation measures MM-LU-3 and MM-LU-4 include further study of aircraft noise levels that result in significant impacts on classroom learning and sound insulation for schools determined by the study or interim noise measurements to be significantly impacted.

AL00038-4

Comment:

It is important for the reviewing public and decision makers to be aware of the single-event noise levels at impacted schools, because the Community Noise Equivalent Level (CNEL) measurement weights nighttime noise with a penalty, and such an approach under-reports the actual noise impacts at schools. The Federal Aviation Administration's (FAA) own documents (e.g., Aviation Noise Effects, March 1985) go one step further: they explain that some types of noise measurements could impact school operations by [indirectly] leading to a shift in daytime operations (i.e., concentrating plane arrivals and landings during the hours that schools are in session).

Response:

The effect of aircraft noise on schools was addressed in detail in the Supplement to the Draft EIS/EIR in Section 4.1 and Appendix SC-1. In that document, schools exposed to aircraft noise inside the school at levels of 55 and 65 decibels (adequate to disrupt the intelligibility of speech in lecture and small group settings, respectively) are identified and the durations of such exposure are provided. The information takes into consideration only the noise that occurs during the 8-hour school day.

AL00038-5

Comment:

That 1985 FAA document also states that "DNL contours or grid analyses do not accurately reflect noise exposure at specific locations. Predicted levels may vary +/-5 dB around actual measured levels for any given location." Please comment on whether the CNEL noise contours are accurate, and to what extent the actual noise levels may vary from the reported CNEL levels.

Response:

All noise analysis was done in accordance to the FAA's policy guidance for the preparation of NEPA documents. These documents include FAA Order 5050.4A and 1050.1D. Please see Topical Response TR-N-1 regarding the noise modeling approach.

AL00038-6

Comment:

The EIS/EIR states that several schools are currently exposed to 65 dB CNEL or greater noise levels from the airport. Please identify by name each of the District schools which fall within this 65 dB CNEL contour. Please also identify District schools which fall within the 70 dB CNEL contour. What are the current and projected noise levels at these schools?

Response:

As identified in Table 14 of Technical Report 1, *Land Use Technical Report*, of the Draft EIR/EIS, the following four LAUSD schools are exposed to 65 CNEL or greater noise levels under 1996 baseline conditions: 98th Street Elementary School, Paseo del Rey Magnet School, Westchester High School and Magnet Center, and Westchester-Emerson Community Adult School. As identified in Table 47 of Technical Report 1, the following two LAUSD schools would be newly exposed to 65 CNEL or greater noise levels under Alternative B compared to the 1996 Baseline: Loyola Village Elementary School and Manhattan Place Elementary School. Under Alternatives A and C, as well as the No Action/No Project Alternative, no LAUSD schools would be newly exposed to 65 CNEL or greater noise levels compared to the 1996 baseline.

Since publication of the Draft EIS/EIR, a Supplement to the Draft EIS/EIR has been prepared which evaluated an additional Master Plan alternative (Alternative D), incorporated information on Year 2000 conditions, and provided new analysis of single event aircraft noise levels that result in classroom disruption. This information was provided in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analysis provided in 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. As presented in Table S51 of Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR, under Alternative D no LAUSD schools would be newly exposed to 65 CNEL or greater noise levels compared to the 1996 baseline. No LAUSD schools are exposed to the 70 CNEL under the 1996 baseline, and no LAUSD schools would be newly exposed to 70 CNEL or greater noise levels as a result of development of any of the Master Plan Alternatives compared to the 1996 baseline. Under the No Action/No Project Alternative and Alternative A, the 98th St Elementary School site is considered as vacant property, as a result of current acquisition and relocation activities within the Manchester Square and Belford areas, as further described in Topical Response TR-MP-3. Under Alternatives B, C, and D the 98th Street Elementary School site would be developed as airport-related uses.

A summary of LAUSD schools that would be newly exposed to greater than 65 CNEL noise levels, under each of the Master Plan alternatives is presented in Table 1 below. For those schools newly exposed to the 65 CNEL or greater noise levels, 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 that are not already considered compatible under Title 21 (it being understood that, in each instance land use compatibility is achieved through application of the aviation easements, the Districts noise mitigation obligations apply). Compatibility under the terms of the Settlement Agreement between the City of Los Angeles and LAUSD is discussed below.

3. Comments and Responses

Table 1

**LAUSD Facilities Newly Exposed to High Noise Levels (65 CNEL or greater) 2015
(Compared to 1996 Baseline)**

School	No Action/ No Project	Alternative A	Alternative B	Alternative C	Alternative D
Loyola Village Elementary School	-	-	X	-	-
Manhattan Place Elementary School	-	-	X	-	-

Source: Draft EIS/EIR Land Use Technical Report Tables 21, 31, 47, 61 and Supplement to the Draft EIS/EIR Supplemental Land Use Technical Report Table S51.

As presented in Section 4.1, Noise and Section 4.2, Land Use, thresholds used to identify significant interior noise levels that result in classroom disruption included: 55 dBA Lmax, 65 dBA Lmax, and 35 Leq(h). Table S9 in Technical Report S-1, identified the following four LAUSD schools that are exposed to high single event noise levels under 1996 baseline conditions: 98th Street Elementary, Paseo del Rey Magnet School, Westchester High School and Magnet Center, and Westchester-Emerson Community Adult School. Under Alternatives A, C and D, when compared to the 1996 baseline, no LAUSD schools would be newly exposed to significant single event noise levels. As shown in Table S4.2-14 of the Supplement to the Draft EIS/EIR, under Alternative B, compared to the 1996 baseline, the only LAUSD school that would be newly exposed would be Century Park Elementary School. LAUSD schools that would be newly exposed to high single event noise levels, by alternative, are presented in Table 2, below.

As indicated in Section 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 significant aircraft noise impacts on schools. Under these measures, mitigation is provided to schools to further evaluate and, if necessary, establish additional noise thresholds and to provide sound insulation for schools determined to be significantly impacted by single event noise levels that result in classroom disruption, unless they are subject to an existing aviation easement, as further described below. However, based on the information presented in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, development of Master Plan Alternatives A, C, and D would not result in a significant noise impacts on LAUSD facilities.

Table 2

**LAUSD Facilities Newly Exposed to High Single Event Noise Levels 2015
(Compared to 1996 Baseline)**

School	No Action/ No Project	Alternative A	Alternative B	Alternative C	Alternative D
Century Park Elementary School	-	-	X	-	-

Source: Supplement to the Draft EIS/EIR Tables S4.2-6, S4.2-10, S4.2-14, S4.2-18, and S4.2-28.

The Amended Judgment and Final Order entered by the Los Angeles Superior Court (Court) in January 1980, or Settlement Agreement, is provided as an attachment to Topical Response TR-LU-3 of this Final EIS/EIR for review. Below is a brief description of some of the provisions of this document; however, the entirety of the Settlement Agreement and its exhibits were considered in preparation of the environmental analysis and should be reviewed for a more detailed and complete understanding. In the Settlement Agreement, the Court:

(a) Established aviation easements for noise, vibrations and fumes from LAX operations (Aviation Easements); and

(b) Required payment of \$20,942,298 to five school districts, of which \$10,257,957.40 was assigned to the Los Angeles Unified School District; and ordered that the Los Angeles Unified School District use the full \$10,257,957.40 Noise Payment "to complete necessary construction or structural modifications of their facilities so as to reduce the noise levels in the classrooms resulting from the operation of

commercial jet aircraft to and from and at Los Angeles International Airport,” and to construct new facilities “in such a manner as to exclude in the classroom any objectionable levels of noise created by the operation of [LAX] to the extent of the easements granted herein.” (Noise Mitigation Payment).

The Settlement Agreement states that “the purpose of the air easements granted hereunder for noise, vibrations and fumes over [the District’s schools] running to the benefit of the [City] is for the purpose of resolving all questions between the parties arising out of the defendant City’s operation of ... [LAX] and the consequent overflight or fly-by of jet aircraft with the attendant consequences of noise, vibrations and fumes with [the District’s schools].

LAWA has reason to conclude that the projected sound levels are well within the aviation easement limits and do not create a surcharge, based on the full provisions of the Settlement Agreement. For example, the aviation easements are defined with “specific levels of noise exposure that will be permitted within the scope of the air easements.” As ordered by the Court, the “criterion or quantitative measure of noise exposure used for the purpose of describing and establishing the air easements granted herein shall be the Community Noise Equivalent Level (CNEL) methodology.” The aviation easements allow up to + 2 dB above 1970 aircraft noise levels and an additional +0.5 dB above the specified noise limits before the noise level is deemed to be a surcharge on the aviation easement. The aviation easements were awarded based on 1970 aircraft noise impacts with additional surcharge allowances for future construction and growth. 1970 aircraft noise impacts were much more extensive than identified under the 1996 baseline or Year 2000 conditions or projected to occur under the Master Plan alternatives. No schools within the Los Angeles Unified School District are projected to exceed the specified noise limits to the aviation easements under Alternatives A, B, C, or D.

Accordingly, the aviation easements and noise mitigation payment and other provisions of the Settlement Agreement resolve land use incompatibility issues and noise impacts at Los Angeles Unified School District schools.

AL00038-7

Comment:

Airport noise is already a problem at several District schools located close to the airport, especially outside on the playground where loudspeakers often are needed make voices heard over the aircraft noise. Aircraft noise is also heard inside classrooms at schools.

For instance, Westchester-Emerson CAS, identified as Westchester-Washington CAS in the EIS/EIR, is not air conditioned and often cannot close doors and windows to aircraft noise. At all other schools, doors and windows are sometimes opened in lieu of using air conditioning and the resulting aircraft noise is disturbing to instruction. These noise problems would be exacerbated by the airport expansion.

Response:

Please see Response to Comment AL00038-6 for a discussion of Los Angeles Unified School District facilities that are affected by airport noise and Responses to Comments AL00038-3 and AL00038-9 for further discussion of aircraft noise exposure levels at Westchester-Emerson CAS. Please see Topical Response TR-LU-4 regarding outdoor noise levels. As stated in this response, significant outdoor 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 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 LAUSD are located within the 75 CNEL or greater noise contour under 1996 baseline or Year 2000 conditions.

See Response to Comment AL00036-6 for a discussion of noise impacts on Los Angeles Unified School District facilities under Alternatives A, B, C, and D.

Mitigation measures under the LAX Master Plan that would reduce exposure of noise sensitive uses to high noise levels were presented in Section 4.1, Noise (subsection 4.1.8.1), and Section 4.2, Land Use (subsection 4.2.8), of the Supplement to the Draft EIS/EIR. These include making over-ocean procedures mandatory; and revising the ANMP to encompass schools determined to be significantly impacted by aircraft noise and not subject to an existing aviation easement. As concluded in Section

3. Comments and Responses

4.2, Land Use (subsection 4.2.9.1), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, significant unavoidable noise impacts were identified where classroom activities take place outdoors within areas newly exposed to the 75 CNEL. Although increases in outdoor noise levels within the 65 to 75 CNEL contours would occur under the build alternatives, these increases would not exceed thresholds of significance. However, it is acknowledged that such increases may be perceptible and could affect outdoor speech and the quality of certain outdoor activities.

The incorrect reference to the Westchester-Emerson CAS is noted. In response, all references to the Westchester-Washington CAS 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.

AL00038-8

Comment:

The Master Plan should not cause an increase in noise levels at schools, where available mitigation measures are available, or where the project description can be modified to avoid noise impacts. To the extent that the project increases the noise at any schools in the LAX Northside area, the currently undeveloped area could be used as a buffer zone, designed to reduce the noise impacts of airport expansion. This area is already owned by Los Angeles World Airports (LAWA), thus such mitigation would be an obvious and practical solution.

Response:

Please see Response to Comment AL00038-6 for a discussion of LAUSD facilities that are affected by airport noise, projected noise increases, and provisions of the "Settlement Agreement" that resolved land use incompatibilities and noise mitigation.

As stated in subsection 4.2.6 of the Draft EIS/EIR, construction noise would affect the following LAUSD schools in the LAX Northside area under one or more of the Master Plan build alternatives: Paseo del Rey Magnet School, Westchester-Emerson Community Adult School, and Westchester High School. Although these impacts would be reduced through implementation of noise mitigation measures MM-N-7 through MM-N-10 presented in subsection 4.1.8.3 of this Final EIS/EIR as derived from subsection 4.1.8.3 of the Supplement to the Draft EIS/EIR, construction noise would remain significant and unavoidable at these LAUSD schools under one or more of the Master Plan build alternatives. As described in subsection 4.2.6 of the Supplement to the Draft EIS/EIR, the development of LAX Northside/Westchester Southside would regulate types of use, building height, building setbacks and landscape buffer setbacks, as stated under Master Plan Commitment LU-1. These requirements would help ensure that any increased noise levels resulting from operational use of LAX Northside/Westchester Southside would not result in significant impacts to schools located to the north.

See also Topical Responses TR-LU-5 and TR-N-4 regarding noise mitigation.

AL00038-9

Comment:

At Westchester-Emerson CAS, which is adjacent to the airport property, 8 to 10 parenting classes are held daily, involving approximately 100 to 125 infants and children ages 1 week to 4 1/2 years. These classes are often held outside. Background noise from nearby aircraft is frequent.

1. How far from the closest runway is the southern property line of Westchester-Emerson CAS? With the added North runway, and the relocated runways of Alternatives B and C, will the noise levels at the school be increased?

Response:

Please see Responses to Comments AL00038-3 and AL00038-6 regarding noise levels that are experienced at Westchester-Emerson CAS under 1996 baseline and Year 2000 conditions and noise levels projected to occur under Alternatives A, B, C, and D. Also see Topical Response TR-LU-4 regarding outdoor noise levels.

The distance from the closest runway to the southern property line of the Westchester-Emerson CAS is approximately 1,450 feet. Under Alternatives A, B, C, and D, the distance from the closest runway to the southern property line would be approximately 1,460 feet; 1,320 feet; 1,110 feet; and 1,450 feet; respectively.

AL00038-10

Comment:

2. What are the current and projected (2005-2015) single-event noise levels on the Westchester-Emerson CAS playground?
3. What are the current and projected (2005-2015) dB CNEL levels at the playground?

Response:

The Westchester-Emerson CAS playground is not identified in the Draft EIS/EIR. However, noise levels were computed at the location for inclusion in the Supplement to the Draft EIS/EIR as Park Site 201. Average daily peak single event levels at that location for 1996 and Year 2000 conditions are 86.4 and 81.6 decibels, respectively. In the year 2015, the peak noise levels are projected to range from a low of 75.9 decibels for Alternative D to a high of 78.3 decibels for Alternative A. For further information, please see Table SC-15 in Appendix S-C1 of the Supplement to the Draft EIS/EIR.

AL00038-11

Comment:

4. Are infants and young children more sensitive to high noise levels than adults? Might hearing be affected or damaged by the projected noise levels?

Response:

LAWA and the FAA are not aware of studies providing conclusions on whether infants and young children are more sensitive to high noise levels than adults, relative to evaluating potential noise impacts of the proposed Master Plan and/or as may be considered relative to evaluating land use compatibility issues of the project. Substantial information exists regarding the primary cause of acquired hearing loss in children, which, according to the National Organization for Hearing Research, is otitis media (middle ear infection). Of late, there has become increasing attention given to the potential for hearing damage to infants and young children due to high noise levels from toys. There are presently no government noise standards specific to the protection of hearing in infants and young children, including by the Consumer Product Safety Commission. The American Society of Testing Materials (ASTM) safety requirement ASTM F963 states "Toys shall not produce impulsive noises with an instantaneous sound pressure level exceeding 138 decibels (dB) when measured at any position 25 cm from the surface of the toy." Consumer advocate groups have expressed concern regarding the lack of a more stringent noise safety requirement for toys, recognizing that the federal Occupational Safety and Health Administration have established noise standards aimed at hearing protection for prolonged exposure to noise levels greater than 85 dB. Please see Response to Comment AL00017-246 regarding an analysis of the project-related noise levels as related to OSHA standards.

AL00038-12

Comment:

5. What does research tell us about the effects of frequent background (aircraft) noise on hearing, and on human health?

Response:

Please see Responses to Comments AL00017-52 regarding the health effects of aircraft noise 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.

3. Comments and Responses

AL00038-13

Comment:

Air Quality

As explained above, classes involving infants and young children are often held outside at Westchester-Emerson CAS.

1. Are these infants and young children more susceptible to airplane-generated emissions than adults? Are such emissions hazardous to their health? Will there be any airport-generated emissions at the playground which are hazardous?

2. Will the emissions at the school be increased with the proposed added North runway, or by the relocated runways of Alternatives B and C? Please quantify the current and projected (2005 and 2015) emissions at Westchester-Emerson CAS.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. The human health risk assessment evaluated potential adverse health effects associated with toxic air pollutants released by airport activities for the selected alternatives for receptors which included residents (adults and young children) and school children. The Supplement to the Draft EIS/EIR provided an evaluation of Alternative D and updated the risk assessment based on a reevaluation of baseline conditions and revised mitigation measures. Please refer to Sections 4.24.1.6, Environmental Consequences, and 4.24.1.9, Level of Significance after Mitigation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for a discussion of health risk and hazards associated with Alternative A (added Runway North), Alternative B (added Runway South), and Alternative C. In addition please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects.

Some people may be more sensitive than the majority of the population to the effects of toxic air pollutants. These people are considered sensitive receptors, and may include children. Specific receptor locations of regulatory and community concern were identified and health risks and hazards were evaluated at these locations. These sensitive receptors included schools, hospitals, nursing homes, and day-care facilities. Sensitive receptors were accounted for through the use of conservative toxicity criteria designed to protect the most sensitive individuals in the population. In addition, conservative exposure assumptions were used to evaluate potential exposure. For example, the exposed population was assumed to be located at the point of maximum contaminant concentrations and to have continuous inhalation exposure for 24 hours per day for the entire exposure period. Estimated health risk and hazards presented in the health risk assessment are considered the worst possible due to the conservative exposure and toxicity criteria used in the evaluation.

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 and schools 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 are presented on maps that identify community boundaries. Please refer to Section 4.24.1 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.

AL00038-14

Comment:

Transportation

In formulating congestion relief measures for off-airport surface transportation impacts, please consider the comments in Attachment A. The District asks that the attached requests from our Transportation

Branch be incorporated into the Master Plan's mitigation measures. Additionally, the District requests that the following two mitigation measures be included in the Master Plan:

- No hauling past District schools; where that is not feasible, restrict hauling to hours when schools are not in session.
- No staging or parking of construction vehicles, including vehicles to transport workers, on streets adjacent to District schools.

The schools listed in the introduction to this report will be particularly impacted by construction in the LAX Northside area. District buses from schools throughout this area park adjacent to these schools during the day. At Westchester-Emerson CAS, many buses park on Emerson Avenue and on Liberator, and many students park along 88th Street. Will street parking currently used by school buses and by students be adversely impacted by development in these areas? If so, mitigation should be provided.

Response:

Specific haul route/detour plans will be prepared for each specific project and will conform to a series of restrictions intended to avoid impacts to residential streets and schools. The commentor's request specifically regarding schools is reasonable. Every effort would be made to keep construction traffic away from schools, particularly while schools are in session.

AL00038-15

Comment:

Land Use

Figure 3 in the Land Use Technical Report shows that the General Plan Land Use Designation is an Airport Buffer Area for the area adjacent on the south of Westchester High School and Westchester-Emerson CAS. Please advise what the Master Plan now proposes as the land use designation for these areas. If the Master Plan is approved with mixed-use to the immediate east, south, and west of Westchester-Emerson CAS (proposed for hotel, office, retail), how many stories might the revised land use/zoning entitlements permit?

Response:

Figure 3 in the Land Use Technical Report of the Draft EIS/EIR (also Figure 4.2-2 of the Draft EIS/EIR) is the Los Angeles International Airport Interim Plan (Interim Plan). As indicated on page 4-83, in Section 4.2, Land Use, of the Draft EIS/EIR, the Interim Plan was intended as a short-term, general guide for coordinating the development of airport facilities with that of surrounding communities. The history of planning for the airport is provided on pages 4-83 and 4-84 of the Draft EIS/EIR. A decision was made that airport growth and related capacity could best be resolved through the Master Plan process. Figure 4.2-3 of the Draft EIS/EIR shows the existing zoning of the airport property. The area south of the Westchester High School and Westchester-Emerson Community Adult School is located within the LAX Northside/Westchester Southside Plan and is zoned Light Industrial (M2-1). As indicated on page 4-93 of the Draft EIS/EIR, Ordinance 159,526 entitled the development of the LAX Northside subject to additional [Q] conditions. As shown on Figure 4.2-4 of the Draft EIS/EIR, Lots 1 and 2 are the properties adjacent to the school. Ordinance 159,526 permits offices, business park and research and development center on these lots. With regard to building height, on Lot 2 between Loyola Boulevard and Hastings Avenue, no structure within 100 feet of the northern property line shall exceed three stories (including parking levels) or 45 feet in height measured from the finished grade of the lot. Buildings must be set back 50 feet from the northern property line of Lot 2. On Lot 1, no structure located within 200 feet of the northern airport property line between Falmouth Avenue and Pershing Drive shall exceed three stories (including parking levels) or 45 feet in height measured from the finished grade of the lot. South thereof, the buildings shall not exceed four stories (including parking levels) or 55 feet in height. All structures on Lot 1 must be set back a minimum of 100 feet from the northern airport property line between Falmouth Avenue and Pershing Drive.

AL00038-16

Comment:

Would there be any shade/shadow impacts on the school, or on its playground?

3. Comments and Responses

Response:

As was discussed in Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, building heights within LAX Northside/Westchester Southside would be subject to height restrictions based on FAA airport requirements and the LAX Zone/LAX Specific Plan, which would incorporate, to the maximum extent feasible, the requirements of the [Q] zoning conditions currently in place for the site and included in Ordinance 159,526. The [Q] conditions specify that structures within 100 feet of the northern property line (in the area near Westchester High School and Westchester-Emerson Community Adult School) be limited to heights of three stories or 45 feet. In addition, 50-foot setbacks are required in this area, and along some segments of the interface an even greater distance would be provided between the school and proposed development due to intervening residential homes and the alignment of 91st Street. Furthermore, the area between Loyola Boulevard and Hastings Avenue, which is adjacent to the school, is designated for open space as a landscape buffer and would not cause shade/shadow impacts. With the open space land use designation and implementation of the LAX Zone/LAX Specific Plan (refer to Master Plan Commitment LU-1, Incorporation of City of Los Angeles Ordinance No. 159,526 [Q] Zoning Conditions for LAX Northside into the LAX Northside/Westchester Southside Project (Alternatives A, B, C, and D), within the Supplement to the Draft EIS/EIR), comparable requirements would be implemented in this area under each of the build alternatives. Therefore, shade and shadow impacts on Westchester High School are not expected.

AL00038-17

Comment:

Construction Impacts

Construction of airport area roads and of buildings within the Northside buffer zone will have significant noise, air quality, traffic and access impacts which cannot be completely mitigated. Page 143 of the Land Use Technical Report states that construction impacts will be significant and unavoidable in noise-sensitive areas located within 600 feet of construction sites. Land uses subjected to noise levels of 5 dB above ambient will include areas north of the airport in Westchester. Schools impacted include Westchester HS, Westchester-Washington CAS, and Paseo del Rey Elementary/Magnet School.

To what extent could these construction impacts be minimized or reduced to insignificance by improvement of the Northside area as a true buffer zone to minimize impacts of the airport expansion, instead of construction of the proposed 2.65 million square feet of mixed-use?

Response:

The commentor is correct in identifying significant and unavoidable construction impacts. Although construction impacts could be substantially reduced by a less intensive development, even a much smaller project would likely result in unavoidable impacts associated with noise and air quality. All feasible mitigation measures have been explored to reduce temporary and intermittent construction impacts. Also, please see Section 4.20, Construction Impacts (subsection 4.20.5), Master Plan Commitment C-1, Establishment of a Ground Transportation/Construction Coordination Office, in the Supplement to the Draft EIS/EIR. The duties of this office include working with residential and commercial neighbors to address their concerns regarding construction activity.

Under LAWA staff's new preferred Alternative D, LAX Northside would be developed with up to 4.5 million square feet (MSF) of mixed use development and include a vehicle trip cap that would reduce traffic generation to the same level of daily vehicle trips that would have resulted from development of the 2.62 MSF Westchester Southside. It should be noted that LAX Northside is an approved project with fully vested entitlements for development of 4.5 MSF of commercial, office, and research/development uses, as described in Section 4.2, Land Use (subsection 4.2.3), of the Draft EIS/EIR. The LAX Northside project was subject to previous environmental evaluation and is consistent with existing plans and policies. Furthermore, under the LAX Zone/LAX Specific Plan, LAX Northside would incorporate the requirements of [Q] conditions from Ordinance 159,526 to mitigate potential land use incompatibilities with uses to the north. Please also see Response to Comment AL00038-18 for additional discussion of LAX Northside and construction impacts.

AL00038-18

Comment:

General Comments

Commercial Development of LAX Northside

Pages 2-11 of the EIS/EIR's Executive Summary state that "minimizing negative impacts and preserving and enhancing the positive impacts on adjacent neighborhoods is an important goal of the Master Plan." Much of the area of LAX Northside (renamed Westchester Southside in the Master Plan) is currently vacant, and serves as a buffer zone between the airport and an area with residential and school uses. This buffer area is currently zoned for intense development of airport-related uses, but designated Airport Buffer Area on the General Plan. The Master Plan proposes to downzone this now vacant area from intense development to community commercial "village" development. However, as indicated in the EIS/EIR, even with this less intense development the Master Plan will have significant adverse noise, air quality, and construction-related impacts on District schools compared to 1996 Baseline conditions. These adverse noise and air impacts will occur not only during construction, but will be permanent impacts from the development of this area. The District is concerned that schools adjacent to the vacant Airport Buffer Area not be significantly impacted by both airport expansion and commercial development of the area which served as a buffer from the airport.

Response:

Figure 4.2-2 of the Draft EIS/EIR shows the Los Angeles International Airport Interim Plan (Interim Plan), which designates the northern portion of the airport as Airport Buffer Area. However, as indicated on page 4-83, in Section 4.2, Land Use, of the Draft EIS/EIR, the Interim Plan was intended as a short-term, general guide for coordinating the development of airport facilities with that of surrounding communities. The history of planning for the airport is provided on pages 4-83 and 4-84 of the Draft EIS/EIR. A decision was made that airport growth and related capacity could best be resolved through the Master Plan process. Figure 4.2-3 of the Draft EIS/EIR shows the existing zoning of the airport property. The LAX Northside project is approximately 358 acres of land on airport property at the north side of LAX, north and south of Westchester Parkway, between Pershing Drive and Sepulveda Boulevard. Approvals include the Final EIR; Zoning Ordinances (159,526, 169,254, and 169,768) and Final Tract Map No. 34836. The approvals allow commercial, recreational, and airport-related industrial land uses totaling 4.5 million square feet (MSF) on 12 parcels. As indicated on page 4-93, the development is subject to [Q] conditions, which place additional building height, setback, landscaping, and other restrictions to the underlying zoning designations to mitigate potential effects on surrounding uses and ensure uniformity of development.

Under the LAX Master Plan Alternatives A, B, and C, Westchester Southside would reduce the allowable development to 2.62 MSF. As stated in Master Plan Commitment LU-1 of the Supplement to the Draft EIS/EIR, all the build alternatives would incorporate the requirements of the [Q] conditions established for the approved LAX Northside. As described in Section 3.3.2 of the Supplement to the Draft EIS/EIR, under Alternative D, the total amount of traffic generation associated with the development of LAX Northside would be reduced to the same level of daily vehicle trips that would have resulted from development of Westchester Southside through implementation of a vehicle trip cap.

Construction impacts due to noise, air quality, and traffic on LAUSD schools located near LAX Northside/Westchester Southside were analyzed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. As described in subsection 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, under Alternatives A, B, C, and D, construction impacts from noise would occur within 600 feet of the LAX Northside/Westchester Southside northern property line and would include the following LAUSD schools: Westchester High School, Westchester-Emerson Community Adult School, and Paseo del Rey Magnet School. Construction noise impacts were identified in the Draft EIS/EIR and Supplement to the Draft EIS/EIR as significant and unavoidable even with the implementation of Mitigation Measures MM-N-7 through MM-N-11 (presented in the Supplement to the Draft EIS/EIR). As concluded in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, air quality impacts from temporary construction activities would have a significant and unavoidable affect on sensitive land uses, including schools. As further described in subsection 4.6.9 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, construction emissions under Alternatives A, B, C would be significant and unavoidable after application of mitigation measures for CO, VOC, NOx, SO2, and PM10. Under Alternative D, construction emissions would be significant and unavoidable after application of mitigation measures for CO, VOC, NOx, and PM10. As

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presented in Topical Response TR-LU-2, construction emissions may potentially impact the Westchester area (and schools located therein) since construction emission would exceed the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for NO₂ and PM₁₀ under Alternatives A, B, C, and would exceed NAAQS and CAAQS for PM₁₀ under Alternative D. As presented in Section 4.3.2 and 4.20 the Draft EIS/EIR and Supplement to the Draft EIS/EIR, under all of the Master Plan alternatives, construction related traffic and lane closures would temporarily disrupt normal roadway operations in areas proximate to LAX. These impacts would be reduced through implementation of Master Plan Commitments ST-9 through ST-22 (which control construction traffic, construction deliveries, and construction employee traffic) and Master Plan Commitment C-1 (which includes the provision of a construction coordination office). However, even with these provisions, it is assumed that there would still be a significant and temporarily unavoidable impact from construction traffic.

Please see Response to Comment AL00038-6 regarding noise impacts on LAUSD schools resulting from Master Plan implementation.

Regarding air quality impacts due to development of the LAX Master Plan on LAUSD schools in the vicinity of LAX Northside/Westchester Southside, as presented in Topical Response TR-LU-2 for the Westchester Community, NAAQS would not be exceeded and CAAQS would be exceeded for particulate matter (i.e., PM₁₀).

Regarding traffic impacts on LAUSD schools near LAX Northside/Westchester Southside due to Master Plan implementation, as presented in Section 4.3.2 of the Draft EIS/EIR, six intersections would remain significantly impacted after the implementation of traffic mitigation measures under Alternatives A, B, and C compared to 1996 baseline conditions. These intersections are not located in proximity to LAUSD schools in the Westchester community. In addition, with the implementation of a Neighborhood Traffic Management Plan (described in Section 5.1, of Technical Report S-2b, in the Supplement to the Draft EIS/EIR), operational traffic is not expected to affect existing circulation patterns or pedestrian safety in proximity to LAUSD schools. Development of the ring road and LAX Expressway, as well as intersection improvements in the Westchester area, and proposed mitigation measures would improve overall roadway conditions compared to future conditions without the LAX Master Plan. In addition, as described in Section 4.3.2, Off-Airport Surface Transportation (subsection 4.2.3.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, roadway improvements proposed for the build alternatives would direct airport traffic away from neighborhood streets. As analyzed in Section 4.3.2 of the Supplement to the Draft EIS/EIR, under Alternative D, two intersections in Westchester (also not located in proximity to LAUSD schools) would remain significantly impacted after implementation of mitigation measures.

For a summary of effects on schools associated with other issues see Section 4.27, Schools, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00038-19

Comment:

LAWA in its Master Plan has the opportunity with this airport-owned vacant land to truly mitigate the impacts of increased aircraft and passenger traffic by using this area completely as a buffer zone between the existing community uses and the proposed expanded airport facilities. It is incomprehensible that such a buffer zone, perhaps with earthen berms and/or large trees to reduce noise, has not been explored in this major study. The District requests that the use of this airport-owned land as a true buffer zone be considered as an alternative in any subsequent environmental review, and that, at a minimum, LAWA and the Federal Aviation Administration (FAA) carefully explore the benefits of a buffer zone in the Response to Comments for this EIS/EIR. Two District schools are immediately adjacent to this buffer zone: Westchester High School and Westchester-Emerson CAS.

Response:

Comment noted. On November 14, 1984, Ordinance No. 159,526 was approved, thus entitling LAX Northside to be developed for commercial, manufacturing, and recreational purposes subject to additional conditions. This ordinance and required conditions are explained in Section 4.2, Land Use, and in the Land Use Technical Report of the Draft EIS/EIR. Additionally, please see Topical Response TR-LU-2 regarding potential impacts to the community of Westchester and Topical Response TR-N-4 regarding noise mitigation, particularly TR-N- 4.2 regarding use of berms or trees as noise mitigation

measures. The subject area, known as LAX Northside, has been entitled for a variety of uses which are expected to serve as a de facto buffer area between existing community uses and the proposed airport facilities with commercial, manufacturing, and recreational uses, subject to additional conditions under Los Angeles City Ordinance 159,526.

AL00038-20

Comment:

The District has the following questions relative to LAX Northside:

1. How could a buffer zone at LAX Northside be designed to minimize the impacts of the Master Plan?
2. Which of the many noise, air, traffic, and construction-related impacts enumerated in Master Plan could LAWA truly reduce to insignificance with such a buffer zone?
3. With a well-designed buffer zone, what impacts, if any, would remain at the four District schools to the north of the airport?
4. Are there other feasible mitigation measures, or feasible modifications to the project description, which could reduce impacts on these four schools to an equal or greater extent than the creation of a well-designed buffer zone for LAX Northside?

Response:

Please see Response to Comment AL00038-17 regarding construction impacts associated with LAX Northside/Westchester Southside. As further described in Section 4.2, Land Use, and Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the buffer zone at LAX Northside addresses potential impacts through a combination of buffer zone setbacks, building setbacks, use restrictions, building height restrictions and other conditions outlined in Ordinance 159,526. These conditions mitigate potential land use incompatibilities with LAX Northside/Westchester Southside and LAUSD schools located to the north. Throughout the preparation of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, all feasible mitigation measures were considered to minimize impacts on LAUSD schools from development of the LAX Master Plan. Regarding operational impacts in this area associated with noise and traffic, see Topical Response TR-LU-2 and Response to Comment AL00038-18.

AL00038-21

Comment:

Manchester Square Area

This area, which surrounds the 98th Street ES, is being purchased for noise mitigation purposes as part of an ongoing LAWA project. The District participated in the environmental review of the Manchester Square project, and is satisfied with the mitigation. Therefore, the District will not be reviewing anew the plans for development of the Manchester Square area which are summarized in this EIS/EIR.

Response:

Comment noted.

AL00038-22

Comment:

Other Impacts on Schools, Not Identified in This EIS/EIR

This Master Plan will have impacts on District schools which have neither been assessed nor even discussed in this EIS/EIR, and which may be equally or more significant than the impacts so far identified. Each of the Master Plan alternatives results in a shift of certain aircraft operations from LAX to other airports in the region. The District is concerned about this, in part because some schools located close to these local airports are more burdened by significant aircraft noise, air emissions, and safety concerns than are those located close to LAX.

LAX serves domestic, international, cargo, and general aviation/military aircraft. Demand for all these operations is growing, with forecast demand for general aviation/military operations expected to be 85%

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greater in 2015 than in 1997. The Master Plan is cutting the space for general aviation facilities from 14 acres to between 4 and 6 acres. While cutting space for general aviation, LAWA will expand facilities for domestic, international, and cargo flights, and for numerous other airport-related uses.

Unless the Master Plan includes adequate and reasonably convenient facilities and supportive demand management practices for general aviation aircraft, these planes (non-commercial commuter jets, business jets, and small aircraft) will be squeezed out, and will instead use small, local airports which are often located in the midst of residential neighborhoods. Such a diversion of general aviation planes to local airports in residential neighborhoods is an impact of the Master Plan which is reasonably foreseeable; it must be addressed, and the impacts on schools must be studied. Among the significant impacts would be noise, safety, and air quality impacts at District schools, many of which are located close to and under the flight paths at Santa Monica, Burbank and Van Nuys Airports. These schools already suffer excess noise from general aviation planes; if LAX cannot accommodate the increased demand for general aviation aircraft, the problems at schools surrounding neighborhood airports will be exacerbated.

The District asks that LAWA and the FAA provide a detailed analysis of regional demand for general aviation operations.

Though such operations have recently decreased at LAX, they have dramatically increased at some local airports. The study of general aviation in the region should answer the following questions, among others:

1. Have recent LAX practices (landing and operations fees; convenience of general aviation facilities relative to convenience of large jet facilities; remote parking for commuter aircraft; etc.) contributed to the displacement of general aviation operations to other airports?
2. Specifically what are the current and baseline (1996) LAX facilities and practices relative to general aviation (e.g., Fixed Base Operator facilities; fees)? What general aviation facilities and practices are proposed under the Master Plan Alternatives? Would the selection of four-runway Alternative C result in fewer general aviation planes than the selection of Alternatives A or B?
3. What is the number of general aviation take-offs and landings at LAX under each of these scenarios (baseline, current, and Master Plan Alternatives)?
4. Given the projected growth in general aviation operations, how many take offs and landings will be diverted from LAX to local airports? Which airports will be likely to service the aircraft which cannot be accommodated at LAX?
5. Would the growth in general aviation operations be proportionally greater at local airports than at LAX?
6. What would be the air, noise, and safety impacts at District schools which would result from the increase in operations at the local airports? Special attention should be paid to impacts at schools which are under the approach paths and take off paths of aircraft, and of schools which are otherwise significantly impacted by aircraft noise. The District will be pleased to provide LAWA and the FAA a list of such schools.

The California Environmental Quality Act anticipates the need for such analyses of indirect and cumulative impacts. Enough details are known about the regional demand for general aviation planes, and the ability or inability of local, neighborhood airports to absorb increased air traffic, to complete a meaningful analysis. Only by doing this will the District and the reviewing public really comprehend the impact that the proposed Master Plan will have on schools.

Response:

The reduction in general aviation facilities from 14 acres to between 4 and 6 acres is due more to a proposed consolidation of existing facilities than an elimination of facilities. General aviation facilities are only a very small part of LAX, and LAX is not considered to be a general aviation center in the Los Angeles area. There are several other more notable facilities nearby that fulfill the role of a general aviation airport, including Van Nuys Airport (730 acres), Santa Monica Airport (227 acres), Hawthorne Airport (80 acres), and Torrance Airport (490 acres). As described in Chapter 3 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, general aviation activities at LAX are expected to continue with implementation of the proposed Master Plan, with the majority of general aviation activity occurring during the non-peak hours of commercial airline operations. Table S3-3 of the Supplement to the Draft EIS/EIR provides a breakdown of aircraft activities in 1996, 2000, and 2015 for commercial passenger operations, cargo, and general aviation and military. As indicated therein, the number of annual flight

operations for general aviation and military are expected to increase by approximately 25 to 32 percent by 2015 under the proposed build alternatives, as compared to 1996 conditions. In summary, general aviation operations are a relatively minor activity at LAX and implementation of the proposed Master Plan is not expected to result in a significant displacement of that activity such that other more notable general aviation airports in the area would be substantially affected.

AL00038-23

Comment:

Need For a Regional Plan

There has been widespread appeal for a more regional analysis of airport needs and facilities than is provided in the LAX Master Plan. Much emphasis is placed on the responsibility of other regions to provide airport facilities for travelers from their own areas. A regional sharing of the burdens and benefits of airport development would allow LAX to free up space for general aviation.

Response:

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

AL00038-24

Comment:

While the focus of airport planners and of the reviewing public is currently to reach out for regional solutions, LAWA must also redirect its efforts to resolve all aviation needs of the City of Los Angeles and surrounding cities. It must expand its vision for the types of aircraft it will serve. It should focus on coordinating with local airports to ensure that these airports and the residential neighborhoods surrounding them are not burdened with commuter flights and other aircraft that should more reasonably be serviced at LAX.

Response:

Comment noted.

AL00038-25

Comment:

Conclusion

The Master Plan will result in significant impacts on schools. The schools impacted are not only those in the vicinity of LAX, but, indirectly, schools which are located close to local airports. Many of these impacts of the Master Plan have not yet been identified. Though additional mitigation measures might reduce some impacts, the Master Plan as it relates to a long-term and comprehensive solution to air travel in Los Angeles falls short. Much additional planning and analysis is needed. This must not be done in a vacuum, but instead with the full participation of a dozen other regional airports, as well as with local airports. LAX must be designed to provide optimal facilities for all of the aviation needs of Los Angeles and surrounding cities.

Response:

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

AL00038-26

Comment:

The following are the environmental impact concerns and the mitigation measures necessary to address the related issues for transported students and bus routes near these five (5) District schools.

I OVERALL IMPACT

3. Comments and Responses

This master plan project has some potential to impact school transportation.

Near Paseo Del Rey ES

- Twenty one (21) buses deliver integration students to Paseo Del Rey ES.
- Two (2) integration buses pick up students at one (1) stop near Paseo Del Rey ES.
- Approximately fifteen (15) other buses transport approximately 650 students within one-half mile of this proposed site to integration programs in the greater Los Angeles area.
- Five (5) other integration buses deadhead within 1/2 mile of the proposed master plan area.
- Special education buses also travel through and make home pick ups in this area.

Near Westchester SH

- Thirteen (13) buses deliver integration students to Westchester SH.
- Five (5) bus pick up integration students at five (5) stops near Westchester SH.
- Approximately fifteen (15) other buses transport approximately 500 students within one-half mile of the proposed master plan area to integration programs in the greater Los Angeles area.
- Approximately twenty eight (28) buses deadhead within one- half mile of the proposed master plan area.
- Ten (10) buses deliver twenty nine (29) disabled children to special day classes at Westchester SH.
- Four (4) buses pick up disabled students at Westchester SH to deliver them to special day classes at four (4) other District schools.
- Other buses travel through the area to transport disabled children from home sites.

Near Loyola Village ES

- Fifteen (15) buses deliver integration students to Loyola Village ES.
- Three (3) other buses pick up integration students at three (3) stops near Loyola Village ES.
- Approximately thirteen (13) other buses transport approximately 500 students within one-half mile of the proposed master plan area to integration programs in the greater Los Angeles area.
- Approximately twenty eight (28) buses deadhead within one- half mile of the proposed master plan area.
- Other buses travel through the area to transport disabled children from home sites.

Near Emerson Manor Adult School

- Approximately thirteen (13) buses transport approximately 550 students within one-half mile of the proposed master plan area to integration programs in the greater Los Angeles area.
- Approximately fifteen (15) buses deadhead within one- half mile of the proposed master plan area.
- Other buses travel through the area to transport disabled children from home sites.

Near 98th Street ES

- One (1) bus delivers integration students to 98th Street ES.
- Eight (8) bus pick up integration students at three (3) stops near 98th Street ES.
- Approximately two (2) buses deadhead within one-half mile of the proposed master plan area.
- Five (5) buses deliver twelve (12) disabled children to special day classes at 98th Street ES.
- Four (4) buses pick up ten (10) disabled students at 98th Street ES to deliver them to special day classes at five (5) other District schools.
- Other buses travel through the area to transport disabled children from home sites.

II ENVIRONMENTAL IMPACTS

ON SCHOOL TRANSPORTATION

- During the construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.
- Some additional costs to the District for additional drivers' time generated by routing delays or diversions.
- Rough street surfaces may be caused by construction and heavy equipment.
- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact school bus on-time performance and bus passenger safety.

ON STUDENT PEDESTRIANS

- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact student pedestrian safety.

OTHER CONSIDERATIONS

- Because of provisions in the California Vehicle Code, other trucks and construction vehicles may encounter school buses using the red flashing lights and must stop.
- Because of the nearness of the schools, trucks and construction equipment may encounter concentrations of student pedestrians.

III ADDITIONAL MITIGATION MEASURES REQUESTED PRIOR NOTICE

- The Project Manager or designee should notify the LAUSD Transportation Branch of the expected start and ending dates for the various portions of the project that may affect traffic through the areas.

TRAFFIC MANAGEMENT

- Contractors to provide flag-men to assist traffic when moving trucks and/or heavy equipment on/off the proposed sites or when temporarily closing traffic lanes.
- When possible, avoid heaviest construction traffic between the hours of 6:30 a. m. to 8:00 a. m. and between 2:30 p. m. and 4:00 p. m. to minimize delays to the arrivals and departures of buses and encounters with student pedestrians.

STUDENT SAFETY

- Contractors to restore affected street and sidewalk surfaces to reasonable smoothness to minimize the potential for bus accidents and trip & fall injuries to student pedestrians.

OTHER CONSIDERATIONS

- Contractors to remind their drivers of construction vehicles of the requirement to stop for the red flashing lights of any school bus.
- Contractors to remind drivers to be alert to the presence of children and exercise care.
- Contractors should notify drivers that the presence of a crossing guard and school zone flashing lights do not exempt school buses from using the red flashing lights.
- The presence of any crossing guard, school zone flashing lights or the red lights of a school bus do not guarantee that student pedestrians will act appropriately when crossing streets.

Response:

Specific haul route/detour plans will be prepared for each specific project and will conform to a series of restrictions intended to avoid impacts to residential streets and schools. Further, the Traffic Coordination Office, provided as part of Master Plan Commitment C-1, would help ensure the schools are not impacted. The other specific requests made by the commentor are the types of details that will be included in the specific haul routes/detour plans for each project. Every effort would be made to keep construction traffic away from schools, particularly while schools are in session.

AL00039

Kennedy, Hilda

City of Inglewood

9/21/2001

AL00039-1

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 Carlton Square Homeowners Association in Inglewood.

Response:

Comment noted. Please see responses to comment letter PFM00001.

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AL00040 Haley, Eric Riverside County Transportation Commission 9/21/2001

AL00040-1

Comment:

General Comments

Our review has led to serious concerns about the adequacy of this EIS/EIR as an objective informational document and as an instrument for full public disclosure of the potential effects associated with the project. In summary, the following are general points relative to the document as a whole, for which we request a response:

Response:

Comment noted. Please see Responses to Comments below.

AL00040-2

Comment:

1. The document presents information in a selective manner, rather than providing objective information useful to evaluate and make judgments regarding the project's environmental impacts on a regional basis. The EIS/EIR fails to adequately address the project's relationship to important regional plans, especially the Southern California Association of Governments (SCAG) adopted regional airport strategy as part of the Regional Transportation Plan (RTP). The EIS/EIR must be revised and recirculated to provide a thorough analysis and comparison of the project with a regional airport 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.

AL00040-3

Comment:

2. The EIS/EIR contains many inconsistencies and partial disclosures of information, resulting in an inaccurate picture of the project's impacts and relationship to regional airport planning.

Response:

Comment noted. Please see Responses to Comments AL00040-4 through AL00040-158, which address all of the specific concerns raised by the commentor.

AL00040-4**Comment:**

Lack of clarity and inadequacies also occur in the justification of the purpose and need of the project and associated definition of project alternatives.

Response:

The purpose and need for the proposed project is clearly identified in Chapter 2 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00040-5**Comment:**

The EIS/EIR contains seemingly low assumptions regarding increased flights and increased passenger and cargo projections (i.e. 89 million annual passengers, or "MAP" is assumed, compared to data suggesting a capacity of closer to 120 MAP).

In addition, the EIS/EIR makes an aggressive assumption of no net increase in flights, without providing a reasonable analysis of the probability of this occurring and without providing a worst-case analysis should demand or flights are greater than assumed. In this regard, the LAX Master Plan Draft EIS/EIR creates artificially low projections of passenger demand and flights, resulting in grossly understated impacts.

Response:

The basis of the future capacity projections for each of the Master Plan alternatives was described in Chapter 1, Regional Context, of the Draft EIS/EIR, with additional detail and supporting technical data provided in the Draft Master Plan. The comment is incorrect in stating that the Draft EIS/EIR assumed no net increase in flights. As shown in Tables 3-1 and 3-2 of the Draft EIS/EIR, an increase in aircraft activity (flights) over that of the environmental baseline would be anticipated for all alternatives. Increases over environmental baseline conditions were also shown in Table S3-1 of the Supplement to the Draft EIS/EIR, which addressed the addition of Alternative D.

AL00040-6**Comment:**

3. The analysis fails to take into account project conformity with relevant plans of the South Coast Air Quality Management District (SCAQMD), SCAG, State and Federal agencies and does not adequately address the project's relationship to regional growth in the area. If implemented, the LAX Master Plan would result in significant air quality, noise and traffic impacts on both a local and regional level. These impacts could be substantially reduced, consistent with CEQA and NEPA standards, by implementing SCAG's regional airport strategy. The EIS/EIR fails to adequately address the regional airport strategy, and fails to provide adequate grounds for rejecting this as a viable alternative.

Response:

As was indicated in Section 4.6, Air Quality, on pages 4-510 and 4-511 of the Draft EIS/EIR and pages 4-386 and 4-387 of the Supplement to the Draft EIS/EIR, a draft general conformity analysis and determination was prepared and issued for public comment prior to publication of the Final EIS/EIR.

As discussed in Response to Comment AL00040-2 above, subsequent to the publication of the Draft EIS/EIR, Alternative D, the Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. 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. The environmental impacts of Alternative D were addressed in the Supplement to the Draft EIS-EIR.

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The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed induced socio-economic impacts (growth inducement) in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), air quality in Section 4.6, Air Quality; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; 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.

AL00040-7

Comment:

4. The LAX Master Plan Draft EIS/EIR traffic section contains numerous conclusions with inadequate explanations or complete omissions of discussions regarding the local and regional circulation system and associated project impacts. The EIS/EIR does not adequately address local circulation impacts around LAX, impacts upon the local freeway system, including the I-405, impacts upon the CMP network, and trucking impacts through the inland Empire.

Response:

Please see Topical Response TR-ST-4 for a discussion of project impacts to the surrounding arterial streets and freeways. Also see Topical Response TR-ST-2 for a discussion of the study area definition. The impact analysis included in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR includes the impacts of truck trips.

AL00040-8

Comment:

5. The environmental justice discussion fails to address the inequitable concentration of impacts to the residents and businesses that would be impacted and/or acquired as part of the project, and the availability of opportunities for impacted/displaced businesses and residents to relocate in similar nearby areas.

Response:

Environmental justice was addressed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix D of the Supplement to the Draft EIS/EIR. The purpose of the environmental justice analysis is to identify and address any impacts that would disproportionately and adversely affect minority or low income populations. No significant impacts or disproportionate effects were identified with regard to residential acquisition, as discussed on page 4-428 of the Draft EIS/EIR; the relocation of residents would be fully addressed through compliance with the Uniform Relocation Act and implementation of a LAWA Relocation Program that includes provisions for special assistance to minority residents. Similarly, acquisition of businesses would be undertaken in compliance with the Uniform Relocation Act, which stipulates that fair compensation or adequate assistance be provided for displaced business. Also, Master Plan Commitment RBR-1 specifies the content of the Business Relocation Plan, including provisions to address special concerns of minority business owners. Special concerns 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 provide assistance and materials in Spanish and other languages as necessary.

AL00040-9

Comment:

The EIS/EIR also fails to address environmental justice implications with respect to the project's impacts upon minority and low-income populations in surrounding regions that would be exposed to increased traffic, air quality and noise impacts due to the project.

Response:

Please see Response to Comment AL00040-94 regarding the study area selection. See also Topical Response TR-EJ-1 and Topical Response TR-EJ-2. Traffic, air quality, and noise impacts within

minority and low-income communities were addressed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00040-10

Comment:

The analysis disregards the fact that the inequitable concentration of impacts to minority and low-income populations could be substantially reduced or avoided through meeting the air travel demands in subregional markets, particularly in the identified high growth areas of the inland Empire.

Response:

All LAX Master Plan alternatives were selected in accordance with the requirements identified in the California Environmental Quality Act (CEQA), and the National Environmental Policy Act (NEPA). Please see Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for a detailed discussion of the alternative selection process. Detailed information concerning the environmental justice considerations for Alternative D can be found in Section 4.4.3, Environmental Justice, of the Supplement to the Draft 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.

AL00040-11

Comment:

These general and specific points are elaborated within the detailed comments that follow.

Response:

Please see Responses to Comments below.

AL00040-12

Comment:

Local and regional plans dictate that air traffic demand is best met in subregional markets (counties), to reduce local and regional traffic, air quality, and noise impacts. Per CEQA Guidelines Section 15162.6(f)(2), if a regional or local plan has identified feasible alternative sites (i.e., SCAG's Regional Airport Plan), feasible alternative sites must be addressed in the EIR. CEQA, NEPA and state and federal environmental justice principles require analysis and consideration of feasible alternatives that could reduce or avoid the project's identified significant socioeconomic, traffic, air quality and noise impacts.

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 TR-ALT-1, 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 socioeconomic, traffic, air quality, and noise, were evaluated in the Supplement to the Draft EIS/EIR, which was circulated for public review and comment. LAWA's formulation of Alternative D was based in part on its consideration of the SCAG 2001 RTP, and meets the requirements of CEQA and its Guidelines for taking into consideration relevant existing regional plans when formulating project alternatives.

3. Comments and Responses

AL00040-13

Comment:

Further, due to the fact that the Final FAA Approval will be based on the alternatives provided within the Final EIS/EIR, RCTC, WRCOG and SANBAG believe that the EIS/EIR does not provide sufficient procedural or technical grounds for required findings under CEQA and NEPA. Therefore, the LAX Master Plan EIS/EIR requires revision and recirculation to provide a detailed comparative analysis of the proposed project with the regional airport strategy, as well as revised analyses to more accurately reflect the proposed project's impacts on both a local and regional level.

Response:

The Draft EIS/EIR provided a comprehensive analysis of a reasonable range of alternatives ranging from the No Action/No Project Alternative to three build alternatives that provide for up to approximately 98 million annual passengers at LAX in 2015. Furthermore, 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, 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 was circulated for public review and comment.

AL00040-14

Comment:

We respectfully request a detailed response for each of the comments and questions raised in the following Attachment "A". Furthermore, in responding to these comments and questions, we respectfully request that all responses include appropriate citations to applicable documents.

Response:

Responses to the commentor's Attachment A are provided below.

AL00040-15

Comment:

It is our sincere hope that the Los Angeles World Airports and State and Federal government officials will recognize the need for a more balanced evaluation of the merits of the project and take a regional approach to providing airport service to the region for the next century and beyond.

Response:

Comment noted. Please see Response to Comment AL00040-2 above.

AL00040-16

Comment:

EXECUTIVE SUMMARY

Page ES-2 Paragraph 1, 4th sentence

The fourth sentence identifies instances where "other data from later years (e.g., 1999 or 2000) is used.." Please cite where the SCAG regional airport strategy is utilized for analysis in this document and cite where the 2000 Census data were utilized.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues. The SCAG Regional Transportation Plan (RTP) was discussed in Chapter 1 of the Draft EIS/EIR. Please also see Topical Response TR-MP-2 regarding a discussion of the 2001 RTP. The Draft EIS/EIR utilized 1990 Census

data, as that was the most current data available at the time. The Supplement to the Draft EIS/EIR provided information pertaining to 2000 Census data, including an analysis of impacts based on these more recent data (see Section 4.4, Social Impacts, of the Supplement to the Draft EIS/EIR).

AL00040-17

Comment:

Page ES-3 Paragraph 6, 1st sentence

The first sentence states that regional airports do not presently have the capacity to accommodate the projected needs. This statement warrants justification. Discuss regional airport capacity and ability for improvements, as well as regional airport capacity as identified by SCAG. Discuss the capacity, including passenger and cargo, of the region's commercial airports and former military bases, including the underutilized Ontario International Airport, San Bernardino International Airport, March Air Reserve Base, Southern California Logistics Airport, and Palm Springs Regional Airport.

Response:

Please see Topical Response TR-RC-1 regarding the roles and responsibilities of LAWA, the City, SCAG, and SCRAA in meeting regional demand and the forecasts and capacities of the other regional airports as well as Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan.

AL00040-18

Comment:

Page ES-4 Paragraph 1, 3rd sentence

The third sentence states that there are no legal means to force airlines to serve one airport or another or to "cap" the number of flights. Please discuss how the total maximum Million Air Passengers (MAP) and accompanying increase in cargo tonnage for the LAX expansion was derived.

Response:

Airport operators and the Federal Aviation Administration (FAA) do not have the authority to limit future activity at airports. It is airlines' decision to schedule and operate flights with their choice of aircraft. The Draft LAX 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. See Chapter V, Section 3.3.2 of the Draft LAX Master Plan for a discussion on the activity levels for Alternatives A, B, and C.

The most constraining component at an airport defines the capacity of the entire airport. The most constraining factor with Alternative C is the airfield, not the terminal. Because Alternative C only has four runways, the peak hour operations would be constrained and Alternative C would not be able to serve the unconstrained forecast demand of 98 MAP. The Master Plan analysis assumed that the number of daily and hourly flights would remain within the limits of the airfield's practical capacity based on maximum tolerable average delays of 10 to 15 minutes. (See page V-3.183 of the Master Plan for an explanation of why this level of delay was chosen as the threshold.) These delay levels are higher than typical industry planning standards of what is considered "acceptable" and the airfield would be congested. See Chapter V, Section 3.3.2, Final Iteration Constrained Activity, of the Draft LAX Master Plan for more information.

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.

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. Serving 89.6 MAP with four runways means delays would increase

3. Comments and Responses

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.

Alternative C would retain the majority of cargo facilities in the Imperial and South Cargo complexes, redevelop portions of the Century Cargo Complex, and construct new cargo facilities in the Westchester Parkway and Manchester Square areas. Cargo facilities in Alternative C would encompass 7,122,000 square feet of apron area on 276 acres of real estate. In Alternative C there are about 44 additional cargo operations projected a day. These additional operations could only be added at off-peak hours due to runway capacity constraints. The projected increase in size of the cargo facilities, increase in operations, and the projected increase in fleet mix for all operations are all factors used in predicting that the unconstrained forecast of to 4.2 million tons of cargo would be met in Alternative C. However, there is no cap or limit proposed that would limit activity to the projected 89.6 MAP or 4.2 million tons of cargo.

Additional information and analysis specific to the future (2015) level of airport activity that Alternative D would serve was provided in Chapter 3 of the Supplement to the Draft EIS/EIR and Section 3 of the Draft Master Plan Addendum.

AL00040-19

Comment:

Discuss what the impacts would be as a result of the increase beyond the EIS/EIR assumed total maximum MAP, cargo capacity, and assumed number of flights.

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

AL00040-20

Comment:

Discuss the proposed LAX expansion's effects upon other airports in the region, in terms of inhibiting their expansion opportunities and conflicting with the SCAG regional airport strategy.

Response:

Please see Topical Response TR-RC-1 regarding the roles and responsibilities of LAWA, the City, SCAG, and SCRAA in meeting regional demand and the forecasts and capacities of the other regional airports as well as Topical Response TR-MP-2 regarding LAWA's efforts to ensure compatibility between the LAX Master Plan and the SCAG RTP. Because the new Alternative D for LAX is consistent with SCAG's 2001 regional aviation plan, substantial regional demand would be left for other airports to serve. Hence, airports in the Inland Empire should have opportunities for substantial growth in the coming years.

AL00040-21

Comment:

Page ES-4 Paragraph 4

This paragraph is speculative and unsubstantiated by fact. LAX does NOT have facilities in place, as the project requires significant improvements to achieve the desired service levels. Discuss the relative efficiency of investing in improvements at LAX, on a per MAP basis, compared to dispersing the required investments at other airports in the region.

Response:

As discussed in Section 2.8, Funding, 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. The level of funding from federal grants for other regional airports is not directly dependent upon the grants used at LAX. Thus, the development of LAX does not by definition limit further development of other regional airports.

Moreover, LAWA's Alternative D for LAX and SCAG's RTP leave substantial projected passenger and cargo demand for other regional airports. As the other airports in the region attract elements of this future demand, they also should be able to attract different types of financing to build new facilities to service it.

The specifics of the required investments at the other regional airports to construct facilities to meet certain passenger and cargo activity levels are beyond the scope of the LAX Master Plan and the associated EIS/EIR.

AL00040-22

Comment:

Page ES-4 Paragraph 5

Paragraph five discussion is unsubstantiated information. According to the "Inland Empire & Southern California's Airport Policy" report prepared by John E. Housing, Ph.D. (September 30, 2000, page ii), the population growth projected for the Inland Empire is estimated to exceed that of Los Angeles County, with an increase of 1.8 million to a total population of over 5.0 million by 2020. Provide population numbers based on the 2000 Census. Provide an exhibit showing population growth by city and county in the 20-mile market area surrounding LAX, compared to a graphic showing regional population growth by city and county for southern California.

Response:

Please see Chapter 3, Section 5.2.2, Projected Demographic and Socioeconomic Indicators, of the Draft LAX Master Plan. Figure III.5.3 presents the projected 2015 population by geographic zone. Please also see Response to Comment AL00040-16 regarding census data and Topical Response TR-MP-2 regarding the compatibility between the LAX Master Plan and SCAG's RTP.

AL00040-23

Comment:

Page ES-5 Paragraph 2, 3rd sentence

The third sentence identifies that, with changes to larger aircraft and operational adjustments, LAX Airport currently has the ability to serve approximately 78.7 MAP and 3.1 million annual tons of cargo. This statement warrants further justification. Given that current traffic and operational constraints at LAX suggest that LAX is already near capacity, 78.7 MAP appears to be a fictitiously inflated number in an attempt to reduce the difference between existing and proposed capacity. Describe how LAX could go from 58 MAP in 1996 to 78.7 MAP with only "changes in larger aircraft and operational adjustments", which ignores the increase in freight that occurred at the same time.

Response:

The expected activity levels that could be served by LAX without improvements were defined based on the maximum capacity of the existing facilities. Chapter V, Section 3.3.2.2, of the LAX Draft Master Plan contains a more detailed discussion on the capacity of LAX without improvements. The Master Plan assumes that congestion and delays would increase to maximum tolerable levels, thereby allowing the No Action/No Project Alternative to serve more passengers and cargo than LAX serves today. 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.

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AL00040-24

Comment:

Given that the EIS/EIR states that "the existing facilities at LAX are already straining to accommodate the current level of demand for aviation services" (page ES-6), describe the feasibility of assumed future improvements and associated required discretionary approvals, particularly the feasibility and availability of "larger aircraft".

Response:

As described in the Preface of the Draft EIS/EIR, LAX was designed in the mid-1950's when commercial aircraft were much smaller than today's fleet, and activity levels were much less than today. One of the main aspects of each of the build alternatives is to update the facilities at LAX to more appropriately serve the aircraft types and activity levels of today and as projected to occur through 2015. This includes accommodating the new larger aircraft.

AL00040-25

Comment:

Page ES-7 Development of Alternatives discussion

Provide substantiation for the statement "it will be difficult for the region's other commercial service airports to accommodate their projected share of increased growth in the regional demand". Describe existing capacity at other airports in the region, corresponding unconstrained demand, and explain the necessary improvements (if any) for these facilities to meet this projected demand.

Response:

Please see Topical Response TR-RC-1 regarding the roles and responsibilities of LAWA, the City, SCAG, and SCRAA in meeting regional demand and the forecasts and capacities of the other regional airports. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

AL00040-26

Comment:

Page ES-9 Summary of Activity Comparison of Alternatives Table

The table regarding Total Annual Aircraft Operations is confusing, and conflicts with Table 3-1. Show how the Total Annual Aircraft Operation numbers were generated. Figures listed below the Total Annual Aircraft Operations do not equate to the total.

Response:

The Total Annual Aircraft Operations row in Table ES-9 and Table 3-1 of the Draft EIS/EIR represents data for two different activity levels. Table ES-9 demonstrates the level of activity for the unconstrained forecast and Master Plan alternatives in the year 2015 while Table 3-1 discusses the level activity in the year 2005. The rows following the Total Annual Aircraft Operations row do not equate to the total because the general aviation operations (22,900) and military operations (14,100) are not listed separately in this table, however they are included in the total number of operations. In both tables the Total Annual Aircraft Operations are derived by taking the sum of domestic, international, cargo and general aviation operations. Please see Chapter V, Section 3.3.2 of the Draft LAX Master Plan for further discussion of each Master Plan alternative's activity level.

AL00040-27**Comment:**

Page ES-9 The Summary of Activity Table, and corresponding discussion of alternatives throughout the EIS/EIR, provides an inappropriately limited view of the environmental impacts associated with each alternative. The table, and corresponding discussion of alternatives in the EIS/EIR, limits the scope of the alternatives to physical impacts upon LAX and the immediate surrounding area. The fundamental description and evaluation of the project alternatives are flawed in at least the following major aspects, rendering them invalid pursuant to CEQA and NEPA:

Response:

A more comprehensive description of the characteristics of each of the four alternatives addressed in the Draft EIS/EIR was provided in Chapter 3, Alternatives. 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.

AL00040-28**Comment:**

1. LAWA appears to have arbitrarily limited the project objectives to expansion of LAX, which is not a permissible restriction given the regional nature of the project (serving much of southern California), and the involvement of state and federal agencies with the authority and responsibility to develop regional solutions to air travel;

Response:

The project objectives/statement of purpose and need are not limited to the expansion of LAX. Alternative D-Enhanced Safety and Security Plan, added subsequent to publication of the Draft EIS/EIR, provides for improvements at LAX designed for a future (2015) activity level that is comparable to that of the No Action/No Project Alternative. Alternative D is consistent with the policy framework of the SCAG 2001 Regional Transportation Plan (RTP), which calls for no expansion of LAX. As described in Chapter 2 of the Supplement to the Draft EIS/EIR, Alternative D is responsive to the project objectives/statement of purpose and need for the Master Plan.

AL00040-29**Comment:**

2. The alternatives exclude consideration of the secondary impacts of project alternatives, particularly with respect to significant regional impacts in surrounding areas associated with increased traffic, noise and air pollution. Consistent with concepts set forth in SCAG's regional airport strategy, it is also intuitive that varying operational levels at LAX will have both direct and indirect impacts upon communities well outside the limited area evaluated in the EIS/EIR. These are completely ignored in the EIS/EIR, and therefore create a false impression of project impacts. As an example, the actual impact of Alternative C is much greater than represented in the EIS/EIR, due to increased regional truck and passenger travel necessary for Alternative C, as compared to the No Project/No Action Alternative and Environmental Baseline. The increased travel for Alternative C has a direct effect of concentrating passenger and cargo activities at LAX, rather than responding to regional growth within the regional growth submarket areas.

3. Comments and Responses

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed direct and indirect impacts associated with the proposed project to the extent reasonably foreseeable. The nature and extent of the project's secondary impacts occurring in more distant areas such as Riverside County are not expected to be significant. Please see Topical Response TR-ST-2 for a discussion of the study area definition related to traffic impacts.

AL00040-30

Comment:

3. The EIS/EIR inappropriately utilizes apparently low assumptions for passenger and cargo activity, given that the EIS/EIR has acknowledged the inability to restrict or cap flights. It also appears that the projected passenger and cargo activity figures are based on "acceptable" levels of airport service. This does not seem reasonable, given that LAX is currently operating well beyond its original design capacity of 40 MAP, at over 63 MAP (an increase beyond "design capacity" of over 50%!). The EIS/EIR should address a worst-case scenario utilizing the theoretical design capacity of the proposed expansions.

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

AL00040-31

Comment:

4. The EIS/EIR fails to provide an adequate range of alternatives relative to cargo activity, as all of the build alternatives provide for the same level of cargo activity. As cargo activity has direct impacts on regional truck traffic (with associated air quality and noise impacts), the EIS/EIR should examine an alternative that reduces projected LAX cargo activity by distributing cargo activity to other regional airports.

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, 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 that of the No Action/No Project Alternative, and would make the airport safer and more secure, convenient, and efficient. Alternative D's lower cargo level for LAX is consistent with the policy framework of the SCAG 2001 RTP, which shows substantial cargo levels at four Inland Empire airports. LAWA, however, is not obligated to adopt an alternative that calls for specific future air cargo facilities and activity levels at airports that LAWA does not control.

AL00040-32

Comment:

5. The No Action/No Project Alternative assumes various improvements per the existing Master Plan. The EIS/EIR should specifically identify the improvements necessary to achieve the assumed MAP and cargo activity. It is not clear, given the age of the existing Master Plan, whether or not these assumed "No Project" improvements could indeed be constructed without separate CEQA review, in which case they are inappropriately included as part of a "No Project" Alternative.

Response:

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions, including the need for environmental review of projects therein.

AL00040-33**Comment:**

Page ES-11 No Action/No Project Alternative, Paragraph 3

The No Action/No Project Alternative discussion fails to address that the airports in the region have the ability to absorb the passenger and cargo demand shortfalls. Identify and compare the implications of redistribution of the shortfall of 19.2 MAP and 1 million tons of cargo to other regional airports, consistent with SCAG's regional airport strategy.

Response:

Please see Response to Comment AL00040-2 above.

AL00040-34**Comment:**

Page ES-25 Off-Airport Surface Transportation, Paragraph 6

The EIS/EIR fails to address the regional traffic impacts of the project, including impacts on the CMP network in Los Angeles, San Bernardino and Riverside counties. The EIS/EIR inappropriately compares the build alternatives with passenger and cargo figures of the No Project/No Action Alternative, rather than with the environmental baseline.

Response:

For purposes of identifying significant impacts under CEQA, the project alternatives were compared to the adjusted environmental baseline. Impacts on the CMP system throughout Los Angeles County are included in the CMP analysis, Section 6 of Technical Report 3b of the Draft EIS/EIR and Section 6 of Technical Report S-2b of the Supplement to the Draft EIS/EIR. CMP system impacts do not extend out to areas close to the Inland Empire counties. Therefore, it can be reasonably concluded that there would be no CMP impacts in the Inland Empire.

AL00040-35**Comment:**

Page ES-41 Summary Comparison of Environmental Impacts From Alternatives A, B, and C

Provide all footnotes at bottom of each page.

Response:

Comment noted.

AL00040-36**Comment:**

REGIONAL CONTEXT

General Comment

1. As noted in prior comments, the EIS/EIR is fundamentally flawed in its approach to providing regional air travel services from a single point without adequate consideration of other regional airports. Pursuant to CEQA and NEPA, this is particularly important due to the identified unavoidable significant impacts associated with concentration of regional air travel at LAX, impacts that could be substantially reduced through providing increased service at other airports. Notwithstanding the need to evaluate other airports, LAWA should at minimum provide for operational scenarios involving expanded service at the two regional airports it has control over - Palmdale and Ontario. These airports are both capable

3. Comments and Responses

of expanded passenger and cargo traffic, which would reduce local impacts around LAX as well as reduce regional traffic, air and noise impacts associated with regional trucking activities traveling to and from LAX.

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.

AL00040-37

Comment:

Page 1-13 1.2.1.2 Market Accessibility discussion

The Market Accessibility analysis seems to address accessibility to LAX in a vacuum. Discuss how the Los Angeles Regional Airport System Airport Travel Time Zones were determined. Define the baseline assumptions regarding traffic conditions for the 60 minute time travel zone, and how projected travel delays were factored into the "60-minute" service area. Recent MTA forecasts suggest peak period travel speeds in Los Angeles metropolitan area with an average of less than 20 mph.

Response:

The accessibility figures were derived from the SCAG/RADAM zones to each airport in the basin. Because the RADAM zones are a geographic area, the travel times are an average for the entire zone. The information is reported for AM Peak (6:00am-9:00am) and PM Peak (2:00pm-7:00pm). The 1994 AM Peak was used for this analysis because accessibility is a passenger choice parameter that is driven by the passenger's departure flight and because the AM travel times favor outlying airports. Please see Figure I-3.4 of the Draft EIS/EIR for more information.

AL00040-38

Comment:

Page 1-13 1.2.2 Allocation of Air Service Among Regional Airports

The information provided within this discussion does not reflect the conditions of the potential service operations of the regional airports. Identify regional use of airports per SCAG's regional airport strategy. The EIS/EIR needs to address a reasonable alternative incorporating a reduced LAX program (with traffic and noise mitigation), along with expansions at regional airports. March Air Reserve Base is discounted for passenger travel, although the EIS/EIR acknowledges that this is being planned. Ontario is acknowledged as having the potential to capture a greater market share, but this is also not considered in developing the alternatives. Ontario International Airport, San Bernardino International Airport, March Air Reserve Base, Southern California Logistics Airport and Palm Springs Regional Airport are now capable of handling more cargo traffic, yet this is not reflected in any of the alternatives.

Response:

Please see Topical Response TR-RC-1 regarding the role of the LAX Master Plan in planning for regional aviation demands and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. Also see Response to Comment AF00001-56 regarding the range of alternatives evaluated in the Draft EIS/EIR and the use of regional airports. It is beyond the scope of the LAX Master Plan EIS/EIR and the authority of LAWA and the FAA to develop a regional plan/strategy for meeting the future aviation demands of the region. The Southern California Association of Governments (SCAG) is

the federally-designated Metropolitan Planning Organization (MPO) responsible for the formulation of Regional Transportation Plans (RTPs). Please see Topical Response TR-ALT-1 and Topical Response TR-MP-2 for an explanation of how LAWA developed Alternative D for LAX, and why Alternative D is consistent with the policy framework of the SCAG 2001 Regional Transportation Plan (RTP). The SCAG RTP does project substantial increases in cargo activity levels through 2020 at Ontario, March, San Bernardino and Southern California Logistics airports, and substantial increases in passenger activity levels at Ontario airport.

AL00040-39

Comment:

PURPOSE AND NEED FOR THE PROPOSED PROJECT

Page 2-2 Paragraph 2, 4th sentence

Quantify the return on capital investment as it relates to improving LAX and redirecting state and federal funding from other airport facilities. What is the amount of investment capital that would be re-apportioned to other airports if the LAX proposed improvements were based on the No Project Alternative?

Response:

Comment noted. As discussed in Section 2.8 of the Draft EIS/EIR, the proposed funding would include a combination of FAA Airport Improvement Fund grants, passenger facility charges, general airport revenue bonds, airline fees, and other state/federal grants. No City of Los Angeles General Fund dollars would be used to pay for any of the proposed on-airport improvements. The level of funding from federal grants for other regional airports is not directly dependent upon the grants used at LAX. Thus, no additional grant capital would be available if the No Action/No Project Alternative were selected.

AL00040-40

Comment:

Page 2-2 2.1.3 The International Trade Component, Paragraph 2, 1st sentence

This statement is speculative. How was the International Trade Component determined, and how can only LAX be expected to provide substantial international service during the project planning horizon year? For example, international freight courier service is already being provided at Southern California Logistics Airport.

Response:

The international trade component was determined based on the economic benefit (in terms of revenue) generated by the growing volume of international passengers and high-value consumer and electronic goods, agriculture, financial services, telecommunications, and entertainment from the Asian and Latin American markets. LAX, which is currently the country's primary gateway to the Asia-Pacific region and provides virtually 100 percent of the region's international air service, will be expected to continue to provide the great majority of international service for several reasons. LAX will be expected to provide substantial air service because it has the facilities in place necessary to support international travel that would be difficult and costly to duplicate elsewhere. It has a vast network of off-airport businesses that form an intricate network supporting a complex international trade center, and bilateral agreements between the U.S. and many foreign governments specifically designate LAX as the U.S. port entry. LAX also provides the best opportunity for the region to leverage its local base of international passengers to attract greater international air service by airlines providing opportunities for connecting passengers.

Other airports in the region cannot provide these same qualities necessary to attract additional international air service. While other airports in the region (such as the Southern California Logistics Airport) may establish some limited international service, LAX will be the only airport during the planning period (up through 2015) to serve the bulk of the Los Angeles region's international travel needs.

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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. International connecting passengers are especially susceptible to competition from out-of-region airports. The future ability of LAX to provide adequate facilities to meet the growing air travel demand will depend on the implementation of the Master Plan.

AL00040-41

Comment:

Page 2-4 2.2.1.2 SCAG Forecast for LAX

This discussion needs to incorporate information obtained from the 2000 Census data and SCAG's regional airport strategy.

Response:

Please see Topical Response TR-RC-1 regarding the roles and responsibilities of LAWA, the City, SCAG, and SCRAA in meeting regional demand and the forecasts and capacities of the other regional airports contained in SCAG's 2001 RTP. Please also see Topical Response TR-MP-2 regarding the compatibility between the LAX Master Plan and SCAG's RTP.

LAWA's Alternative D - The Enhanced Safety and Security Plan - for LAX and SCAG's regional plan leaves substantial projected passenger and cargo demand for other regional airports. 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. Since the elimination of El Toro as a viable option to meet a major portion of the projected unmet demand in the region, the Inland Empire airports such as Ontario become more important in providing facilities to serve a larger percentage of the regional demand.

AL00040-42

Comment:

Page 2-4 2.2.1.2 SCAG Forecast for LAX, Paragraph 1, 5th sentence

Cite where the statement "SCAG found that some air service would leave the region rather than relocate to airports other than LAX in the Los Angeles region" was derived.

Response:

SCAG makes this assertion in several of its aviation scenarios in the 2001 RTP. The following quote is from Scenario 6 in which LAX is constrained to 78 MAP. "With 147.9 MAP a significant number of domestic and international passengers are diverted to other regions or are not traveling, thereby generating what is referred to as "Latent Demand". This demand increases when requisite passenger expectations in terms of non-stop destinations, flight frequencies, costs, ground access and convenience attributes (i.e. terminal congestion, gate congestion, long delays, etc.) are not met by the selected airports. Latent demand also materializes simply due to the lack of available seats during peak periods, as would be the case with LAX under this scenario."

With LAX constrained to approximately 78 MAP, as SCAG assumed in the RTP and LAWA assumed under Alternative D, a significant portion of the passenger demand cannot be met by the other airports in the region due to facility and environmental constraints, and policy restrictions. With the airport constrained to 78.9 MAP, LAX is expected to accommodate 78 percent of unconstrained operations demand, 81 percent of passenger demand, and 74 percent of the cargo demand in 2015.

AL00040-43

Comment:

Page 2-5 2.2.1.5 Recent Trends at LAX, Paragraph 1, 4th sentence

The 4th sentence states that LAX Air Cargo Traffic (ACT) increased from 1,896,000 in 1996, which is inconsistent with the ACT identified on page ES-9, Summary of Activity Comparison of Alternatives Table, Environmental Baseline (1996) ACT of 1,896,764. This inconsistency should be corrected throughout the document.

Response:

The 1,896,000 Air Cargo Tons (ACT) indicated on page 2-6 of the Draft EIS/EIR is in error; however, that is the only location in the Draft EIS/EIR where the miscalculation occurs. The correct number of 1,896,764 is used consistently throughout the remainder of the document.

AL00040-44**Comment:**

Page 2-8 Paragraph 5, 4th sentence

This assumption is unsubstantiated (implementation of Alternative C and resultant shortfall of approximately 8.3 MAP of primarily international passenger demand and 7 percent of the international air service would still be lost to the region).

Response:

As summarized in the table below, the unconstrained forecast for LAX projects that international passenger demand would reach 37 million annually (22.5 million origin & destination (O&D) passengers and 14.5 million connecting passengers) by 2015. Due to the airside capacity limitations, Alternative C would not be able to accommodate the unconstrained forecast demand. The Draft LAX Master Plan projected that the airlines would adjust air service patterns in several ways in response to the capacity constraints. The projected air service changes include 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 V, Concept Development, Section 3.3.2, Final Iteration Constrained Activity; page V-3.181 for more information on the projected air service adjustments. Based on the capacity constraints and the expected reaction of the airlines, Alternative C is projected to serve 100 percent of the unconstrained O&D passenger demand (international and domestic), 93 percent of the international passenger demand, and 100 percent of the unconstrained cargo demand in 2015. The 7 percent unserved international passenger demand would be the connecting international passengers, which would likely be lost to the region (it is expected that the airlines would route connecting passengers through other hubs). No international O&D passenger demand would be lost to the region because other Los Angeles region airports are at a competitive disadvantage to capture international air service not accommodated at LAX due in part to the fact that this type of service requires unique and expansive infrastructure that is not easily duplicated and does not currently exist elsewhere in the region. New runways would be needed in order to increase LAX airside capacity and to capture 100 percent of the unconstrained passenger demand (international and domestic) at LAX, as proposed in Alternatives A and B.

Planning Year 2015

	Annual Domestic Passengers			Annual International Passengers			
	O&D	Connecting	Subtotal	O&D	Connecting	Subtotal	Total
Unconstrained	42,250,000	18,653,000	60,903,000	22,492,000	14,565,000	37,057,000	97,960,000
Alternative C	42,250,000	12,682,000	54,932,000	22,492,000	12,129,000	34,621,000	89,553,000

3. Comments and Responses

AL00040-45

Comment:

Page 2-8 Paragraph 9, 3rd sentence

Paragraph 9, 3rd sentence states that without the master plan improvements "the low air service and activity potential will mean an annual loss to the region of 20 billion dollars in economic activity and 98,000 jobs". However, per the SCAG Economic Impact Report, by CIC Research of San Diego, under all SCAG Major Scenarios, there was no impact on SCAG economy. In fact, the results showed that Southern California's economic output under each scenario was within 1.5% of 98.2 billion. Explain how the claimed economic loss of potentially 20 billion dollars in the region is derived.

Response:

It cannot be assumed that other airports in the Southern California region would be able to accommodate substantially larger future volumes of air passengers and air cargo, due to voter-approved capacity and/or operating restrictions and other factors. In fact, as a result of continuing resistance to airport expansion in some other communities in the region, SCAG is now in the process of reconsidering its 2001 RTP assumptions about regional air transportation capacity as it prepares the 2004 RTP Update. Therefore, a City of Los Angeles decision to expand LAX in a way that falls short of meeting the demand for air transportation in the region could result in a reduction in future economic activity, as discussed in Section 4.4.1, Employment/Socio-economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting economic technical data is provided in Technical Report 5 of the Draft EIS/EIR and Technical Report S-3 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan (RTP).

AL00040-46

Comment:

Page 2-11 2.3.9 Airport-Related Impacts on Adjacent Neighborhoods, Paragraph 1, 4th sentence

Discuss the negative impacts associated with the land acquisition of 57 single-family dwelling units and 89 multiple-family dwelling units, which results in the dislocation of families who may be unable to stay in the area due to lack of affordable housing.

Response:

Master Plan Alternatives A, B, and C would each necessitate the acquisition of a total of 84 dwelling units, including 57 single-family units and 27 multi-family units, as was indicated in the table entitled "Acquisition and Relocation Overview Comparing the Alternatives" on page 4-369 in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR. The need to acquire any homes or businesses would be limited to those determined necessary for the approved project. LAWA would conform to governing federal and state requirements for the payment of just compensation for the purchase of acquired property, and additional relocation assistance would be provided to ensure that each displaced owner or tenant is provided a comparable replacement dwelling. Section 4.4.2, Relocation of Residences and Business, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR also addressed LAWA's property acquisition and relocation assistance programs. Compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, its implementing regulations, state and local regulations, and FAA Advisory Circular 150/5100-17, ensured through implementation of Master Plan Commitment RBR-1, Residential and Business Relocation Program (Alternatives A, B, C, and D), would serve to reduce or avoid significant relocation impacts. As addressed in the Master Plan commitment, the needs of persons who cannot readily be relocated using regular relocation program benefits and/or procedures would be addressed through a Last Resort Housing Program.

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. Residential acquisition is not proposed as part of Alternative D.

Please also see Topical Response TR-RBR-1 regarding residential acquisition and relocation issues, including affordable housing.

AL00040-47

Comment:

ALTERNATIVES

General Comments

1. As noted in previous comments, the EIS/EIR is fundamentally flawed in its premise leading to the cursory review and summary rejection of all regional airport alternatives. The LAX Master Plan is a regional project requiring review and approval by several local, state and federal agencies, which requires consideration of regional solutions to the issue of meeting existing and projected air travel demand. The EIS/EIR provides no serious consideration or analysis of a regional airport alternative, as suggested in SCAG's regional airport strategy, even though LAWA controls two of these regional airports - Palmdale and Ontario. As stated elsewhere in these comments, a regional airport alternative would require significantly less off-site capital improvements (estimated by SCAG at \$250 to \$500 million for Ontario and El Toro, compared to \$12 billion for LAX), with associated substantial reductions in related direct and indirect impacts or, put differently, could result in a far higher degree of airport ground access mitigation per dollar of capital investment.

2. The EIS/EIR makes repeated references to a regional airport alternative not being feasible, due to the alleged lack of control available to local agencies, and due to alleged constraints at other airports. These statements are unsubstantiated, and taint the entire EIS/EIR document. Obviously, with the ability of LAWA, FAA and other agencies to decide what level of funding is provided, and whether or not certain on-site and off-site improvements are made, the airline industry will not necessarily be constrained in its ability to use LAX. The notion that we are helplessly at the whim of free market conditions is contrary to the discretionary review process empowered to local, state and federal agencies, and completely disregards the reality of local land use decision-making and constraints placed on facilities by the availability of infrastructure and airport-related facilities. This is particularly true given that LAWA has control over Palmdale and Ontario airports.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Response to Comment AF00001-56 regarding the Draft EIS/EIR assumptions pertaining to Ontario International and Palmdale Regional airports. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

AL00040-48

Comment:

3. The EIS/EIR sets up a series of questionable arguments resulting in an inflated "baseline" condition and a fictitious "No Project/No Action Alternative", in order to make the "project's" increment appear smaller, while at the same time using an arbitrarily low figure for airport activity given the fact that LAX is currently operating well beyond its "design capacity" of 40 MAP. If the design capacity of 40 MAP is capable of handling 28.7 MAP, what is the design capacity of 89 MAP capable of handling?

Response:

Please see Topical Response TR-GEN-3 regarding how the current activity levels at LAX relate to design capacity, and how that relates to the future capacity projections associated with the Master Plan alternatives. Please also see Topical Response TR-GEN-1 regarding baseline issues and Topical Response TR-GEN-2 regarding the No Action/No Project Alternative.

3. Comments and Responses

AL00040-49

Comment:

4. The "project" as described in the EIS/EIR inappropriately limits the consideration of a regional airport alternative and supports a \$12 billion capital investment of off-site improvements that would reduce funding available for other airports, thereby creating an investment momentum that would predispose the region toward limited development of other airports.

Response:

As discussed in Section 2.8, Funding, of the Draft EIS/EIR, the proposed funding would include a combination of FAA Airport Improvement Fund grants, passenger facility charges, general airport revenue bonds, airline fees, and other state/federal grants. No City of Los Angeles General Fund dollars would be used to pay for any of the proposed improvements. The level of funding from federal grants for other regional airports is not directly dependent upon the grants used at LAX. Thus, the development of LAX does not by definition limit further development of other regional airports.

AL00040-50

Comment:

5. The "Alternatives" section provides a mere three pages of discussion regarding alternatives to the project, and 63 pages of a summarization of the Project Description and EIS/EIR conclusions, which appears redundant with the Executive Summary. The vast majority of Section 1, Regional Context, is devoted not to an evaluation of potential alternatives, but rather provides background information on various alternatives and attempts to justify their lack of consideration. This is clearly unacceptable for a regional public facility such as LAX.

Response:

Pages ES-9 through ES-21 of the Executive Summary summarize the description of the four alternatives addressed in the Draft EIS/EIR, and pages 3-8 through 3-64 of Chapter 3, Alternatives, provide the more detailed explanation of the subject alternatives. Given the role that LAX serves in meeting regional aviation demands and the fact that the alternatives being considered for the Master Plan have different characteristics relative to future activity levels, Chapter 1, Regional Context, is intended to provide background information and a context in which the commentor may better understand how each alternative would relate to future regional aviation demand.

AL00040-51

Comment:

Page 3-1 3. Alternatives, Paragraph 6

Explain why the EIS/EIR does not address the ability of other airports to accommodate air cargo demand, which could reduce regional truck traffic and reduce cargo traffic-related impacts in the vicinity of LAX.

Response:

Regional cargo demand and the ability of this demand to be accommodated at regional airports is addressed in Section 4.3.2 of the Draft Master Plan (Volume 1, Chapter I, page I-4.5). 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 for passengers and cargo 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 - including cargo demand - to other airports in the region.

AL00040-52**Comment:**

Page 3-2 3.1 .1.2 Alternative Airport Locations discussion

RCTC, SANBAG and WRCOG do not support the unsubstantiated comments that the Palmdale and Ontario Airports are "being given every advantage to increase their level of service", and the statement that "these airports have neither the facilities nor market advantage that would enable them to attract a significant amounts of demand away from LAX". Provide justification for these statements, with specific examples of actions by LAWA to promote expansion of Ontario and Palmdale airports as viable alternatives to expansion of LAX.

Response:

The mission of LAWA's Air Service Marketing Division is to increase passenger and cargo traffic levels at all LAWA airports, including Ontario International (ONT) and Palmdale Regional (PMD). LAWA is undertaking efforts to increase the market share of ONT in the L.A. Basin including domestic passenger service, international passenger service, and cargo service. LAWA is conducting market research and analyzing demand and supply levels among ONT markets to identify under-served city-pair markets, and is assisting tenants in marketing ONT cargo facilities. LAWA is also continuing to work with airlines to initiate more nonstop medium- and long-haul domestic service at the airport, and is assessing the viability of nonstop jet service to new international markets. LAWA is conducting market research aimed at reinitiating domestic passenger service at the Palmdale airport, and identifying origin and destination markets at PMD with sufficient demand to support turboprop or regional jet service. LAWA is also identifying markets that would support cargo at PMD.

AL00040-53**Comment:**

Page 3-13 Paragraph 4, and Paragraph 5

As noted in previous comments, the EIS/EIR uses inconsistent environmental baseline years, which warrants clarification and justification.

Response:

Please see Topical Response TR-GEN-1 regarding baseline issues.

AL00040-54**Comment:**

Page 3-14 Table 3-1 Summary of Activity by Alternatives - 2005

Provide a discussion of the assumptions applied to the Unconstrained Forecast.

Response:

A discussion of the methodology and data used to develop the unconstrained forecast can be found in the Draft LAX Master Plan, Chapter III. Please see Chapter IV of the Draft LAX Master Plan for a discussion of the unconstrained activity levels and the design day activity levels.

AL00040-55**Comment:**

Page 3-60 Comparative Summary of Alternatives

The EIS/EIR states that "the airport can accommodate additional aircraft and passengers beyond these levels; however, the result is a degraded level of service". Again, as noted in previous comments, the

3. Comments and Responses

EIS/EIR presents an artificially low estimate of airport activity, in terms of MAP, cargo traffic and flights, as the entire EIS/EIR is predicated upon airport activity at "reasonable levels of service", even though LAX is currently operating well beyond its "design capacity" of 40 MAP. The entire EIS/EIR must be revised and recirculated to address a worst-case scenario addressing predicted maximum MAP and flights.

Response:

Please see Topical Response TR-GEN-3 regarding actual versus projected capacity levels at LAX.

AL00040-56

Comment:

NOISE
General Comments

1. The entire premise of this section relates to the overall project assumptions regarding MAP and flight activity. As previously stated, the EIS/EIR understates both factors, which renders the noise analysis inadequate. The EIS/EIR should be revised and re-circulated to address a more realistic worst-case scenario for passenger flights, as well as increased flights, should "larger aircraft" not materialize. The EIS/EIR should document airline manufacturer commitments to provide these "larger aircraft", and what a reasonable delivery date would be. Should this commitment not be possible or not occur until after the Master Plan horizon year of 2015, the EIS/EIR should be revised and re-circulated to reflect flight activity consistent with current market technology.

Response:

Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.5 regarding the accuracy of forecast fleet mix.

AL00040-57

Comment:

2 . Please demonstrate compliance with CEQA Guidelines that states that all impacts must be evaluated using the handbook prepared by the California Department of Transportation, Division of Aeronautics, Public Resources Code Section § 21096; and CEQA Guidelines Section § 15154.

Response:

Please see 3.0 Affected Environment/Environmental Baseline in Technical Report 1 of the Draft EIS/EIR and Section 2.0 Affected Environment/Environmental Baseline of Technical Report S-1 of the Supplement to the Draft EIS/EIR, for reference and usage of the Caltrans Airport Land Use Planning Handbook, and Chapter 6, Other NEPA/CEQA Topic.

AL00040-58

Comment:

3. Please describe the criteria used in developing the list of sensitive receptors. Additionally, please state the radius that was used to determine the area where sensitive receptors would be impacted.

Response:

Please refer to Topical Response TR-LU-5 for a description of the criteria used in defining noise-sensitive receptors and identifying noise-sensitive receptors that would be significantly impacted under the Master Plan alternatives.

As stated in Section 4.2.2 of the Draft EIS/EIR, the radius used to determine the area where sensitive receptors would be impacted (or Study Area) was generally based on the geographic area covered by LAWA's Aircraft Noise Mitigation Program (ANMP). The ANMP includes areas within the 1992 fourth quarter 65 CNEL noise contour that are exposed to high noise levels and eligible for soundproofing. The general boundaries of the Study Area are Dockweiler State Beach to the west, Centinela and

Florence Avenues to the north, the Harbor Freeway (I-110) to the east, and El Segundo and Imperial Boulevards to the south. This area extends approximately nine miles from the Pacific Ocean on the west to the I-110 on the east and extends from north to south approximately three miles at the narrowest point (between Florence Avenue and Imperial Highway) to four miles at the widest point (between Centinela Avenue and El Segundo Boulevard).

AL00040-59

Comment:

4 . Please include an analysis of the noise level measurements in L10, L50, and L90 values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) for the project plus alternatives.

Response:

Because the noise levels of the project alternatives are not taken via noise monitors, it is not possible to forecast exceedances for noise level measurements. The INM does not accommodate the L(n) metric for aircraft noise evaluations. The metrics included in this comment are not accepted for use in evaluating aviation noise impacts. For additional information regarding the use of CNEL as the principal metric of aircraft noise evaluation and SEL for the characterization of single-event aircraft noise, as addressed in the Supplement to the Draft EIS/EIR, please see Topical Response TR-N-1 regarding noise modeling approach.

AL00040-60

Comment:

5. Please include an analysis of the noise impacts from the on-site rock crushing facility that is proposed as a mitigation measure for air quality impacts.

Response:

Mitigation Measure MM-AQ-1, Implement Revised Air Quality Mitigation Program, in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, does identify that a rock crushing facility is proposed as a mitigation measure. At this time the location of the rock crushing plant has not been determined. The facility, however, would be sited in order to comply with the City of Los Angeles noise regulations and therefore minimize the impact on the community. Additionally, Section 4.1, Noise, of the Supplement to the Draft EIS/EIR included Mitigation Measure MM-N-11, Construction Scheduling, that indicates that the timing and/or sequence of the noisiest construction operations shall avoid sensitive times of the day.

AL00040-61

Comment:

6. Please describe the atmospheric conditions including temperature, humidity, and the presence of wind and rain at the time the noise measurements were taken.

Response:

Atmospheric conditions were not taken to prepare the roadway noise analysis. Roadway peak noise hour Leq was developed using the Federal Highway Administration Highway Traffic Noise Prediction Model, STAMINA 2.0 (Report No. FHWA-RD-77-108). Please see Section 4.1, Noise, of the Draft EIS/EIR for the roadway noise methodology. Please also see Topical Response TR-N-1 regarding the modeling approach for aircraft noise.

AL00040-62

Comment:

Please include a land use map which identifies the residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute to the environment within the area

3. Comments and Responses

impacted by the proposed project (impacted can be identified as areas where there is a potential noise increase of 5dB(A) or more, during either construction or operation, over existing background levels).

Response:

Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR included figures showing underlying land uses (including residences, hospitals, libraries, schools, and churches) that would be newly exposed to high noise levels or significant noise increases (defined by either the 65 CNEL noise contour, an increase of 1.5 CNEL within the 65 CNEL noise contour, or the 94 dBA SEL noise contour). Please see Topical Response TR-LU-5 regarding thresholds used to identify significant aircraft noise levels. In addition, Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR identified significant impacts for noise sensitive uses that would be exposed to a 5 dBA increase above ambient noise levels during construction, and, for informational purposes, noise-sensitive receptors that would experience a 3 dBA increase within the 60 CNEL or a 5 dBA increase below the 60 CNEL. Subsection 4.1.6.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR included an analysis of noise-sensitive uses that would be exposed to an increase of 5 dBA Leq(h) in peak hour noise levels as a result of roadway traffic noise. The location of these receptors was shown on Figure 4.1-5 of the Draft EIS/EIR and Figure S4.1-1 of the Supplement to the Draft EIS/EIR.

AL00040-63

Comment:

7. The EIS/EIR fails to address off-site and cumulative noise impacts associated with project-related traffic on regional roadways, particularly in the Inland Empire.

Response:

The Roadway noise analysis followed the procedures in Title 23 of the United States Code of Federal Regulations Part 772, Procedures for Abatement of Highway Traffic Noise and Construction Noise, and FHWA Highway Traffic Noise Analysis and Abatement Policy and Guidance. The roadway noise analysis did not extend out to the Inland Empire because the contribution of total roadway noise by LAX Master Plan project cars and trucks is very small, even near the airport. In fact, there are only three locations that would experience significant impacts from project-related cars and trucks. Two of those locations are on the future Ring Road (south section) and the LAX Expressway. Both of these locations would be dominated by high speed project traffic. This concentration of high-speed project traffic is not experienced anywhere else, even in other locations adjacent to the airport. As far away as the Inland Empire, there would be so few vehicles generated by the project on any given road that the contribution of these vehicles' noise to total roadway noise would be negligible. Also, please see Figure 4.1-5, Roadway Noise Sensitive Receptor Sites, in Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for a depiction of the boundary area for the roadway noise analysis.

AL00040-64

Comment:

Page 4-14 Construction Noise Key Conclusions, Paragraph 4, 2nd sentence

Why was 600 feet used as the distance for determining whether a noise-sensitive receptor would be significant adjacent to a construction activity? Does this assume buffering from landscape areas and buildings? Please state the percentage of area and the locations that fall within this assumption.

Response:

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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.

The distance of 600 feet was derived from the construction noise analysis, as discussed in Section 4.1.2.4, Construction Equipment Noise Methodology, of the Draft EIS/EIR. Typical construction noise levels at a reference distance were calculated for a range of distances using a conservative noise propagation rate of 4.5 dBA per doubling of distance and were compared with ambient noise levels at

the noise-sensitive land uses. Potential for noise impact was calculated based on the increase of construction noise above the ambient noise by 5 dBA Leq or more. The construction noise thresholds of significance were detailed in subsection 4.1.4.3 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The resultant analysis concluded (in subsection 4.1.6.4.2 of the Draft EIS/EIR and subsection 4.1.6.4.3 of the Supplement to the Draft EIS/EIR) that construction noise would potentially exceed ambient noise levels by 5 dBA Leq or more in noise-sensitive areas within 600 feet of construction activity for Alternatives A, B, C, and D as depicted in Figure 4.1-6 of the Draft EIS/EIR and Figure S4.1-5 of the Supplement to the Draft EIS/EIR. A conservative degree of noise reduction was assumed for all of the affected areas shown in Figures 4.1-6 and S4.1-5 due to shielding from intervening buildings and landscape.

Also, please see Response to Comment SPC00275-44 regarding construction noise impacts and applicable mitigation measures.

AL00040-65

Comment:

Page 4-15 Section 4.1.1, Paragraph 1, 1st sentence

Why was the year 2005 used as a forecast year if construction activity is going to peak in 2004?

Response:

Construction of the LAX Master Plan, as described under the build alternatives addressed in the Draft EIS/EIR, would be conducted in two phases. Page ES-21 of the Executive Summary of the Draft EIS/EIR provided discussion regarding development phases for Alternatives A, B, and C (i.e., build alternatives). Each phase of construction associated with the build alternatives addressed in the Draft EIS/EIR would involve many construction elements or "sub-projects", dispersed geographically in and around the LAX project area. Each sub-project would have its own construction timetable with associated increasing and decreasing levels of construction noise. While overall construction activity was initially projected to peak in 2004 (i.e., many "sub-projects" occurring throughout the study area during that year), construction activity at any one given noise-sensitive location in the project area may or may not peak during this period. For this reason, the construction noise analysis was based on a worst-case analysis, independent of any particular year.

It should be noted that the nature and extent of improvement projects proposed under Alternative D, which is addressed in the Supplement to the Draft EIS/EIR, are substantially less than those of Alternatives A, B, and C (please refer to page ES-19 of the Supplement to the Draft EIS/EIR regarding phases of construction under Alternative D). Alternative D does not include several of the major projects associated with the other build alternatives, such as the LAX Expressway, the ring road, the west terminal, and additional cargo facilities, and, therefore, can be completed within a much smaller overall construction program. The construction schedule for Alternative D, addressed in the Supplement to the Draft EIS/EIR, assumes that the start of construction in fall 2004 and completion by 2015. Please see Response to Comment AL00033-26 for additional information regarding the construction phasing for the build alternatives addressed in both the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00040-66

Comment:

TRAFFIC AND TRANSPORTATION

General Comments

1. As noted in previous comments, the EIS/EIR analysis of off-airport transportation issues is fundamentally flawed, in that it provides inadequate or no analysis of freeway impacts outside the Tier I study area, including the Inland Empire.

Response:

Impacts on the CMP system throughout Los Angeles County are included in the CMP analysis, Section 6 of Technical Report 3b of the Draft EIS/EIR and Section 6 of Technical Report 2b of the Supplement

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to the Draft EIS/EIR. Alternative D would include Ground and Intermodal Transportation Centers east of the airport; therefore, the transportation study area for this alternative was extended east of the area considered for Alternatives A, B, and C as shown in Figure S4.3.2-1 (page 4-245) of the Supplement to the Draft EIS/EIR. CMP system impacts do not extend out to areas close to the Inland Empire counties. Therefore, it can be reasonably concluded that there would be no CMP impacts in the Inland Empire. For further information regarding the surface transportation analysis methodology, please see Topical Response TR-ST-2.

AL00040-67

Comment:

2. The EIS/EIR must use a 20-year planning horizon for traffic impacts, as required by Caltrans. This affects many of the EIS/EIR sections.

Response:

There is no requirement within NEPA or CEQA for a 20-year time horizon in the Draft EIS/EIR. The time horizon used in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR coincides with completion (i.e., build-out) of the LAX Master Plan. This is consistent with the requirement for traffic studies in Los Angeles.

AL00040-68

Comment:

3. The EIS/EIR must address the extension of the Metro Link Green Line to LAX Airport. What impacts would occur with the reduction of traffic to and from the LAX Airport with the Metro Link Green Line and the ability of people to utilize mass transit from the Inland Empire?

Response:

The technical transportation analysis associated with the Master Planning work has already factored in reductions in vehicular trips that would result from the extension of the Metro Green Line. Please see Topical Response TR-ST-5 regarding the rail/transit plan for more information.

AL00040-69

Comment:

Page 4-273 Paragraph 6, 2nd sentence

Provide a detailed discussion and a detailed plan as to how Alternative C would ensure lower passenger activity levels during peak commuter hours, when the airport is estimated to grow substantially and there is no real incentive to reduce flights during peak hours. What is the mechanism to ensure that Alternative C would result in lower passenger activity?

Response:

The analysis of peak activity levels for Alternative C was addressed in Section 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR.

AL00040-70

Comment:

Page 4-274 Overview, Paragraph 11

Provide a discussion of each Master Plan commitment. Explain how these 11 Master Plan commitments will be implemented and identify the funding mechanisms for each.

Response:

The Master Plan commitments for off-airport surface transportation were discussed in subsection 4.3.2.5, Master Plan Commitments, of the Supplement to the Draft EIS/EIR. Please see Response to Comment PC02220-6 regarding funding. Additional Master Plan commitments were presented in subsection 4.3.2.5 of the Supplement to the Draft EIS/EIR.

AL00040-71

Comment:

Page 4-275 Section 4.3.2.2, Paragraph 2

Please explain why the third Tier analysis discusses the Congestion Management Program impact analysis, was only done on Alternative C, when ultimately all of the alternatives are to be analyzed at the same level of detail as the Preferred Alternative, as per NEPA requirements.

Response:

The Tier III CMP analysis is not a requirement of NEPA or CEQA, but is a requirement of the Los Angeles County Congestion Management Program. The Los Angeles CMP does not require every alternative to be analyzed. A discussion of the "rules" for evaluating CMP impacts is provided in Topical Response TR-ST-2.

AL00040-72

Comment:

Page 4-275 Section 4.3.2.2, Paragraph 3

For clarity and consistency, provide separate discussions of each of the three Tiers as identified in paragraph 2, above.

Page 4-275 Section 4.3.2.2, Paragraph 6

Traditionally the a.m. peak periods is from 6:00 a.m. to 9:00 a.m. and the p.m. peak period is from 3:00 p.m. to 7:00 p.m. The highest one hour period in each of the peak periods should be analyzed. However, in this analysis 8:00 a.m. to 9:00 a.m. and 5:00 p.m. to 6:00 p.m. were assumed to be the peak hours. What type of forecasting tools are being used to evaluate peak traffic impacts, and are they consistent with other regional traffic models? Please explain the basis for this assumption.

Page 4-276 Section 4.3.2.2, Paragraph 3

As part of the assumptions for the Adjusted Environmental Baseline, what are the assumptions for regional truck traffic growth as it relates to increases in Cargo capacity?

Response:

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology which includes discussion regarding peak hours and the Adjusted Environmental Baseline. See also Topical Response TR-ST-1 regarding cargo truck traffic.

AL00040-73

Comment:

Page 4-276 Section 4.3.2.2, Paragraph 4

The No Action/No Project Alternative does not seem realistic due to the projected amount of traffic. How can LAX grow to such an extent without terminal modification and other improvements? LAX is currently struggling to meet its demand as is.

3. Comments and Responses

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 see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways and Topical Response TR-ST-4 regarding airport area traffic concerns. See also Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions.

AL00040-74

Comment:

Page 4-276 Section 4.3.2.2, Paragraph 6

Provide figures illustrating the a.m. peak hour, p.m. peak hour and airport peak hour intersection volumes for all study intersections. These figures will assist in clarifying traffic flow within the study area.

Page 4-276 Section 4.3.2.2, Paragraph 7

Provide figures illustrating the a.m. peak hour, p.m. peak hour, airport peak hour and average daily traffic (ADT) volumes for all study roadway segments, as well as travel speeds for each alternative. Provide figures illustrating the percentage of traffic on an area street that is directly attributed to airport activity. These figures will assist in clarifying traffic flow within the study area.

Page 4-276 Section 4.3.2.2, Paragraph 8

Provide figures illustrating traffic volumes along freeway mainlines. These figures will assist in clarifying traffic flow within the study area.

Page 4-276 Section 4.3.2.2, Paragraph 12

Provide project trip generation and trip distribution for Alternatives A, B and C. Projected trip distribution should be shown for airport passengers, employees, cargo/ancillary and collateral development trips. Please clarify how airport truck traffic was treated in all analysis scenarios.

Page 4-277 Figure 4.3.2-1 Off-Airport Surface Transportation Study Area

Include call-outs for Tier 3 Congestion Management Program (CMP) intersections.

Page 4-279 Section 4.3.2.2, Paragraph 1, 2nd sentence

Clarification required as it relates to the statement that "... the trip reduction benefits of the transit improvements were intentionally held to a small percent in year 2005." Quantify the trip reduction benefits of transit improvements in Year 2005. Provide supporting data to justify the increase in "average vehicle ridership" for years 2005 and 2015.

Page 4-279 Section 4.3.2.2, Paragraph 3

Clarify the modified trip distribution discussed in this paragraph. Were the trip distributions modified, based on the change in population, employment and/or travel speeds?

Page 4-279 Section 4.3.2.2, Paragraph 5

Provide trip distribution figures for collateral projects assumed in this analysis. These figures will assist in clarifying traffic flow from collateral projects within the study areas.

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. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, which includes discussion regarding trip generation, trip distribution, CMP, and transit percentage. The level of detail provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR including all technical reports and appendices, is appropriate. The remaining information requested by the commentor is beyond the scope of these program-level environmental documents.

AL00040-75

Comment:

Page 4-281 Section 4.3.2.2, Paragraph 1, 4th sentence

The sentence states, "The second comparison, to the No Action/No Project Alternative, is for informational purposes under CEQA and is the basis for the NEPA analysis." Explain the basis for limiting the NEPA analysis to a "plan to plan" rather than a comparison with existing conditions. Once again, if it is based on NEPA requirements, the No Project/No Action Alternative requires analysis of Tier 3 CMP intersections.

Response:

The No Action/No Project is the required basis of comparison under NEPA. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, which discusses the definition of baseline scenarios and incorporation of local/regional plans and programs. The CMP analysis is provided in Technical Reports 3b, Off-Airport Ground Access Impacts and Mitigation Measures, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report.

AL00040-76

Comment:

Page 4-281 Section 4.3.2.2, Paragraph 2, 2nd sentence

The EIS/EIR lacks a quantified analysis of the project's impacts upon the regional freeway and arterial system, even though the project will substantially increase peak hour trips on freeways throughout the region. Based on the data in the EIR/EIS, it is not possible to evaluate the project's impacts upon the CMP network in Los Angeles and surrounding counties.

Response:

The quantified analysis of the regional freeway and arterial system is provided in Technical Report 3b, Section 6, of the Draft EIS/EIR and Technical Report S-2b of the Supplement to the Draft EIS/EIR.

AL00040-77

Comment:

The EIS/EIR needs to provide an exhibit, as is typically done in any CEQA or NEPA document, showing the peak hour and average daily traffic on the surrounding road system, for existing (adjusted baseline), "No Project", and project scenarios.

Response:

Detailed peak hour information is provided in Technical Report 3b, Off-Airport Ground Access Impacts and Mitigation Measures, of the Draft EIS/EIR. As peak hour data is the standard metric for roadway planning and design, peak hour traffic was used in this analysis. See also Topical Response TR-ST-2 regarding peak hours and the Adjusted Environmental Baseline.

3. Comments and Responses

AL00040-78

Comment:

As discussed previously, the no project scenario should use a more realistic airport activity level given current airport constraints, and should also include reasonable improvements to serve the projected growth even in a "No Project" condition.

Response:

Base assumptions made in the No Action/No Project Alternative followed the requirements of NEPA and CEQA. The requirements of this alternative were summarized on Page 3-8 of the Draft EIS/EIR. For further information regarding the No Action/No Project Alternative, please see Topical Response TR-GEN-2.

AL00040-79

Comment:

The EIS/EIR should provide an exhibit showing peak hour and daily trip distribution (in percent) for all scenarios, including all modes of transportation (the referenced technical reports include exhibits which are unintelligible). Since the preliminary Mitigation Measures were developed for the Adjusted Environmental Baseline, potentially resulting in a more conservative mitigation plan and/or more mitigation, discuss how the "over" mitigation, as a result of more impacts, would be growth inducing.

Response:

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, which includes discussion regarding modal trip distribution. If the project were to provide more mitigation improvements than required for project-related impacts, it is believed that the traffic system as a whole would operate better.

AL00040-80

Comment:

Page 4-282 Section 4.3.2.2, Paragraph 1

This discussion is unclear. If each of the two construction phases of Alternative C were analyzed, Alternatives A and B should also include an analysis for all construction phases. Further, explain how long-term impacts (14 years) for Alternative C would be similar to other Alternatives, when Alternative A and B would have additional truck traffic beyond the fourteen -year construction phase. It is intuitive that an alternative with greater construction requirements would either require additional time to construct (extending the total duration or the length of construction during any given day), or it would require more intense construction efforts (increased truck and employee trips).

Response:

The peak hour impacts of construction traffic are very similar for Alternatives A, B, and C. The peak hour is the time frame analyzed for traffic analyses. Therefore, Alternative C was selected as representative of the construction traffic impacts of all alternatives. In Alternatives A and B, a longer portion of the 14-year construction period would include heavy construction than in Alternative C, but the peak hour impacts in Alternatives A and B are not expected to exceed the peak hour impacts of Alternative C. Also, 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 phasing.

AL00040-81

Comment:

Page 4-284 Section 4.3.2.3, Paragraph 4

Provide a table showing a.m. peak hour, p.m. peak hour and airport peak hour, existing intersection and roadway level of service and corresponding volume-to-capacity (V/C) ratio and travel speeds. Provide a graphic for a.m. peak hour and airport peak hour volumes. This table will clarify the locations of existing deficiency and provide a base for comparison to future analysis years.

Page 4-284 Section 4.3.2.3, Paragraph 5

Provide numerical labels adjacent to the traffic flow chart to clarify airport versus non-airport traffic for the a.m. peak hour, p.m. peak hour and airport peak hour.

Page 4-290 Section 4.3.2.3, Paragraph 8, 2nd sentence

The statement that the Adjusted Environmental Baseline "... presents an unrealistic view of the future condition" requires further clarification. Provide a discussion that identifies why the Adjusted Environmental Baseline is unrealistic and provide a realistic Adjusted Environmental Baseline to be utilized throughout the analysis, as per CEQA Guidelines Section § 15126. Provide additional discussion of how "LAX traffic will continue to grow", given the existing capacity of LAX and current deficiency without any terminal expansions.

Page 4-292 Section 4.3.2.5, Paragraph 8, 1st sentence, ST-13. Separation of Construction Traffic

This paragraph identifies that "Construction traffic will be separate from regular "airport" traffic by various means..." This is inappropriately vague. Provide a matrix that depicts the various means to separate construction traffic from regular "airport traffic". In addition, identify where and how the construction traffic separation would occur.

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. Tables showing existing AM peak hour, PM peak hour and airport peak hour intersection and roadway levels of service and corresponding V/C ratios are provided in Technical Report 2b of the Draft EIS/EIR. Figure 4.3.2-3 shows the PM peak hour comparison of airport and non-airport traffic. The AM and airport peak hours were not included because they are so similar to the PM peak hour that little value would be gained. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology for a discussion of the baseline scenarios. The various means to separate construction traffic from regular airport traffic are itemized in Section 7 of Technical Report 3b of the Draft EIS/EIR.

AL00040-82

Comment:

Page 4-293

The entire premise of the No Action/No Project Alternative appears flawed. This alternative does NOT present "a more realistic view", as it is not realistic to assume 125% growth in airport activity without commensurate improvements. As stated previously, it is also questionable whether or not LAX could sustain the purported levels for the "No Project" airport activity. How can LAX expand from its current 67 MAP to 78.7 MAP without terminal or airport parking improvements (page 3-25 of the EIS/EIR)? LAX is already straining to meet current demands and current levels of service, resulting in adjacent roads often approaching or exceeding LOS F.

Page 4-293 Section 4.3.2.6.1, Paragraph 1, 5th sentence

As part of providing a detailed traffic analysis for the No Action/No Project Alternative, it appears that the traffic counts were included from the LAX Northside and Continental City properties. Provide a discussion of the associated mitigation measures for these projects and identify if they were incorporated in the to future conditions analysis.

Page 4-293 Section 4.3.2.6.1, Paragraph 3

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Provide a table summarizing the level of service and corresponding V/C ratio for No Action/No Project alternative for all analysis periods. Also, provide corresponding No Action/No Project level of service graphics. Please clarify if the No Action/No Project alternative assumes any planned City of Los Angeles and/or adjacent City roadway improvements within the study area. The discussion of the No Action/No Project Alternative is incomplete and should be revised to include a discussion of impacts as they relate to Tier 2 and Tier 3 impacts.

Page 4-293 Section 4.3.2.6.1, Paragraph 5, discussion

Identify the freeway improvements that were included for the No Action/No Project Alternative and the baseline condition.

Response:

Please see Topical Response TR-ST-2 for a discussion of the baseline scenarios. There are no traffic counts from the LAX Northside and Continental City properties because both of these entitled projects are currently undeveloped. Please also see Topical Response TR-ST-2 for a discussion of the integration of the LAX Northside and Continental City entitled developments into the No Action/No Project Alternative. Additional details on the LAX Northside project are provided in Topical Response TR-ST-7. Topical Response TR-ST-4 provides additional information on these projects. The requested tables providing level of service and corresponding V/C ratio for the No Action/No Project Alternative are provided in Attachment C of Technical Report 3b of the Draft EIS/EIR for all analysis periods. The No Action/No Project Alternative includes precisely the same funded transportation improvements, including arterial and freeway improvements, that are in all the other alternatives as itemized in Table 2.4 of Technical Report 3b.

AL00040-83

Comment:

Page 4-294 Section 4.3.2.6.1, Table 4.3.2-4 Peak Hour Trip Generation of LAX Master Plan Alternatives

Table indicates total peak hour trip generation for all analysis scenarios. Provide additional information regarding inbound, outbound and ADT trip generation. For truck trips, additional discussion of PCE factors is needed. Explain why the Alternatives/Category column combined the 1996 and Adjusted Environmental Baseline Trips. Explain why the peak hour trips are reduced with the build alternatives, even though airport activity increases. Appropriate PCE factors should be incorporated into all EIS/EIR discussions regarding traffic impacts.

Page 4-295 Table 4.3.2-5 Impact of the No Action/No Project Alternative (Tier 1 Study Area, PM Peak Hour)

This Table is incomplete. Revise Table 4.3.2-5 to include a comparison of all the Alternative scenarios, in addition to a comparison with the Adjusted Environmental Baseline. Included a detailed discussion of Tier 2 and Tier 3 impacts. Table should include the analysis for a.m. peak hour and airport peak hour conditions. Analysis of other Tiers should also be included in the table.

Page 4-295 Section 4.3.2.6.2, Paragraph 1, 1st sentence

The first sentence states "All three build Alternatives would have similar improvements to ground access facilities in and around the airport. Provide a table which identifies the specific similar improvements to ground access facilities around the airport, including those assumed for the No Project/No Action Alternative.

Page 4-295 Section 4.3.2.6.2, Paragraph 1, 3rd sentence

Provide clarification regarding why the general discussion focuses on a comparison of the Alternatives future conditions to the No Action Alternative, while the analysis for determining the mitigation measures is based on the Adjusted Environmental Baseline.

Page 4-295 Section 4.3.2.6.2, Paragraph 3, 4th sentence

Paragraph 3, 4th sentence states, "Joint funding for this expressway will be pursued." Identify all expressways that require joint funding for the LAX Master Plan. Provide a discussion regarding how the joint funding will be pursued, the phasing of the funding, and implications if the funding for all identified expressways are not received.

Page 4-296 Section 4.3.2.6.2, Paragraph 2, 6th sentence

Paragraph 2, 6th sentence states that "highly congested sections of the I-405 between SR 90 and I-105 would have less airport traffic-benefitting both airport and non-airport traffic, while other sections of the I-405 and I-105 would have more airport traffic, indicating an appropriate reallocation of airport traffic." requires clarification. Explain how this re-allocation would be appropriate, if the whole area is highly congested. Indicate how and what percentage of traffic was reallocated based on the assumed improvements. It appears that this analysis re-allocates traffic on highly congested sections of the I-405 outside of the Tier 1 study area, resulting in potential significant impacts to surrounding cities in the region. Provide additional discussion of the effects of the reallocation of airport traffic outside of Tier 1.

Page 4-296 Table 4.3.2.6 Study Area Traffic Benefits of LAX Master Plan Alternatives, Year 2015.

This Table appears to misconstrue the facts so as to claim that the additional traffic generation for 2015, reallocated along freeways and arterial roadways, would provide traffic benefits. Discuss how the reallocated traffic was re-dispersed and how the reallocations of traffic within the Tier 2 Study Area would affect speeds on freeways and hours of travel within the greater County of Los Angeles area.

Response:

Please see Subtopical Responses TR-ST-2.1, TR-ST-2.2, and TR-ST-2.5 regarding Tier 1 and Tier 2 impacts, Adjusted Environmental Baseline Use, and traffic distribution, respectively. The level of detail provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, including all technical reports and appendices, is appropriate. The remaining information requested by the commentor is beyond the scope of these program-level environmental documents. Please see Response to Comment PC02220-6 regarding funding.

AL00040-84

Comment:

Page 4-299 Section 4.3.2.6.2, Paragraph 1, 3rd sentence

The statement that the "I-405 traffic increases would simply reflect the shift in traffic from adjacent surface streets, and should not be construed as an adverse impact created by the project" is misleading and inconclusive. The fact that implementation of the project would only change the dispersion of traffic within the Tier 1 Study Area seems short-sighted and does not address the cumulative impacts of the Alternatives. In addition, concentration of traffic in one area, whether or not it is due to redistribution from other areas, nonetheless constitutes a potentially significant impact warranting appropriate analysis. Per CEQA, provide a discussion of cumulative traffic impacts for each of the Alternatives that includes both the Tier 2 Study Area, and Tier 3 Study Area CMP impacts.

Response:

The analysis of each roadway segment and intersection accounted for the change in its traffic condition when comparing the project scenario to the Adjusted Environmental Baseline, regardless of the source of the traffic. Any change in traffic conditions was considered the result of the project and was mitigated accordingly. Please see Response to Comment AR00003-21 regarding cumulative impacts.

AL00040-85

Comment:

Page 4-299 Section 4.3.2.6.2, Paragraph 2, 1st and 2nd sentence

The statements that "the Master Plan would mitigate impacts, in some cases, it would improve regional traffic flow compared to conditions that would exist if the Master Plan is not developed" is

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unsubstantiated. Provide a quantitative comparison matrix of where regional reductions in volumes would occur on freeway and roadway links and where regional increases would occur.

Page 4-299 Section 4.3.2.6.2, Table 4.3.2-7 Significantly-Affected Surface Transportation Facilities Compared to Adjusted Environmental Baseline.

Since this table is a comparison to the Adjusted Environmental Baseline, the addition of Adjusted Environmental Baseline results is needed. Footnote No. 2 states "... significantly affected freeway segments and ramps are addressed and fully mitigated through the Congestion Management Program (CMP)." This statement is not true. Provide a summary of the CMP analysis, including a discussion of how the project affects passenger and truck traffic throughout the Southern California regional highway system, including the CMPs for Los Angeles, Riverside, San Bernardino and Orange counties. As part of the analysis, identify how the CMP would be affected with regard to the Adjusted Environmental Baseline.

Page 4-299 Section 4.3.2.6.2, Paragraph 5

Provide discussion indicating the total number of impacted intersections, number of impacted intersections during the a.m. peak hour, p.m. peak hour and airport peak hour for study years 2005 and 2015 for Alternative A.

Page 4-300 Section 4.3.2.6.2, Table 4.3.2-8 Year 2005 Alternative A Levels of Service (Adjusted Environmental Baseline Comparison)

Provide a column indicating the change in V/C, similar to Table 4.3.2-23, to clarify to what degree the intersections are significantly impacted. Provide additional discussion indicating that under year 2005 the level of service results are:

- 28 impacted facilities
- 25 impacted intersections
- 20 impacted intersections during the a.m. peak hour
- 15 impacted intersections during the p.m. peak hour
- 5 impacted intersections during the airport peak hour
- 3 impacted roadway segment
- 1 impacted roadway segment during the a.m. peak hour
- 3 impacted roadway segments during the p.m. peak hour

Page 4-302 Section 4.3.2.6.2, Table 4.3.2-9 Year 2015 Alternative A Levels of Service (Adjusted Environmental Baseline Comparison)

Provide a column indicating the change in V/C, similar to Table 4.3.2-23, to clarify to what degree the intersections are significantly impacted. Provide additional discussion indicating that under year 2015 the level of service results are:

- 39 impacted facilities
- 31 impacted intersections
- 24 impacted intersections during the a.m. peak hour
- 13 impacted intersections during the p.m. peak hour
- 5 impacted intersections during the airport peak hour
- 8 impacted roadway segment
- 5 impacted roadway segments during the a.m. peak hour
- 5 impacted roadway segments during the p.m. peak hour
- 1 impacted roadway segment during the airport peak hour

Page 4-305 Section 4.3.2.6.2, Paragraph 1

Provide a table showing the level of service results for the Alternative A comparison to the No Action/No Project alternative for analysis years 2005 and 2015, similar to Table 4.3.2-9. This will clarify the results of Table 4.3.2-11 indicating the impacted intersections and roadways.

Page 4-305 Section 4.3.2.6.2, Consistency with Regional and Local Transportation Plans. Paragraph 2.

Provide dates of all documents cited.

Page 4-305 Paragraph 3, 2nd sentence

For clarity, provide a matrix that provides all relevant policies in the identified transportation plans and those policies that would require amendments to reflect increased airport demand.

Page 4-305 Section 4.3.2.6.2, Table 4.3.2-10 Significantly Affected Surface Transportation Facilities compared to No/Action/No Project Alternative

Since this table is a comparison to the No Action/No Project alternative, the addition of No Action/No Project alternative results is needed.

Page 4-305 Section 4.3.2.6.2, Table 4.3.2-11, Alternative A - Affected Intersections and Street Links (2015 Compared to No Action/No Project)

This table should be expanded to indicate the single peak hour level of service (highest four consecutive 15-minute periods), V/C ratios and change in V/C ratio of Alternative A compared to the No Action/No Project alternative, to clarify what intersection and roadway segments are impacted by the proposed project.

Page 4-306 Section 4.3.2.6.2, Paragraph 1

Provide discussion indicating the total number of impacted intersections, number of impacted intersections during the a.m. peak hour, p.m. peak hour and airport peak hour for study years 2005 and 2015 for Alternative B.

Page 4-306 Table 4.3.2-11 Alternative A - Affected Intersection and Street Links (2015 - Compared to No Action/No Project Alternative)

Footnote No. 1 states, "Based on LOS comparison with the No Action/No Project Alternative." Identify which projects are included in the CMP for the No Action/No Project Alternative.

Page 4-306 Section 4.3.2.6.2, Table 4.3.2-12 Year 2005 Alternative B - Levels of Service (Adjusted Environmental Baseline Comparison)

Provide a column indicating the change in V/C, similar to Table 4.3.2-23, to clarify to what degree the intersections are significantly impacted. Provide additional discussion indicating that under year 2005 the level of service results are:

- 27 impacted facilities
- 25 impacted intersections
- 20 impacted intersections during the a.m. peak hour
- 17 impacted intersections during the p.m. peak hour
- 4 impacted intersections during the airport peak hour
- 2 impacted roadway segment
- 1 impacted roadway segment during the a.m. peak hour
- 1 impacted roadway segment during the airport peak hour

Page 4-308 Section 4.3.2.6.2, Table 4.3.2-13 Year 2015 Alternative B - Levels of Service (Adjusted Environmental Baseline Comparison)

Summarize the results of impact analysis.

- 33 impacted facilities
- 28 impacted intersections
- 23 impacted intersections during the a.m. peak hour
- 19 impacted intersections during the p.m. peak hour
- 3 impacted intersections during the airport peak hour
- 5 impacted roadway segment
- 3 impacted roadway segments during the a.m. peak hour
- 2 impacted roadway segments during the p.m. peak hour

3. Comments and Responses

- 1 impacted roadway segment during the airport peak hour

Page 4-311 Section 4.3.2.6.2, Table 4.3.2-14 Alternative B - Affected Intersection and Street Links (2015 - Compared to No Action/No Project)

This table should be expanded to indicate the peak hour level of service, V/C ratio and Change in V/C ratio of Alternative B compared to the No Action/No Project alternative to clarify what intersection and roadway segments are impacted by the proposed project.

Page 4-311 Section 4.3.2.6.2, Paragraph 2, 3rd sentence

Paragraph 2, 3rd sentence states "However, some plans may require amendments to increase airport demand." Provide a matrix identifying inconsistencies with Local And Regional Plans and potential mitigation.

Page 4-311 Section 4.3.2.6.2, Paragraph 3

Provide discussion indicating the total number of impacted intersections, number of impacted intersections during the a.m. peak hour, p.m. peak hour and airport peak hour for study years 2005 and 2015 for Alternative C.

Page 4-312 Section 4.3.2.6.2, Table 4.3.2-15 Year 2005 Alternative C - Levels of Service (Adjusted Environmental Baseline Comparison)

Summarize the results of impact analysis.

- 25 impacted facilities
- 23 impacted intersections
- 20 impacted intersections during the a.m. peak hour
- 12 impacted intersections during the p.m. peak hour
- 2 impacted intersections during the airport peak hour
- 2 impacted roadway segment
- 1 impacted roadway segment during the a.m. peak hour
- 1 impacted roadway segment during the airport peak hour

Page 4-314 Section 4.3.2.6.2, Table 4.3.2-16 Year 2015 Alternative C Levels of Service (Adjusted Environmental Baseline Comparison)

Summarize the results of impact analysis.

- 37 impacted facilities
- 29 impacted intersections
- 24 impacted intersections during the a.m. peak hour
- 20 impacted intersections during the p.m. peak hour
- 2 impacted intersections during the airport peak hour
- 8 impacted roadway segment
- 5 impacted roadway segments during the a.m. peak hour
- 6 impacted roadway segments during the p.m. peak hour

Page 4-317 Section 4.3.2.6.2, Table 4.3.2-17 Alternative C - Affected Intersection and Street Links (2015 - Compared to No Action/No Project)

This table should be expanded to indicate the peak hour level of service, V/C ratio and Change in V/C ratio of Alternative C compared to the No Action/No Project alternative to clarify what intersection and roadway segments are impacted by the proposed project.

Response:

Please see Topical Response TR-ST-2 for a discussion of mitigation, Adjusted Environmental Baseline use, relevant policies, and peak hour results. The level of detail provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, including all technical reports and appendices, is appropriate. The remaining information requested by the commentor is beyond the scope of these program-level environmental documents.

AL00040-86

Comment:

Page 4-317 Section 4.3.2.7.1, Paragraph 1

The LAX Northside and Continental City developments are anticipated to generate large amounts of construction traffic under the No Action/No Project alternative. Quantify the potential construction traffic for these developments and clarify whether these developments are assumed in Alternatives A, B and C.

Page 4-318 4.3.2.7.1, Paragraph 1, 3rd sentence

Paragraph 1, 3rd sentence states, "Because there are no adopted policies for those projects that would control traffic generation during peak periods, it is likely that substantial traffic would be generated during peak periods of the day, compounding the existing traffic congestion around the airport." Identify the worst-case traffic generation for the identified projects mixed with the potential increased construction truck traffic for each of the surrounding projects and alternative projects.

Page 4-318 4.3.2.7.2, Paragraph 4, 1st sentence and Table 4.3.2-18 Phasing Plan

Paragraph 4, 1st sentence states that "The general construction concept is to have many of the transportation improvements completed within the first five years after construction begins." Provide a discussion of the five years of phased mitigation and how those actions relate to the funding for the project. As per Table 4.3.2-18 Phasing Plan, a substantial amount of construction is proposed over a nine-year period. Provide a Phased Mitigation Plan for the nine-year construction efforts and estimated funding for those actions.

Page 4-319 Section 4.3.2.7.2, Paragraph 7

This discussion assumes that the truck trips would occur seven days a week, twenty hours a day, for fourteen years. First, identify all sensitive receptors for all truck routes and secondary alternative routes in the event accidents were to occur on the primary routes. Second, provide the passenger car equivalent analysis of truck traffic generation and impacts to LOS, given that the construction will occur over a fourteen-year period.

Page 4-320 Section 4.3.2.8, Paragraph 1, 6th sentence

The statement that "... however, cumulative impacts for construction activities on the off-airport surface transportation system would still be significant and temporarily unavoidable." Is unsubstantiated. The only cumulative project identified in this discussion that would result in additional disruptions to the proposed truck routes during the fourteen-year construction effort is Playa Vista, as cited on page 4-318, paragraph 1, that states "It is likely that many of the same haul routes that are anticipated for the LAX Master Plan would also be used for the LAX Northside and Continental City projects..." further identifies the potential additional delays and re-routing of trucks, resulting in additional impacts to the area, beyond just the Playa Vista project. Provide a matrix which identifies all potential cumulative projects that would utilize the proposed LAX Master Plan truck routes. In addition, provide a phased mitigation plan to address the cumulative construction impacts.

Response:

The LAX Northside and Continental City projects are included only in the No Action/No Project Alternative, because these properties would be used for other purposes in the project alternatives. The construction traffic generated by these alternative uses in Alternatives A, B, and C was included in the analysis of those alternatives.

The construction impacts of the LAX Northside and Continental City developments were addressed in the environmental impact reports for those developments. The level of detail included in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR is sufficient to address environmental impacts and mitigations per CEQA and NEPA. However, more detailed detour/haul route plans would be prepared for each project prior to implementation.

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The analysis focused on the peak period of construction traffic, since that would account for the maximum impacts due to construction. The off-airport surface transportation analysis did account for passenger car equivalents of trucks.

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.

AL00040-87

Comment:

Page 4-321 Section 4.3.2.9.1, Table 4.3.2-I 9 Year 2005 Alternative A - Mitigation Plan (Adjusted Environmental Baseline Comparison)

Since this table compares the Adjusted Environmental Baseline to Alternative A Mitigation Plans level of service, the table should include the Adjusted Environmental Baseline and Alternative A without mitigation level of service, similar to Table 4.3.2-23. This will clarify whether the recommended mitigation is sufficient to mitigate the forecast significant impacts.

Currently LADOT uses two traffic control technologies in ATSAC system. Please specify whether the ATSAC/UTCS or ATSAC/ATCS is recommended as mitigation measures.

The intersections of Aviation/Century, I-405 NB Ramps/La Tijera and I-405 SB Ramps/La Tijera were not impacted under Alternative A Year 2005 scenario. Please clarify why mitigation measures are recommended. The intersections of Centinela/Jefferson, Sepulveda/Centinela, La Cienega/ Florence, Lincoln/Jefferson and the roadway link of Venice south of Venice state that no additional mitigation is necessary. Please clarify how the V/C ratio improves at these locations without mitigation. What if any mitigation were recommended at these impacted locations?

The intersections of Aviation/Rosecrans, Lincoln/La Tijera, Sepulveda/La Tijera, Lincoln/83rd Lincoln/Manchester and Sepulveda/Manchester remain impacted after implementation of the mitigation measure.

The intersections of Aviation/Century, Aviation/El Segundo and La Cienega/Century are new impacted intersections. Please explain how these intersections are now impacted.

Page 4-323 Section 4.3.2.9.1, Table 4.3.2-20 Year 2015 Alternative A Mitigation Plan (Adjusted Environmental Baseline Comparison)

Since this table compares the Adjusted Environmental Baseline to Alternative A Mitigation Plans level of service, the table should include the Adjusted Environmental Baseline and Alternative A without mitigation level of service, similar to Table 4.3.2-23. This will clarify if the recommended mitigation is sufficient to mitigate the forecast significant impacts.

The intersection of Aviation/El Segundo and roadway segment of Centinela west of Sepulveda were not impacted under Alternative A Year 2015 scenario. Please clarify why mitigation measures are recommended.

The intersections of La Cienega/Florence and I-405 NB Ramps/Imperial and the roadway links of Lincoln south of Venice and Centinela south of Venice state that no additional mitigation necessary. Please clarify how the V/C ratio improves at these locations without mitigation. What if any mitigation were recommended at these impacted locations.

The intersections of Lincoln/Teale and Pershing/Manchester remain impacted after implementation of the mitigation measure.

Page 4-325 Table 4.3.2-20 Year 20015 Alternative A - Mitigation Plan (Adjusted Environmental Baseline Comparison)

Footnotes 123 and 124 identify mitigation measures that include the implementation of ATSAC and ATCS. Discuss the effectiveness of these mitigation measures. The EIS/EIR needs to quantify the effectiveness and feasibility of all mitigation measures, especially related to traffic, since there are traffic models readily available to quantify whether or not the mitigation will be effective or feasible are measured. The mitigation measures appear more of a Black Box solution.

Page 4-326 Section 4.3.2.9.2, Table 4.3.2-21 Year 2005 Alternative B - Mitigation Plan (Adjusted Environmental Baseline Comparison)

Since this table compares the Adjusted Environmental Baseline to Alternative B Mitigation Plans level of service, the table should include the Adjusted Environmental Baseline and Alternative A without mitigation level of service, similar to Table 4.3.2-23. This will clarify if the recommended mitigation is sufficient to mitigate the forecast significant impacts.

Currently LADOT uses two traffic control technologies in ATSAC system. Please specify if the ATSAC/UTCS or ATSAC/ATCS is recommended as mitigation measures.

The EIS/EIR roadway links of Sepulveda south of Venice and Lincoln south of Jefferson require no additional mitigation. Please clarify how the V/C ratio improves at these location without mitigation. What if any mitigation were recommended at these impacted locations.

The intersection of La Cienega/Arbor Vitae remains impacted after implementation of the mitigation measure.

Page 4-328 Section 4.3.2.9.2, Year 2015 Alternative B - Mitigation Plan (Adjusted Environmental Baseline Comparison)

Since this table compares the Adjusted Environmental Baseline to Alternative B Mitigation Plans level of service, the table should include the Adjusted Environmental Baseline and Alternative A without mitigation level of service, similar to Table 4.3.2-23. This will clarify whether the recommended mitigation is sufficient to mitigate the forecast significant impacts.

Currently LADOT uses two traffic control technologies in ATSAC system. Please specify if the ATSAC/UTCS or ATSAC/ATCS is recommended as mitigation measures.

The intersection of Pershing/Westchester and the roadway links of Centinela south of Venice state that no additional mitigation necessary. Please clarify how the V/C ratio improves at these location without mitigation. What if any mitigation were recommended at these impacted locations.

The intersection of Lincoln/La Tijera remains impacted after implementation of the mitigation measure.

The intersection of Pershing/Manchester is a new impacted location. Please explain how these intersections are now impacted.

The intersections of Aviation/El Segundo, La Cienega/Florence, La Cienega/Manchester and La Tijera/Manchester indicate that the 2005 mitigation is temporary. Clarify what mitigation measure is recommended for Year 2015.

Page 4-331 4.3.2.10 Level of Significance After Mitigation, discussion

The discussion of interim conditions identifies that the impacts would be fully mitigated by the proposed improvements that would be completed after 2005, but before 2015. This analysis includes an interim period of ten years, from 2005 to 2015. Does the interim period analysis identifying intersections operating at a LOS D or better include all 15 years of construction? Explain how the interim period, resulting in a LOS D or better at intersections, is affected by the cumulative construction traffic. Does the EIS/EIR consider the combined effect of ongoing construction traffic over fourteen years with the phased-in expansion of the airport (i.e., the Year 2005 operating year will be in effect during periods of major construction, and construction will still be proceeding as LAX approaches its 2015 horizon year)?

3. Comments and Responses

Page 4-331 Section 4.3.2.10.1, Paragraph 1

Specify the intersections with significant impacts that would be temporarily unmitigated. Provide summary of 2015 conditions after mitigation.

Page 4-332 Section 4.3.2.10.2, Paragraph 1

Specify the intersections with significant impacts that would be temporarily unmitigated. Provide summary of 2015 conditions after mitigation.

Page 4-332 Sections 4.3.2.10.3, Paragraph 1

Specify the intersections with significant impacts that would be temporarily unmitigated. Provide summary of 2015 conditions after mitigation.

Page 4-333 Section 4.3.2.9.3, Table 4.3.2-23 LADOT Level of Service Analysis, Alternative C 2005

The intersections of Aviation/Arbor Vitae, La Cienega/Arbor Vitae, Lincoln/Jefferson, Vista Del Mar/Grand, Lincoln/Marina Expressway, Airport/Arbor Vitae, Sepulveda/ Mariposa, Lincoln/Venice, Aviation/Imperial, I-405 NB Ramps/Jefferson, La Cienega/Century, Lincoln/Manchester, Sepulveda/Imperial and Lincoln/ Washington remain impacted after implementation of the mitigation measure. Provide roadway analysis for year 2005 Alternative C similar to Alternatives B and C.

Page 4-340 Section 4.3.2.9.3, Table 4.3.2-24 LADOT Level of Service Analysis, Alternative C 2015

The intersections of Lincoln/Jefferson, Lincoln/Manchester, Lincoln/Teale, Sepulveda/Mariposa, Lincoln/Marina Expressway, La Cienega/Arbor Vitae, Sepulveda/Imperial, La Cienega/Century, Lincoln/La Tijera and Sepulveda/La Tijera remain impacted after implementation of the mitigation measure. Provide roadway analysis for year 2015 Alternative C similar to Alternatives B and C.

Table 4.1

This and all tables in the EIS/EIR should clearly indicate the geographic area represented by the table (i.e., Tier 1, Tier 2, Tier 3, etc.). The EIS/EIR should provide a similar table addressing regional impacts of the project.

Response:

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, in particular Subtopical Response TR-ST-2.7 regarding ATSAC, ATCS, and mitigation. Also, please see Topical Response TR-ST-3 regarding construction traffic. The level of detail provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, including all technical reports and appendices, is appropriate. The remaining information requested by the commentor is beyond the scope of the program-level EIS/EIR.

AL00040-88

Comment:

Table 4.3

The EIS/EIR inappropriately compares the project impacts to the No Action/No Project Alternative, which artificially reduces the project's incremental impact. The EIS/EIR should provide as detailed a comparison, or more so, with the Adjusted Environmental Baseline as with the No Action/No Project Alternative.

Response:

As described in Chapter 3, Alternatives, of the Draft EIS/EIR and the introduction to Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the environmental baseline and, for certain topics, the Adjusted Environmental Baseline were used as the basis for comparison in determining the impacts of each alternative under CEQA, and

the No Action/No Project Alternative was used as the basis for comparison in determining impacts under NEPA.

AL00040-89

Comment:

Tables 4.5-5.7

The EIS/EIR should address regional impacts in these tables.

Airport Trip Distribution Figures:

These figures, presumably intended to allow the reader to understand the geographic distribution of project-related trips, does not provide valuable information. See comments on Page 4-281.

Technical Report - LAX Master Plan EIS/EIR
2b. Off-Airport Surface Transportation, January 2001

Page II-7.29 Section 7.3.1.3 LAX Cargo and Ancillary Trips, Paragraph 1

This discussion does not identify the truck mix assumed. Provide a list of the truck mix percentages utilized.

Page II-7.33 Section 7.3.2.1 Location of Survey discussion

This discussion identifies that the surveys were conducted during March, 1995. Why was this timeline chosen, when the Airport Peak as identified on page I I-7.6 is in August?

Page II-7.33 Section 7.3.2.2 Methodology

The methodology is flawed. The survey is based on field crews counting motorists who give either a "thumbs up or thumbs down". Provide a discussion as to what alternative survey methods were explored and the degree of certainty that this information is indeed a true representation of what is occurring.

Response:

Please see Topical Response TR-ST-1 regarding cargo truck traffic. The level of detail provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, including all technical reports and appendices, is appropriate. The remaining information requested by the commentor is beyond the scope of these program-level EIS/EIR.

AL00040-90

Comment:

Page III-5 E. Other LAX Property Zones, Paragraph 4

As part of the vehicle classification survey, 25% of the traffic at LAX is comprised of trucks. Of those trucks, provide the percentage of 2-axle, 3-axle, and 4-axle trucks. The PCE factor of 2.0 is unrealistically low, due to the fact that LAX is a large cargo airport and a substantial percentage of cargo requires distribution outside the immediate area, requiring larger trucks. The PCE must be revised to reflect a more realistic PCE of 2.5 to 3.0 to reflect the larger trucks.

Response:

The use of a PCE of 2.0 is the standard default value recommended by the Highway Capacity Manual (HCM2000: Transportation Research Board). To be consistent with accepted industry standards, it was important that information from the HCM be used whenever appropriate. Also, a standard PCE of 2.0 was deemed appropriate based on research done at the inception of the technical work for the LAX Master Plan and under the advisement of a Technical Review Group. While there are larger trucks operating in the LAX area that transport cargo to and from distant areas, there are also substantial

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percentages of small and mid-sized trucks operating in the area, including those that can be loaded/unloaded more quickly and efficiently due to their comparatively smaller size and ability to move more efficiently through urban roadway systems. It should be noted, relative to cargo truck trips and impacts, that Alternative D is designed to serve a future (2015) cargo activity level of approximately 3.1 million annual tons, which is the same as under the No Action/No Project Alternative. As such, cargo truck impacts under Alternative D would be less than those of the other build alternatives.

AL00040-91

Comment:

Page VIII-1 A. LAX Ground Access Model Update, Paragraph 1, 3rd sentence

Cite the document and date of the Table utilized for the State Highway VMT growth for Caltrans. Explain why SCAG's RTP information was not utilized.

Page VIII-1 Paragraph 4, 1st sentence

Explain why a full recalibration of the model was not performed. The model is flawed due to the fact that it does not reflect the existing conditions for the 1996 Study Area condition.

Technical Report - LAX Master Plan EIS/EIR
3b. Off-Airport Ground Access Impact and Mitigation Measures, January 2001

Page 1-3 Section 3-1, Paragraph 1 discussion

Provide a discussion of the market share included from SCAG's regional transportation model and its mode choice component.

Page 2-1 Section 2.1, Paragraph 6

Provide a table showing all 61 study intersections and specify which study area the intersection is located in. Also provide a similar table showing all study roadway segments and the corresponding study area.

Page 2-1 Section 2.2, Paragraph 1, 3rd sentence

This sentence identifies the traffic model to be calibrated to 1994 data then updated so that its estimates of existing conditions now reflect 1996 peak hour conditions. The LAX Master Plan, Section 4.7 Off-Airport Ground Transportation, page 1-4.10 states, "Off-airport transportation facilities were analyzed for existing (1994) conditions." Clarify which baseline condition year is being applied and confirm that the 1996 peak hour conditions were utilized for all model runs.

Response:

Please see Topical Response TR-ST-2 regarding SCAG's regional model and model calibration. The level of detail provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, including all technical reports and appendices, is appropriate. The remaining information requested by the commentor is beyond the scope of these program-level EIS/EIR.

AL00040-92

Comment:

Page 2-1 Section 2.2 Forecasting Procedures, Paragraph 4, 6th sentence

This sentence states that, "Trucks were converted into Passenger Car Equivalents (PCEs) using a factor of 2.0 PCEs per truck. The traffic model is flawed with the inclusion of the under represented PCE of 2.0. LAX is estimated to accept 3.2 million tons of Air Cargo under the No Action/No Project Alternative and 4.2 million tons under Alternative C. This substantial amount of cargo will require a substantial amount of large trucks (18 to 20 wheels) to disperse the cargo. These large trucks under

general transportation guideline are at PCEs of 2.5 to 3.0. Revise the models to reflect the more realistic PCE of 3.0 and provide the truck mix proposed for the traffic model.

Response:

Please see Response to Comment AL00040-90 regarding PCEs.

AL00040-93

Comment:

Page 2-2 Section 2.3, Paragraph 3

Discuss the procedures regarding how the SCAG forecasts for population, housing, and employment (1996) forecasts were disaggregated to fit the smaller zones in the Study Area.

Page 2-3 Section 2.3 Paragraph 1

Provide detailed trip generation and assumed trip generation assignment for the planned development projects that were added to the background traffic.

Page 2-3 Section 2.4, Paragraph 1

Provide additional discussion clarifying if future planned improvements were assumed for all alternatives.

Page 2-12

Substantiate the use of 2.0 as a PCE factor. The factor used in the EIS/EIR appears low. Provide a comparison/analysis of other PCE factors, such as those developed through SCAG's heavy-duty truck model.

Page 2-16 Section 2.4, Transit Improvement, discussion

As part of the "Tiered" approach, identify whether the Metro Green Line extension to LAX was incorporated for future 2015 for the No Action/No Project Alternative.

The Alternatives Under Study discussion for Alternatives A, B and C all include light rail Metro Green Line direct service to LAX. Explain why the extension of the Metro Green Line was not included in the No Action/No Project Alternative, when Table 2.4, Anticipated Expansion of Transit Services for Year 2005 and 2015 for LAX Study Area identifies the Metro Green Line as possible with the added capacity.

Table 2.3

Are all of these included with the No Action/No Project Alternative?

Table 2.5

Defend use of the indicated thresholds for facilities that are already exceeding their theoretical capacity (LOS F).

Page 2-19

Significance Threshold discussion Explain the basis for the freeway mainline and ramp significance thresholds, and provide a graphic indicating where project-related traffic drops off to below these thresholds (based on the increment between the adjusted environmental baseline and a worst-case scenario project, as noted in other comments).

Page 3-1 Paragraph 9, 2nd sentence

The EIS/EIR Attachments do not include a copy of the LAX Ground Access Model Calibration and Validation Report (September 30, 1998). Provide a copy of this report.

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Page 3-1 Paragraph 10, 2nd sentence

The statement that "The Master Plan of Alternatives reduce the overall vehicular trips associated with the project" is unsubstantiated. Explain how the Alternatives that have substantial increases in MAP and cargo, result in reductions in the overall vehicle trips. What was the percentage reduction of vehicular trips as a result of the incorporation of the Metro Green Line?

Page 3-1 Paragraph 10

Explain how Alternative C has only 4,656 collateral trips in 2015 without land acquisition, while the No Action/No Project Alternative doubles to 12,479 in 2015. It appears that Alternative C includes a double reduction in collateral trips as a result of land acquisition, which should have been included as part of the initial calculations. The growth factor for Alternative C, prior to land acquisition in 2005, is substantially lower. This analysis seems to arbitrarily increase the No Action/No Project Alternative collateral trips. In addition, what mechanisms are in place to guarantee that the land acquisitions are to occur?

Page 3-1 Section 3, Paragraph 10

It seems unrealistic that the No Action/No Project alternative would have a higher trip generation than Alternatives A, B and C, given the current demands on LAX and the current congestion in and around the airport with no capacity improvements planned.

Page 3-6 Sections 3, Table 3.1 Trip generation of LAX Master Plan Alternatives

Typically a trip generation table shows ADT trip generation assumptions. This assists in determining the effects of the project on the roadway links. Were PCE factors assumed in this trip generation table. Provide discussion of trip distribution assumptions for all alternatives.

Page 3-9 Section 3.2, Paragraph 1

It seems unrealistic that under No Action/No Project alternative that LAX can sustain the growth projections give the current conditions in and around LAX. LAX is already struggling to meet current demand.

Page 3-9 Section 3.2, Paragraph 1, 3rd sentence

Explain why there are no Capital Improvements included in the No Action/No Project Alternative. Revise Table 4.1 Existing and Future Transportation Deficiencies RTP Background Assumptions to reflect 2015 No Action/No Project Alternative with proposed Capital Improvements incorporated.

Page 3-9 Section 3.3, Paragraphs 5 and 6

Additional discussion is needed to explain the potential reduction in traffic in Alternative A compared to the No Action/No Project alternative. Explain why under Alternative A the airport peak has increased, while the a.m. peak hour and p.m. peak hour traffic decreases.

Page 3-9 Section 3.4, Paragraph 2

Additional discussion is needed to explain the potential reduction in traffic in Alternative B compared to the No Action/No Project alternative.

Page 3-10 Section 3.5, Paragraph 2

Additional discussion is needed to explain the potential reduction in traffic in Alternative C compared to the No Action/No Project alternative.

Page 3-10 Section 3.6, Paragraph 1

Provide percent trip distribution assumptions for all alternatives.

Page 6-1 Table 6.1 Project Trip Generation For 2015 CMP Analysis

Explain how Vehicle Trip Ends were derived. The numbers reflected in Table 6.1 for Vehicle Trip Ends are not consistent with Table 3.1 Trip Generation of LAX Master Plan Alternatives trips.

Page 6-1 Section 6.1, Table 6.1 Project Trip Generation for 2015 CMP Analysis

A comparison between Table 3.1 and Table 6.1 shows some inconsistencies. Based on footnote No. 1 in table 3.1, all trips shown are in vehicles trips. The trip generations for Alternative C in Table 3.1 do not match the vehicle trips shown in Table 6.1 for Alternative C. These numbers in Table 3.1, however, do match the PCE trips in Table 6.1. Clarification is needed to determine which trip generation numbers are correct. Provide a discussion of how the Daily Trip factor of 4.6 was derived.

Page 6-3 Table 6.2 Master Plan (Alternative C) Impacts on CMP Arterial Segments and Freeways 2015 No Action/No Project Baseline Assumptions

Attachment G, Supplemental Information, has excluded a Table for Alternative C Weekday AM Peak Hour Levels of Service for Freeway Segments. Provide this Table. Why was Alternative C Weekday PM Peak Hour Levels of Service for Freeway Segments added to the 2015 No Action/No Project Alternative 2015 counts? Explain why Attachment G, Alternative C Weekday PM Peak Hour Level of Service For Freeway Segments utilized demand/capacity ratio, when the CMP significance criteria is based on a volume/capacity ratio.

Page 6-3 Table 6.2 Master Plan (Alternative C) Impacts on CMP Arterial Segments and Freeways 2015 No Action/No Project Baseline Assumptions

Discuss the relationship between the Freeway Mainline segments identified within Figure 2-1 and Attachment G, 2015 Phase 3F: Alternative C Weekday PM Peak Hour Levels of Service for Freeway Segments. As part of the CMP, transportation impacts are identified wherever an increase exists in volume/ capacity ratio of 0.02 or greater, among other requirements. Table 6.2 exceeds this ratio for Project Impacts at I-10 SB/WB-Lincoln and I-405 SB/WB n/o Venice. Explain why these two segments were not identified as impacted segments.

Page 6-4 Transit Corridor Capacity, Paragraph 1

Provide the analysis conducted to determine transit corridor capacities within the Study Area.

Page 6-4 Paragraph 1, discussion

Explain why transit demand would increase with the development of all the Alternatives, when Alternatives A, B, and C would increase traffic efficiency and additional parking. Why were no plans identified to extend the Metro Green Line to the east terminal?

Page 211

Table 2015 Phase 3F No Action/No Project Alternative (With Final Mitigation) Weekday Peak Hour Levels of Service For Freeway Mainline Segments

A comparison of the 2015 Phase 3F (With Final Mitigation) Weekday Peak Hour Levels of Service For Freeway Mainline Segments for the No Action/No Project Alternative and Alternative C reveals that the No Action/No Project Alternative will have a total of 5-link segment directions operating at a less efficient LOS, while development of Alternative C will impact a total of 9-link segment directions. Explain why Alternative C with (mitigation incorporated) has greater impacts on freeway links, although 3b Off-Airport Ground Access Impacts and Mitigation Measures, page 3-1, states that, "The Master Planned Alternatives reduce the overall vehicular trips associated with the Project".

Response:

Please see Topical Response TR-ST-1 regarding cargo truck traffic, Topical Response TR-ST-2 regarding SCAG's regional model and model calibration, Topical Response TR-ST-5 regarding the rail/transit plan, and Topical Response TR-ST-4 regarding airport area traffic concerns. The level of detail provided in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, including all technical reports

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and appendices, is appropriate. The remaining information requested by the commentor is beyond the scope of these program-level EIS/EIR.

AL00040-94

Comment:

ENVIRONMENTAL JUSTICE

General Comments

1. The EIS/EIR fails to consider Environmental Justice issues outside the narrowly defined limits of the LAX area. As set forth in our introductory comments and in other areas, the EIS/EIR does not address project-related impacts to minority and low-income populations outside of the immediate study area. Due to the project's significant traffic, air and noise impacts, the EIS/EIR must be revised and recirculated to address Environmental Justice impacts to populations in the Inland Empire.

Response:

As stated on page 4-402, in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the study area for the analysis is defined as the area in which the collective environmental effects of the Master Plan alternatives would be likely to occur, extending beyond the areas adjacent to LAX to include those areas potentially affected by aircraft noise (defined by the future 65 dB CNEL noise contours) and aircraft or airport-related emissions, as well as airport-related traffic impacts, including congestion, noise and air pollution. Although specific analyses of environmental justice concerns in the Inland Empire is outside of the scope of the LAX Master Plan EIS/EIR, see pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as appropriately analyzed in the Southern California Association of Government (SCAG) Regional Transportation Plan and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Also note that LAWA Staff's new preferred alternative, Alternative D, limits future (2015) growth at LAX to levels similar to what would occur with existing facilities if the LAX Master Plan were not approved. Alternative D reduces growth at LAX compared to the other build alternatives, potentially shifting the burden of airport expansion to other regional airports, including airports in the Inland Empire. To the extent that other regional airports undertake expansion plans, these plans would be subject to environmental review and would address environmental justice issues pursuant to NEPA and/or CEQA as applicable. 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, and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00040-95

Comment:

2. The EIS/EIR inappropriately defers mitigation to a later stage. Although FAA review may not be complete, the lack of significance determinations, the "preliminary findings" and lack of a specific mitigation program renders the EIS/EIR section of little value.

Response:

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. While mitigation measures were accounted for and discussed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the reason the section 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 minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

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.

AL00040-96

Comment:

3. Although the EIS/EIR pays procedural respect to listing the existing conditions, the majority of the tone and analysis focuses on a comparison with the No Action/No Project Alternative. As stated in other areas of this letter, this inappropriately reduces the incremental impact of the project, and creates the impression of "reduced impacts" in comparison to a non-existent No Action/No Project Alternative (a "plan to plan" analysis).

Response:

Please see Response to Comment AL00040-88 regarding the basis for assessing impacts of each alternative under CEQA and under NEPA.

AL00040-97

Comment:

Page 4-396 Air Quality and Health Effects, Paragraph 1, 3rd sentence

The third sentence states that there was a "lack of available background data and limited information on the cumulative effects of multiple air pollutants." However, numerous comprehensive epidemiological studies are available regarding this information, including MATES-II which is cited elsewhere in the EIS/EIR. Additional background data is available from SCAQMD, SCAG and numerous public interest groups, including the Communities for a Better Environment (CBE). In addition, Census 2000 data is now available, and should be utilized to identify whether or not other Environmental Justice populations outside of the study area would be impacted, particularly with respect to the Inland Empire. Contrary to the EIS/EIR implications that the cumulative impact cannot be quantified, there are several analytical tools available to quantify this impact based on project-generated traffic volumes and projected freeway conditions from Caltrans and others.

Response:

Please see Response to Comment AL00017-190. Further, the Supplement to the Draft EIS/EIR included updated census 2000 information.

AL00040-98

Comment:

This analysis should consider the increased traffic, air quality and noise impacts due to LAX not complying with SCAG's regional airport strategy, resulting in increased trip lengths, slower travel

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speeds, and increased through traffic on local highways and freeways to reach LAX rather than other regional airports such as Ontario.

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. Additional information concerning the role of the LAX Master Plan as a regional component of the air transportation network can be found in Topical Response TR-RC-1. A discussion of the LAX Master Plan as it relates to the SCAG Regional Transportation Plan can be found in Topical Response TR-MP-2.

AL00040-99

Comment:

Page 4-404 Figure 4.4.3-2 Minority Census Tract Within the Study Area

This figure appears to have arbitrary boundaries and only assesses the communities that are within the flight path of LAX. Please provide a new exhibit which depicts minority and low income populations surrounding all of the areas which will be impacted by the implementation of the LAX Master Plan, including populations that would be impacted in the Inland Empire due to increased traffic, air quality and noise impacts. This graphic should also provide the percentages of all surrounding populations based on race and income.

Response:

Please see Response to Comment AL00040-94 regarding the study area selection. Regarding data on race and income, this information was provided in Table 3, Appendix F of the Draft EIS/EIR and in Tables S-2 and S-3 of Appendix S-D 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 and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

AL00040-100

Comment:

Page 4-412 Aircraft Noise/Land Use

When comparing Figure 4.4.3-8, No Action/No Project Alternative, and Figure 4.4.3-7, Alternative C, the two graphics appear very similar in regards to the 2015 noise contours. However, under the description of Alternative C, three runways would be lengthened and one would be widened. These noise contours appear to be inconsistent with the description of the proposed project. Please explain how these two noise contours can appear to be so similar when the No Project Alternative would clearly have shorter runways and fewer flights.

Response:

An overlay of the 65 CNEL noise contours under Alternative C 2015 compared to the No Action/No Project Alternative was presented in Figure 4.2-23 of the Draft EIS/EIR. Overall, the noise contours projected to occur under the No Action/No Project Alternative and Alternative C in 2015 are nearly identical since the number of aircraft operations are nearly the same under both alternatives. As shown on Figure 4.2-23, the shift in the north contour leading to the north runway complex reflects changes to the north runway complex proposed under Alternative C and presented in Table 3-4 of the Draft EIS/EIR. The north contours under Alternative C are slightly longer than those of the No Action/No Project Alternative, reflecting the slight shift of the east end of the runway. Other variations in the contour patterns are associated with the distribution of aircraft among the north and south runway complexes between the two cases.

Please also see Subtopical Response TR-N-3.3 regarding effects influencing changes in noise contours.

AL00040-101

Comment:

Additionally, explain how these noise contours for Alternative C are not extended in the areas where the runways are proposed to be lengthened, as this extension would accommodate larger cargo/passenger aircraft which would create more noise.

Response:

Please see Topical Response TR-N-3, in particular Subtopical Response TR-N-3.3, regarding effects influencing changes in noise contours and Topical Response TR-N-6 , in particular Subtopical Response TR-N-6.3, regarding larger aircraft and noise.

AL00040-102

Comment:

Page 4-427 Relocation of Residences or Businesses

According to the statistics provided in the EIS/EIR, Executive Summary, minority/low income residents of 57 single family dwelling units and 89 multiple family dwelling units would be relocated. However, according to page 4-427, Relocation of Residences or Businesses, approximately 172 residents in 84 dwelling units located in Census Tract 2780 would require relocation. Census Tract 2780 does not include residents of Manchester Square and the Airport Belford area who are eligible for relocation under the existing ANMP. Please explain the discrepancy between the numbers of relocated units and include the Manchester Square and Airport Belford residents.

Response:

Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR (page 4-380), discussed acquisition within the Manchester Square and Belford areas and indicated that it is proceeding under an existing voluntary acquisition and relocation program. Therefore, the acquisition numbers were discussed under the No Action/No Project Alternative rather than for Alternatives A, B, and C, because this program is independent of the LAX Master Plan. On page ES-10, in the Executive Summary of the Draft EIS/EIR, the listing of 89 multiple family dwelling units proposed for acquisition under Alternative C, is in error, the correct number is 27 as indicated in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR. This error has been corrected, as shown on page ES-31 of the Supplement to the Draft EIS/EIR.

AL00040-103

Comment:

Additionally, minorities might not always have the financial means to relocate within their community as the cost of housing within the area has increased significantly; therefore, this action would place a significant financial burden on these individuals. Please provide an analysis that would assess the economic impacts associated with the probability of dislocated families to purchase housing in the same vicinity. In addition, provide a discussion regarding the availability for dislocated families of multiple family dwelling units to relocate in the same vicinity at a similar cost.

Response:

Please see Section 4.4.2.5, Relocation of Residences or Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and Master Plan Commitment RBR-1, which indicated that the plan would be implemented in compliance with the Uniform Act, state and local regulations, and FAA Advisory Circular 150/5100-17. Among other objectives, the commitment ensures that: no residential occupant would be required to move until comparable decent, safe and sanitary housing is made available; the relocation process does not result in different or separate treatment because of race, religion, national origin, gender, marital status, or other arbitrary circumstances; and, the unique needs

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of minority and low-income persons and businesses are addressed, including the provision of assistance and materials in Spanish and other languages as necessary. With these provisions and the housing availability described in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, it is expected that comparable housing would be found for relocated residents within reasonable proximity to LAX. Also note, LAWA Staff's new preferred alternative, Alternative D, does not propose residential acquisition.

AL00040-104

Comment:

AIR QUALITY

General Comments

1. The EIS/EIR lacks any meaningful discussion of the project's off-site air quality impacts, except for a narrowly defined area in the immediate vicinity of LAX. The proposed project will have a direct effect on the number and nature of truck trips throughout the LA basin. In fact, LAWA's proposal to exceed SCAG's recommended service level of 78 MAP will result in increased truck and passenger vehicle trips and associated air emissions, due to passengers and cargo having to travel farther to LAX as opposed to local area airports. The EIS/EIR inappropriately dismisses the projects effects upon stifling expansion potential at other regional airports. Therefore, the EIS/EIR must be revised and recirculated to provide a quantitative analysis evaluating the regional air quality impacts of the project, including evaluation of elevated diesel emission and criteria pollutant levels at sensitive receptors along the regions major transportation network (freeways). The analysis should specifically address a comparative analysis of local air quality impacts within the Inland Empire associated with project-related passenger and truck trips, including an evaluation of the project alternatives and a regional airport strategy relying more heavily on local submarket airports (Ontario International Airport, San Bernardino International Airport, March Air Reserve Base, Southern California Logistics Airport and Palm Springs Regional Airport).

Response:

Regional off-airport emissions were calculated for the entire South Coast Air Basin in Section 4.6, Air Quality, of the Draft EIS/EIR and have been revised using the most currently available EMFAC2002 emissions model as described and presented in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-RC-1 regarding the role of the LAX Master Plan in the regional approach to meeting demand and Topical Response TR-ALT-1 regarding the range of alternatives studied for the LAX Master Plan.

AL00040-105

Comment:

2. The EIS/EIR fails to address health risks associated with diesel emissions and air toxics generated by the project, and for areas located outside of the immediate LAX area (Inland Empire).

Response:

Diesel exhaust, in the form of particulate matter (PM), is evaluated as a toxic air pollutant (TAP) of concern in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR, using the approach presented by SCAQMD in the MATES-II study. Please refer to Section 3.6, Evaluation of Diesel Exhaust as a TAP of Concern, of Technical Report 14a, of the Draft EIS/EIR. To estimate risks associated with diesel, the evaluation considered diesel exhaust from ground sources only. Diesel exhaust is emitted from several ground sources, predominately trucks and buses. Jet aircraft use a lighter fuel and a substantially different combustion process than diesel engines. The result is dramatically lower emissions of particulates in exhaust, and much different toxicological properties. Relatively little is currently known about the actual toxicity or PM present in jet exhaust. Because of differing fuels, very different combustion processes in jet engines and diesel engines, extrapolation of PM emissions from diesel exhaust to jet exhaust is not considered appropriate or scientifically justifiable. Although PM from jet exhaust is not quantified in the evaluation, carcinogenic risks and hazard quotients are calculated for specific jet exhaust components with known emission factors (e.g., chlorinated dioxins, various polynuclear aromatic hydrocarbons (PAHs) and 1,3-butadiene). CALEPA toxicity criteria for diesel considers the unique toxicity and physical and chemical characteristics of

diesel exhaust. Particulate matter present in jet exhaust is not considered chemically, physically, or toxicological similar to diesel exhaust.

Regarding evaluation of health risks outside the immediate LAX area, please refer to Response to Comment AL00017-35. The analysis was carried out to the point geographically where incremental impacts can be regarded as negligible.

AL00040-106

Comment:

3. The EIS/EIR must address the local and regional air quality impacts associated with increased emissions due to increased traffic congestion caused by the project

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts, including those from on-road sources, in Section 4.6, Air Quality, with supporting technical data and analyses 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.

AL00040-107

Comment:

4. The EIS/EIR presents an under-representation of actual air quality impacts due to using apparently low MAP and cargo projections, given that the current airport "designed" for 40 MAP is actually serving 67 MAP or more. Similarly, an airport "designed" for 89 MAP would intuitively accommodate much more actual passenger and cargo travel. The EIS/EIR needs to be revised throughout the document to address this inadequacy.

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

AL00040-108

Comment:

5. The EIS/EIR should present cumulative construction emissions, given the extraordinarily long period of construction, not just focus on peak construction periods.

Response:

The analysis provided in the Supplement to the Draft EIS/EIR for the newly proposed Alternative D breaks down peak construction emissions as follows: starting year, ending year and peak interim year. Using the peak emissions represents the most conservative approach possible. Taking the highest peak year and assuming a 13-years construction period, the total cumulative impacts from the project can be determined. This is not, however, representative of a daily impact on air quality, health, and visibility, which is the focus of the environmental analysis.

AL00040-109

Comment:

6. The EIS/EIR uses a variety of existing condition or "baseline" years, which is both confusing and questionable relative to legal adequacy. The EIS/EIR should clearly define the various "existing" years used in the document, for which analyses they are used, and why utilizing a more current analysis year (1999 or 2000) is not feasible or necessary. It is questionable whether or not a document circulated in year 2001 with 1996 data is legally adequate, given the provisions of CEQA Guidelines § 15125 and § 15162. Considering the long period that elapsed since circulation of the original NOP, and the numerous changes in the project and regulatory environment, it is questionable whether or not the NOP

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required revision and recirculation. The fact that it was not does not excuse the use of outdated information.

Response:

Please see Responses to Comments AL00022-12, AL00022-55, and Topical Response TR-GEN-1 regarding baseline issues.

AL00040-110

Comment:

7. The EIS/EIR defers on the issue of air quality conformity. The EIS/EIR should explain how this complies with CEQA Guidelines § 15125(d), and why this analysis could not reasonably be completed now (prior to release of the Draft EIS/EIR). This is a critical issue for this project, as it fails to comply with the adopted SCAG regional airport strategy.

Response:

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

AL00040-111

Comment:

8. The EIS/EIR uses a confusing array of air quality models, for which modeling assumptions are difficult to identify. For each of the key modeling efforts, the EIS/EIR should identify which model is used, whether or not it is the most appropriate and current model for that application, and what the key modeling assumptions are. Given both the local and regional impacts of this project, and controversy associated with several of the project's key assumptions (including annual passengers and number of flights), the EIS/EIR should provide a sensitivity analysis for each of the models showing which of the input variables have the greatest tendency to affect modeling results. The EIS/EIR should indicate, for each of the variables addressed, a reasonable numeric range for that variable compared to what was assumed in the EIS/EIR.

Response:

The dispersion models and their assumptions used in the air quality analyses were discussed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The uncertainties of the modeled impacts are discussed in Appendix G to the Draft EIS/EIR. Please see Response to Comment SAL00013-117 regarding model performance.

AL00040-112

Comment:

9. Although the EIS/EIR acknowledges that diesel emissions and off-airport mobile emissions represent the greatest contribution to regional health risks, the EIS/EIR fails to provide a health risk assessment addressing diesel, toxic and criteria pollutant emissions along the regional freeway system.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety; air quality in Section 4.6, Air Quality; and traffic in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C1 and S-E and Technical Reports S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR.

The Draft EIS/EIR evaluated health risks associated with emissions from airport operations, including diesel emissions associated with ground service equipment (GSE) and truck traffic on roadways within the airport boundary. LAWA consulted with the South Coast Air Quality Management District prior to performance of the health risk assessment. The regional freeway system was not identified for inclusion in the health risk assessment. However, cumulative impacts were assessed in the Draft EIS/EIR using the results of the Multiple Air Toxics Exposure Study II (MATES II). MATES II examined

total air quality impacts from air toxics, and included emissions from mobile sources throughout the Los Angeles basin.

Air quality impacts from project-related traffic from the I-105 and I-405 freeways were included in the CO intersection analysis presented in Section 4.6, Air Quality, of the Draft EIS/EIR and Section 4.6 of the Supplement to the Draft EIS/EIR. Table 4.6-12 of the Draft EIS/EIR and Table S4.6-13 of the Supplement to the Draft EIS/EIR presented the air quality impacts at the freeway offramps for the interim and horizon build years for all alternatives. Direct air quality impacts from I-105 and I-405 thru traffic were not included in the analysis since this traffic is not directly related to the LAX Master Plan project,

AL00040-113

Comment:

10. The air quality cumulative impact analysis is grossly inadequate, providing neither a reasonable summary and incorporation of a previously adopted regional planning EIR, nor a list of projects that may contribute to cumulative impacts. Did LAWA contact other local agencies for a list of cumulative projects? At a minimum, the EIS/EIR should consult with the State Energy Commission and SCAQMD, which have developed an extensive cumulative projects database for several portions of southern California.

Response:

As discussed in Section 2.6 of the Draft EIS/EIR, the cumulative impacts analysis is 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. The air quality cumulative impacts analyses of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR account for regional growth occurring by 2015, including the plans, projects, and projections reflected in the No Action/No Project Alternative, and conclude that impacts under any of the build alternatives would be cumulatively significant and unavoidable.

AL00040-114

Comment:

11. The EIS/EIR should identify which of the mitigation measures are feasible, and which are recommended for project conditions.

Response:

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. Mitigation Measures identified in Section 4.6 of the Supplement to the Draft EIS/EIR were proposed for adoption at the time of project approval. Approved Mitigation Measures will be incorporated into a Mitigation Monitoring and Reporting Program.

AL00040-115

Comment:

12. This section needs to include a methodology for selecting and screening sensitive receptors, as well as screening techniques used in eliminating sensitive receptors.

Response:

Ninety-three sensitive receptors (including schools, hospitals, nursing homes, as well as the intersections and monitoring stations) were included in the modeling analyses. No sensitive receptors were eliminated. Refer to Table 7 of Appendix G to the Draft EIS/EIR for a complete listing of all sensitive/discrete receptors used in the modeling analyses.

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AL00040-116

Comment:

13. For all relevant air quality tables, the EIS/EIR should provide either a narrative or footnotes that summarize the key assumptions utilized in the table, rather than referring the reader to multiple technical appendices without appropriate specific citations.

Response:

Comment noted. Key assumptions have been footnoted, where applicable in tables, for example, the four footnoted assumptions found in Table 4.6-5 of the Draft EIS/EIR. Where applicable, citations to specific attachments of the Technical Report have been provided as seen in Table 4.6-11, of the Draft EIS/EIR, for example.

AL00040-117

Comment:

14. Provide an analysis of the project's contribution to regional ozone impacts using a recognized transport model such as the ARB/SCAQMD's Airshed model.

Response:

SCAQMD performed regional ozone modeling, which included airport sources, for the 1997 AQMP and the 2003 AQMP. A regional airshed model cannot appropriately be applied to a small subset of regional emission sources and the output of a regional airshed model cannot appropriately be used to determine the contributions to modeled impacts from a small subset of regional emission sources. Therefore, regional ozone modeling is not appropriate for this EIS/EIR.

AL00040-118

Comment:

Page 4-462 Section 4.6.2, Paragraph 5, 2nd sentence

Environmental baseline activity data levels at LAX and facilities were from 1996 and 1997. Please explain why these dates were chosen over more recent data.

Page 4-464 Section 4.6.2.1, Aircraft Section, 2nd sentence

Please explain why aircraft activity levels from 1996 were used.

Response:

Please see Topical Response TR-GEN-1 regarding the environmental baseline.

AL00040-119

Comment:

Page 4-467 Footnote 217

Shouldn't the June 12, 1998 South Coast Air Quality Management District Best Available Control Technology document be used instead?

Response:

Prior to 1998, SCAQMD's BACT guidance prescribed specific emission control technologies by type of source, applicable to new and newly modified stationary sources. The commentor is correct that in 1998, SCAQMD revised its BACT guidance to require a case-by-case approach to analyze the most cost effective emission control technology, also applicable to new and newly modified stationary sources. The emission limits assumed for new stationary sources for the analyses of Alternatives A, B,

and C (primarily the proposed West Central Utility Plant (CUP)) in the Draft EIS/EIR represented emission rates consistent with the intent of the latest BACT guidance. No new or modified stationary sources were proposed for Alternative D, therefore the BACT guidance was not applicable to the analyses in the Supplement to the Draft EIS/EIR.

AL00040-120

Comment:

Page 4-478 Section 4.6.3.4

Please demonstrate compliance with the United States Environmental Protection Agency "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA-405/4-87-013) August 1995 that pertains to air quality data being collected from the project site.

Response:

Descriptions of the methodologies used to collect the meteorological data are described in Attachment Y, Technical Reports - Ambient Monitoring and Deposition Monitoring of Technical Report 4 of the Draft EIS/EIR. EPA has produced a number of documents regarding meteorological data collection, all of which are acceptable. The data were collected using methods acceptable for regulatory modeling as outlined in "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD) (EPA-450/4-87-007) and quality-assured using methods outlined by EPA in "Quality Assurance Handbook for Air Pollution Measurement Systems, Volume IV, Meteorological Measurements" (EPA-600/R-94-038d) revised March 1995.

AL00040-121

Comment:

Page 4-495 Section 4.6.6, Paragraph 2, 5th sentence

What were the assumptions based upon for the Sulfate to be released and remain in the atmosphere as SO₂? Isn't the Central Utility Plant a stationary source for SO₂?

Response:

Please see Response to Comment AL00033-328 concerning sulfates. The Central Utility Plant (CUP) was included in this analysis as a stationary source. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed the CUP, as well as the analysis of other on-airport stationary sources in Section 2.1.3.2, Stationary Point Sources, of Appendix G.

AL00040-122

Comment:

Page 4-502 Section 4.6.6.1

Throughout this section reference is made to "local CO hot spot analyses at 17 intersections". Please identify the criteria used to select these 17 intersections. Please list the ten intersections with the highest projected peak hour traffic volumes in the study area (existing plus project, for all combined movements). Please provide a summary of key assumptions used in this analysis (peak hour traffic, vehicle speeds, distance to receptors, temperature, wind direction and stability class, etc.). Additionally, please include a diagram indicating the location of all 17 intersections.

Response:

Please see Section 2.2.4, CAL3QHCR Model for Local Roadway Intersections, of Appendix G, Air Quality, in the Draft EIS/EIR and Section 2.2.4, CAL3QHCR Model for Local Roadway Intersections, of Appendix S-E in the Supplement to the Draft EIS/EIR, which included a discussion on intersection selection and CO hot spot analysis parameters. Traffic data used for the analysis 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. Figure S4.3.2-1 in Section 4.3.2, Off-Airport Surface Transportation, of the Supplement to the

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Draft EIS/EIR, illustrated the locations of all the studied intersections. The hourly meteorological data used for this analysis is the same one year data set used for all other air quality dispersion modeling in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, as provided by the South Coast Air Quality Management District (SCAQMD) for use with the LAX EIS/EIR analyses. Please see Section 2.2.1, Meteorological Data, of Appendix G, Air Quality, in the Draft EIS/EIR and in Section 2.2.1, Meteorological Data of Appendix S-E in the Supplement to the Draft EIS/EIR regarding information on the meteorological data set used for air quality analyses.

AL00040-123

Comment:

Page 4-511 Section 4.6.7

Please explain why the protocol for the Cumulative Air Quality modeling analysis did not involve the projects typical operating mode in combination with other sources in the area. These sources should include those that have received construction permits but are not yet operating and those that are currently involved in the permitting process.

Response:

Please see Response to Comment AL00018-60 regarding cumulative impacts.

AL00040-124

Comment:

4-513 Section 4.6.8, last bullet point

This bullet point mentions the use of an on-site rock crushing facility. Please explain why the impacts associated with this mitigation measure (particularly with respect to PM10) were not included in Section 4.6.8.6.

Response:

Emissions from rock crushing operations are now included in Appendix S-E of the Supplement to the Draft EIS/EIR. Also, please see Response to Comment SPC00296-41 regarding emissions from the rock crusher.

AL00040-125

Comment:

Page 4-518 Table 4.6-17 and 4.6-18, footnote 8

Please explain the basis for the assumption that each remote terminal will reduce 750,000 trips per year.

Response:

The 750,000-trip reduction was taken from the most recent year's historical passenger data from the Van Nuys FlyAway. This data is compiled and tracked by LAWA using parking information as well as transit fares collected on a fiscal year basis. The current proposal by LAWA is to introduce up to five additional flyaways rather than the two flyaways assumed in this mitigation measure. Therefore, actual trips reduced may be significantly greater than the 750,000 assumed in this mitigation measure.

AL00040-126

Comment:

HUMAN HEALTH AND SAFETY

General Comments

1. The EIS/EIR analysis of Human Health and Safety issues is fundamentally flawed, in that it provides inadequate or no analysis of the Adjusted Environmental baseline and four alternatives.

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.

AL00040-127

Comment:

2. Throughout the discussion of impacts as a result of implementation of each Alternative, a comparison of the baseline is identified, however, no baseline numbers are provided in the tables. Provide the quantitative analysis of the environmental baseline.

Response:

No quantitative analysis of risks and hazards for baseline conditions was completed. Comparative emissions and air concentrations for TAPs were provided in Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

AL00040-128

Comment:

3. The Alternatives discussion requires exhibits, which depict the area affected by the each of the Alternatives. This will provide the public with an opportunity to understand the incremental cancer risks of each of the Alternatives.

Response:

Chapter 3, Alternatives, of the Draft EIS/EIR presented figures that showed the area that could be affected by each build alternative and the No Project/No Action Alternative. Section 4.24, Human Health and Safety, presented figures for each alternative that showed the geographical extent of incremental cancer risks and non-cancer hazards.

In addition, the Supplement to the Draft EIS/EIR presented figures that showed the extent of incremental cancer risks and non-cancer hazards by census tract. 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 4.24.1, 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 of the Supplemental to the Draft EIS/EIR.

AL00040-129

Comment:

Page 4-999 Paragraph 4, 1st sentence

Provide an analysis that includes impacts of toxic air pollutants associated with current airport operations. Per CEQA, existing conditions are to be analyzed.

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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. Also refer to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR for an analysis of cancer risks and non-cancer health hazards compared to Year 2000 conditions as a basis for comparison to air toxic-related risks presented in the Draft EIS/EIR measured against the 1996 baseline.

AL00040-130

Comment:

Page 4-999 Key Conclusions, Paragraph 2, 3rd sentence

Identify health hazards that without mitigation would be significant for all build alternatives.

Response:

Please refer to subsection 4.24.1.6, Environmental Consequences, of Section 4.24.1, Human Health Risk Assessment, in the Supplement to the Draft EIS/EIR for a discussion of significance determinations for non-cancer health hazards for Alternatives A, B, C and D under pre-mitigation conditions. Also included in this section is a discussion of acute non-cancer hazards predicted for each build alternative.

AL00040-131

Comment:

Page 4-1000 Paragraph 2, 1st sentence

Please clarify if all the build alternatives will result in reduction in human health impacts, and which human health impacts with implementation of preliminary mitigation would remain significant.

Response:

Mitigation measures were revised in the Supplement to the Draft EIS/EIR (please see Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.8, Mitigation Measures, and 4.24.1.9, Level of Significance After Mitigation) and potential health impacts for Alternative D were evaluated. Results of the evaluation based on new mitigation measures indicate the following:

Cancer Risks:

After mitigation measures are implemented, cancer risks for Alternatives A, B, and C in 2005 were less than significant. In all areas, cancer risks would actually be less than those for 1996 baseline conditions resulting in beneficial impacts under Alternatives A, B, and C in 2005. After build out in 2015, incremental cancer risks for Alternatives A, B, and C are estimated to be less than the CEQA threshold of significance, and even larger areas near the airport might experience reduced cancer risks. Estimated incremental cancer risks would decrease for Alternative D from those for the 1996 baseline for almost all locations in the vicinity of the airport for both interim and build out years. Beneficial impacts are predicted even for locations where TAP concentrations might be highest. Slight increases in estimated incremental cancer risks are predicted for a very small area adjacent to the airport compared to 1996 baseline; however, these increases would be less than significant.

Non-Cancer Risks

After implementation of mitigation measures, chronic non-cancer health hazards for Alternatives B and C would be less than those estimated under pre-mitigation conditions, but would remain greater than 1996 levels in an amount above the CEQA threshold of significance in horizon year 2015. Chronic non-cancer health hazards for Alternative A would not exceed the significance threshold in horizon year 2015. Acute non-cancer health hazards would increase from 1996 levels in an amount above the CEQA threshold of significance in horizon year 2015 for Alternatives A, B, and C. Nearly all non-cancer hazard is caused by acrolein, and possible effects to people exposed to this TAP are limited to mild irritation of eyes and mucous membranes. More serious effects on health are not anticipated at the low

concentrations predicted in air near LAX. Non-cancer hazards for Alternatives A, B, and C would not exceed the significance threshold for the interim year, during construction.

Non-cancer hazards would decrease under Alternative D from 1996 baseline conditions for all locations in the vicinity of the airport for both interim and build out years. This finding holds true for both chronic and acute non-cancer hazard estimates. The beneficial impacts of Alternative D are predicted even for locations where TAP concentrations might be highest.

The paucity of data on acrolein emissions from jet aircraft engines makes estimates of non-cancer health hazards very uncertain. Emissions estimates for acrolein are based on available data that were generated from old aircraft engines not generally in use today and using military fuel that differs from fuel used at LAX. Acrolein is not generally recognized as a significant TAP in the South Coast Air Basin and a recent study near Chicago's O'Hare airport failed to detect acrolein in essentially all samples taken in communities near the facility. All of this information suggests that the analysis presented for acrolein in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR, may substantially overestimate releases, and thus may overestimate possible chronic and acute impacts to human health.

AL00040-132

Comment:

Page 4-1000 Paragraph 9, 2nd sentence

For clarity and consistency, provide separate discussions and matrix of each of the three alternatives with implementation of potential mitigation measures. Clarify why Alternative A would be the most favorable of all three alternatives as cited on page 4-999, while Alternative C would have the least amount of area experiencing non-significant increases in risks and hazards as cited on page 4-1000.

Page 4-1000 Paragraph 2

Please clarify the difference between implementation of preliminary mitigation, and implementation of potential mitigation options as cited in paragraph 9. Are the preliminary and optional mitigation measures equally applied to each alternative?

Response:

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, that would 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 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.

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 were provided in Section 4.24.1, Human

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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.

AL00040-133

Comment:

Page 4-1004 Identification of Areas of Potential Impacts, Paragraph 1, 3rd sentence

Clarification required as to why the analysis compared the No Action/No Project Alternative to the other alternatives rather than to the Adjusted Environmental Baseline?

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. The No Action/No Project Alternative is not the baseline but is used as another gauge to judge the impact of the build alternatives. Possible future emissions associated with LAX under the No Action/No Project Alternative and the four build alternatives were estimated from the established baseline by either increasing or decreasing emission rate estimates from specific sources based on projected changes in airport operations as described in Technical Report 14a of the Draft EIS/EIR. Predicted impacts for the four build alternatives and the No Action/No Project Alternative are measured against 1996 baseline. Please refer to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR for additional analyses which measure the impacts of the four build alternatives and the No Action/No Project Alternative against Year 2000 conditions and for revised mitigation measures.

AL00040-134

Comment:

Page 4-1004 Identification of Areas of Potential Impacts, discussion

Explain the basis for limiting the analysis to "areas of potential impact around LAX" rather than a comparison with areas within an hour of the airport. This analysis does not address the increase in truck traffic and human health affects with regard to an increase of 4.2 million tons of cargo to be dispersed by diesel trucks within an hour radius.

Response:

The analysis in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR focused on those areas identified by regulatory agencies to be of concern. The area suggested by this comment falls outside the scope of the EIS/EIR. Please refer to Section 4.6, Air Quality, of the Draft EIS/EIR regarding LAX-related emission sources. All vehicles traveling onto and from LAX were considered in the analysis while within airport environs, including privately-owned vehicles, government-owned vehicles, and commercially-owned vehicles such as rental cars, shuttles, buses, taxicabs and trucks. Emissions from on-road vehicles to be used during the construction were also addressed in the analysis. This approach addressed vehicle emissions at the point where they are most concentrated (at the airport) and is likely to capture maximum potential impacts. Please also refer to Attachment F, Air Quality Modeling Protocol for Toxic Air Pollutants of Technical Report 14a of the Draft EIS/EIR regarding the general approach used to estimate emissions for airport operations.

To put possible regional contribution of potential risk associated with cargo tonnage transported to and from LAX into perspective, the Port of Long Beach, the world's 12th busiest container cargo port, handled 64.5 million metric tons (71 million tons) in 2002. The Port of Los Angeles, located in San Pedro Bay about 20 miles south of downtown Los Angeles, handled an annual tonnage of 113.9 million metric tons (125.5 million tons) in 2001 (2002 data not yet available). The cargo tonnage handled by LAX is small compared to the cargo tonnage handled by the port facilities.

The health risk assessment did, however, assess risks and hazards associated with activity at the airport 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. 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. 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 air quality. The MATES-II study was intended to characterize basin background risks from all sources of toxic air pollutants in the region. As shown on Figure 4.24.1-2 (Cancer Risks, Inclusive of Environmental Baseline, for the Build Alternatives and the No Action/No Project Alternative, East-Northeast Projection 2015 pre-Mitigation) of the Draft EIS/EIR, increases in potential cancer risks near the LAX fence line, where impacts are greatest, would be only a small fraction of cumulative risks associated with air pollution in the South Coast Air Basin. For example, the maximum contribution of the No Action/No Project Alternative is at most 2 percent of the cumulative health risk estimated by the MATES II study for all other activities in the Los Angeles area near LAX.

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 4.24.1, 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 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.

AL00040-135

Comment:

Page 4-1007 Emission of Future Air Quality Impacts, Paragraph 2, 2nd sentence

The comment that "Projections indicate that the aircraft fleet mix and numbers of operations are not anticipated to change substantially from the baseline and the No Action/No Project Alternative in 2005" is inaccurate, when compared to Table 3-1 Summary Activity by Alternatives-2005. Baseline conditions must be modeled separately to understand the existing conditions, per CEQA requirements.

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. 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 presented in the Draft EIS/EIR estimated using 1996 baseline conditions.

Aircraft fleet mixes and the number of operations at LAX were determined from extensive surveys. Please refer to Section IV.3, Mobile Sources, of Air Quality Modeling Protocol for Toxic Air Pollutants of

3. Comments and Responses

the LAX Master Plan Draft EIS/EIR for a description of the methodology used to evaluate aircraft operations and to estimate aircraft emissions for LAX Master Plan Alternatives. Future emissions for alternatives were estimated using data sources and growth projections identified in the LAX Master Plan project description. Sources of TAPs, and emission rates for TAPs during LAX operations for the 1996 baseline were determined from air emissions inventories collected for air quality analysis. Please refer to Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR and Topical Response TR-HRA-1 regarding baseline conditions for LAX. Possible future emissions associated with LAX under the No Action/No Project Alternative and the build alternatives were estimated from the established baseline by either increasing or decreasing emission rate estimates from specific sources based on projected changes in airport operations for two horizon years, 2005 and 2015. Projected future emission rates from LAX sources were then used as inputs, along with meteorological and geographic information, to an air dispersion model. This model predicted possible future concentrations of TAPs for each horizon year at hundreds of locations within a defined study area around the airport. To estimate TAP concentrations at specific locations in the study area for the baseline year, emissions associated with the No Action/No Project Alternative for horizon year 2005 were subtracted out of the total emissions, resulting in the starting point for emission estimates, the baseline.

AL00040-136

Comment:

Page 4-1008 Section 4.24.1.3, Paragraph 2, 4th sentence

This analysis is flawed and requires additional studies to be performed. Explain how the present analysis included within this document can possibly identify accurately key toxic air contaminants in the area. The findings of the initiated LAWA study of air quality, which will gather air quality for a 12-month monitoring program and source apportionment analysis needs to be incorporated.

Response:

Key contaminants in exhaust from combustion sources are well known and well studied in the Los Angeles Basin. The MATES-II study was used in the comparison of "background" risks from all sources within the South Coast Air Basin to those estimated to be associated with operations at LAX, which are dominated by releases from combustion sources. Please see Chapter 4, pages 4-3 and 4-617 of the Supplement to the Draft EIS/EIR for a discussion of the environmental baseline. In addition, 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. .

AL00040-137

Comment:

Page 4-1010 Section 4.24.1.6.1, Table 4.24.1-3

Provide the baseline conditions and list all the alternatives separately for the 2005 condition.

Response:

Please refer to Section 4.24.1.6, Environmental Consequences, in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR, which described human health impacts (incremental cancer risks and non-cancer hazards) for Alternatives A, B, and C in horizon year 2005. As discussed in this section, the differences among Master Plan alternatives for airport operations and airport traffic at horizon year 2005 would be minimal. Thus, both emissions and possible human health risks would be similar. Please refer to Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR for an evaluation of human health impacts associated with the implementation of Alternatives A, B, C in horizon year 2005 compared to Year 2000 conditions. In addition, the Supplement to the Draft EIS/EIR provided an evaluation of human health impacts for a fourth alternative (Alternative D). Please refer to TR-HRA-1 regarding baseline conditions.

AL00040-138**Comment:**

Page 4-1011 Section 4.24.1.6.2, Paragraph 1, 1st sentence

Revise the analysis to reflect only Alternative A for 2005, not the combined total of Alternatives A, B, and C.

Response:

Please refer to Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.2, General Approach and Methodology, page 4-1007) of the Draft EIS/EIR. Under Estimation of Future Air Quality Impacts, the first paragraph, third sentence indicated "For horizon year 2005, emissions estimates for the build alternatives were so similar that only one set of inputs to the air dispersion modeling was necessary to represent possible air quality impacts for all three alternatives." The analysis did not reflect the combined total of Alternatives A, B, and C; rather, the emission estimates were so similar that separate analyses were not necessary.

AL00040-139**Comment:**

Page 4-1013 Discussion of Impacts, Paragraph 1, 2nd sentence

Discuss if there would still be an incremental cancer risks reduction in 2015 with incorporation of clean burning planes, although increasing number of overall flight by approximately 40% in 2015.

Response:

The analyses in the Draft EIS/EIR did not account for increases in the number of cleaner burning engines, even though such changes are highly likely to occur in the near future. The difficulty was in projecting when and how many aircraft operations would be converted. Thus, the Draft EIS/EIR probably overstates potential cancer risks and noncancer hazards for the build alternatives, but quantitative estimates of how great this overestimation may be are not available.

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. An assessment of the level of significance of incremental cancer risks for all build alternatives based on revised mitigation measures was provided 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 discussed in this section, incremental cancer risks in horizon year 2015 under post mitigation conditions would be less than significant for the four build alternatives. Additionally, incremental cancer risks would decrease for most locations in the study area with recommended mitigation measures in horizon year 2015 for all four build alternatives. For example, after mitigation, incremental cancer risks associated with Alternative D are predicted to be negative throughout most of the study area. In other words, impacts associated with this alternative are predicted to be less than those estimated for LAX operations in the baseline year 1996.

AL00040-140**Comment:**

Page 4-1015 Paragraph 4, 6th sentence

Explain why the highest incremental risk could be in the range of 10 persons in one million, while Table 4.24.1-3 shows the highest incident of 0.9.

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Response:

The risk range of 10 in one million is a threshold of significance, not a calculated potential risk of cancer. Table 4.24.1-3 in the Draft EIS/EIR presented calculated incremental cancer risks and noncancer health hazards associated with the alternatives for the horizon year 2005. 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.

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. 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.

AL00040-141

Comment:

Page 4-1016 Section 4.24.1.6.4, Discussion of Impacts, Paragraph 2, 2nd sentence

Provide a fleet-mix analysis regarding the number of new cleaner engine planes, and the emissions related to the increase of flights in and out of LAX. Include a comparison matrix and number of flight caps of the fleet-mix that would need to occur to ensure that none of the thresholds would be exceeded.

Response:

Please refer to Technical Report S-4 and Appendix S-E, Supplemental Air Quality Impact Analysis, of the Supplement to the Draft EIS/EIR. Technical Report S-4 and Appendix S-E provides database assumptions regarding passenger and cargo aircraft, landing/takeoff operations assumptions, and aircraft time in mode assumptions.

Regarding the daily operations for the 1996 Baseline and 2015 Alternative D scenarios in the LAX Master Plan and Draft General Conformity Determination, a number of older aircraft disappear completely (B727, BAE146, DC8, DC9), and others have substantially reduced operations (B737-300, DC10, MD80/MD80-87) in 2015. While the LAX 2015 Fleet Mix does not include B737-700, 800, or 900 airframes, the analysis actually assumed that the B757-200 would be used on many of the routes that the newer B737s could fly.

AL00040-142

Comment:

Page 4-1017 Section 4.24.1.6.4, Discussion of Impacts, Paragraph 1

Explain why this Alternative would have more night flights than compared with the other alternatives.

Response:

The content of this comment is essentially the same as comment AL00017-103; please refer to Response to Comment AL00017-103.

AL00040-143**Comment:**

Page 4-1017 Section 4.24.1.7.1, Paragraph 1, last sentence

The statement that "Because the incremental contribution would be so small (i.e. de Minimus), it would probably not be measurable against urban background conditions in the South Coast Air Basin." is unsubstantiated. Provide a quantitative analysis of the cumulative impacts associated with all of the alternatives.

Response:

The Draft EIS/EIR used the South Coast Air Quality Management District urban air toxics monitoring and evaluation study (MATES-II) to quantitatively evaluate possible incremental contributions of LAX operations to cumulative cancer risk impacts for each of the alternatives. Results of the quantitative analysis were presented in Section 4.24.1.7, Cumulative Impacts, of the Draft EIS/EIR. As shown on Figure 4.24.1-2 (Cancer Risks, Inclusive of Environmental Baseline, for the Build Alternatives and the No Action/No Project Alternative, East-Northeast Projection 2015 pre-Mitigation) of the Draft EIS/EIR, increases in potential cancer risks near the LAX fence line, where impacts are greatest, would be only a small fraction of cumulative risks associated with air pollution in the South Coast Air Basin. For example, the maximum contribution of the No Action/No Project Alternative is at most 2 percent of the cumulative health risk estimated by the MATES II study for all other activities in the Los Angeles area near LAX.

In addition, the Supplement to the Draft EIS/EIR used data from the U.S. EPA to evaluate non-cancer cumulative impacts. The evaluation of these cumulative impacts was presented in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7, Cumulative Impacts), of the Supplement to the Draft EIS/EIR.

AL00040-144**Comment:**

Page 4-1021 Paragraph 2,

The Cumulative Effects statement that "The built alternative could possibly either contribute to or subtract from past present or future impacts, based on the observation that cancer risks may be reduced in all or most areas after implementation of the Master Plan" is at best speculative. This discussion needs to identify that implementation of any of the Alternatives would result in an Unavoidable Significant Impact under CEQA.

Response:

As indicated in the Draft EIS/EIR, the SCAQMD conducted an urban air toxics monitoring and evaluation study for the South Coast Air Basin called MATES-II. MATES-II provides a general evaluation of cancer risks associated with TAPs from all sources within the South Coast Air Basin. According to the study, the cancer risks in the Basin range from 1,120 in a million to 1,740 in a million with an average of 1,400 in a million. These cancer risk estimates are high and indicate that current impacts associated with sources of TAPs from past and present projects in the region are significant. The MATES-II is an appropriate estimate of present cumulative impacts of TAPs emissions in the Los Angeles Basin. It does not, however, have sufficient resolution to determine the fractional contribution of current LAX impacts to TAPs in the airshed. Only possible incremental contributions to cumulative impacts can be assessed.

The analysis completed for the Supplement to the Draft EIS/EIR included consideration of cumulative cancer impacts for Alternative D measured against baseline 1996 and cumulative cancer impacts for the No Action/No Project Alternative and Alternative D measured against Year 2000 conditions. The cumulative impacts to cancer risk associated with the No Action/No Project Alternative and Alternatives A, B, or C, in combination with other past, present, and probable future projects, measured against baseline 1996 have not changed from those described in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7), of the Draft EIS/EIR.

3. Comments and Responses

The contribution of the build alternatives to cumulative impacts in horizon year 2015 under pre-mitigation conditions was evaluated by comparison of possible incremental cancer risks with the average MATES-II Basin risk as a means to estimate the cumulative impact of TAPs from LAX on communities surrounding the airport, in conjunction with impacts of TAPs from other past and present projects (i.e., MATES-II baseline conditions). Impacts from the MATES-II did not distinguish between LAX and other sources and can be assumed to represent the range of current total potential risks from all sources, including LAX. If LAX contributions to these impacts were reduced compared to current baseline conditions in the future as a result of implementing the LAX Master Plan, cumulative impacts in the Basin near LAX would also be reduced.

Comparisons indicate that LAX emissions under Alternatives A, B, and C would reduce cumulative cancer risks for many areas nearest the airport. Areas where cumulative impacts would be reduced generally occur at about 2.3 miles east-northeast of the LAX theme building. Some areas would experience an increase in cumulative impacts, for example, near the LAX fence line. However, these increases would be only a small fraction of the cumulative risks associated with air pollution in the South Coast Air Basin. The maximum contribution for Alternatives B and C would be less than 1 percent. Implementation of Alternative A would result in a decrease in cumulative risks of about 0.4 percent.

As indicated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3), of the Supplement to the Draft EIS/EIR, implementation of Alternative D would reduce cumulative cancer risks for all areas near the airport, including a small decrease in cumulative risks near the LAX fence line.

AL00040-145

Comment:

Page 4-1021 Section 4.24.1.8, Mitigation Measures, discussion

Provide detailed discussion of the four identified mitigation measures to be implemented. Include when the mitigation would be implemented and what agency would be responsible for enforcement. The utilization of potential mitigation option to reduce cancer risks without any discussion on how the specific mitigation would actually reduce the impacts is outrageous! Provide a discussion of which mitigation and how the mitigation would reduce impacts.

Response:

Please see Topical Response TR-HRA-4 regarding human health mitigation strategies. Also, please refer to Response to Comment AF00003-63 regarding mitigation monitoring and reporting.

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. 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 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.

AL00040-146

Comment:

Page 4-1034 Section 4.24.1.9.3, Paragraph 3, 3rd sentence

Discuss how the identified optional mitigation measures are utilized to reduce impacts and when the final mitigation plan is to be developed. These mitigation measures appear not to be in compliance with CEQA Guidelines § 15126.4.

Response:

The content of this comment is essentially the same as comment AL00040-145; please refer to Response to Comment AL00040-145.

AL00040-147

Comment:

Page 4-1039 4.24.2, Paragraph 3

This analysis is based on the nature of the runway development for each alternative. Explain if the analysis includes a discussion regarding the FAA revised take-off and landing patterns, increasing noise on the outlying runways?

Response:

The aircraft noise analyses completed for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR take into account the utilization of different runways for takeoffs and landings, as well as reverse-flow operations, based on 1996 and 2000 Flight Track Utilization Percentages at LAX. The supporting information is presented in Appendix D of the Draft EIS/EIR and Appendix S-C1 of the Supplement to the Draft EIS/EIR.

AL00040-148

Comment:

Page 4-1044 Section 4.24.2.3, Paragraph 1, 7th sentence

The statement that the "baseline noise from aircraft at LAX is not expected to cause permanent hearing damage to residents near LAX" is misleading and inconclusive. If permanent hearing damage is not expected, then does that mean it is an insignificant impact?

Response:

Please see Response to Comment 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. Based on the use of those standards as a threshold of significance, the impacts of all of the alternatives would be less than significant.

AL00040-149

Comment:

Page 4-1045 Table 4.24.2-2

Does this Table include, as part of the Over Land discussion, the frequency of airlines outside of the designated airway as a result of Santa Ana winds, dense fog conditions, planes missing the landing strip, and plane reroutes?

Response:

The data included in Table 4.24.2-2 of the Draft EIS/EIR presented the land areas exposed to noise above 65 CNEL for the average annual condition, as computed by the INM and processed for presentation in Section 4.2, Land Use. As such, it included the annual average conditions of the parameters questioned by the commentor.

3. Comments and Responses

AL00040-150

Comment:

Page 4-1052 Fuel Farm, Paragraph 1, 2nd sentence

Provide a discussion of the existing condition of the Fuel Farm and potential of relocation of feeder pipelines to the facility. Where would the interim storage be addressed?

Response:

Please see Chapter II, Existing Conditions, Section 5.7 of the Draft LAX Master Plan for a description of the existing fuel farm.

The existing fuel farm would be relocated under Alternatives A and B. Under Alternative A the fuel farm would be relocated to a 563,000 square foot area northwest of the intersection of Sepulveda Boulevard and Imperial Highway.

Under Alternative B the fuel farm would be relocated to an off-site area south of the airport.

Under Alternative C the existing fuel farm would remain in place while an expansion of the fuel farm facility would be constructed south of the existing facility.

As indicated on page 3-47 of the Supplement to the Draft EIS/EIR, under Alternative D, the overall site footprint of the fuel farm would be reduced, but the fuel farm would retain its existing capacity and remain in its existing location. Please see Section 4.24.3, Safety (CEQA), of the Draft EIS/EIR for a more detailed discussion of the airport fuel farm. In addition, please see Response to Comment PC01269-1 regarding fuel transmission lines associated with Alternative B.

AL00040-151

Comment:

Page 4-1065 Off-Site Fuel Farm Sites, discussion

Provide a discussion of phasing of all off-site fuel farms and the viability of those facilities to be built.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR were 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 and phasing issues in a more specific manner, as necessary and appropriate.

AL00040-152

Comment:

Page 4-1067 Aviation Incidents and Accidents, Paragraph 2, 5th sentence

For clarity, discuss at what point current design standard would not be met at LAX. Identify at what point the FAA operation restrictions, limiting the use of certain facilities to maintain the prescribed standard level of safety, would occur.

Response:

The Federal Aviation Administration (FAA) airport design standards have been revised over time. As a result, certain features of the existing airfield no longer meet current standards. In each case, restrictions have been imposed as needed to ensure safety. While these restrictions maintain a safe environment, they add to airfield congestion which results in an increase in air pollution and aircraft delay. For example, operation congestion at LAX has increased due in part to taxi speed restrictions imposed as a result of insufficient taxiway separation distances.

Restrictions imposed due to non-standards conditions are typically documented as part of the airport's certification under Code of Federal Regulations (CFR) Title 14, Aeronautics and Space, Part 139. Part 139 prescribes rules governing the certification and operation of land airports which serve any scheduled or unscheduled passenger operation of an air carrier that is conducted with an aircraft having a seating capacity of more than 30 passengers. According to Part 139, an applicant for an airport operating certificate must prepare, and submit with an application, an airport certification manual for approval by FAA. Each holder of an airport operating certificate must keep its airport certification manual current at all times. Any future restrictions required as a result of not meeting current design standards would be immediately documented and submitted to the FAA for approval. The LAX approved airport certification manual is available through LAWA.

AL00040-153

Comment:

Page 4-1069 Application of Design Standards at LAX, Wing Span, Paragraph 1

Provide a comparison of the new larger aircraft (airbuses) to the existing fleet. What are the potential restrictions to the runway configurations of each alternative?

Response:

NLA, specifically the Airbus A380, will be the largest commercial jet aircraft when it enters commercial service as expected in 2006. Relative to the largest commercial jet currently in service, the Boeing 747-400, it will be approximately eight feet longer and have a wingspan that is approximately 50 feet wider. Section 3.2.6, New Large Aircraft Airport Design Requirements, in Chapter IV of the Draft LAX Master Plan provides a detailed comparison of the New Large Aircraft (NLA) to the existing fleet.

The No Action/No Project Alternative would not modify any of the existing runways. According to Airbus, Runway 6L/24R is the only existing runway lacking sufficient length for A380 departures. Each of the four existing runway provides sufficient length for A380 arrivals. However, due to the width of the aircraft, modifications would likely be made to runway shoulders. Existing Runway 7R/25L is the only existing runway that fully complies with aircraft design Group VI width recommendations.

Sufficient modifications to the airfield are proposed in Alternatives A, B, C and D to allow greater flexibility and safety for A380 operations on the LAX airfield. Alternatives A & B each include a fifth runway. In each alternative, the fifth runway is intended to accommodate more commuter aircraft. A380 operations would be restricted from the proposed fifth runway in Alternatives A & B. Alternatives C & D would each maintain a four runway airfield at LAX and in each alternative each of the proposed runways would accommodate A380 arrival and departure operations according to Airbus' published takeoff and landing distance requirements for the A380.

AL00040-154

Comment:

Page 4-1075 Table 4.24.3-3 Runway Safety Area Dimensions at LAX

Include a matrix that compares the alternatives to the existing runway lengths and widths.

Response:

Below is a matrix that depicts the runway lengths and widths under each alternative. Please see Table S3-2 in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR which summarized the facilities by Alternative for 2015.

3. Comments and Responses

North	Existing	No Action/ No Project	Alternative A	Alternative B	Alternative C	Alternative D
6L/24R	8,925 x 150	8,925 x 150	6,700 x 200 ¹	10,000 x 200 ^{2,3}	9,400 x 200 ^{2,3}	10,420 x 150 ⁶
6C/24C	N/A	N/A	12,000 x 200 ²	N/A	N/A	N/A
6R/24L	10,285 x 150	10,285 x 150	12,000 x 200 ²	12,000 x 200 ^{2,3}	12,000 x 200 ^{3,6}	11,700 x 200 ^{2,6}
South						
7L/25R	12,091 x 150	12,091 x 150	12,000 x 200 ³	12,000 x 200 ^{2,5}	12,091 x 150	12,091 x 150
7C/25C	N/A	N/A	N/A	12,000 x 200 ^{2,5}	N/A	N/A
7R/25L	11,096 x 200	11,096 x 200	12,000 x 200 ⁴	6,700 x 200 ¹	11,096 x 200 ²	11,096 x 200 ²

¹ New
² Relocated
³ Upgraded
⁴ Reconstructed
⁵ Replaced
⁶ Extended

N/A = Not Available - Does not exist in this alternative.

AL00040-155

Comment:

Page 4-1095 Aviation Incidents and Accidents, Paragraph 1

Under the No Action/No Project Alternative, LAX would operate safely. However, the impacts would lead to operational impacts and passenger delays. Discuss the potential cap of flights in the event that no improvements were incorporated.

Response:

As described in Chapter 3 of the Draft EIS/EIR, the impact of these restrictions would be to limit aircraft operations in the peak hour under the No Action/No Project Alternative. The peak hour operations for the No Action/No Project Alternative are projected to remain at 1996 baseline level (159 operations in the peak hour). Under this alternative, design day aircraft operations are projected to increase from 2,235 in 1996 to 2,279 in 2015. The increase would be mainly cargo operations which operate primarily during off-peak periods.

AL00040-156

Comment:

Page 4-1114 Oil Refinery Located South of the Airport, discussion

Provide a discussion regarding how the fuel storage off-site would be transferred to the airport and the potential risk of upset.

Response:

As discussed on page 4-768 in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR, under Alternative B, construction of an off-site fuel farm at either the Scattergood Electric Generating Station or the oil refinery located south of the airport would occur. With development of either of these sites, existing fuel transmission lines would need to be extended from the current terminus at LAX to the fuel farm and fuel transmission lines would need to be provided between the oil refinery site or the Scattergood site and LAX. The proposed alignment for these pipelines is in the existing right-of-way of Vista del Mar. An underground concrete "utilidor" would contain the piping from the fuel farm site to LAX. The utilidor box would be designed to contain any spillage from the transmission lines, and a leak detection system with periodical double block and bleed closure valves would create individual emergency fuel shutoff points that would segmentize the main line. The pipeline

would be constructed in accordance with all applicable regulations and permit requirements. Thus, the risk of upset associated with the fuel transmission lines would be less than significant.

AL00040-157**Comment:**

Page 4-1127 Paragraph 1, 1st sentence

Explain why under Alternative C aircraft operations are projected to increase by 4.4 percent in 2015, when within Section 3 Alternatives, Table 3-1 Summary of Activities by Alternatives-2005 and Table 3-2 Summary of Activities by Alternatives-2015 suggests something different.

Response:

The information in Tables 3-1 and 3-2 in Chapter 3, Alternatives, of the Draft EIS/EIR is consistent with the statement regarding the projected aircraft operations increase under Alternative C on page 4-1127 of the Draft EIS/EIR. As indicated in Table 3-2 of the Draft EIS/EIR, under Alternative C, annual aircraft operations are projected to increase from 763,866 in 1996 to 797,249 in 2015, an approximate 4.4 percent increase.

AL00040-158**Comment:**

Page 4-1128 Section 4.24.3.8, Mitigation Measures

It appears that there may be mitigation regarding the LNG/CNG Facilities, as cited on page 4-1095. These mitigation measures may include: modifications to the Emergency Response and Evacuation Plan, fact sheets, etc. Provide a list of potential mitigation measures as they relate to the relocation of facilities.

Response:

Comment noted. As indicated on page 4-1128 in Section 4.24.3, Safety, of the Draft EIS/EIR, no mitigation measures are required as Alternatives A, B, and C would not have a significant impact with respect to safety. However, it should be noted that the relocated LNG/CNG Facility would comply with all applicable setback and safety requirements, including Los Angeles Fire Code setback requirements. Under Alternative D, the existing LAWA LNG/CNG facility would not be relocated.

AL00041	Sheehan, Lari	County of Los Angeles	9/24/2001
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The content of this comment letter is identical to comment letter AL00036; please refer to the responses to comment letter AL00036.

AL00042	Flood, John	City of Palos Verdes Estates	9/12/2001
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AL00042-1**Comment:**

At its meeting on September 11, 2001, the Palos Verdes Estates City Council unanimously endorsed the comment letter submitted by the South Bay Cities Council of Governments (COG) re: The Draft Environmental Impact Statement/Environmental Impact Report on the Los Angeles International Airport Master Plan Improvements.

The comment letter takes issue with the Draft EIS/EIR in seven general categories. It finds it deficient in the following respects: (1) It does not properly designate the baseline for analysis; (2) It does not fully analyze the project's off-airport surface traffic impact; (3) The noise analysis understates the project's noise impact; (4) The air quality analysis is inadequate; (5) The alternatives fail to satisfy the purpose

3. Comments and Responses

and need for proceeding with the project; (6) It does not adequately specify mitigation measures or methods to endorse them; and (7) The unrelated issue of "safety" should not be used as a smoke screen to push the capacity driven EIS/EIR forward.

Response:

Please see responses to comment letter AR00003 for responses to each of the comments contained in the comment letter on the Draft EIS/EIR from the South Bay Cities Council of Governments.

AL00042-2

Comment:

The level of air traffic growth posited in Preferred Alternative C would have a dramatic and deleterious effect on the environment and quality of life in the communities in the vicinity of LAX. All South Bay cities would experience increased noise and air pollution from aircraft, significant congestion and air pollution from general traffic, and safety issues involved with landing/take-off/taxiing of aircraft at LAX, to say nothing of the costs to be borne by taxpayers.

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, traffic in Section 4.3, Surface Transportation, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-SAF-1 regarding aviation safety. 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.

AL00042-3

Comment:

The City of Palos Verdes Estates heartily endorses the COG comment letter conclusion that after the necessary revisions are made, significant new information will emerge which will require that the Draft EIS/EIR be recirculated. As such, we oppose the expansion of LAX as proposed.

Response:

Comment noted. Please see responses to comment letter AR00003 for responses to each of the comments contained in the comment letter on the Draft EIS/EIR from the South Bay Cities Council of Governments. 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.

AL00043	Lyon, Marilyn	City of Rancho Palos Verdes	9/20/2001
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AL00043-1

Comment:

At our regularly scheduled meeting of July 17, 2001 the Rancho Palos Verdes City Council discussed the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) and the comment letter prepared for the South Bay Cities Council of Governments by a team of consultants. Our review of these documents led to a recommendation by the City Council that Los Angeles World Airports deem the Draft EIS/EIR 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 following issues are of particular concern to the City Council and have not been adequately addressed in the Draft EIS/EIR:

Response:

Please see responses to comment letter AR00003 for responses to each of the comments contained in the comment letter on the Draft EIS/EIR from the South Bay Cities Council of Governments.

AL00043-2

Comment:

1. Regional airport expansion.

Aviation needs of the region can be better met if airport capacity is expanded by considering other airport sites. The analysis of alternatives to the proposed project is a fundamental requirement of both CEQA and NEPA. The analysis in the EIR/EIS of alternate airport sites or a regional solution that would rely on the use of several different airports to accommodate increased passenger and air cargo demand is woefully inadequate.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Topical Responses TR-RC-1 regarding the role of the LAX Master Plan in a regional approach to meeting demand. As indicated in Topical Response TR-ALT-1, 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.

AL00043-3

Comment:

2. Congestion.

In 1997 LAX drew 7 MAP from outside its 60-minute access zone including many who lived closer to other airports in the Region. Dependence on LAX has increased traffic congestion. This issue has not been adequately addressed in the document.

Response:

Section 4.3, Surface Transportation, of the Draft EIS/EIR and 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. Specifically addressing traffic congestion on off-airport roadways, Section 4.3.2 suggests that doing nothing at LAX would yield more traffic congestion than what is proposed for the future development of LAX under Alternatives A, B, or C. Each alternative presents the same concept of redirecting traffic away from surrounding local communities by providing direct access to the airport via the proposed combination of the LAX Expressway and the Ring Road. (Please note that Alternative D does not have an LAX Expressway or Ring Road.) For example, page 4-274 indicated that even at an elevated traffic demand in 2015, the traffic benefits of Alternative C would yield a 9 percent reduction in hours spent traveling on arterial streets, a 3 percent improvement in average freeway speed, and the number of freeway and arterial lane-miles at Level of Service (LOS) grade F would be reduced by over 10 percent, compared to the No Action/No Project Alternative for that same year. Regarding traffic concerns pertaining to the cargo truck traffic plan and neighborhood impacts from trucks, please see Topical Response TR-ST-1. 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. Regarding traffic measures to minimize neighborhood impacts, please see Topical Response TR-ST-6.

3. Comments and Responses

AL00043-4

Comment:

3. Dangerous Overcrowding.

LAX is the world's third busiest airport, but its 3,500 acres makes it one of the smallest major international airports in size in this nation. Denver has 35,000 acres to handle less aviation.

Response:

Comment noted.

AL00043-5

Comment:

However, the joint EIS/EIR does not adequately analyze this issue.

Response:

Please see Topical Response TR-SAF-1 regarding aviation safety.

AL00043-6

Comment:

4. Air Pollution.

LAX is already the largest stationary source of air pollution in Los Angeles and its expansion would worsen air pollution.

Response:

Because LAX represents a complex aggregation of multiple stationary, on-road mobile, and off-road mobile sources owned and operated by many public- and private-sector entities spread over a fairly large area, it would be misleading to compare the total on-site emissions at LAX to those of any single facility or any single category of sources.

The South Coast Air Quality Management District's 2003 Air Quality Management Plan (AQMP) provides estimates of emissions in the South Coast Air Basin. Based on a comparison of data in Table A-4, 2000 Annual Average Emissions by Source Category in SCAB (tons/day) in the Appendix III Attachment A of the 2003 AQMP to data suggested by Table S4.6-7, LAX Year 2000 Emissions Inventory for On-Airport Sources, in the Supplement to the Draft EIS/EIR, the criteria pollutant emissions for all sources on-site at LAX comprise less than two-hundredths of one percent of the basinwide emissions. This comparison demonstrates the following relationships of on-site LAX emissions to basinwide emissions: particulate matter, 0.01 percent; volatile organic compounds, 0.02 percent; sulfur dioxide, 0.02 percent; carbon monoxide, 0.01 percent; and oxides of nitrogen, 0.02 percent.

AL00043-7

Comment:

Under current LAX expansion plans the number of tons of Nitrogen oxide (NOx) emitted would increase from 5,943 tons in 1999 to an estimated 9,044 tons by 2025.

Response:

Comment noted. Mitigated NOx 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.

AL00043-8**Comment:**

No analysis of the potential toxicity of jet fuel has been included for current and future impacts. Once again, this issue is not adequately analyzed in the document.

Response:

Please see Response to Comment AF00001-29 regarding jet fuel.

AL00043-9**Comment:**

5. Noise.

LAX expansion calls for lengthening a runway from 7,000 to 12,000 feet Eastward. This would push the current noise footprint from landing planes eastward into more communities. About 31,000 homes and 36 schools near LAX currently suffer from noise exceeding 65 decibel noise level at which the FAA has determined a substantial portion of the community will be adversely affected. However, the analysis of this important issue is incomplete at best and no analysis of impacts on cities such as Rancho Palos Verdes has been included.

Response:

As presented in subsections 4.1.6 and 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, development of the Master Plan alternatives would result in some areas to the east being newly exposed to high noise levels. Please see Response to Comment AL00014-5 regarding the number of schools and homes that are exposed to the 65 CNEL noise contour under 1996 baseline and Year 2000 conditions. As stated in subsection 4.2.2 of the Draft EIS/EIR, the 65 CNEL noise contours define areas of incompatibility for noise-sensitive land uses under Federal Aviation Regulations (FAR) Part 150 and Title 21 of the California Code of Regulations. Please see Topical Response TR-LU-3 for a description of the Aircraft Noise Mitigation Program (ANMP) which addresses homes and schools currently and historically exposed to 65 CNEL or greater noise levels. Also see Response to Comment AL00006-2 regarding current measures underway to address existing aircraft noise levels.

As shown on Figure 4.2-5 of the Draft EIS/EIR, the City of Rancho Palos Verdes is outside the current ANMP boundaries that define areas exposed to high noise levels (based on the fourth quarter 1992 65 CNEL or greater noise contours). As also shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the area within the 65 CNEL noise contour has decreased from 1992 conditions. As shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the City of Rancho Palos Verdes is also outside of areas exposed to high single event noise levels (as defined by the 94 dBA noise contour). Therefore, based on the thresholds presented in Section 4.1, Noise (subsection 4.1.4), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, no significant impact from aircraft noise has been identified for the City of Rancho Palos Verdes. Please see Subtopical Response TR-N-3.1 regarding South Bay overflights.

AL00043-10**Comment:**

6. "Environmental Justice"

Minority and low in-come communities already suffer adverse effects from heavy usage of LAX. According to LAX's own draft environmental impact report, "projected future increases in aviation activity at LAX would have a disproportionate impact on minority and low-income communities East of LAX under all the proposed building alternatives." Impacts on the region, including Rancho Palos Verdes, created by expansion have not been considered. Again, the analysis that is required by CEQA and NEPA has not been performed as required by those statutes.

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Response:

Please see Response to Comment AL00040-94 and Topical Response TR-N-2 regarding the environmental justice study area and effects on more remote communities. For further information on the evaluation of potential impacts to Rancho Palos Verdes due to aircraft activity, please see Subtopical Response TR-N-3.1.

AL00043-11

Comment:

7. Public Safety.

LAX has been averaging 11 incursions (near misses) a year during the past three years, which is seven more than the number considered acceptable by the FAA. More flights at LAX would further endanger safety.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

AL00043-12

Comment:

8. Transit/Safety Issues.

In 1993 Airport and FAA officials warned that the Green Line's path near runways would distract pilots with its lights, befuddle radar with electromagnetic emissions and stand in the way of low flying aircraft in emergencies. MTA officials said that construction of an airport metro station would cause major utility conflicts, disrupt air service during construction and potentially disturb two underground "contamination" areas. The analysis of this issue, including the cumulative impact of these two projects, is not adequate. Why was this FAA safety issue not addressed?

Response:

The subject concerns were based on the possibility of extending the Green Line northward along Aviation Boulevard, crossing directly in front of the south runway complex. This is a different alignment than the one presently being proposed as part of the Master plan alternatives. Under Alternatives A, B, and C, the Green Line would be extended to the West Terminal in a tunnel located parallel to Runway 7R/25L. Under Alternative D, the Green Line would not be extended, but instead an Intermodal Transportation Center would be constructed nearby to serve passengers of the Green Line. Please also see Chapter 3, Alternatives, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding locations of existing and proposed light rail facilities (e.g., Green Line). In addition please see Topical Response TR-ST-5 regarding the rail/transit plan.

AL00043-13

Comment:

The South Bay Cities Council of Governments' comments that are attached, as well as the A.C. Lazzaretto and Associates Report prepared for the County of Los Angeles, identify extensive omissions and deficiencies with the Draft EIS/EIR reflect the feelings of the Rancho Palos Verdes City Council and more fully address the issues outlined above.

Response:

Please see responses to comment letter AR00003 for responses to each of the comments contained in the comment letter on the Draft EIS/EIR from the South Bay Cities Council of Governments, and responses to comment letter AL00022 for responses to each of the comments contained in the A.C. Lazzaretto and Associates Report.

AL00043-14**Comment:**

In addition, as noted above, we are particularly concerned that the document omits the discussion of an alternative of a fully regional solution that more effectively utilizes other commercially viable airports in Southern California to address the anticipated growth in regional air passenger and air cargo demand.

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.

AL00044**Blum, Jerry****City of Ontario****9/24/2001****AL00044-1****Comment:**

I believe, based on the information contained in the Draft EIS/EIR., Alternative C (No Additional Runway) is the better alternative to pursue. However, the City of Ontario would like the following issues to be analyzed and addressed in the LAX Master Plan:

Response:

Comment noted. Please see Responses to Comments below.

AL00044-2**Comment:**

The following Transportation Issues should be addressed in the Master Plan:

- 1 . The ground transportation model should include any impacts to surrounding freeways and highways.
2. The ground transportation model should include any impacts to City arterials surrounding the Airport and "Level of Service" impacts on intersections surrounding the Airport.
3. Alternative modes of transportation for getting passengers to the Airport (bus service, Amtrak, Metrolink, High Speed Rail and Maglev).
- 4 . Shuttle and pedestrian circulation elements between parking areas and the terminals.

Response:

The transportation analysis as summarized in the Draft EIS/EIR and Supplement to the Draft EIS/EIR in Section 4.3.2, Off-Airport Surface Transportation, and Technical Report 3b, Off-Airport Ground Access and Mitigation Measures, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report, provided impact information on surrounding freeways, highways, and city arterials. Alternative modes of transportation were summarized in the Draft EIS/EIR and Supplement to the Draft EIS/EIR in Section 4.3.1, On-Airport Surface Transportation, and Technical Reports 3a, On-Airport Surface Transportation Technical Report, and S-2a, Supplemental On-Airport Surface Transportation Technical Report. See also Topical Response TR-ST-2 and Topical Response TR-ST-5 for more information on roadway conditions and transit.

3. Comments and Responses

AL00044-3

Comment:

5. Infrastructure element to address additional water, sewer, storm drain, etc., extension and/or off-site capacity issues.

Response:

Potential impacts to utilities resulting from the proposed Master Plan alternatives were addressed in Section 4.25, Utilities, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00044-4

Comment:

The following Land Use Issues should be addressed in the Master Plan:

- 1 . Impacts (opportunities and constraints) on surrounding uses.

Response:

The primary focus of Chapter 4 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR was on the potential impacts that implementation of the LAX Master Plan would have on surrounding uses. The opportunities or benefits of the program are less of a focus but were described in Chapter 2, Purpose and Need, and Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The project's opportunities are largely to serve local and regional demand for air transportation. Employment and economic benefits would accrue accordingly.

AL00044-5

Comment:

2. Details on the configuration of runways, flight patterns, approach zone, and clear zone modifications.

Response:

The generalized primary airspace routes for the No Action/No Project Alternative and Alternatives A, B, and C, are provided in Section 3.2.2, Airspace Flow, in Appendix J of the Draft LAX Master Plan, Chapter V. Section 1.4.2, Airspace Operating Assumptions, in Appendix D of the Draft LAX Master Plan Addendum presents the generalized primary airspace routes for Alternative D.

Draft Airport Layout Plans including runway configuration, approach zone, and clear zone pertaining to Alternative C and Alternative D have been submitted to the FAA, specifically the Airport Division of Federal Aviation Administration Western Pacific Region at 15000 Aviation Boulevard, Hawthorne, CA 90250.

AL00044-6

Comment:

Although LAX is not located near Ontario, its future expansion will have a direct impact on the Ontario International Airport. In an effort to visualize such potential impacts we would like the above to be analyzed and incorporated into the environmental review of the project.

Response:

Comment noted. Please see responses to comments above. In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed regional issues in Chapter 1, Regional Context, and Chapter 3, Alternatives. Also, Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00045 Brann, Don City of El Segundo 8/21/2001

The content of this comment letter is identical to comment letter AL00027; please refer to the responses to comment letter AL00027.

AL00046 Dougher, Walt City of Manhattan Beach 9/24/2001

AL00046-1

Comment:

The City of Manhattan Beach has reviewed the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR). Based on our review, along with the analysis of consultants hired by the South Bay Council of Governments (which represents the City of Manhattan Beach), we are recommending 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 South Bay Cities Council of Governments' consultant team of technical experts has produced a report of technical comments, which identifies extensive omissions and deficiencies with the Draft EIS/EIR (attached). The City of Manhattan Beach fully agrees with all of the comments made in the technical comments by the South Bay Cities Council of Governments report. Manhattan Beach is primarily concerned with three general categories: (1) the inadequate discussion of the project's surface traffic impacts; (2) the inadequacy of the noise impact analysis; and (3) the inadequacy of the air quality analysis.

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.

AL00046-2

Comment:

The Draft EIS/EIR does not fully analyze the project's off-airport surface traffic impacts. The analysis in the Draft EIS/EIR gives little consideration to surface traffic impacts on South Bay Communities such as Manhattan Beach which are not in direct proximity to the airport. Of the 76 intersections analyzed in the Draft EIS/EIR, only 9 were south of the I-105 (Century) freeway. For example, the intersection of Rosecrans and I-405 was not included in the analysis. This intersection, along with others throughout the area are greatly impacted by airport traffic. There are inconsistencies in the Draft EIS/EIR on those intersections that are studied. For instance, the Draft EIS/EIR notes that 8% of the afternoon peak traffic 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..."

Response:

This comment is similar to comment AR00003-25. Please see Response to Comment AR00003-25.

3. Comments and Responses

AL00046-3

Comment:

The Draft EIS/EIR noise analysis understates the Project's noise impacts. The Draft EIS/EIR minimizes the Project's noise impacts by failing 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.1 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 dismisses the impact of single event overflight noise on the South Bay communities by (1) failing to depict and analyze the noise impacts from additional new routes over areas not previously over-flown; (2) failing to acknowledge a potential increase in lateral separation of aircraft which could lead to an increase in overflight noise; (3) failing to report or study the noise impacts of increased operations over coastal zones; and (4) using an outdated modeling system to justify the decision not to study the noise impacts to South Bay communities.

1 The Draft EIS/EIR improperly relies on draft FAA Order 1050.1E and the City of Los Angeles= Draft L.A. CEOA Thresholds Guide (May 14, 1998) as authority for several of its assertions.

Response:

The content of this comment is similar to comment AR00003-40; please see Response to Comment AR00003-40.

AL00046-4

Comment:

The Draft EIS/EIR air quality analysis is inadequate. 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). Basic economic theory dictates that demand will reach equilibrium for a given level of supply at a certain market cost. If the supply curve is shifted, as would occur under an increased capacity situation the supply/demand equilibrium for the same level of market cost will shift to a point of higher demand. By assuming no supply/demand shift the Draft EIS/EIR does not fully take into account the decrease to air quality in the region, which will have a negative impact on air quality in Manhattan Beach.

Response:

The content of this comment is similar to comment AR00003-45; please see Response to Comment AR00003-45.

AL00046-5

Comment:

In addition to the issues listed above, we are also 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:

Alternative D, Enhanced Safety and Security Plan, has been 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. 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.

AL00046-6

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 AL00046-7 through AL00046-70 below.

AL00046-7

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

3. Comments and Responses

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.

AL00046-8

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.

AL00046-9

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.

AL00046-10

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.

AL00046-11

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 comment AR00003-7.

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AL00046-12

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:

The content of this comment is essentially the same as comment AR00003-8; please see Response to Comment AR00003-8.

AL00046-13

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:

The content of this comment is essentially the same as comment AR00003-9; please see Response to Comment AR00003-9.

AL00046-14

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

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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.

AL00046-15

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.

AL00046-16

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:

The content of this comment is essentially the same as comment AR00003-12; please see Response to Comment AR00003-12.

AL00046-17**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 content of this comment is essentially the same as comment AR00003-13; please see Response to Comment AR00003-13.

AL00046-18**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.

AL00046-19**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

3. Comments and Responses

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 "intrail", 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 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.

AL00046-20

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 content of this comment is essentially the same as comment AR00003-16; please see Response to Comment AR00003-16.

AL00046-21**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.

AL00046-22**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.

AL00046-23**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;

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Response:

Please see Subtopical Response TR-ST-2.1 for a discussion of the study area and facilities analyzed.

AL00046-24

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.

AL00046-25

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.

AL00046-26

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.

AL00046-27

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.

AL00046-28

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.

AL00046-29

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.

3. Comments and Responses

Response:

This comment is similar to comment AR00003-25. Please see Response to Comment AR00003-25.

AL00046-30

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

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.

AL00046-31

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

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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.

AL00046-32

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.

Intersection8 Difference	Existing	Adjusted	Alternative C		Difference
	V/C(LOS)	Baseline V/C(LOS)	(w/mit)	(w) V/C(LOS)	(w) Existing
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.

Response:

Please see Response to Comment AR00003-21 regarding cumulative impacts.

AL00046-33

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.

Alternative	AM PEAK			PM PEAK		
	Adjusted	No	Alternative	Adjusted	No	
	Baseline	Project	C	Baseline	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

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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.

AL00046-34

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.

AL00046-35

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.

AL00046-36

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.

AL00046-37**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:

This comment is similar to comment AR00003-33. Please see Response to Comment AR00003-33.

AL00046-38**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.

AL00046-39**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.

AL00046-40**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

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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.

AL00046-41

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.

AL00046-42

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.

AL00046-43

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.

Response:

The content of this comment is essentially the same as comment AR00003-39; please see Response to Comment AR00003-39.

AL00046-44

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,

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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 1050.1D, 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.

AL00046-45

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:

The content of this comment is essentially the same as comment AR00003-41; please see Response to Comment AR00003-41.

AL00046-46

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.

AL00046-47

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

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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.

AL00046-48

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.

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.

AL00046-49

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:

The content of this comment is essentially the same as comment AR00003-45; please see Response to Comment AR00003-45.

AL00046-50

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.

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Response:

The content of this comment is identical to comment AR00003-46; please see Response to Comment AR00003-46.

AL00046-51

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.

AL00046-52

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:

The content of this comment is essentially the same as comment AR00003-48; please see Response to Comment AR00003-48.

AL00046-53

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.

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AL00046-54

Comment:

D. The Applicability of the Construction Equipment NOx Standard is Overstated.

The Draft EIS/EIR states that only construction vehicles meeting a 2.5 grams per brake horsepower-hour (g/bhp-hr) NOx 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+NOx standard (that is the basis for the 2.5 g/bhp-hr NOx 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 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 NOx at levels around 4.0 g/bhp-hr (an exact value is not possible since the standard is again expressed as NMHC+NOx, 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 content of this comment is essentially the same as comment AR00003-50; please see Response to Comment AR00003-50.

AL00046-55

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 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.

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:

The content of this comment is essentially the same as comment AR00003-51; please see Response to Comment AR00003-51.

AL00046-56

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:

The content of this comment is essentially the same as comment AR0003-52; please see Response to Comment AR0003-52.

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AL00046-57

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 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, 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 NO_x 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 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 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-NO_x relation as a means to estimate aircraft

takeoff PM emission rates for each of the engines with NO_x 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:

The content of this comment is essentially the same as comment AR00003-53; please see Response to Comment AR00003-53.

AL00046-58

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:

The content of this comment is essentially the same as comment AR00003-54; please see Response to Comment AR00003-54.

AL00046-59

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

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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:

The content of this comment is essentially the same as comment AR00003-55; please see Response to Comment AR00003-55.

AL00046-60

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:

The content of this comment is essentially the same as comment AR00003-56; please see Response to Comment AR00003-56.

AL00046-61

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.

AL00046-62

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.

3. Comments and Responses

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.

AL00046-63

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.

AL00046-64

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:

The content of this comment is essentially the same as comment AR00003-60; please see Response to Comment AR00003-60.

AL00046-65

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.

AL00046-66

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.

AL00046-67

Comment:

A. The Draft EIS/EIR Delays Disclosure of the Full List of Mitigation Measures Until the Final EIS/EIR.

3. Comments and Responses

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.

AL00046-68

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.

AL00046-69

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.

AL00046-70

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.

3. Comments and Responses

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.

AL00047 King, Norm San Bernardino Associated Governments 9/21/2001

The content of this comment letter is identical to comment letter AL00040; please refer to the responses to comment letter AL00040.

AL00048 Bishop, AICP, Rick Western Riverside Council of Governments 9/21/2001

The content of this comment letter is identical to comment letter AL00040; please refer to the responses to comment letter AL00040.

AL00049 Kennedy, Hilda City of Inglewood 10/16/2001

AL00049-1

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.

The attached comments are from Inglewood's representative in the California State Assembly, Assemblyman Jerome Horton, 51st District. We previously sent comments he drafted also voicing his concerns about the current Draft Master Plan and EIS/EIR Report.

Response:

Responses to the attached letter from Assemblyman Jerome Horton are provided in the responses to comment letter PC02518.

AL00050 Okazaki, James City of Los Angeles 11/9/2001

AL00050-1

Comment:

The City of Los Angeles Department of Transportation (LADOT) has reviewed the Draft Environmental Impact Statement /Environmental Impact Report (DEIS/DEIR) for the LAX Master Plan Project. LADOT has worked closely with Los Angeles World Airport (LAWA) staff and their consultants to develop an acceptable off-site traffic impact analysis and to prepare a transportation mitigation program designed to address the anticipated traffic impacts of the proposed Master Plan for the Los Angeles International Airport. However, in light of recent events, it appears that an additional alternative with emphasis on safety and security will be formulated and integrated into the DEIS/DEIR process. LADOT looks forward to working with LAWA staff and their consultants to prepare a comprehensive ground access plan for the new alternative.

Given the current circumstances, our comments herein are limited to the review and analysis of the previous alternatives presented in the LAX Master Plan DEIR/DEIS. We expect to make additional comments on the new alternative, which focuses on safety and security, once we are provided with the new traffic impact analysis.

Response:

Comment noted. Alternative D, the Enhanced Safety and Security Plan, was addressed in the Supplement to the Draft EIS/EIR.

AL00050-2**Comment:**

General Comments

1. PEAK HOUR TRAFFIC VERSUS MAP GROWTH THRESHOLDS

The "preferred" alternative (Alt. C) indicates that the airport infrastructure would be expanded to accommodate up to 89.6 million-annual-passengers (MAP) by year 2015, up from the 1996 level of 58 MAP. The current airport infrastructure was designed for 40 MAP, yet today's passenger activity levels have grown to beyond 50% of the MAP design. While the issue of MAP growth may be academic, it can, nonetheless, be a direct indicator of the magnitude of traffic congestion within and surrounding LAX. The amount of airport traffic generated during peak commuter hours, not airport MAP, is the indicator used by LADOT to determine significant traffic impacts and surface street congestion levels. If the Alternative C plans are pursued, LADOT recommends that LAWA staff, in consultation with LADOT, develop "trip cap" reduction measures designed to trigger transportation improvements and/or Transportation Demand Management (TDM) strategies when established peak hour trip generation thresholds are exceeded. The Airport Traffic Management Center (TMC), which will include several closed-circuit television cameras and vehicle detector loops throughout the Central Terminal Area, can be utilized in implementing the "trip cap" program by monitoring airport vehicular traffic.

Response:

The commentor is correct that peak hour traffic, not MAP, is the appropriate metric of traffic planning and engineering. A mitigation phasing plan will be available to help ensure that necessary mitigation measures are in place prior to major facility opening. Although the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided the appropriate level of detail for a program-level environmental analysis, a more specific phasing plan will be developed prior to construction. That phasing plan may include the type of trip cap measures that the commentor is referring to.

AL00050-3**Comment:****2. NEW ALTERNATIVE**

It is our understanding that a new alternative, which emphasizes security and safety, will be developed by LAWA. LADOT should be consulted in the development of the traffic forecasts and traffic impact analyses to ensure the accuracy of all the assumptions related to the transportation network and forecast model are accurate.

Response:

LADOT's Westchester office worked closely with LAWA and the LAX Master Plan team to develop assumptions, forecasts, and analyses of the new alternative, Alternative D.

AL00050-4**Comment:****3. ROADWAY INFRASTRUCTURE COST**

The total cost of the proposed Ring Road, LAX Expressway and Green Line Extension exceeds \$1 billion. The Final Environmental Impact Report should include a financial plan that lists potential funding sources needed to finance the proposed infrastructure improvements.

3. Comments and Responses

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.

AL00050-5

Comment:

4. MITIGATION PHASING PLAN

To ensure that the full build-out of the project does not take place until all of the required transportation improvements are implemented, a mitigation implementation plan showing when transportation improvements will be guaranteed and constructed commensurate to the level of airport facility development should be developed. The sub-phasing plan should be developed in consultation with LADOT.

Response:

This comment is similar to comment AR00003-38. Please see Response to Comment AR00003-38.

AL00050-6

Comment:

5. REMOTE PARKING MD BAGGAGE CHECK-IN

According to the DEIR/DEIS, in 1999, the Van Nuys Fly-Away service provided daily scheduled bus service from Van Nuys Airport to and from LAX to accommodate an average of 2,600 daily riders (both passengers and airport employees). The report proposes additional FlyAway sites, including in the San Fernando Valley by year 2005 and in Orange County by year 2015 (Technical Report 3b - Section 5.1). Other potential sites are being explored. With increasing traffic demand for the airport and a result of unmitigated traffic impacts, LADOT strongly recommends a major expansion of the Fly-Away service program. To effectively serve as an attractive option to airport passengers and to address the urgent need for off-site passenger screening, remote luggage check-in and express shuttle service to the central terminal area should be considered for the existing Van Nuys FlyAway and for the other potential locations. A facility offering both remote parking and airline/baggage check-in would be an effective trip reduction measure to minimize the traffic impacts of the proposed airport expansion and to address the off-site passenger and luggage screening security needs.

Response:

An expanded FlyAway service is a part of each alternative, and is a particularly notable component of the Enhanced Safety and Security Plan alternative, Alternative D. Although the details of the expanded services are beyond the scope of this program-level EIS/EIR, additional information on the expanded service was included in the Supplement to the Draft EIS/EIR. Also, please see Topical Response TR-ST-5 regarding the FlyAway service.

AL00050-7

Comment:

6. LINCOLN CORRIDOR TASK FORCE

The Lincoln Corridor Task Force (LCTF) was formed to join several agencies in an effort to address the increasing congestion along a five-mile stretch of Lincoln Boulevard between Manchester Avenue and the Santa Monica (I-10) Freeway and to determine the long-term transportation needs of the corridor. The LCTF includes representatives from Caltrans, the County of Los Angeles, the Cities of Los Angeles, Culver City and Santa Monica, the Los Angeles County Metropolitan Transportation Authority,

the Southern California Association of Governments, and the California Coastal Commission. Ultimately, the LCTF's goal would be, with consensus from the participating agencies and input from the public, to develop a mutually agreeable transportation improvement plan for Lincoln Boulevard which may include an array of capacity enhancing measures, transit enhancement strategies, and improved corridor aesthetics.

The LAWA-preferred expansion plan (Alternative C) is expected to result in 6 unmitigated significant traffic impacts along Lincoln Boulevard. Therefore, by contributing to the implementation of the improvement plan developed by the LCTF, the LAX Expansion project may be able to address these unmitigated impacts by fully or partially reducing the traffic impacts with the improvements developed by the LCTF. If and when the agencies of the LCTF establish a consensus on a set of transportation improvements for the Lincoln Boulevard corridor, the proposed LAX Master Plan traffic mitigation program along the corridor should be re-examined for consistency and support to the LCTF program. LCTF improvements should be substituted in lieu of the LAX Master Plan improvements if it is determined by LAWA and LADOT that (1) the LCTF improvements are regionally superior and (2) they mitigate the project-related traffic impacts of the LAX Master Plan Project.

Response:

For Alternative C, mitigation measures are proposed for seven of the 10 intersections studied along Lincoln Boulevard. Even with these mitigation measures, Alternative C results in four unmitigated intersections along Lincoln Boulevard in 2005 and five unmitigated intersections along Lincoln Boulevard in 2015. Under Alternative D, there would only be one unmitigated intersection along Lincoln Boulevard in 2015 (Lincoln and Jefferson during the p.m. and airport peak hours). This comment suggests that the mitigation measures proposed in the Draft EIS/EIR be re-examined once the Lincoln Corridor Task Force completes its recommendations for corridor improvements, and that appropriate changes in the mitigation measures be made at that time. Mitigation measures will be coordinated with the Lincoln Corridor Task Force.

AL00050-8

Comment:

7. COMMERCIAL VEHICLE STAGING AREA

The proposed airport expansion should ensure adequate current space allotments for staging of commercial vehicles, including taxis, limousines, chartered buses and vans, and Super Shuttles. The proposed Western Terminal (Alternative C) did not appear to supply adequate commercial vehicle space for terminal curbside loading/unloading and for vehicle staging. The layout and location of the staging areas should be developed in consultation with LADOT.

Response:

Large commercial vehicle staging areas would be provided on both sides of the future airport under Alternatives A, B, and C. Each area should be large enough to accommodate all of the staging demand for that side of the airport. Under Alternative D, a consolidated commercial vehicle staging would be provided south of Arbor Vitae, which would be adequately sized to accommodate the commercial vehicle demand.

AL00050-9

Comment:

8. TRANSIT CENTER

More information on the proposed transit center relocation, relative to layout, location, connectivity to other modes, and the impacts to existing transit routes, is necessary to evaluate the benefits of the proposed transit center.

Response:

The technical transportation analysis conducted as part of the LAX Master Plan effort accounted for modal shares associated with improved bus and rail transit. Please see Topical Response TR-ST-5

3. Comments and Responses

(see Section 3 on Transit) 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.

AL00050-10

Comment:

9. AVIATION BOULEVARD RAIL STRUCTURE

The mitigation program developed by LADOT to address the Alternative C traffic impacts assumes that the existing support columns for the railroad bridge that runs along the west side of Aviation Boulevard in the vicinity of Century Boulevard would be abandoned and removed. However, recent discussions with LAWA staff indicated that the railway may not be abandoned after all and plans may need to be prepared to incorporate the rail structure with the expansion plans. If the railroad support columns are not removed, many of the proposed mitigation measures along Aviation Boulevard would no longer be feasible and alternate mitigations would need to be developed. The Final EIS/EIR needs to address that possibility.

Response:

Under Alternatives B and C, the existing support columns for the railroad bridge would be removed in order to construct and operate the proposed Manchester Square cargo facilities.

Under Alternative D, the support columns and railroad bridge are not affected.

AL00050-11

Comment:

CHAPTER 4 COMMENTS

10. Tables 4.2.1-7 and 4.2.1-8 (starting on page 4-260) indicate that the planned airport parking spaces will exceed the Alternative C demand for parking in year 2015. The DEIR/DEIS indicates that the expected daily demand for short and long-term airport public parking will be 35,636 spaces for all the expansion alternatives in year 2015. However, as part of Alternative C, the expansion plan proposes to provide 39,441 parking spaces, which is 3,805 more spaces than the expected daily demand. Similarly, the projected daily parking demand for airport employees for year 2015 is 12,400 spaces, but 14,265 spaces are proposed as part of the preferred alternative. Providing more parking than the expected demand does not support the trip reduction strategies of an effective Transportation Demand Management program. The report does indicate (Section 4.3.1-On-Airport Surface Transportation) that on-airport parking spaces provided in the preferred alternative would exceed the anticipated demand in an attempt to reduce the number of recirculated trips around the CTA (i.e., motorists who do not find parking are prone to circle around the terminal again until a space is vacated). The final EIS/EIR needs to clarify this issue.

Response:

The transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Prudent planning does allow for some excess parking capacity for good reason because the time required to find an empty parking space is unreasonably high when the occupancy of a parking facility approaches its capacity.

But in addition, excess parking capacity is also prudent in light of seasonal peak periods when parking fills are the highest. The general approach and methodology is to analyze conditions during a design day. A design day is different than a peak day as discussed in Section 2.6.1, Analysis Periods, of Technical Report 3a, On-Airport Surface Transportation. Design day for this airport reflects conditions on an average weekday during the peak month of August. Tables 4.3.1-7 and 4.3.1-8 provide gross volume of parking space demand, irrespective of location, convenience, cost, etc. Parking was subdivided into public parking and employee parking to understand the demand versus capacity for each (see Tables 4.3.1-7 and 4.3.1-8 on pages 4-260 and 4-261 in the Draft EIS/EIR and Tables S4.3.1-7 and S4.3.1-8 in the Supplement to the Draft EIS/EIR). 2015 Alternatives B and D appear to

have a shortage of parking capacity to accommodate public parking. However, when looking at employee parking capacity for 2015 Alternatives B and D, there would be excess capacity. If these alternatives are selected, during the course of advanced planning, studies will refine ways to operationally reallocate employee and public parking facility sizing to meet the demand and further mitigate significant impacts.

AL00050-12

Comment:

11. In Section 4.3.2 (Environmental Action Plan - Proposed, page 4-274), under "Mitigation Measures," it is indicated that the transportation mitigation measures would "eliminate all remaining CEQA significant airport-related off-airport traffic impacts of the Master Plan alternatives by 2015, except for six intersections." However, based on the results of the Alternative C traffic impact analysis for year 2015, as prepared by LADOT, there are nine, not six, intersections that would remain significantly impacted after the proposed mitigation program is implemented. This is an error that is repeated in different sections of the report. Based on the results of the 2015 Alternative C impact analysis, the following nine intersections remain significantly impacted after the proposed traffic mitigation program:

- a. La Tijera Boulevard and Sepulveda Boulevard
- b. Arbor Vitae Street and La Cienega Boulevard
- c. Century Boulevard and La Cienega Boulevard
- d. Jefferson Boulevard and Lincoln Boulevard
- e. La Tijera Boulevard and Lincoln Boulevard
- f. Lincoln Boulevard and Manchester Avenue
- g. Lincoln Boulevard and Marina Expressway
- h. Lincoln Boulevard and Teal Street
- i. Mariposa Avenue and Sepulveda Boulevard

12. In Section 4.3.2.2 (General Approach and Methodology, page 4-275), it is indicated that airport peak hour traffic impacts would be identified and mitigated only if the airport peak hour traffic volumes exceed the volumes of the a.m. or p.m. peak hours. This is incorrect, as LADOT and LAWA have agreed that significant traffic impacts that are identified for all three time periods studied should be mitigated to a level of insignificance. This statement is repeated in several sections of the Off-Airport Surface Transportation section of the report.

13. In Section 4.3.2.3 (Affected Environmental Baseline, Table 4.3.2-3 on page 4-289), it is indicated that, for the Adjusted Environmental Baseline scenario, there are 29 "deficient" facilities in year 2005 and 47 for year 2015. However, it is not clear if these results are for a particular peak hour of traffic or include the total deficient facilities for the three time periods studied (a.m., p.m. and airport peak hour). Additionally, to be consistent, this table should include the results of the Adjusted Environmental Baseline scenario as corrected by LADOT.

14. In Section 4.3.2.6 (Environmental Consequences, Table 4.3.2-4 on page 4-294), it should be explained why the a.m. peak hour trip generation for Alternative C (year 2015) is more than the a.m. peak hour trip generation for Alternatives A and B. To the reader, this is counterintuitive as the airport activity level is greater in Alternatives A and B.

15. In Section 4.3.2.9 (Mitigation Measures, pages 4-320, 4-326 and 4-331), for all three expansion scenarios, Mitigation MM-ST-2 proposes to widen Arbor Vitae Street from 4 to 6 lanes. However, the report does not indicate which section of Arbor Vitae Street is proposed for widening. LADOT has not seen any geometric design drawings depicting the proposed lane configuration for this improvement.

16. In Section 4.3.2.9.3 (Alternative C - No Additional Roadway, page 4-330), the report indicates that 33 intersections were significantly impacted by the proposed Alternative C expansion by year 2005. While the supporting table list 35 intersections as significantly impacted, the intersections of Airport/Arbor Vitae and Aviation/Arbor Vitae were omitted from the summary list of significantly impacted intersections (Table 4.3.2-25 on page 4-347). The report correctly indicates that 32 intersections are expected to be significantly impacted by Alternative C in year 2015.

3. Comments and Responses

17. As indicated in comment number 11 above, nine intersections (not six as indicated in the report), are expected to remain significantly impacted after the proposed mitigation program is implemented for Alternative C by year 2015. Table 4.3.2-28 on page 4-350 neglects to include the intersections of La Tijera/Sepulveda, Lincoln/Marina Expressway, and Sepulveda/Mariposa as unmitigated for year 2015.

Response:

The error in the number of significantly impacted intersections is noted, and has been corrected as part of this Final EIS/EIR (please refer to Section 4.3.2).

The analysis of Alternatives A, B, and C in Technical Report 3b, and Technical Report S-2b for Alternative D, and summarized in Section 4.3.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR used the original significance thresholds for the airport peak hour as defined in the Memorandum of Understanding signed by LAWA and LADOT. Subsequent to the completion of Technical Report 3b, LADOT and LAWA agreed to change the significance threshold in the refined analysis of Alternative C intersections, which was performed by LADOT. This refined intersection analysis using the revised significance thresholds is documented in Section 4.3.2, beginning at subsection 4.3.2.9.3 and continuing to the end of the section. Analysis of Alternative D also uses the revised significance thresholds for the airport peak hour.

The deficient facilities identified in Table 4.3.2-3 are facilities that are deficient in any time period. That is, an intersection that is deficient in only the p.m. peak hour and another that is deficient in all three peak hours, is two deficient intersections. Also, Table 4.3.2-3 compares several scenarios. The data used in this table must be consistent, or the comparison becomes invalid. Therefore, it was necessary to use the original data for the adjusted environmental baseline in this table. Incorporating the data developed in the refined intersection analysis of Alternative C would result in an inappropriate comparison with the other scenarios in the table.

The trip generation of passenger trips was a direct result of the hourly air passenger flight schedule. The flight schedule differed for each alternative and was dependent on factors such as fleet mix, load factors, markets served, gate availability, runway capacity and other factors. The passenger schedule was then converted to vehicle trips by using lead and lag factors, mode split assumptions, vehicle occupancy, and other factors. The resulting trip generation is not always intuitive when comparing alternative to alternative in a specific hour. The passenger flight schedule is explained in more detail in the Forecast section of the Draft LAX Master Plan document.

Mitigation Measure MM-ST-5 recommends widening Arbor Vitae Street from four to six lanes from I-405 to Airport Boulevard. Geometric design drawings are beyond the scope of this program-level EIS/EIR. Design drawings will be prepared in the design phase of the project and will be coordinated with LADOT at that time.

Documentation from the LADOT indicates that the ring road would remove any potential impact at the intersections of Airport/Arbor Vitae and Aviation/Arbor Vitae. However, because the ring road would not be fully operational before 2005, there would be a temporary significant impact at these intersections between 2005 and the opening of the ring road as indicated in Section 4.3.2 (subsection 4.3.2.6) of this Final EIS/EIR. Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

AL00050-13

Comment:

TECHNICAL REPORT 3B COMMENTS

18. In Section 4.1 (Future Conditions with RTP Background Assumptions, page 4-1), the reader is referred to Attachment H; however, there is no Attachment H included in Technical Report 3b.

19. In Attachment C (Level of Service Summaries), the LOS summary tables are not clearly identifiable to the reader. For example, the upper left-hand corner of the first summary table includes the heading "P405B1AM." It is not apparent to the reader what this heading means and what the results represent. Each LOS Summary Table should be titled so that the project alternative and results are clearly identifiable to the reader.

Response:

Attachment H contains the detailed CalcaDB intersection LOS sheets for the model that was run with the RTP background assumptions. Because it is over 1,000 pages long, it was not published in the Draft EIS/EIR, but is available upon request as part of the Reference Library. The revised Level of Service Summaries with clear titles indicating project alternative are included as part of this Final EIS/EIR.

AL00050-14

Comment:

CONCLUSION

Under the Mayor's directive, we understand that LAWA will develop a new alternative that would emphasize airport security and air passenger safety. It is our understanding that the new alternative will not include the proposed western terminal, LAX Expressway, Ring Road and expansion of the airport beyond the regional forecasts of 78 MAP. The new alternative, as we understand, would include mass transit enhancements, aggressive TDM measures for airport employees, off-site inter-modal transportation facility, and a high-speed people mover system between the inter-modal center and the LAX terminal area.

LADOT will work with LAWA staff and their consultants to develop a traffic access and circulation plan for the new alternative. As you develop the new alternative, we recommend that you include additional Fly Away centers throughout the region, and that these centers feature passenger security checks and remote luggage check-in. Further, since LAX is one of the only major airports in the United States without a direct freeway connection to the main terminal, we also recommend that LAWA work closely with us and Caltrans to include effective connections to both the I-105 and I-405 Freeways. If an inter-modal terminal is to be located near the freeway, LAWA should consider direct access ramps from the inter-modal terminal to the freeway. Providing direct freeway access would allow for the separation of regional and local traffic, thus bringing relief to the surface streets in the neighboring communities around LAX and improve access to the Airport. An effective transportation plan to address the significant traffic impacts of the Airport traffic also requires an appropriate balance of street improvements, transit enhancements, and aggressive trip reduction measures through a comprehensive Transportation Demand Management Program.

Response:

Comment noted. LAWA and the Master Plan team worked closely with the LADOT Westchester office in developing and analyzing the new alternative, Alternative D, which was evaluated in the Supplement to the Draft EIS/EIR. All of these suggestions were carefully considered. Please note that Alternative D does not include the LAX Expressway or the Ring Road.

AL00051 Alonso, Francisco City of Monterey Park 11/8/2001

AL00051-1

Comment:

The City of Monterey Park has worked jointly with the City of Montebello to prepare comments to the Draft Master Plan Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Los Angeles International Airport.

We believe that the draft Master Plan Draft EIR/EIS is "fatally flawed" and that the only viable conclusion is to start the process over again.

Response:

Comment noted. Please see Responses to Comments below.

3. Comments and Responses

AL00051-2

Comment:

Comments on the Draft EIS/EIR regarding Impacts of the proposed LAX expansion.
The Cities of Monterey Park, Montebello and Communities of the Western San Gabriel Valley
November 7, 2001

1. Introduction

This is the official comment document of the City of Monterey Park, the City of Montebello and the communities of the Western San Gabriel Valley on the proposed Los Angeles International Airport (LAX) Master Plan and the Draft Environmental Impact Statement/Environmental Impact Report (draft EIS/EIR)¹. The Cities appreciate the opportunity provided by Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) to comment on these documents.

1 Prepared by Ecos Consulting, Portland, Oregon.

Response:

Comment noted.

AL00051-3

Comment:

The Cities of Monterey Park, Montebello and the communities of the Western San Gabriel Valley are located within 12 air miles to the east of the Los Angeles International Airport. These communities are located directly under the flight paths of aircraft arriving from the north landing at LAX, and currently are affected by the noise, air emissions, as well as safety related issues from these "over flights." These communities are especially affected under high air traffic congestion, or poor visibility conditions. Under these conditions, more distance is required between aircraft arriving at LAX, and flights have to be routed further east for their approach, further exacerbating the over flight conditions.

Response:

Comment noted. The cities referenced by the commentor are affected by the base leg (perpendicular) segment of the westerly approaches to the airport. This approach is used by all traffic arriving from west coast, Pacific and European origins. Under heavy traffic conditions, the base leg moves eastward to better increase the separations between arriving aircraft and to safely sequence them in with the arrivals coming directly from the east. This eastward extension of the base leg approach results in the conditions described by the commentor.

It is not likely that the procedures can be changed to remove the traffic entirely from over the area. For further information on the effect of these approaches, also see Subtopical Response TR-N-3.5 regarding the effects of elevation on noise contours; Air Quality was addressed in Section 4.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR with additional technical analysis in Appendix G, Air Quality Impact Analysis, and Appendix S-E, Supplemental Air Quality Impact Analysis.

AL00051-4

Comment:

These Cities also have a unique topographical feature in that certain portions within their territories are located at elevations of up to 900 feet above sea level. In an area where approaching flights are supposed to fly at an altitude of 2,500 feet, this means these portions of the communities are exposed as much to aircraft noise and emissions as communities located directly adjacent to the airport.

Response:

The commentor is correct in describing the altitude differences present in Monterey Park. The noise level difference described between aircraft and the source at 2,500 feet is approximately 4 decibels less than that experienced by locations at 1,600 feet from the source. The area falls well beyond the

location of significant CNEL levels. A grid analysis at the location indicates that the noise levels in the Monterey park area average approximately 34 CNEL.

Currently, aircraft directed to land on the north runway complex at LAX fly over the area at 2,500 feet MSL (approximately 1,700 feet above the ground), while those directed to land on the south runways fly over the area at 3,500 feet MSL (approximately 2,700 feet above the ground). Air Traffic Control management has begun to evaluate modifications of the approaches to the north and south runway complexes to increase aircraft altitude over Monterey Park by 2,500 feet for north approaches and 500 feet for south approaches. These actions would result in noise level decreases of between two and eight decibels on the ground. This is a long term solution and will require a redesign of other terminal airspace. The community has requested input to the solution and funding is not currently available. For further information on the effects of elevation on noise contours, please see Subtopical Response TR-N-3.5.

AL00051-5

Comment:

In addition, these Cities are also home to a high proportion of minority and/or low-income population. According to the 2000 US census information, the City of Montebello is approximately 75 percent Hispanic, and the City of Monterey Park is approximately 57 percent Asian and 29 percent Hispanic. In fact, the racial makeup of the Monterey Park community is nearly 80 percent minority.

Response:

Comment noted.

AL00051-6

Comment:

The City of Monterey Park, the City of Montebello and the communities of the Western San Gabriel Valley have grave concerns in regards to the proposed expansion plans presented in the LAX Master Plan and draft EIS/EIR documents. We believe the proposed plans are deeply flawed, and contain numerous omissions, and ambiguous or misleading information.

Response:

Comment noted.

AL00051-7

Comment:

In addition, they contain a number of incorrect assumptions - the documents only presented alternatives that have worse impacts than LAWA and the FAA's preferred options, although alternatives with far less community impacts exist, including a regional transportation system.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in 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.

AL00051-8

Comment:

The Cities are particularly concerned by the omission of any analysis of the effects of the proposed expansion on their residents, especially on the topic of air safety.

3. Comments and Responses

Response:

Comment noted. Safety-related issues were addressed in Section 4.24, Human Health and Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see also Response to Comment AL00017-97 for more information regarding the geographic extent of the environmental analyses and Topical Response TR-SAF-1 regarding aviation safety.

AL00051-9

Comment:

Specifically, the Cities object to the plan proposed by the draft EIS/EIR and the LAX Master Plan because of the following factors:

Response:

Please see Responses to Comments AL00051-10 through AL00051-22 below.

AL00051-10

Comment:

- Air Quality Impacts: The air quality for the citizens living and working in the Cities of Monterey Park, Montebello and the Western San Gabriel Valley will be severely affected as over flight emissions increase, as projected by the draft EIS/EIR. Furthermore, the draft EIS/EIR has not provided impact analysis for the exposed communities under the airport flight path. As the current operations at LAX already constitute the largest single source of air pollution in this nation's worst air quality region, any proposed expansion will further decrease the air quality in the Los Angeles Basin and the affected communities.

Response:

The Emissions and Dispersion Modeling System (EDMS), FAA's required analysis tool for evaluating air quality impacts for aviation sources, was used to calculate aircraft emissions and to predict the air pollutant ground-level concentrations from those emissions. EDMS includes emissions for aircraft during five operating modes (approach, taxi/idle in, taxi/idle out, take off, and climbout). Aircraft emissions during approach mode and climbout mode include pollutants emitted from the ground surface to the atmospheric mixing height (see Appendix G, Section 2.1.3.1, of the Draft EIS/EIR). The latest version of EDMS, used in preparation of the Final EIS/EIR, does include the capability to model dispersion of aircraft emissions generated in the approach, takeoff, and climbout modes. Please see Response to Comment AL00018-10 regarding the location of dispersion model receptors. Please see Topical Response TR-AQ-3 regarding increased air pollution.

AL00051-11

Comment:

- Noise Impacts: An increase in airport operations will significantly increase the noise levels in communities directly under the flight path, thereby reducing the quality of life of the people living there. Scientific studies have shown that noise from departing and arriving aircraft overhead can be a constant source of distress to community members (especially noise from round-the-clock cargo operations). Aircraft noise disturbance range from interfering with normal speech to interrupting sleep, and can disrupt a wide range of activities. Studies also show there is a relationship between noise and the health of community residents - high noise levels can be a factor in hypertension and cardiovascular disorders.

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. 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.

AL00051-12**Comment:**

The draft EIS/EIR also does not contain noise impact analysis beyond the communities adjacent to airport boundaries.

Response:

Section 5 Location Impact Analysis in Appendix D, of the Draft EIS/EIR and Appendix S-C1, of the Supplement to the Draft EIS/EIR, identifies 180 sites located on a regular grid of points, having spacing intervals of 3,000 feet along both north-south and east-west axes, and are generally patterned to include more than the land area within the anticipated 60 CNEL exposure level of the combined alternatives. While the regular grid included additional locations, only those sites that were located over land and off the airport are reported. Please see Subtopical Response TR-N-2.3.

AL00051-13**Comment:**

- Human Health Impacts: Implementation of the draft EIS/EIR's proposed build alternatives will result in increased aircraft emissions of criteria air pollutants - components of urban air pollution and precursors of smog, as well as emissions of toxic air pollutants (TAP) over the Western San Gabriel Valley.

Response:

The Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provided in Technical Report 4 and Appendix G. Toxic air pollutant emissions were addressed in Section 4.24, Human Health and Safety, of the Draft EIS/EIR. Please see Sections 4.6 and 4.24.1 of the Supplement to the Draft EIS/EIR for revised analyses for criteria pollutant and TAP emissions based on the new Alternative D and revised baseline emission estimates.

AL00051-14**Comment:**

Criteria air pollutants exacerbate respiratory and cardiovascular conditions in young and old members of our communities, while the long-term and cumulative risks posed by the emissions of TAPs to the citizens living and working in the communities under the flight paths are currently unknown.

Response:

Criteria pollutants are those pollutants regulated by USEPA or CARB through the use of ambient air quality standards (AAQS), as required by the Clean Air Act (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 AAQS were used in Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to 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. Section 176 of the CAA requires that federal actions conform to applicable SIP.

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. 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. Section 4-24, Human Health and Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR presented results of the TAP health risk assessment. Toxicity criteria developed for TAP 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,

3. Comments and Responses

persons with existing diseases), and individuals with lower levels of protective biological mechanisms due to genetic variability within the population (OEHHA, 2000). Please also see Response to Comment AF00001-51 regarding cumulative risks.

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 TAPs are addressed under the state's air toxics program and final mitigation measures defined in the Final EIS/EIR. 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.

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

AL00051-15

Comment:

- Traffic Impacts: The draft EIS/EIR projects a significant increase in cargo volume at LAX, which will have the potential to affect traffic through the Western San Gabriel communities. Currently, truck traffic to and from the ports of Los Angeles heading east to the Inland Empire and points east pass through these communities. An increase in cargo traffic to and from LAX will add to the current high volume, significantly affecting local traffic patterns and as well as regional arterials to access our communities.

Response:

This comment is concerned about LAX Airport adding extra trucks to the regional transportation system in the future to handle the projected cargo levels assumed in Master Plan Alternatives A, B, and C. Please see Topical Response TR-ST-1, in particular Section 2, for more information regarding cargo truck traffic. Alternative D, which was addressed in the Supplement to the Draft EIS/EIR, would not increase cargo handling facilities at LAX. As indicated in Table S3-2 (page 3-23) of the Supplement to the Draft EIS/EIR, cargo operations are projected to increase to about 3,120,000 tons/year at LAX by 2015 under the No Action/No Project Alternative and Alternative D. The traffic impacts of this level of cargo activity were described in subsection 4.3.2.6.1 (beginning on page 4-293) of the Draft EIS/EIR.

AL00051-16

Comment:

- General Concerns: The draft EIS/EIR lacks sufficient health studies, relies too heavily on models for impact analysis, and omits analysis of significant impacts to outlying areas. While the proposed expansion plans have the potential to affect the whole Los Angeles region and our communities on a number of aspects, most of the draft EIS/EIR's impact analysis was narrowly focused. LAWA and the FAA need to complete a more thorough investigation and analysis of the effects, including safety issues, of the increased operations on communities directly under the flight path, as well as the Los Angeles region.

Response:

Please see Response to Comment AL00017-97 regarding the geographic extent of the analysis provided in the Draft EIS/EIR.

AL00051-17

Comment:

- Outreach Concerns: The draft EIS/EIR and LAX Master Plan combine to present a prohibitive document. It is over 12,000 pages long, available to the general public only at limited locations or via the Internet, and costs approximately \$3,300 to purchase a hard copy. The document is written by experts, and contains many complex technical details. Due to its limited availability, the technical details, and the costs associated with purchasing a copy of the draft EIS/EIR, it is very difficult for the

average citizen, and even small communities and institutions to fully gain an understanding of the impacts of the proposed expansion of LAX.

Response:

Production, publication, and distribution of the Draft EIS/EIR was conducted in accordance with CEQA and NEPA requirements. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

AL00051-18

Comment:

In addition, LAWA and the FAA have not done a credible effort to inform or elicit input from the affected communities.

Response:

Comment noted. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

AL00051-19

Comment:

- Regional Transportation Strategy: The draft EIS/EIR and the proposed Master Plan do not reflect long-term regional transportation strategy of the greater Los Angeles Region. The proposed expansion only focuses on operations at LAX. It does not adequately assess the viability of a region-wide transportation system.

Response:

This comment incorrectly suggests that regional transportation plans were not considered in the analysis. Please see Topical Response TR-ST-2 regarding the surface transportation analysis methodology and results, in particular Section 2.3.

AL00051-20

Comment:

- Environmental Justice: The draft EIS/EIR analysis of impacts focuses narrowly and does not look beyond the communities immediately adjacent to LAX. Communities directly under the flight path are also affected by operations at the airport, and will be subjected to severe air and noise pollution impacts as operations at LAX increase.

Response:

Please see Response to Comment AL00017-190. Also, please see Topical Response TR-AQ-1 which addresses the deposition of pollutants in urban areas. Please also see Topical Response TR-N-3 which addresses the effect of elevation on noise contours, and Topical Response TR-N-4 for mitigation measures to reduce noise. Figures illustrating communities impacted by the LAX Master Plan project were provided in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR.

AL00051-21

Comment:

These communities are not considered for any mitigation measures by LAWA and the FAA. These communities, including the Cities of Monterey Park, Montebello and the Western San Gabriel Valley, are comprised mostly of minority residents. These residents are unfairly bearing the burdens of LAX operations and any future expansions, without any of the projected benefits.

3. Comments and Responses

Response:

As stated on page 4-402, in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the study area for the analysis is defined as the area in which the collective environmental effects of the Master Plan alternatives would be likely to occur, extending beyond the areas adjacent to LAX to include those areas potentially affected by aircraft noise (defined by the future 65 dB CNEL noise contours) and aircraft or airport-related emissions, as well as airport-related traffic impacts, including congestion, noise and air pollution. See pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as appropriately analyzed in the Southern California Association of Government (SCAG) Regional Transportation Plan and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Also note that LAWA Staff's new preferred alternative, Alternative D, limits future (2015) growth at LAX to levels similar to what would occur with existing facilities if the LAX Master Plan were not approved. Alternative D reduces growth at LAX compared to the other build alternatives, potentially shifting the burden of airport expansion to other regional airports. Please see Topical Response TR-EJ-3 regarding the SCAG 2001 RTP and environmental justice considerations.

Please see Subtopical Response TR-N-2.3 which relates to the study area for environmental justice and noise impacts on more remote communities, and Topical Response TR-EJ-3 regarding environmental justice and regional context.

AL00051-22

Comment:

- Security and Safety Factors: The events of September 11, 2001 have created unforeseen circumstances that drastically affect current and future US air travel as well as the growth pressure at LAX. Due to these events, the Cities of Monterey Park, Montebello and the communities of the Western San Gabriel Valley request that LAWA revise the Master Plan and the draft EIS/EIR to include analyses pertaining to security and safety conditions at LAX. These revised impact analyses by LAWA should take into account the near and long-term revised passenger and cargo forecasts based on the September 11 events' impacts to the economy, airlines, security and safety, and air travel in general.

Response:

Comment noted. Appendix S-B of the Supplement to the Draft EIS/EIR addresses changes caused by the events of September 11, 2001. Further, the Supplement to the Draft EIS/EIR analyzed a fourth alternative, Alternative D, Enhanced Safety and Security Plan, to respond to concerns over safety. Alternative D has been created to respond to the needed improvements without expanding LAX.

Surface transportation analyses for Alternatives A, B, C and the No Action/No Project Alternative provided in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, do not include revised assumptions for capacity-limiting security measures. Those measures do not limit curbfront access to the airport and are largely focused on activities within the terminals. This does not substantially change traffic circulation patterns.

Aviation forecasts used for the analyses presented in the Supplement to the Draft EIS/EIR took into consideration trends in air transportation after September 11, 2001, the general downturn in the economy that has occurred over the past several years and the SARS incident in Asian Pacific countries. That revised forecast is provided in the Draft Master Plan Addendum and summarized in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR.

Please also see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

AL00051-23

Comment:

Given the public outcry against the draft EIS/EIR and Master Plan, and the changes in the industry due to the events of September 11, LAWA has the unique opportunity to revisit the document and incorporate the feedback already received. At the very least, LAWA needs to update the Master Plan based on the changes in the industry. These changes are discussed in more detail below.

In summary, the Cities of the Western San Gabriel Valley submit that the draft EIS/EIR documents provided by LAWA and the FAA are currently insufficient. At a minimum, they must be revised to acknowledge the significance of current impacts and the potential for additional impacts in the future.

We request that LAWA and the FAA conduct additional studies and provide analyses of impacts on communities directly under the flight path, and especially those located below the 3,000 feet operating ceiling. In addition, LAWA and the FAA need to also consider the following:

Response:

Please see Response to Comment AL00034-4 regarding changes to the Master Plan process in light of September 11, 2001, and Responses to Comments AL00009-1 and AL00017-97 regarding the geographic extent of the Draft EIS/EIR analysis.

AL00051-24

Comment:

- A study of toxic air pollutants from aircraft and their long-term, cumulative impacts on the exposed population.

Response:

Potential health risks to populations in the vicinity of LAX were analyzed in Section 4.24, Human Health and Safety, of the Draft EIS/EIR, and Supplement to the Draft EIS/EIR, with supporting information in Technical Report 14 of the Draft EIS/EIR and Technical Report S-9 of the Supplement to the Draft EIS/EIR. The human health risk assessment evaluated the potential adverse health effects associated with toxic air pollutants released by airport activities for the selected alternatives. The Supplement to the Draft EIS/EIR provided an evaluation of Alternative D and updated the risk assessment based on a reevaluation of baseline conditions and revised mitigation measures. Cumulative impacts were addressed in subsection 4.24.1.7, Cumulative Impacts, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. For additional information regarding human health impacts, please see Topical Response TR-HRA-3.

Epidemiological studies have been performed at other airports. For example, the Illinois Department of Public Health (IDPH, 2001) examined actual cancer incidence observed in communities near Chicago's O'Hare and Midway airports between 1987 and 1997. Results of the study showed no elevation in cancer incidence for all cancers combined among whites, non-whites, males and females living near the airports. Trend analysis did not indicate a higher cancer burden for populations near the airports as compared to populations living farther away. This observation held true for all cancers combined as well

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as site-specific cancers. A study conducted by the Washington State Department of Health (1999) provided an examination of actual cancer cases near Washington State's SeaTac airport. Results of the study indicated that incidence of cancer was not statistically significantly higher for the SeaTac area compared to areas in the same county that are farther from the airport.

Epidemiological studies differ from risk assessments in that they describe actual incidence of cancer or other adverse health effects observed in real populations, and attempt to relate health effects to specific sources or causes. Risk assessments estimate potential health impacts using environmental data and exposure assumptions (e.g., lifetime exposure). Substantiating potential health risks estimated by risk assessment for an airport through epidemiological studies is very difficult because of the typical lack of exposure information about the study population. Further, understanding all of the factors that may lead to an adverse effect is necessary to related health effects to specific causes. The population evaluated in the epidemiological study may have lived in the area for many years or just a few years. They may have had exposure to chemicals from other sources, such as at work. They may have engaged in behavior such as smoking, drinking, overeating, or other lifestyle habits that increased their risk of adverse health effects. 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 in epidemiological studies 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.

AL00051-25

Comment:

- A study of aircraft noise impacts on the communities under the flight path.

Response:

Comment noted. Please see Responses to Comments AL00051-1, AL00051-3, and AL00051-4 for a discussion related to aircraft noise impacts over Monterey Park and other communities beyond the extent of the 65 CNEL.

AL00051-26

Comment:

- The viability and safety of increased LAX operations over the Los Angeles Region's already constrained airspace.

Response:

The airspace capacity and safety must be considered for any proposed runway expansion project. The analysis for LAX found that there is sufficient airspace capacity to serve the activity generated by the runway systems in each Master Plan alternative and FAA will not approve an alternative that is not safe. Prior to conducting any operations at LAX with any modified airfield, the FAA would develop air traffic control procedures that ensure the continued safety of flight operations at LAX. Please see Topical Response TR-SAF-1 for further discussion regarding aviation safety. Please also see Response to Comment PC00656-2 for more information on the airside analysis. Finally, Alternative D, the Enhanced Safety and Security Plan, has been added and was addressed in the Supplement to the Draft EIS/EIR, in light of the events of September 11, 2001, and is specifically designed to protect airport users and crucial airport infrastructure, and to incorporate federal security recommendations as they are developed to the greatest extent possible.

AL00051-27

Comment:

- Economic (cost-benefit), and origin and destination analyses for affected communities.

Response:

Comment noted.

AL00051-28**Comment:**

In terms of proposed mitigation strategies, we ask that LAWA and the FAA provide the affected communities, including those under the flight path with more defined and realistic mitigation strategies that will actually reduce LAX's current and future operational impacts, including:

Response:

Please see Responses to Comments AL00051-29 through AL00051-32 below.

AL00051-29**Comment:**

- Noise reduction or noise limitation plans for the affected neighborhoods, including restricted flight hours and ceilings.

Response:

Please see Topical Response TR-N-4 regarding noise mitigation, in particular Subtopical Response TR-N-4.1, and Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program. Noise mitigation measures are provided in subsections 4.1.8 and 4.2.8 of the Draft EIS/EIR and 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.

AL00051-30**Comment:**

- An air quality improvement plan to minimize the effects of toxic and criteria air pollutant on the affected communities, including education and outreach efforts to the affected population.

Response:

Comment noted.

AL00051-31**Comment:**

- Active mitigation strategies that monitor impacts to the affected communities and respond whenever impact levels exceed acceptable limits.

Response:

Please see Response to Comment AR00003-63.

AL00051-32**Comment:**

- A concrete, step-by-step plan to address environmental justice issues, including commitments to recognize and address the imbalance of the environmental, noise and health burdens of the airport's operations and expansion currently borne by low income and minority populations under the flight path.

Response:

Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR evaluated environmental justice issues relating to noise and health concerns. Disproportionately high and adverse effects on minority and low-income communities are addressed in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR and Final EIS/EIR

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and through an Environmental Justice Program developed based on an extensive community outreach process. 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.

AL00051-33

Comment:

LAWA and the FAA need to carefully consider a more regional transport system that will better serve the Los Angeles Basin. A regional approach to meeting the Los Angeles Region's transportation needs will help to reduce impacts and pollution in communities under the LAX flight path. This approach will better serve the region's future growth, and will provide a more fair distribution of the economic gains to the LA region. We believe that this region has the potential of setting the standard for a world-class regional transportation strategy.

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. Please also see Response to Comment AF00001-60.

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.

AL00051-34

Comment:

2. Impacts

2a. Air Quality Impacts to Communities Under the Flight Path

Any expansion of LAX operations will further decrease the air quality in the communities directly under the airport's flight path, including the communities of Western San Gabriel Valley. According to the US EPA, aircraft emissions from about 500 to 3,300 feet altitude are essentially the same as emissions at ground level 2. Thus, the Cities of Monterey Park, Montebello, and the communities of Western San Gabriel Valley are exposed to the same air pollutants as communities closer to LAX, due to the fact that these Cities are directly under the flight path and are located within the 2,500 feet operating "ceiling." As operations from LAX increase, we believe that the air quality for the citizens living and working in the Cities of Monterey Park, Montebello, and the Western San Gabriel communities will further worsen.³

2 "Control of Air Pollution from Aircraft and Aircraft Engines," Regulatory Support Document, US Environmental Protection Agency, Washington DC, 1997.

3 LAX Technical Appendix G. "Air Quality Impact Analysis," from "Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements," US Department of Transportation, Federal Aviation Administration.

Response:

Please see Response to Comment AL00051-10.

AL00051-35

Comment:

"Significant and unavoidable" air quality Impacts

The draft EIS/EIR lists six "significant and unavoidable" air-quality related Impacts to the communities surrounding LAX, at least two of which will also significantly impact communities under the flight path.

- The draft EIS/EIR concludes that increased traffic and activity levels will result in increase emissions of all five "criteria pollutants" (the five EPA-classified main components of urban air pollution) in all expansion scenarios.

Response:

Please refer to Response to Comment AF00001-38 for a discussion of the differences in evaluation of impacts associated with criteria pollutants and TAPs. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provided in Technical Report 4 and Appendix G. Toxic air pollutant emissions were addressed in Section 4.24, Human Health and Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The analysis was carried to the point geographically where incremental impacts could be regarded as negligible. Please see Sections 4.6 and 4.24 of the Supplement to the Draft EIS/EIR for revised analyses for criteria pollutant and TAP emissions based on the new alternative, Alternative D and the revised environmental baseline. Please refer to Topical Response TR-HRA-2 regarding the health effects of TAPs.

AL00051-36

Comment:

- The draft EIS/EIR concludes that people living, working, recreating, or attending schools in communities near the airport may experience increased incremental cancer risks from exposure to toxic air pollutants (TAP).

Response:

As indicated in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, potential cancer risks resulting from TAP exposure for Alternatives A, C and D would be less than CEQA thresholds of significance for horizon year 2015 without mitigation. For all of the build alternatives, cancer risks would be lower than the No Action/No Project Alternative and would decrease for most locations near the airport.

AL00051-37

Comment:

Increased criteria pollutant emissions and an increase in their ambient air pollution concentrations will lead to adverse health effects on the residents of the local communities. Emissions of other compounds from aircraft operations will also increase (along with these five criteria pollutants) as LAX operations and over flights increase. These compounds include toxic and carcinogenic air pollutants (TAPS) whose effects are just beginning to be investigated, and their cumulative effects on the general populace are far from fully understood.

Response:

Please refer to Response to Comment AF00001-38 for a discussion of the differences in evaluation of impacts associated with criteria pollutants and TAPs. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provided in Technical Report 4 and Appendix G. Toxic air pollutant emissions were addressed in Section 4.24, Human Health and Safety (CEQA), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The analysis was carried to the point geographically where incremental impacts could be regarded as negligible. Please see Sections 4.6 and 4.24 of the Supplement to the Draft EIS/EIR for revised analyses for criteria pollutant and TAP emissions based on the new alternative,

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Alternative D and the revised environmental baseline. Please refer to Topical Response TR-HRA-1 regarding the use of the Source Apportionment study to assess criteria pollutants and toxic air pollutants and Topical Response TR-HRA-2 regarding the health effects of TAPs.

AL00051-38

Comment:

The draft EIS/EIR acknowledges that people living, working, recreating, or attending schools in communities near the airport may experience increased incremental cancer risks from exposure to toxic air pollutants. However, we ask that LAWA and the FAA thoroughly investigate these risks, and address ways to mitigate these risks. Air pollutants also harm trees and other plant life in the same way they affect humans: by reducing their respiration capacity and increasing their susceptibility to diseases and insect attacks. All of these factors will act to reduce the quality of life for all of its citizens.

Response:

Human health impacts were addressed in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, 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. As indicated in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, potential cancer risks resulting from TAP exposure for Alternatives A, C and D would be less than CEQA thresholds of significance for horizon year 2015 without mitigation. For all of the build alternatives, cancer risks would be lower than the No Action/No Project Alternative and would decrease for most locations near the airport.

In addition, Section 4.10, Biotic Communities, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, evaluated impacts on sensitive biotic communities. As noted in subsection 4.10.7, Cumulative Impacts, areas surrounding the study area consist largely of developed areas with little or no habitat value. Impacts are evaluated for remaining biologically significant areas. Results of the evaluation indicate that Alternatives A, B, and C would have impacts on state-designated sensitive habitats. However, mitigation measures included in the Environmental Action Plan would reduce such impacts to below the threshold of significance.

AL00051-39

Comment:

2b. Noise Impacts to Communities under the Flight Path

The proposed LAX expansion would result in an increase in airport and aircraft activities. Increases in over flights and their frequency can significantly increase the noise levels in communities under its flight path, thereby reducing the quality of life of the people living there. In fact, the City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the City.

Response:

Monterey Park experiences the base leg (perpendicular) segment of the westerly approaches to the airport. This approach is used by all traffic arriving from west coast, Pacific and European origins. Under heavy traffic conditions, the base leg moves eastward to better increase the separations between arriving aircraft and to safely sequence them in with the arrivals coming directly from the east. The eastward extension of the base leg approach results in the conditions described by the commentor. A grid analysis at the location indicates that the aircraft noise levels in the Monterey Park area average approximately 34 CNEL which is less than significant. It is not likely that the procedures can be changed to remove the traffic entirely from over the area. For further information on the effect of these approaches and quality of life issues, please see Subtopical Response TR-N-3.5 regarding the effects of elevation on noise and Topical Response TR-LU-1 regarding the impacts on quality of life. The City of Los Angeles is aware of the of the impacts that occur on the community as a result of aircraft activity; an aggressive acoustical treatment program for those impacted by the heaviest noise levels is one measure designed to mitigate these impacts. Please see Topical Response TR-LU-3 for more information regarding the Aircraft Noise Mitigation Program. 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. In addition, please see Topical Response TR-N-6 regarding noise increase.

AL00051-40

Comment:

The current operations at LAX already subject thousands of people living and working in the Western San Gabriel Valley neighborhoods under the flight path to constant aircraft noise. Current FAA regulations allow for communities experiencing noise levels of 65 dB community noise equivalent level (CNEL) or above to qualify for mitigation measures.

However, for the Cities of Monterey Park, Montebello, and the Western San Gabriel Valley communities, the 65 dB CNEL does not adequately capture the loud noise instances of over flights, which belong in the "single event" category. The 65 dB CNEL measurement only extends to an area that covers less than a mile to the east of the airport. While some measurements were taken in our communities, these did not avail the communities under the flight path to any available mitigation measure. The effects of increased aircraft noise intensity on the citizens of the Western San Gabriel Valley can be as harmful as the impacts on the communities directly adjacent to LAX.

Response:

Comment noted. The commentor is correct in identifying that numerous cities east of LAX are impacted by aircraft operations. The cities referenced by the commentor are affected by the base leg (perpendicular) segment of the westerly approaches to the airport. This approach is used by all traffic arriving from west coast, Pacific and European origins. Under heavy traffic conditions, the base leg moves eastward to better increase the separations between arriving aircraft and to safely sequence them in with the arrivals coming directly from the east. This eastward extension of the base leg approach results in the conditions described by the commentor. The noise level difference described between aircraft and the source at 2,500 feet is approximately 4 decibels less than that experienced by locations at 1,600 feet from the source. The area falls well beyond the location of significant CNEL levels. A grid analysis at the location indicates that the noise levels in the Monterey Park area average approximately 34 CNEL. It is not likely that the procedures can be changed to remove the traffic entirely from over the area. For further information on the effect of these approaches, also see Subtopical Response TR-N-3.5 regarding the effects of elevation on noise, and Subtopical Response TR-N-2.2. Aircraft noise mitigation was described in subsection 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise were provided in subsection 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provided mitigation measures for aircraft noise in subsections 4.1.8 and 4.2.8.

AL00051-41

Comment:

"Significant and unavoidable" noise impacts

The draft EIS/EIR lists seven "significant and unavoidable" noise-related impacts to the communities surrounding LAX, at least three of which can also significantly impact communities under the flight path.

- The draft EIS/EIR concludes that total population/dwellings exposed to aircraft noise above 65 dB CNEL would increase under the three proposed build alternatives, and decrease under the No Action/No Project Alternative.

- The draft EIS/EIR concludes that sensitive uses exposed to aircraft noise above 65 dB CNEL would increase under the three proposed build alternatives, and decrease under the No Action/No Project Alternative.

- The draft EIS/EIR concludes that there are noise-sensitive parcels previously exposed to 65 CNEL or higher noise level that will be exposed to increases in noise levels of 1.5 CNEL or greater under the proposed expansion plans.

3. Comments and Responses

Under the "preferred build alternative," more sensitive use areas such as schools, churches, and other institutions in communities surrounding LAX will be exposed to higher noise levels in 2015, with the phasing in of larger aircraft and cargo flights. This includes sensitive areas in the Cities of Monterey Park, Montebello, and the communities of Western San Gabriel Valley.

Response:

The commentor appears to be referencing the Summary Comparison of Environmental Impacts From Alternatives A, B, and C provided in the Executive Summary of the Draft EIS/EIR for Section 4.1, Noise. These conclusions are more general in nature and were further defined in Section 4.2, Land Use (subsection 4.2.9), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-5 for a description of significant impacts, noise mitigation measures, and level of significance after mitigation.

Subsection 4.2.6 of the Draft EIS/EIR identified noise-sensitive uses that would be newly exposed to high noise levels under Alternative C compared to 1996 baseline conditions. Subsection 4.2.6 of the Supplement to the Draft EIS/EIR identified noise-sensitive uses newly exposed to high noise levels for Alternative C compared to Year 2000 conditions; presented analysis of a new LAWA Staff preferred Alternative D, compared to 1996 baseline and Year 2000 conditions; and included a new analysis of impacts on noise-sensitive uses from single event noise levels.

Regarding aircraft noise impacts Monterey Park (and other areas of Western San Gabriel Valley), as shown on Figure 4.2-5 of the Draft EIS/EIR, the City of Monterey Park is outside the current ANMP boundaries that define areas exposed to high noise levels (based on the 1992 fourth quarter 65 CNEL or greater noise contours). As also shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the area within the 65 CNEL noise contour has decreased from 1992 conditions. As shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the City of Monterey Park is also outside of areas exposed to high single event noise levels (as defined by the 94 dBA SEL noise contour). Therefore, based on the thresholds presented in Section 4.1, Noise (subsection 4.1.4), no significant noise impact from aircraft noise has been identified for the City of Monterey Park.

Please see Topical Response TR-N-3 regarding aircraft flight procedures, in particular Subtopical Response TR-N-3.5 regarding the effect of elevation on noise contours. See also Subtopical Response TR-N-6.3 regarding larger aircraft mean more noise.

AL00051-42

Comment:

High noise levels on communities are not only a constant source of distress, but can disrupt learning abilities in children.⁴

4 See, for example, Bullinger, Monika; Hygge, Staffan; Evans, Gary; Mies, Markus; and Mackensen, Sylvia. "The Psychological Cost of Aircraft Noise for Children." Lecture given at the "Environment and Psyche" symposium in Aachen, Germany, November 1998.

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.

AL00051-43

Comment:

Many members of the nearby communities, and communities under the flight paths are already exposed to excessive noise levels under the current LAX operational structure. We believe the proposed expansion plans will result in an increase in the numbers of the population in the Western San Gabriel Valley exposed to high noise levels and further reduce their quality of life.

Due to the elevation, and the location, the LAX over flights subject the Cities of Monterey Park and Montebello to unacceptable noise levels. According to FAA guidelines, an increase in 1.5 CNEL constitutes a "significant" noise level increase. Currently the communities in the Western San Gabriel Valley have no way of determining whether their residences, schools, and parks currently exposed to excessive aircraft noise levels will be exposed to even higher levels of noise under the proposed expansion plans.

Response:

As described in Response to Comment AL00051-41 no significant aircraft noise impacts were identified in the City of Monterey Park or in the City of Montebello, since these locations do not fall within areas that would be newly exposed to significant noise levels or experience significant noise increases. As stated in subsection 4.2.2 of the Draft EIS/EIR, and as required by FAA Order 5050.4A consistent with Appendix G of Order 1050.1D, an impact is considered significant when a noise-sensitive use within the 65 CNEL contour are subject to noise increases of 1.5 CNEL or greater. Please see Subtopical Response TR-N-3.5 regarding the effect of elevation on noise contours.

AL00051-44

Comment:

Furthermore, none of the mitigation strategies proposed by the draft EIS/EIR to mitigate noise from airport operations will result in reduced noise impacts to the communities under the flight path, including the proposed "least impact" expansion scenario.

Response:

Comment noted. Please see Topical Response TR-LU-5 for a description of how significant noise impacts and corresponding mitigation measures were determined. Also refer to Topical Response TR-LU-3 for a description of the Aircraft Noise Mitigation Program. As shown on Figure 4.2-5 of the Draft EIS/EIR, the City of Monterey Park is outside the current ANMP boundaries that define areas exposed to high noise levels (based on the 1992 fourth quarter 65 CNEL or greater noise contours). As also shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the area within the 65 CNEL noise contour has decreased from 1992 conditions. As shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the City of Monterey Park is also outside of areas exposed to high single event noise levels (as defined by the 94 dBA SEL noise contour). Therefore, based on the thresholds presented in Section 4.1, Noise (subsection 4.1.4), no significant noise impact from aircraft noise was identified for the City of Monterey Park and, therefore, no mitigation was proposed.

AL00051-45

Comment:

While the draft EIS/EIR projects that there will be significant increases in noise levels as well as increases in the noise intensity due to increased operations, it discounts how these increases may affect communities under the flight path, or their environment. Children are particularly susceptible to the effects of high noise levels in their home and learning environments.

Response:

Please see Responses to Comments AL00017-52 and AL00038-11 regarding the health effects of aircraft noise and the impact of high noise levels on children, respectively. 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.

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AL00051-46

Comment:

Furthermore, scientific studies conducted on the effects of high noise levels on communities have shown that there is a relationship between noise and the health of community residents. Scientific studies have also shown that noise from departing and arriving aircraft is a constant source of distress to the affected communities, interfering with normal speech, interrupting sleep, and can disrupt a wide range of activities, and individuals' sense of well-being. A major effect of chronic exposure to elevated noise levels among adults living near airports or on the flight path is the feeling of helplessness: most people who are annoyed by airplane noise report feeling unable or helpless to alter the situation.⁵ High noise levels have also been linked to hypertension and cardiovascular disorders.⁶

5 Borsky, Paul N., "Sleep Interference and Annoyance by Aircraft Noise," Sound and Vibration, December 1976.

6 See, for example, Bronzaf, 1998; or Cohen et al., 1981.

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. 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.

AL00051-47

Comment:

The proposed increase in operations outlined in the draft EIS/EIR will subject noise sensitive areas such as schools, churches, and other places of gathering, including parks and other recreation venues to excessive noise levels. Studies have documented that children chronically exposed to aircraft noise have poorer reading skills when compared to children living in quiet neighborhoods. In addition, studies have suggested that children in high noise areas may develop poor persistence on challenging tasks.⁷

7 Cohen, Sheldon; Evans, Gary W.; Krantz, David S.; Stokols, Daniel, "Physiological, Motivational, and Cognitive Effects of Aircraft Noise on Children", American Psychologist, Vol. 35, No. 3, March 1980.

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. In addition, please see Topical Response TR-LU-4 regarding outdoor noise levels.

AL00051-48

Comment:

All members of our communities will be severely affected, especially ones with less mobility, as they will have no escape from airport-related noise, either in their homes, or at any other near-by location in the communities where they choose to go for recreation or social gathering.

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

AL00051-49

Comment:

Finally, the draft EIS/EIR's expansion plans include proposals for increase in LAX's cargo handling capacity from the current 1.9 million annual tons to 4.2 million annual tons. This increase will result in more round-the-clock cargo flights and other operations, potentially increasing nighttime noise levels.

Response:

The commentor is correct in identifying that cargo flights will increase in the future. Tables IV-A.1 through IV-A.3 located in Chapter IV, Facility Requirements, Appendix A of the LAX Master Plan provide hourly breakdowns for forecasted 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. Monterey Park is affected by the base leg (perpendicular) segment of the westerly approaches to the airport. This approach is used by all traffic arriving from west coast, Pacific and European origins. Under heavy traffic conditions, the base leg moves eastward over Monterey Park to provide more separation between arriving aircraft and to safely sequence them into the arrival flows coming directly from the east. This eastward extension of the base leg approach results in the conditions described by the commentor. Additional cargo operations are incorporated into the forecasts of future operations, and are included in the noise level forecasts provided for each future alternative. Nighttime operations (between midnight and 6:30 a.m.) are typically conducted using over-ocean procedures, during which neither arrivals nor departures would be conducted over Monterey Park. For further information on the various effects that approach operations over Monterey Park may be subject to, please see Subtopical Response TR-N-3.5 regarding the effects of elevation on noise contours, Topical Response TR-N-6 regarding noise increase, Subtopical Response TR-N-3.3, and Topical Response TR-N-5 nighttime aircraft operations and particularly Subtopical Response TR-N-5.4.

AL00051-50

Comment:

Studies have found that intermittent and impulsive noises, such as aircraft noise overhead, are more disturbing to sleep than continuous noise sources. Furthermore, the quality of sleep and sleep disturbance are directly related to aircraft noise exposure in these studies.⁸

8 Borsky, Paul N., "Sleep Interference and Annoyance by Aircraft Noise," Sound and Vibration, December 1978.

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.

AL00051-51

Comment:

2c. Surface Traffic Impacts to Communities on the LAX Cargo and Traffic Corridors

The Master Plan's proposed expansion of LAX operations, especially the increase in LAX cargo capacity, will have the potential to significantly alter the traffic flow through the Cities of Monterey Park, Montebello, and other surrounding communities in the Western San Gabriel Valley. These communities are located on the LAX traffic and cargo corridors (which include I-5, I-10, I-105, I-605, I-710, US-60, and US-91).

The draft EIS/EIR concludes that construction activities from any of the proposed build alternatives will result in increased traffic congestion, potentially affecting the local communities during the next fifteen years of construction and beyond. It further states that these traffic impacts to the citizens living and working in the communities surrounding the airport will be "significant and unavoidable." These

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"significant and unavoidable" impacts may well extend to other communities beyond the draft EIS/EIR's analyses, especially communities that are on the LAX traffic and cargo routes.

Response:

This comment is concerned about LAX Master Plan alternatives adding more truck trips through the communities surrounding LAX in the future. Please see Topical Response TR-ST-1, in particular Subtopical Response TR-ST-1.1, for more information regarding cargo truck traffic. The Congestion Management Program, presented in Section 6 of Technical Reports 3b and S-2b, present the regional traffic impacts, including cargo truck traffic, of the alternatives. In communities as far away from LAX as Monterey Park and Montebello, it is unlikely that the alternatives would make a noticeable impact on traffic conditions, even including trucks. In fact, even if the alternatives were not built, cargo truck traffic in the regions mentioned would likely still be generated, albeit destined to different locations than LAX. Note that Alternative D limits the airport's cargo activity to essentially the same activity as in the No Action/No Project Alternative.

With the remote employee parking locations, many different access routes, and multiple shifts, construction traffic would be extensively dispersed in regions remote from LAX. In fact, the traffic analysis for Alternative D, which was summarized in the Supplement to the Draft EIS/EIR and in Technical Report S-2b, included construction traffic within the total traffic volumes being analyzed. The Congestion Management Program analyzed in Section 6 of Technical Report S-2b shows that the total impacts of the project, including construction traffic, would not extend beyond I-405 (San Diego Freeway) Post Mile R8.02 at Santa Fe Avenue to the south, and Post Mile R18.63 immediately north of Inglewood Boulevard to the north. Project traffic is not considered significant on I-105 or any other freeway in the region. It is concluded that construction traffic should be insignificant outside of those boundaries. Also, see Topical Response TR-ST-3, Construction Traffic, for more information.

AL00051-52

Comment:

Proposed expansion's impacts on surface traffic

The draft EIS/EIR's evaluation of surface traffic impacts by the expansion plans concluded that:

- Construction-related traffic, lane closures, and detours would temporarily impede access to community services and other amenities from some portions of adjacent communities.
- Inbound, upper level ramps traffic in the central terminal area (CTA) would increase.
- Change in vehicle demand through various intersections.
- Construction traffic would disrupt normal roadway operations.
- Disruption of adjacent communities due to temporary changes in circulation patterns (on airport) during construction.

We believe that additional analyses are needed to evaluate impacts to communities such as the Cities of Monterey Park, Montebello, and others. In particular, LAWA needs to conduct a traffic study that includes the major freeways (I-405, I-10) and the impacts on the increased traffic on these roads from the expansion.

Response:

Please refer to Topical Response TR-ST-2, Section 1, for a discussion of the study area and facilities analyzed. The analysis includes an analysis of all freeways and CMP regional arterials in Los Angeles County. This analysis is provided in Section 6 of Technical Reports 3b and S-2b.

AL00051-53

Comment:

3. Flawed Assumptions and/or Omissions by the Draft EIS/EIR

3a. General Document

In examining the draft EIS/EIR, we believe that the conclusions regarding the proposed expansion's impacts on the affected communities, especially communities under the flight path, are not entirely accurate or reliable, and are understated or flawed. Below are a number of factors that we have identified that may affect the draft EIS/EIR's overall assessment of impacts.

Response:

Comment noted. Please see Responses to Comments AL00051-54 through AL00051-61 below.

AL00051-54

Comment:

- The draft EIS/EIR conclusion that the preferred alternative - alternative C or "No Additional Runway" - will have the least negative impacts to the communities and the region is a result of certain questionable assumptions, if not downright advocacy. The preferred alternative, which results in projected improvements in traffic flows and the least delays, compared to the "no action" scenario, inevitably has fewer emissions and noise impacts at LAX. However, the communities under the flight path will not reap any of these benefits, and will be subjected to additional over flights, emissions, and noise.

Response:

The conclusion of the Draft EIS/EIR that Alternative C would have the least negative impacts to the communities and the region has been superseded by that 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.

AL00051-55

Comment:

- The use of the "no action" comparison by the draft EIS/EIR is also extremely misleading to the general public, as the documents only presented alternatives that have worse impacts than LAWA and the FAA's preferred options, although less burdensome alternatives exist.

Response:

Please see Response to Comment PC01094-4.

AL00051-56

Comment:

- The assumptions underlying the impact analyses ignore the possibility that airport improvements may result in more passengers or more flight operations, sooner. If the airport increases its airside efficiency and reduces delays, it is plausible that airlines will choose to increase flights to LAX as opposed to using other regional airports, and resulting in increased community impacts, including impacts to the Western San Gabriel Valley communities.

Response:

The Master Plan forecast projected the unconstrained market demand, that is, the number of passengers who would like to fly in and out of LAX based on historical trends and forecasts of economic variables, without considering facility limitations (see Chapter II of the Master Plan). In other words, the unconstrained market demand assumes that the needed facilities are in place to meet demand. The alternatives evaluated in the Draft EIS/EIR either would not provide all of the facilities needed to meet demand (as is the case with Alternative C) or could only meet the unconstrained passenger demand if the airlines make adjustments in air service. Providing the facilities in Alternatives A, B, or C (that are still less than what is required) would not stimulate demand. 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.

3. Comments and Responses

AL00051-57

Comment:

- The draft EIS/EIR's air quality and noise impact assessments and conclusions use estimates that are based only on models and simulations. The draft EIS/EIR only offers one scenario result for each proposed expansion plan, rather than a range in which future emission inventories or noise impacts may fall. These impact assessments neglect to include analysis for communities under the flight paths.

Response:

The simulation models used to analyze air quality impacts represent the preferred methods to evaluate future activities. All modeling was conducted according to a protocol which was reviewed by SCAQMD prior to conducting the air quality analyses for the Draft EIS/EIR, and comments and suggestions from SCAQMD were incorporated into the protocol. Please see Section 4.1 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for information regarding noise.

AL00051-58

Comment:

- The impact analyses for each of the planning horizon year uses only one possible composition of the future aircraft fleet using LAX. We believe the assumptions for the fleet projection to be overly optimistic, with the adoption of larger aircraft classes by airlines and cargo carriers alike running counter to SCAG's Regional Transportation Plan projections. We believe additional analysis is needed using lower adoption rates by airlines and cargo carriers. More realistic adoption rates have the potential to increase expansion impacts to local communities and communities under the flight path.

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 and the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) in evaluating different activity levels.

AL00051-59

Comment:

- The draft EIS/EIR's projection of aircraft fleet mix does not count foreign-owned and operated aircraft. Sufficient information is available to tell us that emissions from this category may be another significant contributor to the overall airport air quality impacts. Given the importance of LAX as an international hub, foreign flights are expected to account for at least 7% of traffic, if not more.⁹ It is also likely that activities by foreign-owned aircraft will increase in the near future, like other air transport activities. If so, their contribution to the air emissions and noise impacts will also increase.

9 Flying Off Course. Environmental Impacts of America's Airports. Natural Resources Defense Council, New York, NY. October 1996.

Response:

The fleet mix assumed in the Draft EIS/EIR takes into consideration all aircraft and airlines operating at LAX both now and in the future. Please see Chapter V, Appendix H of the Draft LAX Master Plan, Tables V-H.19 through V-H.23 for a listing of all aircraft assumed for each alternative. Please see Appendix F of The Draft Master Plan Addendum, Tables F1 to F-3. This listing includes foreign and domestic aircraft. As shown in Chapter V, Appendix A of the Draft LAX Master Plan, Table V-A.1, the airline groups IN, I1, I2, and I3 represent the foreign flag airlines. Foreign flag airlines account for 22 percent of all daily operations in Alternatives A and B, 24 percent of all daily operations in Alternative C, and 28 percent of daily operations in Alternative D.

AL00051-60

Comment:

- Airspace/Flight Path analysis: the draft EIS/EIR used inaccurate and outdated sources to calculate delays (OAG and ACARS) that do not report all aspects of flight operations. In addition, the use of these outdated and inaccurate information source poses a clear safety threat to the communities located under the flight path and the Los Angeles Basin.

Response:

Comment noted. ACARS data in combination with OAG schedule data was used to calibrate the model in terms of delay. Although not exhaustive, the data used were the best available. ACARS data is limited to certain carriers that make up more than half of the commercial passenger operations and 46.3 percent of the total operations in the design day flight schedule. Limited data collected from foreign flag carriers was used to compare the actual versus simulated taxi times. ACARS data was the best and most accurate source available for use at the time of the baseline calibration. Please see the Draft LAX Master Plan (Chapter IV, Section 2.4.1) for further discussion of the use of ACARS data in the calibration of the SIMMOD model.

AL00051-61

Comment:

- The draft EIS/EIR fails to depict routes that are in conformance with stated airport and FAA policy, as flight paths are not provided in the reports. The absence of flight path information cannot allow for an adequate analysis of the impact of the proposed expansion plans.

Response:

Please see Response to Comment AL00044-5 regarding flight path information.

AL00051-62

Comment:

3b. Air Quality Impacts Assessment

- The draft EIS/EIR's analysis of air quality impacts on affected communities has completely neglected to take into account the impacts of air pollutant emissions on communities under the flight path, including the Cities of Monterey Park, Montebello, and other communities in the Western San Gabriel Valley. As these communities are within the 2,500 feet flight ceiling of arrivals at LAX, any increase in flight operations will expose them to the same air pollutants, and potentially the same air quality impacts as the communities surrounding LAX. Unlike the communities surrounding LAX, the communities under the flight path will not benefit from any proposed air pollution mitigation measures.

Response:

Please see Response to Comment AL00018-10 regarding the placement of modeling receptors for the air quality analyses. Also, please see Topical Response TR-AQ-3 regarding the extent of air quality impacts from aircraft. None of the proposed air quality mitigation measures involve reducing emissions from aircraft while in flight. However, as noted in Topical Response TR-AQ-3, impacts at ground level from aircraft emissions at altitude are expected to be extremely small. Also, it is not true to state that communities such as Monterey Park, Montebello, and other communities in the West San Gabriel Valley will not benefit from proposed air quality mitigation measures at LAX. The Supplement to the Draft EIS/EIR presents an enhanced discussion of air quality mitigation measures in Section 4.6, Air Quality (subsection 4.6.8), and in Appendix S-E, Section 2.3. The proposed air quality mitigation measures would reduce emissions of all pollutants from activities (both operations and construction) at LAX, thereby improving the immediate environs of LAX for people coming from all locations to the airport and reducing the regional contributions to air pollution in the South Coast Air Basin.

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AL00051-63

Comment:

- In discussing the impact of toxic air pollutants (TAP) associated with current airport operations, the EIS/EIR notes that LAWA is initiating an "Independent" study of air quality in the area around LAX for the purpose of examining 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 air toxics study.

AL00051-64

Comment:

LAWA also needs to conduct an assessment of long-term health risks from TAP, their potential effects on the communities under LAX's flight path.

Response:

Potential health risks to populations in the vicinity of LAX were analyzed in Section 4.24, Human Health and Safety, of the Draft EIS/EIR, and Supplement to the Draft EIS/EIR, with supporting information in Technical Report 14 of the Draft EIS/EIR and Technical Report S-9 of the Supplement to the Draft EIS/EIR. The human health risk assessment evaluated the potential adverse health effects associated with toxic air pollutants released by airport activities for the selected alternatives. The Supplement to the Draft EIS/EIR provided an evaluation of Alternative D and updated the risk assessment based on a reevaluation of baseline conditions and revised mitigation measures.

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. Risks were calculated for individuals assumed to be exposed for almost all days of the year and for many years (up to 70) to maximize estimates of possible exposure. 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; also included in this section were 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. Additional figures presenting the geographical extent of incremental cancer risks and health hazards by community under pre-mitigation conditions and for interim years are available in Technical Report S-9 of the Supplement to the Draft EIS/EIR.

For additional information regarding human health impacts, please see Topical Response TR-HRA-3. In addition, please refer to Response to Comment AL00051-24 for a discussion of epidemiological studies conducted at other airports.

AL00051-65

Comment:

- The draft EIS/EIR analysis of airside improvements discounted gate delays and as a result, does not accurately depict arrival and departure flows. This oversight can affect the determination of arrivals to LAX, and thus over flight patterns over the communities in Western San Gabriel Valley. This can significantly affect the noise and air quality impacts analyses as well.

Response:

Delays associated with gates, including ramp congestion and push-backs, were included in the total ground delay and are factors considered in the performance assessment of the baseline and build alternatives. Please see Response to Comment AR00003-16 regarding gate delays in the Master Plan alternatives.

AL00051-66**Comment:**

- The draft EIS/EIR emissions inventory were compiled using emission factors for existing aircraft engines and is missing particulate emission factors for a large number of new engines. Thus, the draft EIS/EIR's assessment of future particulate emissions and impacts is missing an important component.

Response:

Please see Response to Comment AR00003-53 regarding PM emission factors.

AL00051-67**Comment:**

- The draft EIS/EIR does not address how the increase in air pollution from LAX operations affects the State Implementation Plan (SIP), and what steps will be taken to help the State meet the goals and objectives of the SIP. Increased air pollution as a result of increased LAX operations will affect all communities in the Los Angeles Basin.

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.

AL00051-68**Comment:**

- The analytic basis for the community impacts is insufficient, since critical demographic and other relevant health data are missing. The Cities of Monterey Park and Montebello have been excluded in the analysis. Moreover, the draft EIS/EIR does not compare the demographics of communities served by this project to the demographics of communities bearing the burden of the projects impacts.

Response:

Please see Response to Comments AL00017-190 and AL00017-194.

AL00051-69**Comment:**

3c. Noise Impacts Assessment

- The draft EIS/EIR does not analyze noise in communities located beyond the immediately adjacent neighborhoods to the airport.

Response:

Comment noted. For further information on this topic, please see Responses to Comments AL00051-3 and AL00051-4.

AL00051-70**Comment:**

- The EIS/EIR indicates significant noise reductions with the transition to Stage III aircraft. However, Stage III aircraft will provide little to no relief for our communities, as landing aircraft noise is not adequately addressed by Stage III measures.

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Response:

The commentor is correct in his concern that Stage 3 noise reductions show a greater decrease in departure noise rather than arrival noise. Please see Responses to Comments AL00051-3 and AL00051-4 for further information related to the approach operations over Monterey Park and any potential for the reduction of noise levels associated with the single events associated with them. Also please see Subtopical Response TR-N-7.6.

AL00051-71

Comment:

- The draft EIS/EIR proposed noise mitigation strategies consist mostly of measures involving land acquisition and insulation - all are passive measures and are available only for communities adjacent to LAX. No mitigation measures are proposed for those under the flight path. These measures will only be effective if the noise impact estimates provided by the draft EIS/EIR are correct. If future noise levels and intensity exceed predicted levels, these proposed mitigation measures will not be able to address these higher levels, especially if airport improvements result in increased airport operations above the levels forecasted by the draft EIS/EIR.

Response:

The commentor is correct in describing that sound insulation of homes and land acquisition are available as the principal noise mitigation measures to the communities adjacent to LAX. To determine the boundaries of the sound insulation program, LAWA currently uses its Aircraft Noise Mitigation Program (ANMP) contours that are based on noise monitoring, rather than on modeled levels, to determine incompatibility. These noise levels are reported to the California Department of Transportation and County of Los Angeles on a quarterly basis through LAWA's Quarterly Noise Reports. The County of Los Angeles does review and verify the report through its own acoustical consultant before accepting the report. Please see Topical Response TR-N-1 regarding modeling requirements and Subtopical Response TR-N-2.3 regarding evaluation of impacts should extend beyond the 65 CNEL contour to all sensitive areas under flight tracks. Monterey Park is located approximately 12 miles east of LAX and a grid analysis at the location indicates that the aircraft noise levels in the Monterey Park area average approximately 34 CNEL. Monterey Park is affected by the base leg (perpendicular) segment of the westerly approaches to the airport. Even with the forecasted increase in nighttime cargo operations there would not be a significant increase in CNEL levels. Independent of the Draft EIS/EIR process, Air Traffic Control management has evaluated modifications of the approaches to the north and south runway complexes to increase aircraft altitude over Monterey Park, resulting in noise level decreases of several decibels. It is not likely that the procedures can be changed to remove the traffic entirely from over the area (see Subtopical Response TR-N-3.5). Mitigation measures have been taken for those under the flight path. Please see Topical Response TR-LU-3 for information regarding the ANMP and other noise mitigation.

AL00051-72

Comment:

- The communities of the Western San Gabriel Valley have unique geography that not only places them under the flight path of landing aircraft, but also put them at as much as 1,000 feet closer to aircraft in an area where air operations are expected to have a 2,500 feet ceiling. LAWA and the FAA have not taken these conditions into account during their analysis and planning.

Response:

The commentor is correct in describing the altitude differences present in Monterey Park. It is noteworthy that the 2,500-foot ceiling cited by the commentor is in fact, not a ceiling, but rather a typical overflight altitude during the base leg of the downwind approach to the airport from the east. The noise level difference described between aircraft and the source at 2,500 feet is approximately 4 decibels less than that experienced by locations at 1,600 feet from the source. The area falls well beyond the location of significant CNEL levels. A grid analysis at the location indicates that the noise levels in the Monterey Park area average approximately 34 CNEL. Currently, aircraft directed to land on the north runway complex at LAX fly over the area at 2,500 feet MSL (approximately 1,700 feet above the ground), while those directed to land on the south runways fly over the area at 3,500 feet MSL (approximately 2,700 feet above the ground). Air Traffic Control management has begun to evaluate

modifications of the approaches to the north and south runway complexes to increase aircraft altitude over Monterey Park by 2,500 feet for north approaches and 500 feet for south approaches. These actions would result in noise level decreases of between two and eight decibels on the ground. This is a long-term solution and will require a redesign of other terminal airspace. The community has requested input to the solution, however funding is not currently available. For further information on the effects of elevation on aircraft noise, please see Subtopical Response TR-N-3.5.

AL00051-73

Comment:

- The draft EIS/EIR's use of 1996 and earlier noise data as the base year for noise impact analysis is not appropriate, as it does not represent existing conditions (the transition to quieter Stage III aircraft was completed in 1999), and may minimize the relative noise impacts from the "preferred alternative."

Response:

Please see Topical Response TR-N-1 regarding the noise modeling approach. In particular, please see Subtopical Response TR-N-1.3. Please also see Response to Comment AL00033-87.

AL00051-74

Comment:

- Because of the substantial growth in operations projected, the draft EIS/EIR shows no significant improvements in noise reduction under any of the proposed expansion plans. Increases in aircraft operations projected in the draft EIS/EIR will result in additional aircraft operations and noise generation, offsetting any of the anticipated benefits of quieter Stage III aircraft and other mitigating measures. The increased noise levels will seriously affect communities under LAX's flight path.

Response:

Depending on the alternative, noise levels are forecasted to decrease (except Alternative B) when compared to the environmental baseline, yet increase (except Alternative D) when compared to the No Action/No Project Alternative. Although there is a forecasted increase in aircraft operations, this will not necessarily mean an increase in CNEL levels. For information on Stage 3 aircraft please see Topical Response TR-N-6, in particular Subtopical Response TR-N-6.2, and Subtopical Response TR-N-7.6. Additionally, please see Response to Comment AL00051-39 for noise impacts to communities under the flight path. For more information on noise related to Alternative D, the Enhanced Safety and Security Plan, please see Section 4.1, Noise, and Section 4.2, Land Use, of Supplement to the Draft EIS/EIR and Appendix S-C1, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report.

AL00051-75

Comment:

- The draft EIS/EIR does not offer any provisions for in-situ noise monitoring in the affected communities. According to the US EPA, in-situ noise monitoring results at Boston's Logan airport suggested that computer modeling tended to underestimate actual noise levels, at least in some neighborhoods. The draft EIS/EIR does not take this into account in its analysis, and thus does not adequately represent the actual noise impacts on the surrounding, or the effectiveness of its proposed mitigation measures.

Response:

LAWA does conduct regular noise measurements at community sites in the vicinity of the airport. The measurement data are analyzed and used in its development of quarterly noise reports.

The commentor is correct that Boston Logan International Airport noise measurements in a few surrounding areas were found to be unusually higher than modeled levels. The reason was due to the large expanse of water between the source and receiver and the fact that water is an acoustically hard surface that does not sound attenuate. In this unique situation, the FAA made an appropriate modeling

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adjustment. No such adjustment is warranted at LAX. Moreover, the observed differences at LAX between measured and modeled data are much smaller and more random, suggesting the greater possibility of variability in the measurements.

For further information on the relationship between measured and modeled aircraft noise, please see Subtopical Response TR-N-1.1 regarding modeled versus measured noise levels. Also, please see Responses to Comments AL00033-69 and AL00033-70.

AL00051-76

Comment:

- The draft EIS/EIR does not offer any provisions to address the very high noise levels, especially from the projected new "large" aircraft in the projected future fleet mix used in its models. Very high noise levels occur each time aircraft fly over or by neighborhoods, yet these high intensity noise occurrences are underrepresented in CNEL estimation methodology. Communities such as Monterey Park and Montebello are more affected by over flight noise, due to their location and topography.

Response:

Single event levels are not underrepresented in the modeling of CNEL. All noise events are included in the calculations and the average of noise levels is a logarithmic average and not an arithmetic average. Single event noise levels are shown in Table A5-5, Regular and Special Grid Point Assessment - aircraft Lmax in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. Monterey Park is affected by the base leg (perpendicular) segment of the westerly approaches to the airport. This approach is used by all traffic arriving from west coast, Pacific and European origins. Under heavy traffic conditions, the base leg moves eastward over Monterey Park to better increase the separations between arriving aircraft and to safely sequence them into the arrival flows coming directly from the east. This eastward extension of the base leg approach results in the conditions described by the commentor. Air Traffic Control management has evaluated modifications of the approaches to the north and south runway complexes to increase aircraft altitude over Monterey Park, resulting in noise level decreases of several decibels. It is not likely that the procedures can be changed to remove the traffic entirely from over the area. 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 regarding the effects of elevation on aircraft noise contours). For further information on the effect of these approaches on single event noise, please see Topical Response TR-N-2 and Subtopical Response TR-N-6.3.

AL00051-77

Comment:

- The affected communities have raised serious concerns about the ability of the computer modeling relied upon in the draft EIS/EIR to accurately reflect noise levels associated with LAX operations. Yet, the draft EIS/EIR does not adequately address this issue, nor do the mitigation strategies reflect these communities' concerns.

Response:

All noise analysis was done in accordance to the FAA's policy guidance for the preparation of NEPA documents. These documents included FAA Order 5050.4A and 1050.1D compliance. Also, please see Topical Response TR-N-1, in particular, Subtopical Response TR-N-1.1 and Subtopical Response TR-N-1.2.

AL00051-78

Comment:

3d. Traffic Impacts Assessment

- The draft EIS/EIR failed to consider the impact of increased cargo and passenger traffic patterns in areas outside of the airport boundaries. All of the major approaches to the airport will be affected by the projected increases in cargo and passenger traffic. Yet, the draft EIS/EIR used SCAG data as a proxy

for its traffic study, which projects a much lower annual passenger traffic and cargo volume than that of the draft EIS/EIR. Increased traffic on local freeways, including I-605, I-5, I-710, I-405, I-10, and US-60 have the potential to create increased traffic flow in the Cities of Monterey Park, Montebello and the Western San Gabriel Valley.

Response:

The analysis used Draft EIS/EIR forecasts of passenger demand and cargo traffic in its analysis of off-airport transportation impacts and not lower SCAG data as asserted in this comment. Analysis of CMP impacts throughout all of Los Angeles County are provided in Section 6 of Technical Reports 3b and S-2b, following the requirements of the Los Angeles County Congestion Management Program.

AL00051-79

Comment:

- The draft EIS/EIR's use of different base years for traffic impact analysis is not appropriate, as it does not represent existing conditions, and may minimize the relative impacts from the "preferred alternative." In addition, existing traffic studies for regions in the cargo and traffic corridors (such as the San Gabriel Valley Council of Governments Truck Study) have not been utilized or incorporated.

Response:

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology.

AL00051-80

Comment:

- The assumptions used in estimating traffic growth by the draft EIS/EIR used a mixture of 1994 data and forecasts from the 2010 Air Quality Management Plan. The model results can seriously underestimate the amount of future traffic, as the 1994 data may not reflect current conditions, and the 2010 AQMP assumed that the City and the LA region would meet trip reduction targets."¹⁰

10 Ibid.

Response:

Please see Topical Response TR-ST-2 regarding baseline scenarios.

AL00051-81

Comment:

4. Environmental Justice Impacts

The draft EIS/EIR clearly recognizes that the environmental, noise and health burdens of the airport's operations and expansion are, and will be, borne by low income and minority populations living in the communities directly adjacent to the airport. However, LAWA and the FAA should not discount impacts to communities located farther from the airport in their analysis.

Response:

As stated on page 4-402, in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the study area for the analysis is defined as the area in which the collective environmental effects of the Master Plan alternatives would be likely to occur, extending beyond the areas adjacent to LAX to include those areas potentially affected by aircraft noise (defined by the future 65 dB CNEL noise contours) and aircraft or airport-related emissions, as well as airport-related traffic impacts, including congestion, noise and air pollution. Based on the geographic extent of these impacts, the broadest of which is the 65 dB CNEL noise contour, specific analysis of environmental justice concerns in Monterey Park is outside of the scope of the LAX Master Plan EIS/EIR. For further explanation of the 65 dB CNEL noise contour as the primary focus of the aircraft noise impact analysis see Subtopical Response TR-N-2.2 and Subtopical Response TR-N-2.3. 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

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regarding environmental justice-related mitigation and benefits. See Topical Response TR-EJ-3 regarding environmental justice and regional context.

See pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as analyzed in the Southern California Association of Government (SCAG) Regional Transportation Plan and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Also note that LAWA Staff's new preferred alternative, Alternative D, limits future (2015) growth at LAX to levels similar to what would occur with existing facilities if the LAX Master Plan were not approved. Alternative D reduces growth at LAX compared to the other build alternatives, potentially shifting the burden of airport expansion to other regional airports, including airports in the Inland Empire. To the extent that other regional airports undertake expansion plans, these plans would be subject to environmental review and would address environmental justice issues pursuant to NEPA and/or CEQA as applicable.

AL00051-82

Comment:

The communities of Monterey Park, Montebello and others in the Western San Gabriel Valley are located directly under the flight paths, are within the 2,500 foot operational ceiling of most aircraft landing at LAX, and yet, no impact assessment or analysis were conducted for them. These communities, specifically the Cities of Montebello and Monterey Park, are predominately minority based. According to the 2000 US Census information, the City of Montebello is approximately 75 percent Hispanic and Monterey Park is approximately 80 percent minority, 57 percent Asian and 29 percent Hispanic.

Response:

Please see Response to Comment AL00051-82 above regarding the environmental justice study area and effects on more remote communities.

AL00051-83

Comment:

The draft EIS/EIR proposes the creation of an Environmental Justice Task Force to work with the affected communities and LAWA to explore the appropriate formulation of specific Master Plan Commitments related to environmental justice. The Cities of Monterey Park and Montebello, among others located under the flight path, are not included in the environmental justice plan because we do not fall within the 65 dB CNEL contour. It is necessary that we be able to participate in order to assist in the formulation of LAWA's proposed mitigation strategies and to communicate this information to our citizens.

Response:

As stated on page 4-402, in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the study area for the analysis is defined as the area in which the collective environmental effects of the Master Plan alternatives would be likely to occur, extending beyond the areas adjacent to LAX to include those areas potentially affected by aircraft noise (defined by the future 65 dB CNEL noise contours) and aircraft or airport-related emissions, as well as airport-related traffic impacts, including congestion, noise and air pollution. Although specific analyses of environmental justice concerns in Monterey Park is outside of the scope of the LAX Master Plan EIS/EIR, see pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as appropriately analyzed in the Southern California Association of Government (SCAG) Regional Transportation Plan and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. Also see Subtopical Response TR-N-2.3 regarding evaluation of impacts beyond the 65 CNEL Contour.

AL00051-84**Comment:**

Any proposed expansion of LAX will place greater environmental and health burdens on citizens living and working in the Cities of Monterey Park, Montebello, and the communities of Western San Gabriel Valley. Yet, we cannot determine from the details provided by the draft EIS/EIR how LAWA and the FAA plan to recognize and address the unfair burdens currently placed on these affected communities. Furthermore, the draft EIS/EIR does not detail ways to offset the additional burdens placed on these communities from the proposed expansion plans, which is in contrary to the requirements of CEQA.

Response:

Please see Response to Comment AL00051-3 and AL00051-21 regarding effects on more remote communities, Subtopical Response TR-N-2.3 regarding aircraft flight procedures, and TR-EJ-3 regarding environmental justice and regional context.

AL00051-85**Comment:**

Finally, the discussion in the draft EIS/EIR regarding environmental justice issues also contains a number of flaws and omissions. Specifically, the draft EIS/EIR is missing the following important components:

- Affected communities: The draft EIS/EIR includes a thorough analysis of the demographics of the citizens living in the areas surrounding the airport; however, it needs to also consider the demographics of other affected communities, including communities under the LAX flight path. Those living under the flight path, especially those at higher elevations, are potentially affected by the over flights as much as those living adjacent to the airport. The lack of analyses for other affected communities highlights an area where LAWA failed to perform the needed analysis and instead chose to rely on a wait and see approach.

Response:

Please see Response to Comment AL00051-41 and Subtopical Response TR-N-2.3 regarding effects on more remote communities located under the flight path. Also see Response to Comment AL00040-94 regarding the boundary of the environmental justice study area.

AL00051-86**Comment:**

- Origin and destination study: Also lacking in the draft EIS/EIR is an analysis of the use of the airport by the communities in the Los Angeles Basin. The document does not provide an analysis of whether those bearing the largest burden of the airport will benefit from the proposed expansion.

Response:

As described in Chapter 2, Purpose and Need for the Proposed Action, of the Supplement to the Draft EIS/EIR, the transportation and economic related benefits of the project are regional in nature. They accrue to the diverse communities of the region, including those in proximity to the airport that are most subject to its environmental effects. Also see Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits, Topical Response TR-EJ-3 regarding environmental justice and regional context, and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental justice 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 analysis concludes that the project would have a disproportionate and adverse effect on minority and low-income communities in proximity to LAX. The Environmental Justice Program described in Section 4.4.3, Environmental

3. Comments and Responses

Justice (subsection 4.4.3.7), of this Final EIS/EIR, includes proposed benefits as well as mitigation measures that address or help to offset these disproportionate and adverse effects.

AL00051-87

Comment:

- Environmental justice mitigation plans: The draft EIS/EIR fails to detail plans for mitigation of the proposed expansion's noise, air quality, traffic, safety and health impacts in terms of environmental justice. The only mitigation plans proposed by the draft EIS/EIR involve either noise abatement through soundproofing or relocation. Neither of these is adequate mitigation in terms of environmental justice, nor are they applicable to the communities of the Western San Gabriel Valley.

Response:

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. While mitigation measures were accounted for and discussed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the reason the section 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 minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

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.

AL00051-88

Comment:

- Health impacts: The draft EIS/EIR does not address the fact that the minority populations living and working in our communities may be more severely affected by any increase in criteria pollutant emissions as well as other air pollutants. Members of these communities, especially the young and the elderly, will be more severely affected because they may be more susceptible to asthma and other chronic respiratory illnesses.¹¹

11 "Asthma: A Concern for Minority Populations," National Institute of Allergy and Infectious Diseases, January 1997.

Response:

Please see Response to Comment AL00017-190. Particularly, Topical Response TR-HRA-3 addresses potential future health impacts on the young and elderly, including increase episodes of asthma attacks and allergies.

AL00051-89**Comment:**

- Lack of minority outreach: Minority populations may also be less informed of the risks posed by the proposed airport expansion, and have less access to adequate healthcare to help them deal with these respiratory problems.¹²

12 Ibid

Response:

Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR described public outreach to minority communities undertaken as part of the environmental justice program. Please see Topical Response TR-EJ-2 regarding minority outreach undertaken as part of the environmental justice program during circulation of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. A key feature of the outreach program involved a series of workshops to present the initial environmental findings to the community and to gain input regarding possible mitigation measures and off-setting benefits. The workshops included bilingual materials and bilingual staff to ensure that all participants would be informed of the potential impacts of the proposed project. Regarding access to healthcare, please see Section 4.4.3, Environmental Justice (subsection 4.4.3.5.2), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and note that access to healthcare and susceptibility to respiratory problems have been considered in the environmental justice air quality analysis. In addition, a mobile health clinic is proposed as part of the final Environmental Justice Program, as described in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), and Appendix F-A of this Final EIS/EIR.

AL00051-90**Comment:**

5. Changing Security and Safety Factors

Since the events of September 11, Los Angeles International Airport, like other airports around the nation, has implemented additional security measures to improve airport and passenger security. Because LAX is one of the "super hubs" responsible for a major portion of domestic as well as international flights on the West Coast, the implementation of additional security measures at LAX are a much needed action. However, these measures, such as the elimination of curb-side passenger pick-up and drop-off, and changes the routing of international passengers, will have the potential to affect the passenger and vehicle traffic volumes and patterns at LAX. These changes to the traffic and passenger patterns have not been considered by the current version of the Draft EIS/EIR.

Response:

Comment noted. Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

AL00051-91**Comment:**

In addition, the safety conditions at LAX, especially the close frequency and distance between aircraft movements at LAX both in the air and on the ground, have been a major concern by the communities surrounding the airport and communities under the flight paths. These concerns by the communities have not been adequately addressed by the proposed changes in the Draft EIS/EIR. These issues have taken on a new urgency in light of recent events, since human error will not be the only factor affecting aircraft and passenger security.

Response:

Please see Topical Response TR-SAF-1 regarding aviation safety. In addition, please see Response to Comment AL00033-233.

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AL00051-92

Comment:

The Cities of Monterey Park, Montebello, and the communities of the Western San Gabriel Valley have identified a number of additional security and safety issues and concerns for consideration by LAWA. These have arisen as a result of the recent changes to airport security routines, as well as unresolved concerns regarding the safety issues at LAX. These issues are summarized below:

- Increase in airport traffic means an increase in security and safety issues: In simple statistical terms, an increase in passenger and aircraft traffic as proposed by the draft EIS/EIR will have the potential to impact safety and security issues.

- Focus on increasing passenger security and safety rather than increasing flights: The current Draft EIS/EIR already identifies serious safety issues associated with arrival and departing aircraft routed over populated areas, as well as safety issues on the ground. With the current heightened safety and security considerations, LAWA should conduct a more thorough analysis of the current flight patterns to increase the safety and security of passengers and communities under the flight paths.

- New ground traffic patterns need to be considered for impacts: The current security requirements for passenger drop-off and pick-up will require a rerouting of CTA traffic. This will affect the traffic patterns around LAX, and set up new choke points, requiring new analyses.

- New security requirements need to be considered for impacts: The current security measures may be in effect for the foreseeable future. These measures will affect the traffic arriving and departing at the new terminal area, and can affect the traffic patterns for the "ring road" proposed in the "preferred alternative."

- Passenger volumes need to be considered for security and safety: The current design for the passenger arrival and departure areas will need to be re-designed to accommodate greater security checks and longer passenger waiting times. These measures will have the potential to limit overall passenger volumes considered in the Draft EIS/EIR.

- Cargo volumes need to be considered for security: Additional security measures will also be needed for the cargo volume moving through LAX, which will also affect any potential increases in LAX cargo volume as proposed by the Draft EIS/EIR.

Response:

Comment noted. It is the FAA's mission to provide for safe and efficient use of the country's airways. Safe aircraft operations is the first priority of FAA air traffic controllers, and LAX will operate safety irrespective of which Master Plan is adopted. Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided an analysis of estimates for aviation incidents and accidents of the LAX Master Plan alternatives. Also, please see Response to Comment AL00051-93.

AL00051-93

Comment:

6. Changing Economic Factors

The events of September 11, 2001 have impacted the US and global economy, and may have exacerbated the economic slowdown that was taking place. This will have the potential to affect air travel in the US in general, and passenger traffic at LAX in particular.

Of significance are the economic conditions that the commercial airlines are operating under, especially the airlines with major hubs at LAX. Most of the airlines serving LAX have implemented schedule and flight reductions, as well as personnel reductions in response to the decrease in demand. United Airlines, for example, has carried out a 20 percent reduction in its nation-wide work force, and at least a 10 percent reduction in flight service schedules. American Airlines, Delta Airlines, and Continental Airlines, all with major hubs at LAX, have implemented similar reductions in service and personnel.

These actions by the airlines will have major long-term impacts on the future passenger and cargo volumes at LAX.

While the nation's economic down-turns have affected passenger and airline traffic in the past, these conditions were temporary, and have not affected the overall growth in US air travel. However, the recent events have the potential to significantly affect air travel growth in the long-term, and also affect the projected growth at LAX, and the proposed expansions, requiring new planning, analyses, and new solutions, as outlined below:

- New passenger growth projections are needed: Air travel in the US has experienced a marked decrease in passenger volume since September, about 15% less than a year ago. This reduction in passenger volume will have the potential to affect the projected passenger growth predictions at LAX.

- Current airport capacity is no longer at a maximum: For 2001 alone, a 15% reduction in passenger volume translates into a reduction of about 182,000 passengers per day, and over 16 million passengers for the rest of 2001 (based on the current airport operations level of 78 million annual passengers).

- New cargo growth projections are needed: While estimates of air cargo volumes are not yet available, airlines are forecasting about a 10% reduction in flight operations. This reduction in flights may translate into a similar reduction in cargo volume, or about five thousand tons per day, and over 440 thousand tons for the rest of 2001.

- New ground traffic projections are needed: LAX should also expect a similar reduction in vehicle traffic going into and out of the airport, based on a 10% reduction in overall air operations.

- Re-evaluation of Draft EIS/EIR assumptions: Even if the economy and air traffic operations recover from the current slowdown in the near future, the 2% annual passenger growth that was used to estimate and develop the growth scenarios in the Draft EIS/EIR needs to be re-examined.

Response:

The events of September 11, 2001 and the economic slowdown are analyzed in Appendix S-B of the Supplement to the Draft EIS/EIR. The conclusions reached in this analysis confirm the need to plan for and build an expanding air-transportation regional network of airports to support the future growth of the Los Angeles basin. Additional information regarding the role of an alternative at LAX in meeting this need was addressed in Section 1.3, Meeting the Demand for Transportation in the Region, of the Draft EIS/EIR. Please also refer to Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Taken together, these analyses confirm that Alternative D, Enhanced Safety and Security Plan, while responding to safety concerns, would allow LAX to continue as the gateway airport onto the Los Angeles community particularly serving international travelers but its proportional share would diminish through the forecast period of 2015. Alternative D has been created to respond the needed improvements without expanding LAX. Master Plans are underway at LAWA's other two air carrier airports, Ontario and Palmdale.

AL00051-94

Comment:

7. Conclusions

To summarize, the City of Monterey Park, the City of Montebello and the communities of the Western San Gabriel Valley are extremely concerned by the environmental, health, and safety issues presented in the draft EIS/EIR. We believe the proposed plans are deeply flawed, contain numerous omissions, ambiguous or misleading information. In addition, they contain a number of incorrect assumptions - the documents only presented alternatives that have worse impacts than LAWA and the FAA's preferred options, although alternatives with far less community impacts exist. The Cities are also concerned by the omission of any analysis of the effects of the proposed expansion on their residents.

Response:

Comment noted. Please see Responses to Comments above.

3. Comments and Responses

AL00051-95

Comment:

Furthermore, the draft EIS/EIR continually refers to the economic benefit that will be obtained by the entire LA region with the proposed expansion of the airport. However, it does not put forth a plan for the entire region to share in the projected economic benefit. The collective health and environmental burden heavily impacts only those communities that surround the airport and those located under the flight path. Thus, the few are supporting the whole.

LAWA states that it would take a minimum of eight years, on average, to plan, approve and construct new aviation facilities. For this reason, the draft EIS/EIR claims, that the region will lose the economic benefits generated by LAX, while waiting for other airports to be built. However, the timeline for completion of the proposed LAX Master Plan is fifteen years. Thus it will take the other regional airports approximately the same amount of time, if not less, to build up to capacity as it would take LAX to expand.

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.

Also, Section 4.4, Social Impacts, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR described the direct and indirect economic benefits of the project, with the former being within the control of the project and the latter being more of a secondary result of the project. It is beyond the scope of the LAX Master Plan to develop a plan for the region to share in the projected economic benefit of the project. The nature and general geographic extent of impacts associated with each of the Master Plan alternatives was presented throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures. The Draft EIS/EIR and Supplement to the Draft EIS/EIR are information disclosure documents and not intended to evaluate the relationship between economic benefits and environmental impacts.

AL00051-96

Comment:

Taken as a whole, the current economic and safety conditions call into question the validity of some of the assumptions in LAWA's projection of future growth in airport and passenger operations used in the draft EIS/EIR. The City of Los Angeles Mayor's office has recently recommended that LAWA consider keeping the current level of airport services at 78 million annual passengers while determining ways to improve the operations of the airport. Additionally, the current Master Plan and Draft EIS/EIR are not well supported by those in the greater Los Angeles basin. In any case, the reasons behind the need for airport expansion have changed in terms of their immediacy, and LAWA may consider using this opportunity to evaluate a more regional approach to meet the region's and the nation's transportation needs.

Response:

As indicated above, 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.

AL00051-97

Comment:

From the onset of the Master Plan, LAWA dismisses the idea of supporting a regional airport system. The draft EIS/EIR claims that failure to expand LAX would cost the Los Angeles region in both dollars and jobs. However, with LAX assuming the responsibility for all of the air transportation growth in the region, it is denying the right of other portions of the region to grow and benefit from air services. While LAX will continue to be a major hub in a regional system, the other eleven commercial airports should be allowed to grow and expand, as most of the population growth in the region is occurring in the outlying areas adjacent to the other airports. Not only is LAWA imposing additional burdens of noise, safety, health problems and air pollution on the surrounding communities, but its plan also deprives other communities their opportunity for economic benefits of air commerce.

Response:

Please see Response to Comment AL00051-95 above regarding the regional approach. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety.

AL00052 Torres, Richard City of Montebello

AL00052-1

Comment:

On behalf of the Montebello City Council, the City and concerned residents, and in conjunction with the City of Monterey Park, the City of Montebello is submitting our written comments for the Draft EIS/EIR documents. Our City appreciates the opportunity afforded by Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) to review and comment on the Master Plan and the Draft Environmental Impact Statement/Report.

Response:

Comment noted.

AL00052-2

The attachment included as part of this comment letter is identical to the attachment to comment letter AL00051; please refer to Responses to Comments AL00051-2 through AL00051-97.

3. Comments and Responses

AL00053 Hamilton, Gordon City of Los Angeles

11/9/2001

AL00053-1

Comment:

I. GENERAL COMMENTS
A. Baseline Year Assumptions

(1) Bases for use of updated data. The environmental baseline year of 1996 is updated inconsistently. Passenger data uses 1997 updated data. Under Air Quality, modeling began in September 1999, yet available 1998 data was not used. Similarly, school enrollment data from 1996 was used when updated data was available. The selective use of updated data might result in an underestimation of the impact of the project (e.g. Pgs 1-1 and 4-474). As part of the Final EIR/EIS, please clarify and further substantiate the bases for the EIS/EIR baseline year assumptions.

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 passenger data and operational data used in the air quality analysis, is 1996

AL00053-2

Comment:

(2) Related Projects. The DEIS/DEIR notes that the Westchester Southside (LAX Northside) and Continental City projects are included in the Master Plan boundary since their future use is an integral part of the Master Plan. CEQA requires that the environmental baseline be the "existing conditions" (except for traffic and some NEPA issues). The Final EIS/EIR should clarify that these projects are not included in the baseline (Pg 3- 20).

Response:

Although the LAX Northside and Continental City projects are included in the Master Plan boundaries, they are not considered to be part of baseline conditions. As indicated in Chapter 3, Alternatives, of the Draft EIS/EIR (page 3-19, first paragraph): "The baseline reflects historical airport activity for the full year 1996 and the physical facilities of the airport as they existed in 1997. The Continental City and LAX Northside areas of airport property, though fully entitled to proceed without further CEQA documentation, are not developed." Build-out of LAX Northside and Continental City are assumed as part of the No Action/No Project Alternative.

AL00053-3

Comment:

B. No Action/No Project Alternative

(1) Beneficial consequences. There is no discussion of the positive impacts of the No Action/No Project Alternative (Pg 2-7).

Response:

Comment noted. Page 2-7 of the Draft EIS/EIR initiates a discussion of the consequences of not improving LAX, including changes in air service, activity, and airport operations. There are no beneficial consequences relative to air service, activity, or airport operations resulting from the No Action/No Project Alternative.

AL00053-4**Comment:**

C. Growth Projections

(1) Million Annual Passenger number (MAP) and the projected tons of cargo per year limits. The entire traffic analysis (and associated noise and air quality analysis) is based on the maximum number of million annual passengers and tons of cargo served for each Alternative. There is no discussion of the potential for growth beyond the MAP and the maximum tons of cargo for each Build Alternative as a result of the proposed infrastructure and facility improvements and, consequently, the additional impacts on the adjacent neighborhoods. The basis for the growth projections used in the impact analysis of each alternative, and the potential for those projections to be exceeded, should be further addressed in the Final EIS/EIR (General Comment).

Response:

The basis for projected future activity levels at LAX under each of the build alternatives is provided in Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

AL00053-5**Comment:**

II. COMMENTS ON SPECIFIC SECTIONS OF THE DEIS/DEIR
A. Land Use

(1) Acquisition and Conversion of incompatible land uses. The Build Alternatives would result in the acquisition and conversion of substantial acreage of residentially designated land (e.g. Alternative B would remove approximately 10 acres of High Density Residential, 95 acres of Medium Density Residential and 48 acres of Low Density Residential land from the Westchester - Playa del Rey Community Plan area). The Land Use Technical Report concludes that this is not significant, since residential uses are not compatible with airport related uses normally developed on airport property (Pg. 147, Land Use Technical Report). The discussion should be expanded to provide a more complete assessment of the short and long term effects of the removal of these lands from the Westchester-Playa del Rey Community Plan (Pgs 4-75, 4-95, 4-234).

Response:

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-RBR-1 regarding residential acquisition and relocation. As indicated in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR, under LAWA Staff's new preferred alternative, Alternative D, no residential acquisition is proposed.

AL00053-6**Comment:**

In addition, the discussion should focus on the impact on housing in the Westchester area resulting from the acquisition and conversion of these acres of residentially planned parcels (Pg 147, Land Use Technical Report).

Response:

Land use impacts and acquisition impacts associated with the proposed Master Plan were addressed in Section 4.2, Land Use, and Section 4.4.2, Relocation of Residences or Businesses, respectively, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-2 regarding acquisition impacts in the community of Westchester. Also see Topical Response TR-RBR-1 regarding other aspects of residential acquisition.

3. Comments and Responses

AL00053-7

Comment:

The Build Alternatives also indicate the acquisition of acres of commercial and industrial parcels which would then be converted to airport related uses. The Land Use Section of the Final EIS/EIR should be expanded to fully disclose the potential land use impacts on the Westchester Playa del Rey Community Plan related to the loss of land designated Light Industrial and Community Commercial.

Response:

Section 4.2, Land Use (subsection 4.2.6), of the Draft EIS/EIR discussed acquisition of light industrial and community commercial land uses within the Westchester - Playa del Rey Community Plan on page 4-132 including Table 4.2-9; on page 4-138; pages 4-164 and 4-165 including Table 4.2-17; page 4-167; pages 4-190 and 4-191 including Table 4.2-23; and on page 4-193. The Supplement to the Draft EIS/EIR contains additional evaluation of acquisition effects under Alternatives A, B, and C, as well as evaluation of Alternative D, LAWA Staff's preferred alternative. Also see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

AL00053-8

Comment:

(2) Consistency with SCAG's Regional Transportation Plan (RTP). The LAX Master Plan does not appear to be consistent with RTP Policies (Nos. 8 and 20). Policy No. 8 calls for developing mitigation measures to reduce all impacts to an acceptable level. Policy No. 20 calls for expansion of international as well as cargo facilities at other airports in the region (Pg 10-11 - Land Use Tech. Report).

Response:

The Draft EIS/EIR discussed the 1998 RTP. The 2001 RTP was subsequently adopted by SCAG and consistency with this plan was evaluated in the Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR.

Regarding analysis of the 1998 RTP and consistency with Policy No. 8, LAWA has pursued all feasible design features and mitigation measures to address environmental and ground access impacts. See Chapter 5, Environmental Action Plan, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

Regarding analysis of the 1998 RTP and consistency with Policy No. 20, as further stated in Chapter 1, Regional Context, of the Draft EIS/EIR, the forecasting used to establish activity levels for the LAX Master Plan recognized that an increasing share of future demand would be accommodated by other regional airports. However, even with this assumed growth, it was determined that a significant share of the international market would not be accommodated and maintaining and expanding such services at LAX would be a critical component of any regional air transportation plan (see pages 1-24 and 1-25).

Also note that Alternative D, LAWA Staff's new preferred alternative further limits capacity at LAX to a level comparable to that of the No Action/No Project Alternative. This alternative assumes a greater level of air service will be accommodated by other airports.

AL00053-9

Comment:

(3) LAX Master Plan Goals and Objectives Framework. All Alternatives are inconsistent with Goal 1 which calls for "an equitable redistribution of service among all the commercial airport facilities in the Region."

Response:

Please see Response to Comment AL00053-8 and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

AL00053-10

Comment:

The Final EIS/EIR should provide a discussion of how the project relates to Policy 8.5.4 of the General Plan Framework which calls for completion of the LAX Master Plan according to the goals and policies of the LAX Master Plan Goals and Objectives Framework" (Pg 4-84, Technical Report 1, Pg 21).

Response:

As stated on page 21 of Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR, the Los Angeles International Airport Master Plan Goals and Objectives Framework was issued in March 1993 with input from an LAX Technical Advisory Task Force. The LAX Master Plan and EIS/EIR Study was initiated two years later in 1995. The LAX Master Plan proposal has been influenced over time by changes in City government, public outreach and comment, continued input from members of the earlier task force, and a variety of other factors that influence aviation planning, including the events of September 11, 2001. Acknowledging this input and the refinements that have occurred over time as part of the process, the basic goals and objectives set forth in the framework have generally been maintained. Further, more detailed evaluation of consistency with this document was not incorporated into the Draft EIS/EIR due to the document's age and subsequent input that has led to the formation of the current set of LAX Master Plan alternatives.

AL00053-11

Comment:

B. Noise

(1) Project, Construction and Traffic/Roadway Noise. The DEIS/DEIR provides independent assessments of the noise impacts from aircraft, roadway traffic, and construction noise and provides a comparison of these individual results/values with the thresholds of significance. For the combined noise methodology, the DEIS/DEIR states, "because there are no thresholds or generally accepted standards applicable to combined air and road noise, this analysis is provided for informational purposes only" (Pg 4-29). However, CEQA requires that the DEIR analyze the "whole" of the action, which includes aircraft, vehicle traffic noise and any stationary noise sources resulting from the project. Under Methodology to Determine Significance for Project Impacts, the Draft City of Los Angeles CEQA Thresholds Guide states that "the incremental increase in noise generated by the project is the project impact" (Pg 1.2-5). The Final EIS/EIR should add the total combined project noise sources (i.e. aircraft noise, vehicular traffic noise and stationary noise sources) to the ambient noise levels and compare these noise levels against the City's noise threshold.

Response:

Please see Appendix D, Aircraft Noise Technical Report, and subsection 4.1.7, Cumulative Impacts, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00053-12

Comment:

(2) Peak Noise Events. The Noise Section should evaluate instantaneous peak noise events that are relevant to the type of land use that occur along the flight path. The DEIS/DEIR describes the cumulative total of time (less than 20 minutes) from all the single event aircraft flyovers and states that the 109dB events would occur about 110 times per day (Pg 4-1039). The DEIS/DEIR briefly discusses the health effects of these peak noise events (Pg 4-1044). There should be a more complete discussion and evaluation of these events, particularly on sensitive uses (e.g. schools near the airport).

Response:

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. 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

3. Comments and Responses

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.

AL00053-13

Comment:

(3) Aircraft Noise from "Overflights". The Noise Section does not adequately address the issue of aircraft flying over residential areas. The Final EIS/EIR should assess the conditions under which they occur and are projected to occur under each Build Alternative. Also, the existing and projected frequency of these occurrences and proposed mitigation measures should be included in the Final EIS/EIR (General Comment).

Response:

The incompatible areas identified in the noise impact area in the noise section of the Draft EIS/EIR are predominantly residential areas lying east, north and south of the airport. The estimated and projected dwelling and population levels associated with baseline and future conditions were disclosed for each of the various alternatives in accordance with guidance provided by the FAA and Caltrans for land use compatibility planning. Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR relates the noise exposure patterns to all land uses within the areas of exposure by each alternative. Detailed information is provided in Appendix D, Aircraft Noise Technical Report, relative to the frequency of overflight occurrences along all approach and departure paths leading to and from the airport. This information, as well as mitigation actions designed to address land use and noise incompatibilities, is included in this Final EIS/EIR.

AL00053-14

Comment:

C. Air Quality

(1) Project Emissions, Construction Emissions. The Air Quality Section analyses impacts of on-airport emissions, off-airport emissions and construction related emissions. The DEIS/DEIR, states that for purposes of comparison to the appropriate inventory thresholds, these are characterized as separate items to determine conformity (Pg 4-464). In addition, the air quality impacts of the LAX Expressway and State Route 1 Realignment are presented in Appendix K (Pg 4-462). As currently presented, the air quality analysis suggests a segregated approach. The emissions related to all components of the project need to be combined and measured against the threshold to determine conformity.

Response:

The first step in a general conformity evaluation is an applicability determination to compare the total of all direct and indirect emissions of the relevant criteria pollutants from the proposed project (combined emissions from operations and construction, unless such sources are presumed to conform or are otherwise excluded) to the general conformity threshold emission rates. If the threshold emission rates are equaled or exceeded by the maximum combined emissions, the general conformity requirements apply to the proposed project and a general conformity determination must be completed. Please see Response to Comment AF00001-4 regarding general conformity applicability.

AL00053-15

Comment:

(2) Control of airborne particulate matter. The DEIS/DEIR uses a reduction rate of 50% to account for soil stabilization and other dust control practices. However, there is no indication of the source which establishes the control efficiency of 50% (reduction rate) to uncontrolled PM10 emissions. The Final EIS/EIR should provide a reference for the 50% reduction rate (Pg 4-467).

Response:

The control efficiency of PM10 mitigation measures is taken from Table A11-9-A of South Coast Air Quality Management District's (SCAQMD's) 1993 CEQA Air Quality Handbook.

AL00053-16**Comment:**

(3) Age/Timing of data collected for air quality analysis. The table indicates that the data for PM10 baseline air pollutant concentrations was based on less than 12 full months of information. This is of concern because the time of year affects concentration levels of this pollutant. The Final EIS/EIR should provide 12 full months of data or explain why 12 full months is not available and state which months the information was available for (Pg 4-479, Table 4.6-5, Maximum Measured Ambient Air quality in the Vicinity of LAX.).

Response:

The PM10 1996 baseline concentration is based on the highest reported concentrations from 1996 through 1998 from SCAQMD Monitoring Station 094, SW Coastal Los Angeles County as reported on the Air Quality summaries for 1996, 1997, and 1998. The highest reported annual average concentration of PM10 occurred in 1997. The 1997 Air Quality (Summary) noted that only 84 percent of the year was monitored. Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR regarding baseline concentrations and data sources.

AL00053-17**Comment:**

(4) Methods of determining significance. On-airport source impacts are compared to the "environmental baseline." Off-airport source impacts are compared to the "adjusted environmental baseline." CEQA requires that the combined on-airport and off-airport emissions be compared to the existing setting (i.e. the "environmental baseline") (Pg 4-473).

Response:

Please see Topical Response TR-GEN-1 regarding the adjusted environmental baseline.

AL00053-18**Comment:**

D. Public Facilities

(1) School mitigation fee. The impact on schools is normally mitigated through the payment of the development fee or the provision of a suitable site for a campus to provide for the projected increase in school population. The Draft DEIS/DEIR indicates the mitigation measure to be a school development fee. It should be made clear that the fee should take into consideration the exemption for Local, State and Federal Government facilities. This may result in reduced fee that may not provide adequate funding for a school facilities (Pg 4-1219).

Response:

As indicated on page 4-1221 of the Draft EIS/EIR: "Commercial and industrial development occupied by local, state and federal government agencies are not subject to school fees. School fees for the LAX Master Plan would only apply to commercial and industrial space that would be occupied by non-governmental airport tenants." Thus, government agencies, such as LAWA, would not pay school impact fees pursuant to Senate Bill 50 (SB 50). However, the majority of new facilities being proposed are expected to be leased by LAWA to non-governmental tenants which would be subject to school impact fees. As discussed on page 4-1229 of the Draft EIS/EIR, school impact fees paid by non-governmental airport tenants associated with implementation of the LAX Master Plan under Alternatives A, B and C are estimated to range from three to four million dollars. Under Alternative D, as described on page 4-764 of the Supplement to the Draft EIS/EIR, school impact fees paid by non-governmental airport tenants could range from approximately 1.8 to 2 million dollars. Payment of school impact fees would, in accordance with SB 50, provide full and complete mitigation for purposes of the California Environmental Quality Act.

3. Comments and Responses

Additionally, when considering funding for school facilities relative to the LAX Master Plan, it is important to note that the project does not include residential development and, therefore, does not directly contribute to increases in school enrollment. Rather, the estimated school fees would address the potential for new employees to move into the area, add to the number of households, and thereby generate increases in enrollment.

AL00053-19

Comment:

(2) Student Generation Rate. The rate varies with communities but LAUSD uses .78 students per household as against .38 in the DEIS/DEIR. The .38 figure is based on a 1990 "journey to work" files. This may not be reflective of existing or future commuting patterns. The Final EIS/EIR should provide the appropriate factor as determined by the LAUSD or substantiate more fully the basis for using the .38 figure. This issue should be clarified in the Final EIS/EIR (p g 4-1226).

Response:

As stated on page 4-1221 of the Draft EIS/EIR: "The analysis used for the proposed project varies in certain respects from LAUSD methodology, in part, due to refinements made to be more reflective of project characteristics. For the proposed project, on-airport employee household locations were estimated using 1990 census "journey to work" files for employees in the air transportation, retail, entertainment, tourism and manufacturing sectors of the economy that are directly related to LAX. Assuming 1.0 household per on-airport employee, household locations were then overlaid onto LAUSD "high school cluster" areas using a Geographic Information System (GIS). The total numbers of employee households by cluster were then factored by the LAUSD average SGR of 0.39 to calculate student enrollment attributable to the project. The census and GIS-based analysis indicates that about 38 percent of on-airport employees would reside within the boundaries of LAUSD. This compares with LAUSD's 0.78 factor for estimating the number of project employees who would be located within the school district. Although the resulting number of new on-airport employees estimated to locate within the district is lower than what would result using the LAUSD factor, the project methodology is more reflective of the likely settlement patterns of LAX on-airport employees. To the extent that the project's census/GIS-based 0.38 assumption is lower than the 0.78 LAUSD factor, the difference is partially offset by the project methodology used to calculate households, which assumes 1.0 household per employee versus an LAUSD factor of 0.64 households per employee. In comparing the overall differences between the project and LAUSD methodologies, the project enrollment estimate represents about 76 percent of the estimate that would result using LAUSD methodology."

Furthermore, as stated on page 4-1222 of the Draft EIS/EIR: "The methodology for calculating enrollment provides what is considered a high-side estimate of project enrollment impacts. The estimates are considered high, as it is assumed that all on-airport employees would move into newly constructed housing rather than existing housing which would not produce a net increase in student enrollment. Additionally, it is likely that a number of new employees would already live within areas served by LAUSD schools. Furthermore, the 1.0 household per employee factor that is used due to the absence of project specific employee household demographic data represents a worst-case estimate."

AL00053-20

Comment:

(3) Need to integrate the analyses concerning impacts on parks. Potential indirect impacts on park demand, generated off-airport are addressed in the Induced Socio-Economics Section 4.26.3.7. The Final EIS/EIR should address these with the direct impacts in Section 4.26.3. This would avoid the appearance of bifurcating the analysis and would give the total impact on Parks and Recreation (Pg 4-1226).

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed potential indirect impacts on park demand in Section 4.26.3, Parks and Recreation, with a discussion of cumulative impacts on parks in subsection 4.26.3.7. The cumulative analysis addressed indirect and induced impacts on parks. As such, both the direct and indirect effects on parks and recreation areas were addressed in Section 4.26.3 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

AL00053-21**Comment:**

(4) Subsequent Project. Demolition and construction of Fire and/or Police facilities would require subsequent environmental review. This should be analyzed in the Final EIS/EIR (Master Commitment PS- 1).

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed fire protection impacts resulting from relocation of on-airport fire stations in Section 4.26.1, Fire Protection. Furthermore, Section 4.26.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provided a program-level analysis of the Master Plan. A more specific analysis of effects associated with the demolition and relocation of on-airport police and fire stations would be dependent on numerous details regarding construction sequencing that are not feasible to identify in advance of project approval. However, Master Plan Commitment PS-1 ensures that LAWA will develop a Relocation Plan through a cooperative process involving the Los Angeles Fire Department, Los Angeles World Airports Police Division (formerly, Los Angeles World Airports Police Bureau), Los Angeles Police Department, and airport planners. This commitment includes performance standards that specify that the Relocation Plan will address maintenance of required response times, fire flows, personnel, and adequate fire protection services. As stated on page 4-741 of the Supplement to the Draft EIS/EIR, implementation of Master Plan Commitment PS-1, as well as other Master Plan Commitments, and project-by-project plan review to enforce code requirements would result in less-than-significant impacts on fire protection services at LAX. Whether subsequent environmental review related to the fire and police facilities proposals is ultimately required or not, implementation of the Master Plan Commitments presented in the Final EIS/EIR will be monitored through a mitigation monitoring and reporting program.

AL00053-22**Comment:**

E. Transportation

(1) Parking Capacity. Planned parking capacity is more than the projected demand. The final EIS/EIR should provide a discussion and analysis of the potential growth inducing impact of the extra parking spaces (6,800 stalls in 2005 and 3,800 stalls in 2015) (Pg 4-235).

Response:

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. It is not anticipated that any extra stalls would induce parking demand. Please see Response to Comment AL00050-11 regarding parking capacity.

AL00053-23**Comment:**

(2) Phasing of the Automated People Mover (APM) and Green Line. The connection between the Central Terminal Area and the proposed Western Terminal Area is a proposed APM. The extension of the Green Line would connect the Western Terminal Area and the Green Line station at Aviation. However, these are built at the end of the construction period when they are indicated as required mitigation measures for increases in cargo and passengers which will occur earlier with all build alternatives (Sec. 4.3 and Sec. 4.3.1). This issue should be analyzed in the Final EIS/EIR.

Response:

Neither the APM nor the Green Line extension are required as mitigation measures. Both are part of the project. The APM would be built as soon as possible, but not before the first phase of the west terminal would be opened. During that initial period, moving walkways and shuttle buses would be used to transport passengers between terminals and concourses. The Green Line extension is not

3. Comments and Responses

anticipated to have a major impact on the passenger levels using the surface transportation system to access the airport. Therefore, its construction later in the project would not cause any project impacts in the interim.

AL00053-24

Comment:

F. Human Health and Safety

(1) Toxic air pollutants(TAPS). There is no evaluation of toxic air pollutants (TAPS) associated with the current airport operations. A study is proposed to be completed in 2002. The Final EIS/EIR should discuss how this will be incorporated into the conclusions (Pg 4-999).

Response:

Please see Topical Response TR-AQ-2 regarding toxic air pollutants.

AL00053-25

Comment:

(2) Data for TAPS. The DEIS/DEIR relies on data for TAPS prepared by SCAQMD in the cumulative analysis which was not specifically developed for the LAX area. LAWA is conducting a study specific to the Airport which will be concluded in 2002 (Pg 4-1008).

Response:

Please see Topical Response TR-AQ-2 regarding the study of toxic air pollutants.

AL00053-26

Comment:

G . Hydrology and Water Quality

(1) Hydrology - Generalized preliminary assessment of the hydrology impacts of the Alternatives. The Final EIS/EIR should clarify and/or add certainty to the analysis and mitigation, particularly with respect to system improvements and other solutions that are available but where the responsibility for mitigation lies with others. Recognizing that the DEIS/DEIR provides a program level of impact analysis for the Master Plan, the Final EIS/EIR needs to clarify the hydrology and water quality aspects of the project that are presently being addressed and when and how more detailed information will be provided.

Response:

Identification of agencies other than LAWA which must share financial responsibility for mitigation of regional drainage and water quality facilities will be done following completion of Master Plan Commitment HWQ-1 and possibly other studies of contributing drainage areas. In addition, please see Topical Response TR-HWQ-2 regarding Master Plan Commitment HWQ-1.

AL00053-27

Comment:

If there is remaining uncertainty that the cumulative drainage impacts cannot be mitigated they should be assessed and analyzed with a conclusion that such impacts are potentially significant (Pgs 4-532, 4-551).

Response:

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR stated that deficiencies in regional drainage infrastructure would be resolved through implementation of Mitigation Measure MM-HWQ-1. Please refer to Section 4.7, Hydrology and Water Quality (subsection 4.7.7), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for an expanded discussion regarding cumulative impacts.

PC00001 Hamilton, John None Provided 3/20/2001

PC00001-1

Comment:

Would it be possible to take some of the volumes of Master Plan & EIS/EIR home to study on hours office is closed & return when open

Response:

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

PC00002 Uchima, Ansho Uchima Commercial Real Estate 1/31/2001

PC00002-1

Comment:

I own property at 5823 -33 W. 93rd Street and 5812 and 5850 Arbor Vitae Street, a 40-unit apartment complex in Westchester. We understand that there might be a possibility that the airport would expand into this area. We would like to go on record opposing that expansion.

My reasons are as follows. These properties provide me significant retirement income and it would be a burden at my age (75 years old) to find a suitable replacement. I could potentially incur significant income taxes should the property be sold or condemned. We have owned and managed this property since 1975 (23 years) and are very comfortable managing the property and have a good relationship with our tenants and manager. Any replacement property would be risky because we would not have the same experience and knowledge with the new property and its tenants. We would also be concerned about displacing all of our tenants and apartment manager. Many have lived at the property over 10 years and would not be able to find similar housing near the airport.

Response:

Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation issues, including affordable housing.

PC00002-2

Comment:

I feel this is a regional problem and should be addressed by Orange County as well. Why is the burden of airport expansion being placed solely on the City of Los Angeles?

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.

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PC00002-3

Comment:

Since we do not live in the district, please keep us informed and updated of any developments. Please send any future information to my office at Uchima Commercial Real Estate, 3838 Carson St., 3rd Floor, Torrance, CA 90503.

Response:

Comment noted.

PC00003

Hamilton, John

None Provided

3/27/2001

PC00003-1

Comment:

Why no answer to my request of 3/20/01 "Request to check out some of the books overnight &/or weekends

Response:

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

PC00004

Rose, Tara

None Provided

3/26/2001

PC00004-1

Comment:

1. How can you put more effort to ensure that there will be direct public transportation from downtown L.A. to the airport? What will the transportation look like? Will it take carrying luggage into consideration?

Response:

The Master Plan process is not a regional transportation planning effort. Detailed analyses of transit connections to downtown Los Angeles would fall under the MTA Long Range Transportation Planning process or the SCAG Regional Transportation Plan effort. Please see Topical Response TR-ST-5 regarding the rail and transit plan for more information. At present, no car interior configurations exist for accommodating luggage. However, such configurations might be included in the specifications for future car purchases. 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 Supplement to the Draft EIS/EIR.

PC00004-2

Comment:

2. Is there any way to avoid making tunnels in these three plans? Tunnels always take longer than planned - what steps will you take, should this happen at LAX?

Response:

Based on proximity to existing and proposed runways or runway extensions, it is necessary, for safety reasons, that certain improvements such as the proposed extension of the MTA Green Line and the continued use of Sepulveda Boulevard near the north runway complex, under Alternatives A, B, and C, occur below the elevation of the nearby runways. Such tunneling is not required for the No Action/No Project Alternative or Alternative D - the Enhanced Safety and Security Plan, a new alternative that was

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developed subsequent to the publication of the Draft EIS/EIR to add to the range of alternatives currently being considered for the LAX Master Plan.

PC00004-3

Comment:

How will the venting system look in the tunnel(s) to deal with gas fumes from the cars?

Response:

The Master Plan facilities have not yet been designed, but rather are at a conceptual level of detail. Tunnels will be designed in accordance with the City of Los Angeles standards, including venting systems, if necessary.

PC00004-4

Comment:

Will there be enough standing room for cars so people can wait for passengers to come out of the luggage area? And will there be a bus shuttle service to the car waiting area?

Response:

All alternatives for development of the airport have been based on the objective of providing improved conditions at the terminal curbs. In Alternatives A, B, and C, the existing curbs will operate no differently than they do today, and new terminal curbs will be sized and configured to provide a satisfactory level of service. This means that automobiles will be able to dwell at the curb for enough minutes to find their waiting passenger on the curb and load their vehicle. If the passenger has not yet arrived, the vehicle may not be allowed to dwell for an extended period of time with no loading activity. This will depend on the curb operating conditions and the security levels at that point in time. In Alternative D, the existing Central Terminal Area (CTA) would not allow access to private vehicles, but a new Ground Transportation Center would be constructed with sufficient capacity to replace the existing curbs, as was summarized in Chapter 3 of the Supplement to the Draft EIS/EIR. Remote parking lots will be served by either the Automated People Mover or a shuttle bus.

PC00005

Brown, Matthew

None Provided

2/20/2001

PC00005-1

Comment:

As you may imagine given my home address, I am writing you regarding the proposed expansion and improvement of LAX airport. However, unlike some residents of towns near LAX, I am not dead set against your project, in fact I would love to see most of the project, as I have come to know it by reading the local newspapers, come to fruition. I believe that the time is long past to have an extension of the MetroRail green line go all the way to the airport, an extension of the I-105 freeway directly to the airport, a people mover between terminals and especially the suggested consolidated car rental facility. If all these improvements are made, I think that LAX could handle very well the projected 4% increase in passenger service.

Response:

Comment noted.

PC00005-2

Comment:

Yet I think that the proposed doubling of the air cargo service would negatively effect life around LAX. Living in Culver City, it has been my experience to hear the air cargo jets flying overhead at all times of

3. Comments and Responses

the late night and early morning. The roar of these jets is definitely loud enough to wake sleeping people in their own bedrooms and to think that this occurrence would double is mind-boggling.

Response:

A forecast doubling of air cargo volume does not correlate to a doubling of flight operations. The volume increase is predominantly due to the forecast increase in aircraft size and efficiency of cargo space on newer larger aircraft, rather than the result of a large increase in operations. Cargo activity does operate during the nighttime hours. 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. Please also see Topical Response TR-N-5 regarding nighttime aircraft operations.

PC00005-3

Comment:

If the air cargo service must double, as many LA city hall politicians claim for LA's economic future to prosper, then I propose that LAX impose the same flight regulations that Orange County's John Wayne Airport has for airplanes flying over residential neighborhoods. At John Wayne Airport, they cut the engines after a steep take-off to lessen the noise pollution on the surrounding communities. If it's done there, why can't it be done here, especially since the flights in question would contain only the pilots themselves and the air cargo freight and no paying passengers?

Response:

See Topical Response TR-N-3, in particular Subtopical Response TR-N-3.7 regarding SNA departure procedures, which describes why the present procedures are best suited for use at LAX.

PC00005-4

Comment:

Or if this first suggestion is unpalatable to the powers that be, perhaps some of the extra air cargo flights could be flown during the day. I hardly ever hear the jets during the day, but I know there are plenty of flights during the day as well. Do they fly different routes? Do they fly higher up? If so, perhaps the nightly air cargo flights could abide by the same rules as the flights during the day.

Response:

A majority of the aircraft operations at LAX occur during the daytime and evening hours. It is possible that the commentator does not hear the daytime activity due to the surrounding ambient noise levels being much higher during daytime and evening hours than nighttime hours. There are special flight procedures in effect between midnight and 6:30 a.m. These procedures are not mandatory, but are generally used by air traffic controllers when practicable. For more information on this topic, please see Topical Response TR-N-7 regarding noise abatement measures/enforcement, Subtopical Response TR-N-5.1 regarding description of over-ocean procedures, and Subtopical Response TR-N-5.4 regarding relationship of air cargo flights and night noise impacts. Neither LAWA nor FAA have the legal authority to dictate the scheduling of commercial flights, including air cargo flights.

PC00005-5

Comment:

In any case I believe that the best course for LAX airport is to make the necessary improvements discussed in the first paragraph above and to limit the increase in air cargo flights. Or if the air cargo flights double as proposed, then the appropriate regulatory body must impose rules on the air cargo flights to mitigate the tremendous amount of noise pollution from the nightly air cargo flights.

Response:

Comment noted. Please see Topical Response TR-MP-1 regarding cargo night operations, Topical Response TR-N-5 regarding nighttime aircraft operations, and Topical Response TR-N-6 regarding noise increases, specifically, 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.

PC00006 Parks, Betty None Provided 3/9/2001

PC00006-1

Comment:

As you can see, we live in Riverside, so coming to LAX is a major undertaking. The traffic is terrible & I feel it is imperative to:

1. Extend the Green Line into the airport.
2. Extend #105 into the airport = right now there's a huge bottleneck where it ends.
3. The Ring Road if that would help the traffic flow

Response:

Comment noted.

PC00006-2

Comment:

4. More long flights from Ontario Airport to relieve strain on LAX.

Response:

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

PC00007 Hamilton, John None Provided 4/3/2001

PC00007-1

Comment:

1. Why no reply to my last "2" public comments forms I submitted

Response:

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

PC00007-2

Comment:

Why in EIS/EIR main document book #1' figure 4.1-4 the 'Loyola Village' Branch Library left off??

Response:

The Loyola Village Branch was not identified in Figure 4.1-4 of the Draft EIS/EIR. However, it is identified as LIB 13 in Figure S10, Miscellaneous Noise Sensitive Facilities, of Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR.

3. Comments and Responses

PC00007-3

Comment:

3. Why in EIS/EIR book # '1' Fig. 4.1-2 is the 'Osage Elem School missing?

Response:

Osage Elementary School is the former name of the Open Charter Magnet School (GRID ID PBS202), located at the southeast corner of Osage Avenue and W 77th Street in the Westchester neighborhood of Los Angeles. The land use figures within the Draft EIS/EIR, including Figure 4.1-2, mistakenly identify the subject parcel as being a residential use. In conjunction with the preparation of the Supplement to the Draft EIS/EIR, this error was corrected and is accurately reflected in Year 2000 conditions. This correction does not change the conclusions of the Draft EIS/EIR analysis, because the subject site is not impacted by existing or future high noise levels (i.e., 65 dBA CNEL or greater, or 94 SEL or greater) under any of the alternative scenarios.

PC00007-4

Comment:

4. Why in M/P book #1 "Executive Summary page" i-2.3, is Terminal 2 the only one with "Airlines Clubs & Offices" wrong info?

Response:

As indicated on Page I-2.3 of the Executive Summary of the Draft LAX Master Plan, a general description of all existing terminals within the Central Terminal area is included. All terminals have airline clubs and offices included within the total square footages indicated.

PC00008

Bray, Everett

None Provided

3/8/2001

PC00008-1

Comment:

This plan is totally unacceptable! No more homes taken with the disruption of lives, families, and communities.

Response:

Comment noted. Please see Topical Response TR-LU-1 regarding impacts to the quality of life and Topical Response TR-RBR-1 regarding residential acquisition. 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 include any residential acquisition.

PC00008-2

Comment:

We support a regional plan and the Southern California Association of Governments conclusion of a 78 MAP!

Response:

Comment noted. There are two alternatives that have a capacity constraint of approximately 78 MAP at LAX: No Action/No Project Alternative as described in the Draft EIS/EIR and Alternative D as described

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in the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in regional approach to meeting demand.

PC00008-3

Comment:

No more expansion and/or reconfiguration outside of your present facility!

Response:

Comment noted. 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.

PC00009

Bray, Sandra

None Provided

3/8/2001

PC00009-1

Comment:

NO MORE LAND ACQUISITION! NO OUTSIDE EXPANSION! YOU WILL NOT FURTHER DESTROY WESTCHESTER - PLAYA DEL REY.

THIS IS AN ENVIRONMENTAL, HEALTH AND SAFETY TRAVESTY AS WELL AS THE PLANNED DESTRUCTION OF A HEALTHY COMMUNITY. WE ARE TALKING ABOUT HUMAN BEINGS HERE WITH LIVES, FAMILIES, HOMES, BUSINESSES AND THE RIGHT TO LIFE, LIBERTY AND PURSUIT OF HAPPINESS.

Response:

Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-LU-1 regarding quality of life. The Supplement to the Draft EIS/EIR addressed human health and safety impacts associated with Alternative D in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR.

PC00009-2

Comment:

YOU HAVE MANY OTHER OPTIONS THAT WILL NOT DAMAGE THIS COMMUNITY AGAIN - A TRULY REGIONAL SOLUTION INCLUDING PALMDALE IS ONE OF THEM

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, Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

3. Comments and Responses

PC00010 Bray, Sandra None Provided 3/8/2001

PC00010-1

Comment:

What does the word preliminary refer to on Appendix P? ("Preliminary Property Acquisition and Relocation Plan" and why was it used?)

Define your use of it, please

Response:

As indicated in the Introduction and Overview of the subject report, the purpose of that appendix is to describe generally how the Master Plan will relocate residences and business in accordance with applicable statutes. A final relocation plan will be developed during Master Plan implementation, and will depend on which alternative is selected.

PC00011 Bray, Sandra None Provided 3/12/2001

PC00011-1

Comment:

No More! Not Now - Not Ever!

Response:

Comment noted. 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.

PC00011-2

Comment:

30 years of lies & broken promises to the Westchester - Play Del Rey neighbors.

Response:

Comment noted. Please see Topical Response TR-LU-2 regarding impact to the community of Westchester.

PC00011-3

Comment:

No more land grab - whatever you do - do it in Palmdale or your other airports.

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. 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-5 regarding transferring LAX operations to Palmdale.

PC00011-4

Comment:

Shame on your history of false statements & promises.

3. Comments and Responses

Response:

This is not a comment on the contents of the Draft EIS/EIR.

PC00011-5

Comment:

The safety, health & environmental concerns of what you propose is a travesty!

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental impacts both adverse and beneficial in Chapter 4, Affected Environment, Consequences, and Mitigation Measures. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR.

PC00012

Heard, William

None Provided

3/5/2001

PC00012-1

Comment:

Expansion not good for the local community - Westchester is having a hard time maintaining its identity.

Response:

Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

PC00012-2

Comment:

We do not need more traffic and pollution to satisfy the rest of L.A. County - spread it around to other points: All cargo to El Toro and points east - Ontario could be a good place for expanded services, Palmdale is really not a good (or cheap) alternative. The airport needs to keep its present size intact!!

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. 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. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

PC00013

Schivley, Gary

None Provided

3/1/2001

PC00013-1

Comment:

This is regarding the Los Angeles International Airport expansion project. WE DO NOT WANT IT!

3. Comments and Responses

Response:

Comment noted. 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.

PC00013-2

Comment:

1. We are tired of the planes flying dangerously overhead to land at the existing north strip.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety. As described therein, a comprehensive systems of facilities, personnel, and procedures apply to any and all aircraft operations at LAX to provide for a very high level of safety protection to people and property around the airport.

PC00013-3

Comment:

2. We are tired of the foul smelling and choking kerosene jet fuel mist/fumes that falls on us and our house, pets, cars and plants. This is a health hazard. We DO NOT NEED additional cancer causing pollutants in our air. EPA tests no doubt will verify this, if done to the correct standards.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and 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-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-1 regarding air pollutant deposition and Topical Response TR-AQ-3 regarding air pollution increase. Please also see Response to Comment PC00045-4 regarding fumes.

PC00013-4

Comment:

3. We do not need additional vehicles on our already over-taxed roads, again causing more pollution and traffic headaches. This proposed ring road will only cause more congestion, noise and hydrocarbons from the vehicles.

Response:

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 regarding airport area traffic concerns. 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, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. 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. Note that Alternative D does include an LAX Expressway or a Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

PC00013-5**Comment:**

4. We do not want to lose any of our businesses to this expansion.

Response:

Comment noted. Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6, Environmental Consequences), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR discussed business acquisition, relocation impacts, and proposed Master Plan collateral development. As was addressed therein, Alternatives A, B, and C would necessitate the relocation of 330, 323, and 239 existing businesses, respectively, located near LAX, and Alternative D would involve the relocation of 38 businesses. However, Alternatives A, B, and C would include the development of Westchester Southside, a community commercial "village" providing approximately 2.62 million square feet of mixed uses intended to benefit Westchester residents and accommodate many of the displaced uses. Similarly, Alternative D would involve the development of LAX Northside, which would provide 4.5 million square feet (subject to a vehicle trip cap) of mixed-use development. In addition, Master Plan Commitment RBR-1, Residential and Business Relocation Program (Alternatives A, B, C, and D), proposed as part of the Master Plan would facilitate the timely relocation of displaced businesses to appropriate sites within the vicinity of LAX to the extent possible. The Relocation Plan is described in Appendix P to Chapter V of the Master Plan, Preliminary Property Acquisition and Relocation Plan, and updated to reflect Alternative D in Chapters 2.7 and 2.8 of the Master Plan Addendum. It should be noted that, in contrast to the other build alternatives, Alternative D would not involve acquisition within the Westchester Business District. Finally, please see Topical Response TR-APPK-2 regarding property acquisition and relocation efforts associated with the LAX Expressway and State Route 1, and also Topical Response TR-LU-2, regarding the potential effects of the Master Plan alternatives on the community of Westchester.

PC00013-6**Comment:**

5. We are tired of the extreme noise levels and our windows rattling from the jets powering out because of heavy cargo or passenger loads. Increasing the planeloads and size will only exasperate this already BAD situation.

Response:

Please see Topical Response TR-N-8 regarding noise-based vibration and Topical Response TR-N-6.3 regarding relationship between aircraft size and noise levels.

PC00013-7**Comment:**

6. Increasing flight traffic over housing is going to end up a disaster like Cerritos. You cannot increase flights into and out of this airport without raising the danger level.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

PC00013-8**Comment:**

WE SAY NO AND WILL CONTINUE TO DO SO. There are alternative choices to LAX that are more economic and intelligent. There is only so much coastal space available. Infringing on this will only cause grief and misery on the inhabitants and the habitat. PLEASE LISTEN TO US. WE DO NOT WANT TO EXPAND THIS FACILITY.

3. Comments and Responses

Response:

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 project alternatives in Chapter 3, Alternatives, and coastal zone and habitat impacts 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, with supporting technical data and analyses provided in Technical Report 7 of the Draft EIS/EIR and Appendix S-H of the Supplement to the Draft EIS/EIR. 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 and Topical Response TR-LU-1 regarding impacts to quality of life.

PC00014 Munoz, Venancio None Provided 2/21/2001

PC00014-1

Comment:

Please accept this letter, as one, in total disagreement with your expansion plans. Not only do I disagree; I am totally against it. As it reads, the plan will destroy the surrounding area where I live.

Response:

Comment noted. 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-LU-1 regarding impacts to quality of life.

PC00014-2

Comment:

I have lived in the Westchester area since 1996. Since then, there has already been an increase in street traffic (congestion), noise, dust, and pollution. Plus with the expansion, there will be an increase in the air traffic, noise, and pollution due to more activity at the airport.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and air quality in Section 4.6, Air Quality. 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-LU-2 regarding impacts to the community of Westchester. 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.

PC00014-3

Comment:

With the expansion plans, there will be an increase at least a hundred-fold of fumes from both autos and jet aircraft.

Response:

Comment noted. Please see Topical Response TR-AQ-3 regarding air pollution.

PC00014-4**Comment:**

Surely there are alternatives on record that could be looked into. I belong to the Osage Neighborhood Association that is also very much against the expansion.

Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR. It should be noted that, subsequent to the 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, and will make the airport safer and more secure, convenient, and efficient. Alternative D has replaced Alternative C as the LAWA staff-preferred alternative.

PC00014-5**Comment:**

I would appreciate it very much if you give this idea a lot of thought and consideration. Consider the neighborhood, which will be very much damaged by an increase of smog-producing devices. Thank you for your time for reading this.

Response:

Comment noted. Impacts to surrounding communities relating to air quality were addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses 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.

PC00015**Ehret, John****None Provided****2/9/2001****PC00015-1****Comment:**

This is a suggestion to construct a Taxiway on the north side of the existing North North Runway and not move the runway nor add a Taxiway in between them. This is for plan C proposal.

For the following reasons:

1. You will not be increasing the NOISE . A taxing airplane could not be heard over the existing noise.
2. It would a less costly than moving a Runway and still adding a Taxiway down the middle which is unsafe as wing spans increase with the new jumbo jets.
3. Any interruption to existing air traffic would be minimized during construction when comparing to your Plan C, which could be years to complete while traffic is increasing.
4. The Cargo planes could taxi to the new easterly cargo facilities uninhibited by the passenger planes going to the terminals as they do now.
5. The suggested Taxiway would more compatible with the large draining ditch on the north side as the wing could stick out over it while taxing.

[The following are handwritten comments on attachments]

Revision to Plan C Add taxiway rather than a new runway and a taxiway between runway.

3. Comments and Responses

Plan C Problems Higher noise for neighbors. Caution high blds. on Sepulveda and Parkway & higher costs and traffic interruption

Increase in wingspan

Response:

Constructing a taxiway on the north side of the existing Runway 6L/24R would not meet the need to enhance safe aircraft operations and reduce the potential for runway incursions - this is the purpose of the proposed center taxiway in Alternative C. The lack of this center taxiway slows the arrival stream by requiring time-consuming coordination of runway crossings. While these conditions do not create an unsafe environment, they do add to airfield congestion as operations increase. Providing a center taxiway between the two parallel runways allows aircraft to queue and maneuver without blocking runway operations. At the same time, the proposed center taxiway would be designed to accommodate New Large Aircraft (NLA) based on the forecast which anticipates NLA operations in the future. If a new taxiway was provided to the north of the two existing northern runways, aircraft would have to cross two runways either to reach the proposed taxiway from the terminal area or from the proposed taxiway to reach the terminal area. The increased runway crossing would increase the potential for runway incursions as compared to the existing layout. In addition, this would increase taxi distances and add airfield congestion which would not be desired. As a result, such a taxiway would not be used and would be an unnecessary expense.

The commentor is correct in projecting the increased noise impact to the north of the airport in Alternative C. When compared to the No Action/No Project Alternative, Alternatives A, B, and C would have approximately equal levels of newly exposed population impacts in the near term (2005). However, by 2015, Alternative C would be preferable to either Alternative A or B in terms of noise impacts. In contrast, Alternative C would have greater impacts in the short term in terms of population exposed to 1.5 CNEL increases, but by 2015, it would have substantially less impact than either Alternative A or B. Please see Section 4.1 Noise, and Section 4.2, Land Use, and Appendix D and Technical Report 1, of the Draft EIS/EIR for more information on noise.

Regarding the safety of operations with Alternative C, extensive analyses have been taken to ensure that all build alternatives meet Federal Aviation Administration (FAA) airport design standards including providing standard safety areas, standard separation between runways and taxiways, and ensuring that there are no obstructions to the runway approach surfaces. The high buildings on Sepulveda and Parkway are not obstructions to the runway approach surfaces. The center taxiway would be designed and constructed to accommodate the largest aircraft projected to be in operation at LAX and to meet all FAA design standards.

PC00016	Rodriguez, Gabriel and Gillian	None Provided	2/19/2001
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PC00016-1

Comment:

We recently received a visit from your representative, Susan Gilmore, in which she discussed the planned future of LAX and its impact on us. She also invited us to send in any comments we might have on the proposed expansion.

We are not in favor of the removal of houses north of Westchester Parkway, including our own, because:

1. We bought the house partly because of its proximity to the bank, shops, etc., with an eye to the future when we can no longer drive.
2. Our grandson, for whom we babysit daily, lives less than half a mile away and we need to continue to live close to him and the school he attends (he is presently in First Grade).

3. We love the spaciousness of our lot (11,800 feet) and the privacy it affords us and would find it very difficult, if not impossible, to find a similar lot in this vicinity.

4. Due to our age, when purchasing this house we took advantage of Proposition 60/90 (Senior Citizen's Transfer Exclusion) (see copy attached). If we were to move to a comparable house and lot, property taxes would be in the area of \$6,000 a year.

5. We would not mind at all being at the edge of the "buffer zone" if the proposed demolition line were moved a few yards away to the edge of our property.

Response:

Please see Response to Comment AL00040-46. Please also see Topical Response TR-RBR-1 regarding residential acquisition and relocation issues.

PC00016-2

Comment:

While we appreciate that the airport needs to expand in order to handle future growth, we feel that this can be accomplished by means of less intrusion on the very pleasant community of Westchester, which has only recently begun to revive. The airport expansion to the north would be another blow from which it might not recover. Why can't runways be built out to sea, as in Hong Kong? The El Segundo Blue Butterfly can surely be moved to a new local habitat, as has happened in the past. Also, the south side of the airport is industrial and offices, which can be much more easily relocated than houses.

Response:

Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Responses to Comments AL00022-52 and SAL00013-39 regarding alternatives that include ocean runways that would traverse the Los Angeles/El Segundo Dunes. Ocean development is not considered to be feasible due to the high costs, construction difficulty, and environmental concerns. The process of evaluating potential concepts for the LAX Master Plan was described in Chapter 3, Alternatives, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and in Chapter V, Concept Development, of the Draft Master Plan.

PC00016-3

Comment:

We appreciate this opportunity to share our views, and hope that you will continue to keep us informed.

Response:

Comment noted.

PC00017

Park, Noel

**San Pedro and Peninsula
Homeowners' Coalition**

1/31/2001

PC00017-1

Comment:

We have received your blue flyer titled "Public Notice, Los Angeles International Airport Notice of Availability", outlining your intention to charge the public for copies of the Joint Draft Environmental Impact Statement/Environmental Impact Report. We strongly protest the requirement that the public pay for copies to the EIR.

If LAWA can spend 65 million dollars to prepare this report, and propose to spend 12 billion dollars to execute the project, LAWA can afford to provide a copy of the report to any member of the public who requests one. We believe that this requirement will severely limit public knowledge of the intentions of LAWA. It is not unreasonable to infer that the intent of LAWA is to limit irritating and troublesome public

3. Comments and Responses

comment. We believe that this requirement is arguably illegal. It is certainly unconscionable if the intent of Environmental Impact Reports is to inform the public and protect our environment.

Going to the library does not allow a realistic opportunity to study a document over 1000 pages in length. The Internet is fine, as far as it goes, but it is much more difficult to work with in studying a document of this complexity. Many of the most impacted people, including those living in the lower income neighborhoods to the east of LAX, do not have access to the Internet.

Please receive this letter as our first comment on the EIR. If this policy of charging for copies of the EIR is maintained, with its inevitable result of severely limiting public participation, we submit that the EIR is rendered non-responsive and inadequate on its face. Please reverse this inappropriate policy. Please furnish us with a complete copy of all environmental documents for this project, immediately, and without charge.

Response:

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

PC00018 Segal, Jeff Segal Family Partnership 1/29/2001

PC00018-1

Comment:

I am writing to respond to the January 10th letter that you sent to our tenant (see enclosed).

We are the owners of the property at 9210 S. Sepulveda Blvd in Westchester, California. We have a long-term bond lease with a national credit tenant. We have no interest in being acquired. Our company is experienced in defending its property rights in both condemnation, and inverse condemnation, matters. We will diligently defend our property rights should they be threatened or injured by your organization.

Response:

As was discussed in Section 4.2, Land Use, of the Draft EIS/EIR, Alternatives A, B, and C would involve acquisition within the Westchester Business District along Sepulveda Boulevard. While the vast majority of affected businesses are airport-related or office uses, community-serving retail uses, such as the business located at the above-referenced address, would also be acquired. The Proposed Relocation Plan to be implemented by LAWA (refer to Appendix P to Chapter V of the Master Plan and Chapters 2.7 and 2.8 of the Master Plan Addendum) would provide all affected businesses with an array of relocation assistance that would meet requirements under state and federal law, and may include special assistance for displaced businesses in finding relocation sites within nearby areas of the City of Los Angeles, including LAX Northside/Westchester Southside. Please refer to Response to Comment PC00013-5 regarding collateral development at LAX Northside/Westchester Southside. 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. Alternative D involves the acquisition of far fewer businesses than the other build alternatives and would not require acquisition within the Westchester Business District, including the above-referenced property. Please refer to Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester.

PC00019 Walker, Daniel None Provided 2/2/2001

PC00019-1

Comment:

Do you have details (i.e. drawings, ridership forecast, station design) of Green Line Light Rail extension from Aviation to LAX new West terminal?

Response:

Please see Topical Response TR-ST-5 regarding the rail and transit plan. 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, with supporting technical data and analyses provided in Appendix G.

PC00019-2**Comment:**

What will happen to Pershing (west of LAX) under Staff Recommended Plan?

Response:

The most recent Staff Recommended Plan is Alternative D, which is analyzed in detail in the Supplement to the Draft EIS/EIR. Pershing remains unchanged in Alternative D.

PC00019-3**Comment:**

What kind of businesses are planned for Westchester Southside?

Response:

Please see Table 4.2-15 in Chapter 4, Land Use, of the Draft EIS/EIR for a description of proposed land uses for Westchester Southside.

PC00020**Upton, Frances****None Provided****1/26/2001****PC00020-1****Comment:**

I would like a copy of Alternative B - 2015 Added Runway - South. Thank you!

Response:

Alternative B was fully described in Chapter 3, Alternatives (Including Proposed Action), of the Draft EIS/EIR and its potential impacts were detailed in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Topical Response TR-PO-1 regarding the substantial extent to which copies of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR were made available for public review.

PC00021**Boyer, Daniel****None Provided****1/29/2001****PC00021-1****Comment:**

My family and I have enjoyed owning and living in our Westchester home for the past five years and are happy to have LAX as our neighbor. We enjoy watching the beautiful, modern, airliners arrive from all over the world as we can see the LAX arrival flight path from the front yard of our home in Westport Heights. Having LAX as a neighbor also makes our travel plans very convenient. Given a few new regulations, we would welcome plans for the expansion of the LAX facilities and the accompanying economic growth that it will bring to Westchester and to Los Angeles as a whole.

Response:

Comment noted.

3. Comments and Responses

PC00021-2

Comment:

We are concerned however, that regulations for noise control are not being fully addressed as part of LAX expansion. We are concerned by the current lack of restrictions on the operation of older, very loud, turbo jet powered, stage 2 aircraft types at LAX. Specifically, we would prefer to see operations at LAX prohibited for older turbojet powered cargo and passenger airplanes such as the DC-8, DC-9, older MD-80's, 707, 727, and older 737's. These aircraft types are powered by low-bypass, turbojet engines, such as the Pratt & Whitney JT8D. During take-off, these older jet engines, expel very hot, very dirty, very fast (supersonic), exhaust gases that produce an extremely loud, crackling noise due to the shock-waves that they create. It is not uncommon for us to be awoken in the middle of the night by just such an aircraft taking off. Most of our concerns with the LAX expansion effort will be addressed by elimination of stage 2 aircraft operations at LAX. We would like to see a specific date spelled out for elimination of stage 2 aircraft operations at LAX in the Master Plan and EIS/EIR sections that address LAX noise control.

Response:

The aircraft specifically addressed by the comment have been eliminated from use at LAX since December 31, 1999. The relatively small number of Stage 2 operations by small jet aircraft weighing less than 75,000 pounds are allowed to continue without a deadline for phase out. The institution of any ban on aircraft now allowed to operate at the airport would require the preparation of a 14 CFR Part 161 study and approval of any proposed restriction by the FAA. For additional information, please see Topical Response TR-N-7 (subsection TR-N-7.6) regarding ANCA phase-out of Stage 2 aircraft.

PC00022

Rudick, Roger

None Provided

1/19/2001

PC00022-1

Comment:

While I applaud the obvious decision to extend the Green Line to the airport terminals, I'm confused by the strategy in building a "people mover" around the terminals that will also link up with an extended Green Line station. What, exactly, is the difference between a "people mover" and "light rail?"

I submit to you, that they are the same thing. It seems foolish to me to build two incompatible rail systems to transport people to the airport and around the airport. Why not simply extend the Green Line into a loop around all the terminals? Then people can use the green line to get from terminal to terminal, and to get to the rest of the city, without transferring and waiting for another train. Every time you ask someone to change trains, it increases the chances that they will chose to drive instead of using public transportation. This increases traffic congestion. Not only that, using a separate "people mover" means additional maintenance facilities and increased cost. While I understand the advantage of using a driverless train, since the green line drivers are already on the payroll, that advantage is lost. And because there is a driver, there's no reason the green line loop can't be built on ground level, an elevated guideway, a tunnel, or a mix of all three.

London's Heahtrow airport, for one example, is connected directly to the Picadilly Line subway train which travels in a loop and services all the terminals. Please consider my suggestion.

Response:

The Green Line train cannot be used to accomplish the principal functions of the Automated People Mover (APM) System because some of the APM trains are operated as "secure" trains (the people have passed through security) and are moving between the security check point in the West Terminal and the Satellite Concourses. Similarly, the "sterile" (secure) APM trains move international arriving passengers between their arrival gate and the Immigration and Customs FIS facilities. This is a completely different function than the existing Green Line or the Piccadilly Line at London, Heathrow. In fact, the current expansion of London Heathrow is incorporating an APM technology to perform these functions. Although it is feasible for a light rail car to be used for this function, airports worldwide have used the automated people mover class of systems for the "internal" functions of the airport terminal

complex when the movement of secure passengers is involved. Supplemental information on the transit technologies accessing the airport and their associated alignments is provided in Topical Response TR-ST-5 regarding the rail/transit plan.

PC00023 Rouseyrol, Barbara None Provided 4/10/2001

PC00023-1

Comment:

My concerns are:

1. Air & noise pollution - increase of planes & autos.
2. Loss of private housing & business by expansion
3. Relocation allowance & compensation costs paid to residents - how much
4. Safety to residents in surrounding areas.
5. Too much traffic on Sepulveda & Lincoln at present time, too many cars on surface streets

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, relocation impacts in Section 4.4.2, Relocation of Residences or Businesses, health and safety impacts in Section 4.24, Human Health and Safety, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendices D and G, and Technical Reports 1 through 5 and 14 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-1 through S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-3 regarding air pollution increases, Topical Response TR-RBR-1 regarding residential acquisition and relocation, and Topical Response TR-SAF-1 regarding aviation safety.

PC00023-2

Comment:

6. Too many large projects in immediate area & they are not completed - airport expansion would destroy the immediate area. Just too large & too much

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. In addition, please see Response to Comment AL00018-19 regarding the evaluation of cumulative impacts in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

PC00023-3

Comment:

Utilize surrounding airports - El Toro, etc.

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. In the spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

3. Comments and Responses

PC00024 Sather, Milo None Provided 4/14/2001

PC00024-1

Comment:

I propose that all of the foreign flights (except from Canada & Mexico) come into the Palmdale Airport instead of LAX.

Can you work that out?

Response:

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00025 Lamothe, Rae None Provided 4/12/2001

PC00025-1

Comment:

I live in Playa del Rey

Last Wednesday, April 4th, I attended a town hall meeting at Westchester High School regarding the future of LAX. I was displeased from beginning to end. The event was advertised as a town hall meeting/public forum. The minute we arrived we were told that we would be taught how to stop the expansion of LAX. Nothing about the evening resembled a fair or open discussion of LAX.

Response:

Comment noted.

PC00025-2

Comment:

I am writing to let you know that as a resident of Playa del Rey I support the modernization and expansion of LAX. Although I live in Ruth Galanter's district, she certainly does not represent my views.

The airport has not been improved or modernized since the Olympics. Unfortunately, LAX is a rather dismal gateway to our fine city. The surface transportation has reached near grid lock, with no end in sight. There is no reason to believe that the passenger volume will decrease anytime soon.

Given the fact that Los Angeles will continue to be desirable as a destination, how can we best capitalize on our success? My review of the Draft EIR indicates that the proposed ring road and extension of the green line to LAX are a great start to alleviating the present and future congestion. The addition of a terminal on the west end of the property will also assist in the redistribution of the passenger and automobile traffic.

Response:

Comment noted.

PC00025-3

Comment:

Many of the arguments I heard presented last Wednesday were illogical at best. The suggestion that we divert air traffic to Ontario and Palmdale is unrealistic. When was the last time Ms. Galanter or Mr. Gordon flew out of Ontario? When was the last time an overseas tourist was destined for Lancaster? The Venice Boardwalk remains the #1 tourist attraction in Southern California. I operate a business in

3. Comments and Responses

Santa Monica, and trust me, my clients are not interested in flying out of Ontario, John Wayne or anywhere other than LAX. Despite the incentives offered by LAWA, the public simply is not willing to travel in land. Although the population in the Inland Empire is increasing in leaps and bounds, it does not follow that passenger volume is increasing in a similar pattern. Passenger demand is still predominantly generated from Downtown to the Westside. Westside business needs a modern, efficient airport.

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.

PC00025-4

Comment:

The argument that an expansion at LAX will double the volume of cargo is equally flawed. The majority of cargo arrives in the bellies of passenger flights. The assertion that an increase in cargo volume will mean an increase in the number of large cargo planes at night is simply wrong. LAX could easily accommodate a two fold increase in cargo craft with no improvements. Cargo carriers do not need the surface improvements recommended by the LAX Master Plan. My clients, colleagues and neighbors do. Cargo carriers already perform much of their work at night, when the roads are relatively empty.

Response:

Comment noted. Slightly more than half of all cargo at LAX arrives and departs on freighter aircraft. The cargo activity scenario associated with Alternative D is a constrained case as a result of a policy limitation on cargo facilities. The policy constraint is set at approximately 3 million annual tons, the same total cargo volume as the No Action/No Project Alternative. The effective constraint on Alternative D cargo activity would be the lack of adequate cargo building space to meet the unconstrained demand.

PC00025-5

Comment:

Last but not least, the Master Plan includes a new 18 hole golf course. The present 15 hole course is among the most used public courses in the State. A full 18 hole course plus an additional 9 hole course on the water would be a wonderful asset for Westchester and Playa del Rey.

Response:

Comment noted. Each of the four Master Plan build alternatives would expand the existing Westchester Golf Course by 6 acres, with the addition of three holes; however, none of the Master Plan alternatives propose any new golf courses.

PC00026

Peterson, Helen

None Provided

4/10/2001

PC00026-1

Comment:

I have lived in Westchester since 1962. Traffic, noise and dirt have just gotten worse.

3. Comments and Responses

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and air quality in Section 4.6, Air Quality. 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-LU-2 regarding impacts to the community of Westchester.

PC00026-2

Comment:

Right now there is grid lock on Sepulveda from about 6:45 - 9:30 every single morning. Along with this the cross streets are also grid locked. And when you consider Lincoln, it too is grid locked and we still have to open all the businesses that will happen (and traffic) when Howard Hughes is completed.

Response:

Please see Topical Responses TR-ST-4 regarding airport area traffic concerns, Section 1, and Topical Response TR-ST-2 regarding surface transportation analysis methodology and results.

PC00026-3

Comment:

We are told every day about the near misses at LAX now. We don't need more traffic there, we need to find a way to be safer on the streets and at LAX.

Response:

Please see Topical Response TR-SAF-1 for further discussion regarding aviation safety and Topical Response TR-ST-4 regarding airport area traffic concerns.

PC00026-4

Comment:

I am definitely against expansion at LAX. It doesn't appear we (Los Angeles and the Airlines) can handle the passengers and traffic that go through now. Making larger planes does not make it safer. Safety should certainly be a main concern.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed safety in Section 4.24, Human Health and Safety and traffic in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D and Technical Reports 2, 3, and 14c of the Draft EIS/EIR and Appendix S-C and Technical Reports S-2 and S-9 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety. 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.

PC00027

Garcia, Carlos

None Provided

4/10/2001

PC00027-1

Comment:

I oppose any expansion of LAX, I, as many other voters, believe Del Toro, John Wayne or a combo thereof, or Palmdale or Ontario, etc. Any other site, i.e. military bases in possibility of closing.

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. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00028 Hamilton, John None Provided 4/10/2001

PC00028-1**Comment:**

1. "Land Use Technical Report." (EIS/EIR Bk #8) Why in chart/fig. 12 places that have churches & schools only have one or the other?

Response:

It's not clear from the comment what chart/figure the commentor is referencing or which twelve places have churches and schools.

Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR categorizes land use by the predominant use even though some uses may be joint uses, such as a church or a school. The use is clearly identified in the listing of significantly impacted noise-sensitive uses presented in all relevant tables and figures throughout Technical Report 1, of the Draft EIS/EIR. In addition, a comprehensive table of all sensitive receptors within the Study Area is provided in Attachment D of Technical Report 1, of the Draft EIS/EIR. The Supplement to the Draft EIS/EIR and Technical Report S-1, Supplemental Land Use Technical Report, also provides a comprehensive listing of noise-sensitive uses exposed to high noise levels under Year 2000 conditions and noise-sensitive uses that would be significantly impacted by high single event noise levels compared to the 1996 baseline and Year 2000 conditions. In addition, an evaluation of significant impacts is provided for LAWA Staff's new preferred alternative, Alternative D.

PC00028-2**Comment:**

2. Why no "day care centers in report's?"

Response:

Day care centers were listed as private schools in Technical Report 1, Land Use Technical Report, of the Draft EIS/EIR. However the names of these facilities were identified by the property owners rather than the name of the day care. As described in Section 4.2, Land Use (subsection 4.2.3), of the Supplement to the Draft EIS/EIR, the affected environment/environmental baseline related to sensitive receptors has been modified since the Draft EIS/EIR to correct the names of some of the private schools. This correction was incorporated in Attachment A, Table A2, of Technical Report S-1, Supplemental Land Use Technical Report, and all listings of newly impacted noise-sensitive uses presented in the Supplemental Land Use Technical Report and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR. Day care centers are listed as private schools and are identified by the terms preschool, child care center, child development center, and head start in all relevant listings. It should be noted that day care that is provided in a private residence is evaluated as a residential use.

3. Comments and Responses

PC00029 Hoffman, Walter None Provided 4/6/2001

PC00029-1

Comment:

These Drafts must be delayed until the grid lock traffic and excessive noise created by the present LAX operations are mitigated.

Please use your current funds wasted on these plans and promotions to resolve the present problems.

Response:

Comment noted. The 1996 environmental baseline accounts for the incremental increases in activity at LAX that have occurred up to that point, including airport-related traffic and noise, and other environmental factors that affect the surrounding community. The use of 1996 as the baseline year for the CEQA impacts analysis is consistent with the requirements of the CEQA Guidelines. 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) are also required to be monitored.

PC00030 Rodine, Robert The Polaris Group 3/19/2001

PC00030-1

Comment:

Since the first announcement of the 89 MAP Master Plan for LAX, I have been seriously troubled by two factors. First is the regional, economic sub-optimization implicit in the plan relative to the Regional Transportation Plan (CommunityLink21) demand forecasts; and second is the assumption relative to "de-regionalizing" LAX.

It may be that my view of de-regionalization is too simple. I simply don't see other communities stepping up to the table and compensating for the shortfall. And I can't imagine any incentive that Los Angeles could or should put on the table to induce them to change their thinking. Clearly PMD is microscopic relative to the overall need and is clearly not the answer. The net result is that under the 89 MAP Plan we suffer the lion's share of the economic impact for the intransigence of those other communities.

Response:

Comment noted. See also Topical Response TR-RC-1 regarding the role of the LAX Master Plan in the regional approach to meeting air transportation demand.

PC00030-2

Comment:

Dealing with the reduced plan in terms of our own City Council may be a bit different. Please appreciate, my focus may be too heavily biased by my analytic background. It is my feeling that the presentation put before the City Council must be structured in such a way as to make them look like economic heroes for supporting a plan that is good for the region, and like total dunces for rejecting such a plan.

The Plan that Jim Ritchie presented to VICA, and that we have seen at the LAWA Business Council, has a groaning table filled with a smorgasbord of mitigation measures reflecting great insight. But I think

a companion economic analysis can make the presentation for a 98 MAP plan more compelling. Please consider the following analysis:

Gross Economic Benefits Flowing from 98 MAP (with Induced Impacts) 20 Years
Less : Costs for Construction
Costs for Physical Mitigation Measures
Roads
Facility Relocation (Freight)
Physical Barriers
Residential Land Acquisition to 65 CNEI
Less: Redeployment Revenue and Proceeds
Costs for Operational Mitigation Measures
Landing Fee Discounts for Extended Approach/Departure
Net 98 MAP Plan Benefits
Less: Economic Benefits of 62 MAP
Net Marginal Economic Benefit of 98 MAP Plan

Less:
Gross Economic Benefit of 79 MAP Plan (with Induced Impacts) 20 Years
Less: Costs for Construction
Costs for Physical Mitigation Measures
Roads
Facility Relocation (Freight)
Physical Barriers
Residential Land Acquisition to 65 CNEI
Less: Redeployment Revenue and Proceeds
Costs for Operational Mitigation Measures
Landing Fee Discounts for Extended Approach/Departure
Net 79 MAP Plan Benefits
Less: Economic Benefits of 62 MAP
Net Marginal Economic Benefit of 79 MAP Plan

Net Marginal Economic Benefit of 98 MAP Plan Over 79 MAP

Response:

Please see Response to Comment PC02399-22.

PC00030-3

Comment:

It is my hunch that the costs to deliver the 79 MAP Plan will be very close to those of the 98 MAP plan, and so great as to render the economic impact negative, given the cost associated with delivery of the full package. On the other hand, at 98 MAP, which is very close to the demand forecast, the net marginal economic benefits will be so great over 20 years as to make the economic merits of the plan a "No Brainer." That condition is only enhanced by the difference between the net marginal economic benefits of the two Plans.

It is at this point that you say to the Council, "there are the choices you have council persons," and you let them make the hard decision. If they want to fall on their swords for having opted to undermine the economic strength of the region, it is not the duty of you, your staff and consultants, nor that of the business community to deliver it to them.

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

PC00030-4

Comment:

Lydia, the economics of the Non-Addition Rule were never even presented to the City Council, and that destroyed whatever chance logic and reason had to play in deciding the issue. While the cost will ultimately prove to be enormous in that case, that regional loss will be inconsequential in contrast with what we face in the LAX Master Plan. I realize that you serve at the pleasure of the Mayor and it becomes a tough choice for you, but I don't personally believe that this region can afford the cost of simply indulging the "followership" nature of our elected officials.

Response:

Comment noted.

PC00031 Ruhlen, John Westchester LAX Marina del Rey 3/13/2001
Chamber of Commerce

PC00031-1

Comment:

The Airport Relations Committee appreciates your willingness to provide presentational material on the proposed LAX Master Plan to our committee. It is most appreciated and provides the chamber members the opportunity to better understand the LAX Master Plan, receive answers to their questions, and express their concerns.

Please extend our appreciation and compliments to Mr. Ralph Braboy from URS Corporation for his participation. His presentation on the Sepulveda Boulevard/ Westchester Parkway, the Lincoln/Westchester Parkway and the Ring Road was excellent.

Response:

Comment noted.

PC00032 Muckey, Betty None Provided 4/10/2001

PC00032-1

Comment:

I wish to express my dislike of the airport expansion plan. I hope it fails.

Response:

Comment noted. 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.

PC00033 O'Donnol, Elizabeth None Provided 4/16/2001

PC00033-1

Comment:

I have lived under the path of LAX for over 50 years. I am 81 and my husband will be 89 next month. Since 1982, I have received letters from the City of Inglewood ("City") stating that the City or Redevelopment Agency was going to buy our property. Although four or five times people sent by the City have appraised my property, I have actually only ever received one offer several years ago which was terribly low and unreasonable. Since that offer, at least two more appraisals have occurred without ever receiving an offer. When I tried to sell my property in 1995, the potential buyers went to the City

Hall and were told that the City wouldn't give them a business permit and that the City was going to buy the property -- so the buyers decided they didn't even want to "get involved" with the property. The most recent reason that the City was going to buy this property was because of LAX noise abatement. The noise has never been abated and more and more planes seem to be going over all the time. The noise is bad and a constant irritant. The entire neighborhood has declined year after year (for almost 20 years now) since the City and/or Redevelopment Agency has had some grand plan for either Century Boulevard development or LAX noise abatement. Most of my neighbors are gone. The whole reason the neighborhood has gone down is because of the noise and City's action or inaction.

I don't care what the reason is that no one wants to buy my property anymore. All I know is that more and more air plane will most definitely decrease the probability that any human beings can stand to live under these air plane access pathways that fly right over my roof...and I'm really tired of all the promises for year after year from the City.

Response:

The commentor's property, located at 4032 West Century Boulevard, is located within the existing Aircraft Noise Mitigation Program (ANMP) boundaries. The City of Inglewood implements the ANMP within their jurisdictional boundaries. Questions and concerns regarding the status of the City of Inglewood ANMP should be directed to the Residential Sound Insulation Program (telephone number 310/412-5289). Regarding increases in noise associated with implementation of the LAX Master Plan, please see Topical Response TR-LU-4 regarding outdoor noise levels and Topical Response TR-N-6 regarding noise increase.

Also, please see Topical Response TR-RBR-1 regarding residential acquisition and relocation issues. Also see Topical Response TR-ES-1 regarding the effects of LAX on property values.

PC00033-2

Comment:

Further, although there's discussion about vehicle access off the 405 freeway, we get lots of traffic from the Harbor freeway coming down Century Boulevard to LAX being on the other side of the 405 freeway (near Prairie). The vehicle traffic and trucks would increase if more aircraft and terminals are built at LAX so all those access improvements won't help my property, noise abatement, or traffic problems.

Response:

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 regarding airport area traffic concerns. Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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.

PC00033-3

Comment:

I believe the only alternative that should be considered is the "NO PROJECT ALTERNATIVE" which provides for no new improvements to LAX because we already have enough noise and street congestion on Century Boulevard.

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 and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to

3. Comments and Responses

provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

PC00034 Junod, George None Provided 4/12/2001

PC00034-1

Comment:

We would like to comment about the proposed airport expansion at LAX. We have lived in the area since 1947 and have seen a fairly small community expand considerably since then. It offered reasonably clean air and quiet surroundings. The homes, while not castles, were nice looking and by and large well kept up. Then came the airport expansion of several years ago that took away many of those homes and forced people to move away from homes they wanted for years to come. Then another expansion repeated the process adding noise and unclean air.

Response:

Please see Response to Comment AL00017-121 regarding opportunities to alleviate impacts associated with past or present airport activities at LAX. Please also see Topical Response TR-LU-1 regarding impacts on quality of life.

PC00034-2

Comment:

Now they want to do it again. Don't tax paying citizens have any rights over big corporations.

Response:

Please see Topical Response TR-PO-1 regarding the public hearing process.

PC00034-3

Comment:

Isn't L.A. important enough to tell the airlines to use our other airports when they are fixed up.

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. 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-2 regarding the role of deregulation in aviation planning. As a result of deregulation neither LAWA nor the FAA can dictate the rates, routes, or schedules of commercial airlines.

PC00035 Rouseyrol, Andre None Provided 4/10/2001

PC00035-1

Comment:

My concerns for the expansion are:

1. increase air traffic causes increase in air and noise pollution.
2. expansion will increase more auto's which means more air pollution.
3. safety of the surrounding area is a great concern

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, air quality 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 D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-3 regarding air pollution increases.

PC00035-2

Comment:

4. how much of the local private housing & businesses will be taken from the proposed expansion

Response:

Master Plan Alternatives A, B, and C will each necessitate the acquisition of 84 dwelling units, as was indicated in the table entitled "Acquisition and Relocation Overview Comparing the Alternatives" on page 4-370 in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR. These residential acquisitions would occur in addition to the acquisition of 2,568 units within the Manchester Square and Belford areas currently underway as part of the Aircraft Noise Mitigation Program, which would occur regardless of Master Plan development. Business acquisition resulting from implementation of the Master Plan would vary depending on the build alternative developed, with 330 businesses acquired under Alternative A, 323 business acquired under Alternative B, or 239 businesses acquired under Alternative C.

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. Alternative D involves the acquisition of 38 businesses, far fewer than the other build alternatives, and would not require acquisition within the Westchester Business District. Furthermore, residential acquisition is not proposed as part of Alternative D. Please also see Response to Comment PC00013-5 for further discussion of business acquisition and relocation impacts, proposed collateral development at LAX Northside/Westchester Southside, and the proposed Preliminary Property Acquisition and Relocation Plan.

PC00035-3

Comment:

5. traffic on Sepulveda & Lincoln Blvds are too dense now and 77th & 80th streets are a nightmare daily for residents going to work &/or appointments

Response:

Comment noted. 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.

PC00035-4

Comment:

6. Playa Vista & Howard Hughes projects are creating too much traffic now & the projects are incomplete. Too large for the areas. Destroying the area with overdevelopment.

Response:

Comment noted. 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 see Response to Comment AL00018-19 regarding the evaluation of cumulative impacts in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Topical Response TR-ST-4 regarding airport area traffic concerns.

3. Comments and Responses

PC00035-5

Comment:

7. Utilize surrounding airport facilities i.e. El Toro, Long Beach, Lancaster

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.

In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

PC00036 Murphy, Denise None Provided 3/25/2001

PC00036-1

Comment:

I keep hearing how somehow the LAX Master Plan is going to effect SMO & it doesn't sound positive for the residents in Santa Monica.

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.

PC00037 Staples, Peter 7th Street Homeowners' Association (Hermosa Beach) 3/31/2001

PC00037-1

Comment:

Anyone who has recently used LAX would agree that there is room for improvement. The most pressing need is for enhanced ground transportation in and around LAX. Secondly, gates should be added to accommodate the growing number of international passengers. Adding runways is less critical than the other improvements but ought to be considered in the interest of airspace safety.

Response:

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan, Topical Response TR-ALT-1 regarding range of alternatives analyzed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Topical Response TR-SAF-1 regarding aviation safety.

PC00037-2

Comment:

The notion that we can go 15 years without modernizing our ground transportation at LAX is completely untenable. It does not even adequately support our current traffic load, let alone accommodate the inevitable growth. If I were a businessperson flying into L.A. from another country for meetings downtown, I do not know how I would even get there from the airport. Without a U.S. drivers license, I would not care to rent a car, and even if I had heard of L.A.'s rail system, I would have no idea how to get to it. My only option would be to take a cab downtown, paying the world's highest fare (taxi fare comparison made in The Economist, 25 Jan 2001, "City Travel"). Is this any way to lure in levelheaded investors? Congestion is rampant all around LAX -- the 105, the 405, Sepulveda -- and this negatively affects those living around the airport whether they use it or not. The extension of the Green Line, construction of the LAX Expressway, and development of a people mover are all critical developments toward making LAX a useable resource.

Response:

Comment noted. 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 see Topical Response TR-ST-5 regarding the rail/transit plan.

PC00037-3

Comment:

Nearly every time I land at LAX these days, the captain says that we are going to wait for a few minutes for someone to pull away from the gate designated for us. I do not recall hearing that at all four or five years ago. It seems that we are already short of gates and there is every indication that overseas flights will grow quickly in the coming years. These flights are more difficult to offload to smaller regional airports. It is the duty of LAX to provide the gates to serve these passengers.

Response:

Comment noted. All of the Master Plan build alternatives include increasing runway lengths and the number of aircraft parking positions. The increase in runway length proposed in each of the Master Plan build alternatives would reduce airfield congestion and eliminate excessive coordinated crossings in the air, thus reducing departure delays. Please see Response to Comment AR00003-60 for a more detailed discussion.

Construction of Alternative D would result in four new passenger terminals and better improved terminal efficiency.

Please see the Draft Master Plan Addendum, Section 2.2, Terminal/Passenger Processing Facilities for a detailed description on the proposed improvements.

PC00037-4

Comment:

The decision of whether or not to add a runway is one for someone more knowledgeable of the situation to comment on. Safety should be the top priority during the traffic analysis. It may prove more sensible to widen, lengthen, or distribute the existing runways rather than adding another.

Response:

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

3. Comments and Responses

fewer environmental impacts, and improves airport safety and security. Please see the Final Master Plan for a detailed description of Alternative D.

PC00037-5

Comment:

LAWA appears to have done a thoughtful analysis of the problems at LAX. Let us support their efforts to proceed with the dearly needed modernization there and help make L.A. a city of which we can be proud.

Response:

Comment noted.

PC00038	Nicholson, Gordon	None Provided	5/22/2001
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PC00038-1

Comment:

My wife and I moved to El Segundo in 1992 knowing full well that we would live next to one of the busiest airports in the world. We bought into this community thinking that the airport layout and volume of air traffic would stay basically the same. We also knew that the noise level would improve because of the requirement for aircraft to be stage III equipped. Stage III aircraft during the day do make a big difference. But, even a "stage III" Boeing 747 taking off full of fuel and freight at 1:30 in the morning, as three of them did last nite (just like most other nights), is still very noisy and impossible to sleep through.

Response:

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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. In addition, please see Topical Response TR-N-5 regarding nighttime aircraft operations.

PC00038-2

Comment:

If LAX were to increase its volume of air traffic, the frequency of these early a.m. departures and arrivals would increase dramatically, thus having an even greater negative impact on us nearby residents.

Response:

The volume of nighttime operations is expected to increase during the early morning hours. The commentator lives about as near the departure end of the south runway complex as possible, and well within the area eligible for sound insulation under all LAWA guidelines. Sound insulation programs are administered by the surrounding communities. The conditions described will continue throughout the length of the planning period. For further information regarding sleep disturbance and nighttime operations, please see Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR and Topical Response TR-N-5. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

PC00038-3

Comment:

LAX and the City of Los Angeles are making enough money now as it is. Share the wealth with ONT, SNA and BUR for passengers and send the dedicated freight haulers to one of the many abandoned Air Force bases inland.

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.

PC00039**Weir, Jr., Ph.D.,
Alexander****None Provided****4/28/2001****PC00039-1****Comment:**

Comments on the LAX Master Plan Draft

This is a formal request for both the Federal Aviation Authority and the Los Angeles World Airports to inform me how the decrease in Air Quality in Playa del Rey caused by the planned LAX expansion will be mitigated. Specifically, what will be done to counteract the increased air pollution at the intersection of Manchester Ave and Pershing Drive which will be caused by implementation of the LAX Master Plan.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed local CO hotspot analyses, and analyses intersection selection, in Section 4.6, Air Quality, with additional technical data and analyses provided in Appendix G of the Draft EIS/EIR and Appendix S-E of the Supplement to the Draft EIS/EIR. As noted in these documents, selection of intersections for the CO hotspot analysis was based on those intersections that would experience the highest traffic impact as a result of the LAX Master Plan. Based on the criteria described in detail in Appendix G of the Draft EIS/EIR, the intersection of Manchester and Pershing Drive was considered and not selected for further analysis. Please note that all of the 19 selected intersections, before traffic mitigation measures, were calculated to be below CO concentration thresholds as shown in Table S4.6-13 of the Supplement to the Draft EIS/EIR.

PC00039-2**Comment:**

1. The words "Air Quality" are not even mentioned in the 69 page summary or even in the entire document. There is one PARAGRAPH entitled "Air Quality" in the report to the FAA labeled LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report which does not provide ANY data.

Response:

A discussion of the air quality analyses was included in the Draft EIS/EIR Executive Summary on pages ES-30 to ES-32. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses 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.

3. Comments and Responses

PC00039-3

Comment:

While there are thousands of pages (12,000) detailing the number of increased aircraft flights and statements that implementation of the Master Plan will result in an improved environment "Each of the Master Plan Alternates would reduce curbfront demand at the CTA to the new West Terminal Area, (WTA) thereby spreading on-airport traffic over a wider area" (Draft EIS/EIR page 4-235 Section 4.3.1, fifth para), the truth is that Air Quality in Playa del Rey would be very seriously degraded by 1. The increased pollution from increased aircraft take-off;

Response:

Comment noted. Please see Topical Response TR-AQ-3 regarding increased air pollution.

PC00039-4

Comment:

2. Increased automobile traffic to the new West Terminal and to the new Auto Rental Area on Pershing Drive; and

Response:

Please see Topical Response TR-ST-2 regarding traffic impacts.

PC00039-5

Comment:

3. Increased Diesel emissions from the Imperial Cargo area (Increased cargo requirements are one of the two factors mentioned which will require an increase in the number of Aircraft take-off and landings.)

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR air quality analyses accounted for all projected truck and aircraft operations associated with the projected increase in air cargo activity.

PC00039-6

Comment:

2. The reports state that the new WTA "would be designed to accommodate over one-half of the airport's traffic (ibid.p4-235)" While this particular statement refers to On-Airport Surface Transportation, traffic to the airport will be increased to both terminals. Access to the new West terminal is to be from the San Diego Freeway to the Marina Freeway and then through a new interchange to Culver Blvd and then somehow (a cut through on Falmouth Ave was mentioned in one option) to the Westchester Parkway and then to Pershing Drive and the WTA. While this decreases the traffic on Sepulveda and Lincoln, it certainly is detrimental to the environment in Playa del Rey.

Response:

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. Section 4.1, Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts of the proposed airport alternatives. Section 4.6, Air Quality, addressed the air pollution impacts of the proposed airport alternatives.

PC00039-7**Comment:**

3. The "No Action/No Project" Alternate in the reports does not mean what it says. No caps will be placed on the number of flights and a considerable building effort will be instituted North of the Westchester Parkway in Westchester/Playa del Rey as well as a Manchester Square Development in Westchester that has already started.

Response:

Comment noted. Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions and PC01660-5 regarding LAWA's ability to control the number of aircraft operations at LAX.

PC00039-8**Comment:**

There needs to be NO MORE LAX EXPANSION IN PLAYA DEL REY. When I bought my house in Playa del Rey, LAX-including the Terminals, Tower, and Runway- was all East of Sepulveda (which was a street level street, not a tunnel). Since then, the Airport has moved next door to me-TWO new towers, more South Runways, TWO new North Runways, more traffic on Pershing, more pollution from the Aircraft Exhaust (plus the noise).

Response:

Comment noted. 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.

PC00039-9**Comment:**

In May of 1998, the South Coast Air Quality Management District measurements of Particulate Matter (PM10) at LAX (Report SM98001) indicated that LAX exceeded the State of California standard of 50-micrograms/cubic meter in 5 out of 9 measurements. The particle counts measurement near Hawthorne Airport was 27, while at the same time at LAX it was 84 mcg/cu.m. These small particles collect in the lungs and are said by many people to cause cancer.

Response:

Please see Response to Comment PC00070-1 regarding existing air quality, Topical Response TR-AQ-1 regarding air pollutant deposition, and Topical Response TR-AQ-2 regarding toxic air pollutants. From this information, it appears that LAX sources of particulate matter contribute to local levels of this pollutant but not in excess of federal or local guidelines. In particular, the referenced studies cited in TR-AQ-2 indicated that it is difficult, if not impossible, to differentiate the particulate matter collected near LAX as coming from the airport from those that are generated by other nearby sources (i.e., off-site motor vehicles, power plants, etc.). The effects of airborne particulate matter in the vicinity of LAX on human health (including cancer) were also assessed as part of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

PC00039-10**Comment:**

The LAX Master Plan indicates that there are no plans to mitigate the increase in air pollution in Playa del Rey, at least anywhere near the intersection of Pershing and Manchester, which will be caused by the LAX expansion.

3. Comments and Responses

Response:

See Response to Comment PC00039-1 regarding the local CO hotspot analyses.

PC00039-11

Comment:

One technical option would be to require all aircraft to use methanol rather than kerosene (JP-4 or 5). This would technically mitigate the aircraft exhaust pollution. Twenty years ago I published (Chemical Engineering Progress, p92-94, May, 1981 with co-author W.H. von Kleinsmid) results of jet engine tests with methanol as a fuel. The emissions of nitric oxides, NOx, were lowered from 180 to 50 parts per million and the solid particulate emissions were decreased to almost zero. However, the Heating Value of methanol is about half that of petroleum, hence the aircraft would burn twice as many pounds of fuel and the fuel cost would be more than twice as much. While this would mitigate the effect of LAX expansion into Playa del Rey, it is not a practical solution.

Response:

Comment noted.

PC00039-12

Comment:

A more desirable mitigation would be to move the International flights and the cargo flights to Palmdale. The LAX Master Plan gives two causes for the expansion, projected growth in cargo flights and "a need for more Airline First/Business Class lounges for foreign flag carriers" and "International meeter/greeter lobbies" (Nov 7, 2000 draft p i-4.4). One of the Master Plan options requires relocation of ALL of the cargo areas, both Imperial and the Eastside areas. Relocation of this to Palmdale would decrease the air pollution from diesel trucks as well as from cargo -only flights. Those flights which carry passengers and cargo could also leave from Palmdale or land at LAX for passengers only, at their option.

Response:

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00039-13

Comment:

With regard to International flights, it has been my experience that most cities do not try to have an International Airport within the city limits. At least San Francisco, Houston, Fort Worth, Dallas, Chicago, Detroit, New York, London, Paris, Amsterdam, and Tokyo do not. While 40 % of International passengers have connecting flights, this means that 60% do not, and travel for these passengers from Palmdale to other locations in Los Angeles County is not an insurmountable burden (an hour more or less added to a 9 hr flight) compared to the mitigation in air pollution which would be achieved for those "at risk" (children and old people) 24 hours a day, 7 days a week in Playa del Rey.

Response:

Comment noted. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses 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. Also please see Topical Response TR-RC-5 regarding moving LAX operations to Palmdale.

PC00039-14

Comment:

These 12,000 page documents are confusing and misleading (perhaps intentionally) and I have been unable to find any elected officials (or even staff members) who have read the entire 12,000 pages.

Response:

Comment noted.

PC00039-15**Comment:**

The premise that air quality will be improved by transferring air pollution emission sources over a wider area is almost FRAUD. LAX expansion will increase health problems and deaths in Playa del Rey.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and 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-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

PC00040**Ehrlich, Peter****Peter Ehrlich Designer/Sculptor****5/2/2001****PC00040-1****Comment:**

Given that DOT will be able to handle the general traffic growth of the area expected outside of the proposed Airport loop, moving a runway north or south and increasing the number of planes will create a larger area of depressed land east of the airport. The only way I could support the expansion is if all landings and takeoffs were over the water. The reduction of noise in the area east will increase property values and commerce which will bring unexpected revenues to the City of Los Angeles and in general a happier city.

Response:

Comment noted. Due to prevailing winds, aircraft at LAX normally approach and depart to the west (westerly operations). When weather conditions require, operations are reversed, with aircraft arriving and departing to the east (easterly operations). For safety purposes, it is not possible to eliminate all easterly operations. Please see Topical Response TR-N-3 regarding aircraft flight procedures.

PC00041**Weisberg, Katherine****None Provided****5/1/2001****PC00041-1****Comment:**

Since those last 4 years we have noticed a tremendous change in air quality: black soot dirt particles deeply stain our patio, furniture, white deck house etc.

Response:

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

PC00041-2**Comment:**

And what about our lungs (especially young children) We are, already, extremely concerned about the health impact. Thousands of children, in the local schoolyard, can't breath during PE in warm and hot days!

3. Comments and Responses

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

PC00041-3

Comment:

There is no more "room" for more pollution in our lungs. Noise and air pollution are already at their "peak" how can it be increased? it is beyond toleration -

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, air quality 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 D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-N-6 regarding noise increase. 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.

PC00041-4

Comment:

Traffic is unbearable: shuttles, taxis rush into constant accidents (Sepulveda/ S Diego/77th) involving our friends, children and neighbor.

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.

PC00041-5

Comment:

This Westchester community cannot endure anymore, our quality of life has already been too impact since the rehabilitation of runways.

Response:

Please see Topical Response TR-LU-1 regarding impacts on quality of life. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

PC00042 Hagseth, Paul None Provided 5/6/2001

PC00042-1

Comment:

I travel to/from the north LA area frequently and use LAX exclusively due to the ability to fly in early in the morning and return home to DFW late in the evening. I have two comments for the LAX Master Plan,

Response:

Comment noted. Please see Responses to Comments below.

PC00042-2

Comment:

1. I think LAX is a very good airport except for one thing - the traffic on 405. I am not sure if the drive from the 101/405 interchange to LAX will take 20 minutes or 1 hour and twenty minutes.

Response:

Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

PC00042-3

Comment:

2. In spite of item (1), LAX is still by far the best LA airport for me to use. If you all want increase usage of other airports (e.g. BUR or ONT), then the frequency and time of flights to/from those airports must be improved.

Response:

Comment noted.

PC00042-4

Comment:

Concerning comment (1), I question if the 405 connector will help much as it allows an exit off the 405 (southbound) just north of Howard Hughes Parkway. This is where the outside lane of the 405 that exits at la Tijera currently begins. It is usually free of traffic as it exists only even when all the other lanes of 405 are heavily congested.

I suggest a spur freeway be built to branch off of 405 as far north of LAX, (but south of 10) and run down the west side of LAX, through El Segundo and maybe to join Sepulveda on the north side of Manhattan Beach. This would offer the 'beach town' an alternate means to travel north and offer an alternate route to the airport.

Response:

Comment noted.

3. Comments and Responses

PC00043 **Evans, Margie and Vicki** **None Provided** **5/14/2001**

PC00043-1

Comment:

As residents of Ladera Heights, we are strongly opposed to the proposed expansion plans for the Los Angeles International Airport. It is unjust to place the potential for mass traffic, noise, environmental concerns, pollution and the havoc of overcrowding on our peaceful residential community without this area's prior input.

Response:

Comment noted. Please see Topical Response TR-PO-1 regarding the public hearing process.

PC00043-2

Comment:

We prefer the other alternatives that do not directly affect Ladera Heights. As homeowners, we have paid tremendous taxes and endured many hardships to maintain our neighborhood properly. As board members of the Ladera Heights Association, we oppose this effort in concert with fellow association members and many elected officials who are also vehemently against this proposal. We are distraught that the LAX expansion plans show no concern for the needs and rights of the people who will be affected by such a drastic move, nor for the ongoing livelihood of residents' welfare. We urge your organization to seek somewhere else to place your terminal and its related aspects.

Response:

Comment noted. Please see Topical Response TR-LU-1 regarding impacts to quality of life and Topical Response TR-ES-1 regarding impacts to residential property values. 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.

PC00044 **Avery, Glenda** **None Provided** **5/14/2001**

PC00044-1

Comment:

I have lived in Westchester for twenty-five years and I have seen our environment deteriorate because of the increase in traffic at LAX.

Response:

Comment noted. Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding opportunities to alleviate impacts associated with past or present airport activities at LAX. Please also see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

PC00044-2

Comment:

We have considerably more air pollution than we used to.

Response:

Please see Response to Comment PC00070-1.

PC00044-3**Comment:**

We have a black film on our cars and yards which we are breathing.

Response:

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

PC00044-4**Comment:**

The traffic on Sepulveda during non peak times has more than doubled and during busy days it has become unsafe.

Response:

Please see Topical Response TR-ST-4 regarding airport area traffic concerns

PC00044-5**Comment:**

To increase the airport capacity is ignoring my families health and welfare.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-3 regarding human health impacts. 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.

PC00045**Shakstad, Spencer****None Provided****5/15/2001****PC00045-1****Comment:**

I am concerned about L.A. Master Plan on Airports. With the proposed increase of Flights & Passengers as to Safety and Traffic Items.

Response:

Comment noted. Please see Responses to Comments PC00045-2 through PC00045-6 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.

PC00045-2**Comment:**

#1 Sepulveda is already a gridlocked disaster at Imperial Hwy at any time of day.

Response:

Please see Topical Response TR-ST-4 regarding airport area traffic concerns.

3. Comments and Responses

PC00045-3

Comment:

#2 The air quality is bad because of jammed traffic and airplanes waiting to take off.

Response:

The impacts of air pollution in and around the airport were addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. As was indicated in those sections, the air quality analysis took into account existing and future background air quality when calculating project-related impacts. The analysis reported total anticipated pollutant concentrations, not just air quality impacts associated with the Master Plan. That is, the maximum predicted concentrations for each alternative were combined with calculated future background concentrations for individual pollutants to determine if the total concentration would exceed the federal or state ambient air quality standards. Based on this methodology, while roadway and airfield congestion would increase emissions of some air pollutants when compared to the environmental baseline conditions, any of the Master Plan build alternatives would have the effect of reducing congestion when compared to the No Action/No Project Alternative. It should be noted that, in the absence of any of the Master Plan build alternatives, criteria pollutant emissions from on-airport operational sources are generally estimated to increase in the foreseeable future for the No Action/No Project Alternative relative to the environmental baseline. Therefore, in general, pollutant concentrations will be lower in the future under any of the Master Plan build alternatives than would exist under the No Action/No Project Alternative.

It should be noted that, according to the 2003 AQMP prepared by SCAQMD, emissions from aircraft contribute a relatively small fraction of the total manmade emissions in the South Coast Air Basin while on-road vehicles contribute a relatively large fraction of the total manmade emissions in the South Coast Air Basin. In particular, the 2003 AQMP estimates that in 1997 (the year following the environmental baseline used for the LAX Master Plan Draft EIS/EIR), all aircraft in the South Coast Air Basin (including those at LAX as well as those from other commercial, civilian, and military operations) contributed approximately 0.7 percent of the basinwide VOC emissions, 0.8 percent of the basinwide CO emissions, 1.3 percent of the basinwide NOx emissions, and 0.3 percent of the basinwide PM10 emissions. By comparison, all on-road vehicles in the South Coast Air Basin contributed approximately 48 percent of the basinwide VOC emissions, 84 percent of the basinwide CO emissions, 66 percent of the basinwide NOx emissions, and 6.5 percent of the basinwide PM10 emissions.

PC00045-4

Comment:

Jet fuel smell in El Segundo.

Response:

In most cases, airport-related odors are attributed mainly to hydrocarbon emissions from aircraft engines and evaporative emissions from fuel storage facilities and transfer operations. In aircraft exhaust, most odor-causing hydrocarbons are generated during the low-power (i.e. taxi/idle-in and taxi/idle-out) modes. Evaporative hydrocarbon emissions (also called VOC - volatile organic compounds) from fuel are primarily a function of the fuel type, containment vessel design and local meteorological conditions (i.e., ambient temperature, atmospheric pressure, solar radiation, humidity levels, etc.). Wind speed, direction and duration also play important roles in the perception of odor in the vicinity of airports.

The odor intensity of jet fuel is related to concentration in a logarithmic manner. In general, a one percent increase in odor-causing agents results in a ten-fold increase in the odor-causing potential. This is particularly significant when the odor threshold for jet fuel vapors is in the very low parts per billion (ppb) range. In other words, very low levels of fuel-based hydrocarbons are easily detectable by the human sense of smell and small increases in the concentrations greatly amplify its sensitivity.

Hydrocarbon emissions in aircraft exhaust are regulated by the International Civil Aviation Organization (ICAO) engine emission standards, which are becoming progressively more stringent over time and are enforced in the U.S. through the establishment of equivalent standards by both U.S. EPA and FAA. In

addition, jet fuel has a comparatively low vapor pressure, does not evaporate readily under normal conditions and, therefore, generally remains well confined in storage vessels.

Importantly, Section 4.6, Air Quality, of both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the impacts of the LAX Master Plan on air emissions in and around the airport - including hydrocarbons from aircraft exhaust and evaporative emissions from fuel storage/transfer activities. The findings of the analyses indicate that the proposed improvements to LAX would help reduce aircraft-generated hydrocarbon emissions when compared to the No Action/No Project Alternative. This outcome is of utmost importance to the mitigation of odors as many of these reductions occur when the aircraft is in the low-power (i.e. taxi/idle-in and taxi/idle-out) modes. It should also be noted that it is technically infeasible at this time to completely eliminate odors associated with hydrocarbon emissions from aircraft and from fuel storage/transfer activities.

PC00045-5

Comment:

#3 Noise pollution, jet engines at takeoff noise levels.

Response:

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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.

PC00045-6

Comment:

#4 Safety
With the proposed increase more accidents are most likely.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

PC00045-7

Comment:

I would like these issues answered if you have a answer

Response:

Please see responses to comments PC00045-2 through PC00045-6.

PC00046

Lurvey, Robert

None Provided

5/6/2001

PC00046-1

Comment:

I am writing for the purposes of public comment in support of LAX Master Plan "B" and the creation of a new runway on the southern airfield. LAX will most likely handle the sole burden of major international and transcontinental cargo and passenger flights into, and out of, the Southern California region. The airport generates a great deal of tax revenue for the city, and should do its best to keep pace with the growing demand so as not to lose cargo or passenger business.

Response:

Comment noted.

3. Comments and Responses

PC00046-2

Comment:

Alternative "C" does not realize the potential of the airport and allows for too little expansion. It is hoped that regional airport growth will compensate for the under-development of LAX; however, the call for regional airport growth in the lesser developed regions of Ontario and Palmdale, as well as the development of the El Torro Air Base into a commercial airport, will only lead to increased urban sprawl. While it is true that a good number of passengers come from outside the City of Los Angeles, and even the general Greater Los Angeles Basin, expanding regional airports in areas with limited growth, discourages living in cities with resources like the airport, and encourages movement to the outlying areas by both residents and businesses.

Response:

Comment noted.

PC00046-3

Comment:

While there is current opposition from civic leaders in El Segundo, it should be noted that recent commercial development in the City of El Segundo has benefited tremendously from the airport's prime location next to the City of El Segundo. A recent El Segundo Chamber of Commerce ad in the Los Angeles Business Daily billed the city as "being minutes from the airport." If the City of El Segundo is benefiting from businesses locating themselves in El Segundo due to its airport proximity, then El Segundo has no right to argue for slower/no-growth of the airport.

Response:

Comment noted.

PC00046-4

Comment:

While Alternative "A" maintains the same level of growth as Alternative "B," it should be noted that there is reasonable difference between a new southern or a new northern runway. To the north of LAX lies the City of Los Angeles community of Playa Del Rey. Increasing the number of runways on the north field would cause a greater disturbance (though the difference is potentially a minor one) to a City of Los Angeles community. The south field is bordered by the Hyperion Sewage Treatment Plant; extra disturbance from a southern runway is negligible.

Response:

Comment noted. It should be noted that the Hyperion Treatment Plant (HTP) is located adjacent to the southwest corner of the airport. Residential areas within the City of El Segundo are located south of LAX west of Sepulveda Boulevard and east of HTP. 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. 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.

PC00046-5

Comment:

P.S.: Does LAX, a service paid for by City of Los Angeles taxpayers, receive any compensation or extract any fee for non-LA residents who use the airport? If not, can the airport enact some fee?

Response:

Comment noted. The operations at LAX are not directly supported by the taxpayers of Los Angeles, but by revenues from the users and tenants of the airport as well as government grants. Different fees may not lawfully be charged to different users of the airport based on residence.

PC00047 Burchard, Geraldine None Provided 5/4/2001

PC00047-1

Comment:

There are so many options on our air transport. Being somewhere else. Why ruin a perfectly beautiful area with air that would be worse then it already is.

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.

PC00048 Antonovich, Michael County of Los Angeles 4/27/2001

PC00048-1

Comment:

Attached please find a letter from Richard Jensen, suggesting that an alternative to expanding passenger flights would be to expand the freight terminal infrastructure of LAX westward, along the southern end of LAX.

Response:

Responses to the comment letter written by Richard Jensen are provided in Responses to Comments PC03617-1 and PC03617-2.

PC00048-2

Comment:

Please forgive the lateness of this response. I completely support your view on LAX expansion.

You are correct that full-scale expansion of LAX is neither financially feasible nor practical given the problems of aircraft noise, overcrowding, and traffic congestion.

You make a good suggestion to expand the freight terminal of LAX westward. The best way to have this suggestion included in the public debate is by way of comment on the LAX Master Plan EIR.

I will forward your letter to Lydia Kennard, Executive Director, Los Angeles World Airports, and ask that your suggestion to be included as public comment.

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

3. Comments and Responses

Alternative. Please see Response to Comment PC00048-4 regarding the suggestion to expand the freight terminal of LAX westward.

PC00049 Saner, Mandie None Provided 5/25/2001

PC00049-1

Comment:

Where is map showing existing conditions on the wall exhibit?

Response:

This is not a comment on the contents of the Draft EIS/EIR.

PC00049-2

Comment:

I am opposed to anything you want to do on any of these planes except DE Spansion

Response:

Comment noted. 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.

PC00049-3

Comment:

At the present time you are way over your limits = number of passengers - you are allowing danger to people on the ground due to your overflights.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

PC00050 Baker, Janet None Provided 5/13/2001

PC00050-1

Comment:

How do you proposed mitigating the additional noise, at the present time we cannot keep our windows open on summer nites and we live in N. Kentwood!

Response:

Please see Topical Response TR-LU-5 for a discussion of thresholds used to identify significant noise levels that would result from development of the build alternatives and mitigation measures that would reduce exposure of noise-sensitive uses to high noise levels. Also, refer to Topical Response TR-LU-3 for a description of the Aircraft Noise Mitigation Program, TR-LU-4 regarding outdoor noise levels, and TR-N-4 regarding noise mitigation. As was shown on Figure S4.2-2 of the Supplement to the Draft EIS/EIR, the 65 CNEL noise contour (used to identify areas exposed to high noise levels) does not extend north of Manchester Boulevard and Kentwood Avenue under 1996 baseline and Year 2000 conditions. As was shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, under 1996 baseline conditions, high single event noise levels extend north to approximately 83rd Street and Kentwood Avenue.

PC00050-2**Comment:**

Where do you propose that you move the Westchester Plaza as that is in area that the entire community relies on for groceries and many other community services.

Response:

The Supplement to the Draft EIS/EIR provided additional discussion beyond that presented in the Draft EIS/EIR of potential acquisition effects on the Westchester Business District. As was described in Section 4.2, Land Use (subsections 4.2.6.2 through 4.2.6.4), acquisition within the Westchester Business District would be about 16 acres or 31 percent of the District under Alternative A, about 11 acres or 21 percent under Alternative B, or approximately 13 acres or 26 percent of the District under Alternative C. No shopping centers are proposed for acquisition and Ralph's Supermarket is not proposed for acquisition under any of the build alternatives. Alternative A would include acquisition of Longs Drugstore and Office Depot. Office Depot would also be acquired under Alternative C. Longs Drugstore would not be acquired under Alternatives B or C. Alternative A would also acquire the Mayfair Square Shopping area. Under Alternatives A through C, relocation opportunities would be available for some uses nearby within Westchester Southside. Also, many of the uses being acquired are airport related and a number of the community related uses that would be acquired (a bank, an office supply store, a bar and beauty shop) would remain available through other similar businesses located in close proximity within the Westchester Business District.

Also, as was described in Section 4.2, Land Use (subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR, note that in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any acquisition within the Westchester Business District. Refer to Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC00051 Garber, Mr. And Mrs. None Provided
 William**

5/25/2001**PC00051-1****Comment:**

1. Studies made over a number of years commencing with one by Koebig and Koebig Engineers in about 1955 showed clearly that the major problem to any expansion would be traffic design and control. The traffic problem in the airport area has not in fact improved since that study. For Westchester and Playa Del Rey it is steadily getting worse. The Playa Vista project will add very large numbers of automobiles with many businesses and homes both further clogging presently clogged streets, and creating more traffic centered on access to the airport. The development of the Hughes center at Sepulveda Boulevard and Centinella further exacerbates this traffic problem. Additionally in the area along Lincoln Boulevard to the southwest of Playa Vista a large number of homes are to be constructed as are businesses and homes in the Marina area. The traffic area to be considered is not just the airport itself, but the general area. Included must be a review of public transportation since it is difficult to impossible to reach many if not most of the city by transportation other than personal automobiles.

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. Please see Topical Response TR-ST-7 regarding a brief history of LAX Northside/Westchester Southside, its role in the Master Plan, and the impact/benefits of the proposed airport alternatives. For details on how the future traffic demand from the Playa Vista development was incorporated in the Draft EIS/EIR and Supplement to the Draft EIS/EIR or traffic forecast years or technical details on the traffic analysis methodology, Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology.

3. Comments and Responses

PC00051-2

Comment:

2. The possibility of high speed public transportation is already present from the Palmdale Airport to the central City of Los Angeles as well as the Palmdale-Lancaster area and the nearby desert areas. Rail cars now bring commuters to the City from these areas. Improvement of the railroad with high speed services could lessen the need for LAX expansion.

Response:

Please see Topical Response TR-ST-5 regarding the rail/transit plan.

PC00051-3

Comment:

3. Our home is about one mile from the north runway of the airport, and the environmental impact is substantial. Both aircraft fuel and soot from its burning is apparent on the exterior and throughout the house. Plastic chairs and tables used on our deck become black from these materials, and cannot be cleaned.

Response:

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

PC00051-4

Comment:

The fuel smell is overpowering at times, and is of course being taken into our lungs.

Response:

Please see Response to Comment PC00045-4 regarding the topic of odor and Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

PC00051-5

Comment:

We are outside of the area listed by the airport as exposed to noise from the jet engines and planes. However noise is an ever present pollutant which we must suffer from. Increasing the number of take-offs and landings will greatly increase such noise pollution.

Response:

Please see Topical Response TR-N-6 regarding noise increase and Topical Response TR-N-2 regarding single event noise and CNEL differences.

PC00051-6

Comment:

4. The increase planned for take-offs and landings of course means that the amount of fuel and fuel products released into the atmosphere in the area of the airport will as much as double. This must inevitably have a substantial health impact.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR

and Appendix S-C and 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-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase. 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.

PC00051-7

Comment:

Smog requirements for automobiles are very strict, and both regulations and engine research have been required to limit products from fuel burning with consequent health impacts. Very large amounts of fuel and fuel impacts result from airport operations. These should be examined and controlled in the same way that automobile exhausts are. For example, homes within the area affected by these aircraft fuel combustion products should have an interior air filter system provided by the airport for at least minimal protection. Also outdoor activities such as gardening or dining are now quite unpleasant.

Response:

Please refer to Topical Response TR-AQ-3 regarding air pollution increase, Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-HRA-4 regarding human health mitigation strategies.

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).

The Supplement to the Draft EIS/EIR contained 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 contained 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. Although ventilation systems as described by the commentor could improve indoor air quality, indoor air is not a primary issue for exposure to TAPs. Therefore, the focus was placed on mitigation measures that would decrease emissions from identified sources such as automobiles and trucks, which contribute to TAPs concentrations in the airport vicinity.

PC00051-8

Comment:

5. There is most certainly more danger of crashes in the air and on the ground as a result of the very many more flights coming into and out of the present facilities. We have been told that facilities for control are stressed by the number of flights now present, and that federal government action is necessary before any improvement of the system to meet present needs is possible. We have not heard of the planning or even possibility of satisfactory control the proposed increase of as much as the 100% more take-offs and landings.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

3. Comments and Responses

PC00051-9

Comment:

6. We have read in the papers that the Los Angeles International Airport is frequently exposed to episodes of severe wind shear in which high velocity winds will blow in two or three directions at various elevations above the airport. This was reported as being of considerable danger to pilots of planes taking-off and landing as well as to small plane pilots flying across the airport. With sharply increased take-offs and landings this must increase the chances of accidents. Such danger needs to be considered in terms of nearby homes or those in the flight paths.

Response:

Wind shear is a change in wind speed and/or direction over a short distance. It can occur horizontally or vertically and is most often associated with strong temperature inversions, storm frontal activity, thunderstorms and surface obstructions such as a large building in close proximity to the runway. The most hazardous wind shear is that encountered in thunderstorms, which are infrequent in the Los Angeles basin. The most common wind shear in the Los Angeles basin occurs from the temperature inversion. An aircraft encountering wind shear may experience a loss or gain of airspeed or altitude. Early detection of wind shear by the pilot, or by air traffic control and distribution of advisories, lessens the potential hazard. The Los Angeles Air Traffic Control Tower is equipped with a Low Level Wind Shear Alert System (LLWAS). This system is composed of a variety of wind direction and velocity measuring devices around the airport and a center-field wind sensor. Measurement of the wind are continually obtained from these sensors and when a wind shear is indicated by a significant disparity between the centerfield wind and a remote wind sensor, an aural and visual alarm alerts the controller. When this occurs, the controller reports a wind shear alert to effected aircraft on final approach or departure. Aircraft encountering a wind shear inform the control tower of the amount of loss of ground speed in order that it may be passed to successive arriving and departing aircraft. The FAA's Integrated Wind Shear Detection Plan includes LLWAS, the Weather System Processor (WSP) and the Terminal Doppler Radar (TDWR), and as a strategic concept to reduce the potential impacts of wind shear. The Los Angeles Control Tower had their LLWAS updated to the WSP in the last quarter of 2003. This new technology utilizes a dedicated weather channel from the ASR-9 radar located on, or near, the airport to detect and display for the controller's use the occurrence of wind shear. It will assist controllers and pilots in identifying the existence and location of wind shear as well as six levels of precipitation and predicted storm movement.

PC00051-10

Comment:

7. We have not seen an analysis of population versus the airports now available to the City. For example Ontario, Van Nuys and Palmdale.

Response:

Chapter 2, Purpose and Need for the Proposed Action, of the Draft EIS/EIR provided such information. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

PC00051-11

Comment:

We have also not seen how high speed ground transportation to connect these facilities has been reviewed. Certainly there are rail connections to each facility, but the use of these to get passengers to airports near them is not being considered. An example would be the Bay Area Rapid Transit System (BART) which is currently extending its system to both the San Francisco and Oakland Airports. Also in Washington, D.C. there are or will be rapid rail connections to both Dulles and Reagan Airports. Los Angeles needs to make this type of analysis and connection between ground and air. Massive use of personal automobiles wastes fuel and adds to the negative environmental impact from increased smog.

3. Comments and Responses

The current LAX has required us to take more than one full HOUR to make one circle of the various terminals to pick up arriving passengers. The current reliance upon personal transport is unacceptable.

Response:

Please see Topical Response TR-ST-5 regarding the rail/transit plan. In addition, the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality. 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, with supporting technical data and analyses provided in Appendix G.

PC00051-12

Comment:

8. We have appreciated the effort by the airport to make its grounds more attractive, and our receiving the very occasional notices of airport intentions. However our impression is that there is a direct effort to only let us know what the airport believes is palatable to us, and that issues such as those illustrated above are not even receiving attention

Response:

Comment noted. Please see Topical Response TR-PO-1 regarding the public hearing process.

PC00052	Dewar, Jacqueline	None Provided	5/16/2001
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PC00052-1

Comment:

As a Westchester homeowner I am very concerned about the following negative environmental impacts that an expansion of LAX will cause:

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.

PC00052-2

Comment:

1. Increased traffic on 405 Fwy, 105 Fwy and Sepulveda (now at a standstill much of the day)

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.

PC00052-3

Comment:

2. Air Quality (Currently jet fuel drops dirty my patio furniture and enter my lungs!)

Response:

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

3. Comments and Responses

PC00052-4

Comment:

3. Safety in the air or on the ground (Additional traffic at one of the nation's business airports will result in more "near-misses" and increased likelihood of a real disaster).

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

PC00052-5

Comment:

4. Noise pollution (Current noise levels are too high)

Response:

This is not a comment on the contents of the Draft EIS/EIR. Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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. In addition, please see Topical Response TR-N-4 regarding noise mitigation.

PC00052-6

Comment:

and airlines & helicopters are not following current restrictions on sound and over-flights)

Response:

The airport has not established restrictions on aircraft in flight. Topical Response TR-N-7 presents current preferred noise abatement procedures for both fixed wing and helicopter aircraft that are informal measures intended to reduce noise exposure in the airport environs. Section 1.a of the rules specifies clearly that from time to time it may be necessary to deviate from the established procedures in times of aircraft emergencies, adverse weather, or field construction and maintenance work. Rule 5 sets forth the criteria necessary for helicopters to operate to and from LAX, but again, provide exceptions for various conditions. Restrictions are in place which control ground run-ups and ground operations in the Imperial Terminal. Violations of these restrictions occasionally do occur and are dealt with proactively by airport management.

PC00052-7

Comment:

Let's have a Regional Solution!! Not all at LAX!!

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.

PC00053 Johnson, John None Provided 5/15/2001

PC00053-1

Comment:

My primary concern about the LAX expansion is an increase in the noise level. I live just two blocks south of Imperial Highway. At times we cannot hear our radio or TV, even at very high volume. I believe that an increase in LAX passenger volume will cause an already terrible noise problem to get worse. The airport authorities seem to have no interest in helping us alleviate the noise problem with sound insulation.

Response:

Please see Response to Comment PC01377-9 regarding noise impacts in the City of El Segundo. As stated in that response, under the build alternatives there is a reduction of noise- sensitive uses exposed to high noise levels compared to 1996 baseline and Year 2000 conditions and no areas within the City of El Segundo would be newly exposed to significant high noise levels.

Please see Subtopical Response TR-N-6.2 regarding the relationship between aircraft operations and noise, Topical Response TR-LU-3 regarding sound insulation provided under the Aircraft Noise Mitigation Program, and Response to Comment AL00006-2 regarding current measures underway to address existing high noise levels.

PC00054 Mulvany, Colleen None Provided 5/15/2001

PC00054-1

Comment:

I believe that the frequent take-offs just one-quarter mile from my home cause vibrations which have caused damage to my house. Objects on shelves and hanging on the walls often buzz when planes take off. I believe that these vibrations have caused cracks in my walls and ceilings, either due directly from the vibrations or from ground settling caused by the vibrations. LAX expansion will create more take-offs which will increase these vibrations, not to mention the increased air pollution and noise.

Response:

Please see Topical Response TR-N-8 regarding noise-based vibration for a description of the relationship between aircraft noise and vibration induced damage.

PC00054-2

Comment:

When I travel to areas north of my home I always take Pershing Drive to avoid the traffic congestion near the airport on Sepulveda or the 405 Freeway. I understand that the expansion will close Pershing Drive to through traffic, thus taking this option away from me. Furthermore, El Segundo paramedics and ambulances use Pershing Drive for emergency transport to Marina Mercy Hospital. Having to use Vista del Mar will add crucial minutes to the trip, especially during the day in the summer when Vista del Mar is crowded with beach goers.

Response:

This comment is similar to comment AL00018-30. Please see Response to Comment AL00018-30.

3. Comments and Responses

PC00054-3

Comment:

Finally, one night in an attempt to record a radio program, I accidentally recorded myself for three hours in the middle of the night. Upon listening to this tape it is noticeable that my peaceful sleep (snoring) was disturbed whenever a plane took off. While this tape amused my children, it illustrated the effect that the airport noise has on me, and I'm sure many others in the area.

Response:

Comment noted. 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.

PC00055

Sligh, Aldene

None Provided

5/19/2001

PC00055-1

Comment:

1. P. 4-405 EIS/EIR: No Master Plan commitments for remedying or mitigating environmental justice are proposed!

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 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.

PC00055-2

Comment:

2. P. 4-395: The Master Plan relies on the commitments under the Residential & Business Relocation Program to cover environmental justice!

Response:

See Response to Comment AL00040-8 and Response to Comment AL00040-103 regarding residential and business relocation. Concerning mitigation measures and benefits that addressed environmental justice see Section 4.4.3, Environmental Justice of the Final EIS/EIR (subsection 4.4.3.7).

PC00055-3**Comment:**

Note:

Lydia Kennard:

My initial letter to you evoked the very concerns that are confirmed in your EIR/EIS report. There are no and can never be mitigations to combat noise, pollution or traffic which will negatively effect Inglewood. This expansion spells genocide to the residents living near LAX!!!

Response:

Mitigation measures addressing noise, air quality and surface transportation were provided in Section 4.1, Noise, Section 4.2, Land Use, Section 4.3, Surface Transportation, and Section 4.6, Air Quality, of the Draft EIS/EIR and 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 and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

PC00056 Adams, Michael Kelso Townhomes Association 5/19/2001

PC00056-1**Comment:**

Kelso Townhomes is not on the list for noise mitigation testing or improvement when we are directly impacted by noise and pollution. An injustice is being perpetrated on our community by not be included in this testing. LAWA should make provisions for those properties to gain relief from this situation. Please contact me directly with your response.

Response:

Based on additional information provided by the commentor (see Response to Comment PC02061-1) it appears that Kelso Townhomes were constructed in conformance with Title 24 of the California Code of Regulations (California Construction Code) which requires that multiple-family housing built after 1975 in areas of high noise levels (i.e., greater than 65 CNEL) include sound insulation to reduce interior noise levels to 45 CNEL. Also, according to information provided by the City of Inglewood Residential Sound Insulation Program, the property referenced by the commentor is located outside the City of Inglewood's ANMP boundary. However, should the property be determined not to conform to Title 24 standards it could become eligible for soundproofing with implementation of the LAX Master Plan, as it is shown to be significantly impacted under all of the Master Plan alternatives. See Topical Response TR-LU-3 for further description of revisions to the ANMP that would occur with implementation of the LAX Master Plan.

PC00057 Reed, Thomasina None Provided 5/19/2001

PC00057-1**Comment:**

1. I cannot yet give full comments on the Drafts, except to note that I understand no mention of Inglewood USD appears in it, only LAUSD, as far as impacts are concerned. IUSD & Lennox SD, El Segundo SD will all be affected & the impacts on those schools must be mitigated. Protection of children is essential.

Response:

As was discussed on page 4-1220 in Section 4.27, Schools (CEQA), of the Draft EIS/EIR, the schools section addresses the project-generated changes in public school enrollment in the Los Angeles Unified School District (LAUSD) and the extent to which such changes could cause overcrowding of schools. Where the project would have direct impacts on public schools, rather than impacts through changes in enrollment, these effects were analyzed in other sections of the Draft EIS/EIR and Supplement to the

3. Comments and Responses

Draft EIS/EIR which pertain to those impacts (e.g., 4.1, Noise; 4.2, Land Use; 4.3, Surface Transportation; 4.6, Air Quality and 4.24.1, Human Health Risk Assessment) and were summarized in Section 4.27, Schools. Technical Report 17, Schools Technical Report, of the Draft EIS/EIR contains information regarding existing conditions associated with public schools in the vicinity of LAX as well as a discussion of enrollment impacts on public schools outside of the LAUSD under Alternatives A, B, and C. Technical Report 17 addresses impacts on schools outside of Los Angeles Unified School District, including Inglewood Unified School District, El Segundo Unified School District, and Lennox Elementary School District. Please also see Topical Response TR-LU-3 regarding mitigation measures for noise impacts on schools and Response to Comment AL00038-6.

PC00057-2

Comment:

2. I do not believe your plan for community outreach was effective. There were more consultants & employees of LAX here & very few residents. Please do more to inform citizens.

Response:

Comment noted. Please see Topical Response TR-PO-1 regarding the public hearing process.

PC00058

Krafchik, Terry

None Provided

5/18/2001

PC00058-1

Comment:

I am responding to a meeting I attended at the Hacienda Hotel on Monday May 14, 2001.

I was born and raised in Westchester, California. During the late 60's and early 70's I saw the destruction LAX did to the communities of Westchester and Playa del Rey. Neighborhoods were destroyed and schools closed because of the land greed of LAX.

I lived in Playa del Rey and had to move as the noise from the airport was unbearable. You could not carry on a conversation without competing with the noise from the planes, let alone try and watch anything on television. The pollution from the jet fuel permeated everything in and outside of my home. I moved back to Westchester and it was just as bad there. I currently reside in El Segundo and thought I that I was finished running from the airport pollution and noise- but apparently I am not.

Response:

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, traffic impacts in Section 4.3, Surface Transportation, and air quality impacts in Section 4.6, Air Quality. Supporting technical data and analyses is provided in Appendices D and G, and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and in Appendices S-C and S-E, and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-LU-1 regarding impacts on quality of life.

PC00058-2

Comment:

I am vehemently opposed to ANY growth of LAX and increase in passengers. Our streets cannot handle the traffic it has already. The air in our communities is already unhealthy especially to our young children and our elderly.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic in Section 4.3, Surface Transportation, air quality 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 G, and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-E, and Technical Reports S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition,

please see Topical Response TR-HRA-3 regarding human health impacts. 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.

PC00058-3

Comment:

Our communities should not suffer the burden of the expansion. You must look at alternatives and put your energy and money into opening new airports in areas that are growing and would welcome the business. You have a responsibility to your neighbors and it about time you start showing some!

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

PC00059

**Glennon, Ruth and
Don**

None Provided

4/20/2001

PC00059-1

Comment:

We are adamantly opposed to any expansion of LAX for the following reasons:

1. This plan clearly states that the expansion of LAX will add more noise, more air pollution and traffic to the surrounding communities. Westchester-Playa del Rey, El Segundo and Inglewood are already under siege from noise, air pollution and traffic congestion from the airport as it now exists. To add more of the same and expect residential communities to survive is unacceptable.

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-AQ-3 regarding air pollution increase and Topical Response TR-N-6 regarding noise increase. 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.

PC00059-2

Comment:

2. This plan removes 250 small businesses and 80 homes thereby decimating what remains of business in Westchester. In 1984, when we were promised that LAX would never again be expanded, many fine homes and businesses were destroyed. No more!

Response:

Comment noted. The Master Plan is considered separate from growth and expansion that has occurred at LAX in the past. Please see Response to Comment PC00035-2 regarding residential acquisition; Response to Comment PC00013-5 regarding business acquisition and relocation impacts, proposed collateral development at LAX Northside/Westchester Southside, and the proposed Preliminary Property Acquisition and Relocation Plan; and Response to Comment AL00018-1 regarding commercial property acquisition within the Westchester Business District.

3. Comments and Responses

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. Alternative D involves the acquisition of 38 businesses, far fewer than the other build alternatives, and does not proposed residential acquisition. Please refer to Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester.

PC00059-3

Comment:

3. This expansion is estimated to cost 12 BILLION dollars and involves many years of disruptive construction. Yet it would be up to capacity and obsolete three years after completion. What then? This is an opportunity for the leaders of Los Angeles to show that they have a vision for the future. The "band-aid" approach that has been used ad nauseum to solve this cities' problems has never worked.

Response:

Comment noted.

PC00059-4

Comment:

4. This plan poses major health hazards to the people in the surrounding communities. The increase in juvenile asthma throughout the country is well documented. There are 6 elementary schools, 3 middle and Junior Highs and 2 High Schools in Westchester. These growing children need and are entitled to clean air. They also need a quiet environment in which to learn.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. The human health risk assessment specifically evaluated possible health risks for children attending grade schools at locations where air quality impacts are predicted to be highest. As was discussed in the health risk assessments, air quality is actually expected to improve somewhat at these locations. Please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-LU-5 regarding land use and noise mitigation.

PC00059-5

Comment:

5. All projections for future growth in Southern California point inland. Therefore, it is only logical that airports should be built or expanded where there will be the greatest need. Palmdale with 17,000 acres of city- owned land has plenty for now and future needs. The people there want an airport and it should be first choice.

Response:

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00059-6

Comment:

There are also at least three vacant air force bases inland. Why are they not being considered?

Response:

The inland military bases are not within the control of LAWA. 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 refer to Topical Response TR-RC-1 regarding the LAX Master Plan role in a regional approach to meeting demand.

PC00059-7**Comment:**

Every major city in this country and abroad has had the foresight to add a second and third airport outside the inner city and coupled it with a state-of-the-art transportation system. Why not Los Angeles?

Response:

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

PC00059-8**Comment:**

Finally, Westchester is a fine, stable, family neighborhood community. It deserves to be preserved and protected. We have a major university, a good variety of housing and lots of people who are trying to be good neighbors. It should not be sacrificed when there are many alternatives available. We need to have leaders who will take their heads out of the sand, look to the future and quit concentrating on expanding a tiny, obsolete and over-crowded airport. This plan solves nothing and destroys communities that deserve to be protected.

Response:

Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

PC00061**Boyiazis, Nick****None Provided****5/22/2001****PC00061-1****Comment:**

On 04/06/01 @ around 1000 am there was a news report on KNX radio, that in part, told of air traffic controller Michael Furer's (spelling may not be correct) comment that Los Angeles Int'l airport had the most "near misses" of any airport in the country. This is a circumstance that exists while supporting 68 to 78 million annual passengers. How many more "near misses" are projected with the additional aircraft that will be used for the 20-30 million more passengers.

It appears that there are more "missed approaches" by aircraft attempting to land @ LAX - this is an observation on my part over the last few years. If Michael Furer's statement is a fact, and the "near misses" and "missed approaches" circumstance when combined add up to a greater chance for a major catastrophe over the immediate airport area. How much more dynamic will this situation become when more aircraft are added to carry the increased amount of passengers?

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

3. Comments and Responses

PC00061-2

Comment:

If the increase in passengers is to be handled by larger aircraft how much more mobile are these aircraft in elluding these circumstances?

Response:

Please see Topical Response TR-SAF-1 regarding aviation safety.

PC00061-3

Comment:

These above issues affect the safety of all neighboring areas. With bigness comes less accountability. This is not an FAA issue that they have to resolve. They have their budget and cannot possible commit all their funding or manpower to LAX while at the same time all other airports are growing.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

PC00062	Boyiazis, Nick	None Provided	5/22/2001
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PC00062-1

Comment:

If the previous EIR was prepared to support the requirements of 68 million passengers, in & out of LAX, what breach of authority has there been to support the additional 10 million? If the previous EIR has been ignored without any penalty imposed, what will hold the airport authorities accountable for breaching this particular EIR that plans for 98 million passengers? Isn't the 68 to 78 million passenger increase illegal? Why aren't the airport authorities held legally accountable for exceeding the limits of the previous EIR? What purpose do EIRs have if the people that sign these documents are not held accountable for their content?

Response:

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX and Topical Response TR-GEN-4 regarding legal limits on the ability to control activity levels at airports.

PC00063	Boyiazis, Nick	None Provided	5/21/2001
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PC00063-1

Comment:

The vehicles going to and from Los Angeles Intl Airport cause freeway overload, which in turn cause vehicle traffic overload and delays on all the surrounding area neighborhood roads. Since airlines and the federal government do not support using airport funds to assist in upkeep of the surrounding infrastructure, the surrounding neighborhoods are being dragged down and in some areas are already distressed. This airport has one of the worse entries to a major airport in the whole country. It seems as if the local governments cannot keep up with needed road repairs and upkeep, not to say anything about future plans for rapid transit and/or any planned road systems to the west side of the proposed west terminal. If no one can fix what we presently are experiencing what's going to happen when you add that many more vehicles to the present load capacity? Who will fund the required perimeter road and/or rapid transit extension?

3. Comments and Responses

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 see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways and Topical Response TR-ST-4 regarding airport area traffic concerns. Also, please see Response to Comment AL00008-6 regarding funding.

PC00063-2

Comment:

How many more pollutants can be expected to be pumped into the neighboring areas?

Response:

Comment noted. Please see Topical Response TR-AQ-3 regarding air pollution and Response to Comment PC00801-2 regarding the air quality benefits associated with Alternative D.

PC00064 Boyiazis, Nick None Provided 5/22/2001

PC00064-1

Comment:

What is the federal government's opinion regarding the support of the LAX expansion project that is presently projected to cost 16 billion dollars versus a proposed El Toro NAS redevelopment that would cost an estimated 3 billion dollars? Can we say that the \$16 billion is a conservative estimate? Since the major portion is to be provided by the federal government the figure has to be somewhat conservative. How far would the fed'l gov't go when the escalated costs increase by 50%, as they most likely will... the \$16 billion is already a 4 or 5 year old estimate... who will be responsible for the projected increase in cost if this project is undertaken?

Response:

The FAA has not yet expressed its opinion on the merits of the proposed improvements. At the completion of the environmental review process, the FAA will issue a Record of Decision. The estimated cost for the preferred alternative is believed to be a reasonable estimate of the cost to construction the associated projects, given the level of design at this time. The cost estimate includes provisions for inflation during the construction period. As 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 Los Angeles General Fund dollars will be used to pay for any of the proposed improvements.

PC00065 Boyiazis, Nick None Provided 5/22/2001

PC00065-1

Comment:

Is there any reasoning why a development of the Palmdale Airport complex is not included as a viable alternative in the EIR?

Response:

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

3. Comments and Responses

PC00065-2

Comment:

The same question would be to include each of the airports included in the LAWA ownership? Wouldn't this provide the EIR reviewers with a more intelligent solution to the regional airport problem that presently exists?

Response:

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

PC00066

Boyiazis, Nick

None Provided

5/22/2001

PC00066-1

Comment:

In the 1960's timeframe, one could leave automobiles in the nearby areas of the airport outside for at least two weeks without needing a cleaning... now vehicles need cleaning after one day.

Response:

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

PC00066-2

Comment:

The air pollution in and around the airport is getting worse as more flights and in and outgoing vehicles are added to the mix.

Response:

Please see Response to Comment PC00045-3.

PC00066-3

Comment:

With more aircraft and many more vehicles the noise pollution becomes that much more obscene.

Response:

Please see Topical Response TR-N-6, in particular Subtopical Response TR-N-6.1 regarding present and future noise levels. Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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.

PC00066-4

Comment:

What was proposed in the previous EIR to relieve the conditions that exist today?

Response:

It is unclear what conditions the commentor is referring to. Air quality impacts exist even under the "No Action/No Project Alternative" (i.e., no changes to the current airport design). A comprehensive list of all proposed air quality mitigation measures for the proposed alternatives was included in Section 4.6.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR.

PC00066-5**Comment:**

Do we predict the same radical results in the next go around?

Response:

Please see Response to Comment PC00066-4.

PC00066-6**Comment:**

Placing a small percentage of natural gas vehicles into the mix just does not do anything for relief.

Response:

Natural gas vehicles are assumed to be used for off-airport transportation vehicles such as rental car shuttles and taxicabs to the extent technologically feasible. Emissions from construction equipment are assumed to be mitigated through the use of cleaner burning diesel fuel and add-on controls.

As of 2002, approximately 45 percent of LAWA's fleet vehicles at LAX use alternative fuels. LAWA's goal is to have 50 percent of its fleet powered by alternative fuels by the end of 2003. Other mobile source mitigation measures include the use of low-sulfur diesel fuel and particulate traps, employee carpooling, and alternative-fueled shuttle vans for airport passengers. Measures are discussed in Section 4.6.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR, with supporting information in Section 2.3 of Appendix S-E.

PC00066-7**Comment:**

What are vehicle traffic conditions compared to what was predicted in the former EIR? What can be foreseen if this plan is approved?

Response:

Former environmental studies for LAX did not anticipate the level of airport activity that is currently forecast to the year 2015. If approved, the future conditions are anticipated to be as summarized in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation.

PC00067**Chavez, Karine &
Chris****None Provided****4/4/2001****PC00067-1****Comment:**

Can you please tell me if the airport expansion would mean that the homes in the 7600 block of Midfield Ave would have to be taken down?

Thank you

Please let us know ASAP! Thanks!

Response:

The LAX Master Plan would not require the acquisition of residences on Midfield Avenue.

3. Comments and Responses

PC00068 DiVezzetti, Joseph None Provided 4/4/2001

PC00068-1

Comment:

It is very important that any official connected with LAX expansion, to drive not be chauffeured, North on Sepulveda from LAX) to Slauson about 8:30 pm and experience the current traffic. Can you but imagine what LAX expansion would do to the already grid lock on Sepulveda in the early morning. The Grid Lock is strangling the community. This is not a 405 thing but a Westchester community street problem.

Response:

Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. The Draft EIS/EIR and Supplement to the Draft EIS/EIR Section 4.3.2.9 presented the proposed traffic mitigation measures, which included future improvements to the intersections of Manchester/Sepulveda and Centinela/Sepulveda. These proposed changes are designed to improve traffic flow on Sepulveda Boulevard with the project alternatives. 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 regarding airport area traffic concerns. Regarding traffic measures to minimize neighborhood impacts, please see Topical Response TR-ST-6. Please see Topical Response TR-ST-7 regarding a brief history of LAX Northside/Westchester Southside, its role in the Master Plan, and the impact/benefits of the proposed airport alternatives.

PC00069 Pichon, Lizette None Provided 4/4/2001

PC00069-1

Comment:

I am strictly against airport expansion at LAX. The reasons are.

1. Traffic Congestion
2. Will Destroy our Quality of life.
3. Crime
4. Pollution
5. Noise
6. Toxic Contamination
7. Impact on Water Contamination

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, law enforcement impacts in Section 4.26.2, Law Enforcement, air quality impacts in Section 4.6, Air Quality, noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, contamination impacts in Section 4.23, Hazardous Materials, and water quality impacts in Section 4.7, Hydrology and Water Quality. Supporting technical data and analyses are provided in Appendices D and G, and Technical Reports 1, 2, 3, 4, 6, 13 and 16b of the Draft EIS/EIR and Appendices S-C and S-E, and Technical Reports S-1, S-2, S-4, S-5, and S-8 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts to quality of life and Topical Response TR-AQ-2 regarding toxic air pollutants.

PC00069-2

Comment:

8. Airplane Fuel Droppings on Houses & cars
9. Emissions Fuel causes cancer & major health problems, what can be done?

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping and Topical Response TR-HRA-3 regarding human health impacts.

PC00070**Ridley, Starr****None Provided****4/4/2001****PC00070-1****Comment:**

*What is the air pollution now?

Response:

While the South Coast Air Basin (Basin) still has some of the worst air quality in the U.S., the long-term trend demonstrates significant improvements (see South Coast Air Quality Management District (SCAQMD) website topic "Current Air Quality and Trends" at www.aqmd.gov). Between 1976 - 1978 (the years of earliest reliable data records) and 1997 - 1999 (the years immediately following the environmental baseline used for the LAX Master Plan Draft EIS/EIR), the three-year average number of days exceeding the one-hour and eight-hour ozone (O₃) national ambient air quality standard (NAAQS) decreased by 71 percent (from 196 days to 57 days) and 44 percent (from 210 days to 117 days), respectively. Between 1976 - 1978 and 1997 - 1999, the three-year average number of days exceeding the eight-hour carbon monoxide (CO) NAAQS decreased by 91 percent. Between 1985 - 1987 and 1997 - 1999, the three-year average number of days exceeding the 24-hour particulate matter (PM₁₀) NAAQS decreased by 79 percent.

According to SCAQMD, 1999 was the first year since O₃ monitoring began that the entire Basin made it through a summer without experiencing a Stage 1 episode. A Stage 1 episode represents a one-hour average O₃ concentration of greater than or equal to 0.2 part per million. In fact, there were no Stage 1 episodes recorded in the Basin in 2000 or 2001, either. Based on the number of days when an exceedance of the O₃ NAAQS was recorded in the Basin, the number of exceedances has significantly declined and the smog season (the period of the year during which high O₃ concentrations occur) has significantly shortened since 1976.

The one-hour O₃ NAAQS and California ambient air quality standard (CAAQS) as well as the eight-hour O₃ NAAQS were exceeded in 1999 in the Basin, with the most frequent exceedances occurring in the San Bernardino area. During this same time period, there were no exceedances of the one-hour or eight-hour O₃ NAAQS in the coastal portion of Los Angeles County, where LAX is situated.

The eight-hour CO NAAQS and CAAQS were exceeded in 1999 in the Basin, but only in the South Central Los Angeles County area.

Both the 24-hour and annual PM₁₀ NAAQS and CAAQS were exceeded in 1999 widely throughout the Basin, but particularly in the southwest and central San Bernardino Valley and metropolitan Riverside County areas.

Section 4.6.3.3, Environmental Baseline Ambient Air Quality, of the Supplement to the Draft EIS/EIR described the affected environment in the vicinity of LAX. Specifically, the data that was presented in Table S4.6-5, Maximum Measured Ambient Air Quality in the Vicinity of LAX (Environmental Baseline), which included data collected in 1997 and 1998 by LAWA on site at LAX and in 1996 through 1998 as well as 1998 through 2000 by SCAQMD at a long-term air monitoring station in Hawthorne approximately 2.4 miles from the LAX Theme Building, indicate that pollutant concentrations on and around the airport exceeded the one-hour NAAQS and CAAQS for O₃, exceeded the eight-hour NAAQS and CAAQS for CO, and exceeded both the 24-hour and annual CAAQS for particulate matter (PM₁₀). All other pollutant concentrations measured on the airport and at the Hawthorne station were lower than the NAAQS and CAAQS levels over the time periods noted.

3. Comments and Responses

PC00070-2

Comment:

Where will the expansion spread?

Response:

Comment noted. At the direction of Mayor Hahn, the passenger and cargo capacity of LAX under Alternative D is approximately equal to the capacity of the existing facility.

PC00070-3

Comment:

What impact will result in the LAX expansion and the environment?

Response:

Potential impacts of the Proposed Action and its Alternatives were described in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please also see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

PC00070-4

Comment:

Will there be more pollution in LA, due to the expansion? We are polluted enough already.

Response:

Both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the impacts of air pollution in and around the airport in Section 4.6. In general, the predicted air pollution impacts of any of the LAX Master Plan build alternatives will be lower than the predicted impacts of the No Action/No Project Alternative. Also, please see Topical Response TR-AQ-3 regarding air pollution.

PC00070-5

Comment:

Do we need more people to come into LA, than we already have?

Response:

Comment noted.

PC00070-6

Comment:

How come the public was being shut out of the meetings?

Response:

Please see Topical Response TR-PO-1 regarding the public hearing process. No public participants are known to have been excluded from providing input on the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

PC00071 Brown, Jared None Provided 4/5/2001

PC00071-1

Comment:

I have been living in El Segundo CA. for six years, and not 10 min. go's by with out having to tell the pepole on the phone to hang on because planes are flying right over my house, and having to pause the movie that I'm trying to enjoy, Also because of the planes.

Response:

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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. In addition, please see Topical Response TR-N-2 regarding single event noise and CNEL differences and Topical Response TR-N-4 regarding noise mitigation.

PC00071-2

Comment:

The way I feel about L.A.X. is that it is big enough allready, every time I go to the airport I end up getting lost, that right there tells me it's big enough, why take more familys home's away. With me I like to come home sit down have a clean, quiet!!! place to relax, that get's me away from the loud crap I have to deal with all day long, so please tell me why I need to come home to the same shit every day. For me and my family, I think you people need to understand the need for a good non-stressfull household. It keeps my relationship with my family good and healthy. Please understand where I'm coming from and respect us people working for better things.

Response:

Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life. Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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 note that Alternative D, the LAWA staff preferred alternative, does not propose any residential acquisition.

PC00072 Jibilian, Albert None Provided

PC00072-1

Comment:

What happened with the idea of building the airport in Palmdale which was to take care of the extra passenger/cargo loads. I once owned the 2.5 ac. parcel which was the steps to the terminal. I put the parcel in the name of Rick Hartbrodth who in turn sold it to the airport by condemnations. If your not going to put the airport in Palmdale then give me back my 2 1/2 acres. Did you also scrap the monorail idea from Palmdale to LAX

Response:

Please see Chapter 1, Regional Context, of the Draft EIS/EIR, Topical Response TR-RC-3 for a high-speed rail connection to Palmdale, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

3. Comments and Responses

PC00073 Gateman, Mark None Provided 4/4/2001

PC00073-1

Comment:

I/we want no further airport expansion for LAX. At 68mm (MAP,) currently, we feel strongly that we are at full capacity for the LAX size. At 78mm (MAP,) this is 10mm (MAP) too many for the LAX. To expand to 89mm (MAP) is not what we want for our Westchester area.

Response:

Comment noted. 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. Please see Topical Response TR-LU-2 concerning impacts on Westchester.

PC00073-2

Comment:

And since we have so many regional airports, it makes intelligent sense to expand and improve on those many regional airports.

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.

PC00074 Ehret, John None Provided

PC00074-1

Comment:

TO MUCH & TO BIG NO

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.

PC00075 Zaczynski, Edward None Provided 4/4/2001

PC00075-1

Comment:

This airport does not need to be expanded we don't need the traffic or the polution to poison our kids

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic in Section 4.3, Surface Transportation, air quality 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 G, and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, S-4, S-9a and S-9b 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.

PC00076

Phillips, Colleen

None Provided

4/3/2001

PC00076-1

Comment:

This area can not support the traffic increase that will be created by the LAX Expansion plan. The 405 freeway is already a nightmare.

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. 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.

PC00076-2

Comment:

Why can't the commercial (cargo) traffic be re-routed to other regional airports: (Ontario, Van Nuys etc), The Westside of LA is already the most crowded section of the city. What about El Toro?

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. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale, for information about airline economics and splitting airline passenger and air cargo services.

3. Comments and Responses

PC00076-3

Comment:

We need a regional plan that utilizes all the facilities in the surrounding region. (The larger planes of the future need to go to Palmdale etc).

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-5 regarding transferring LAX operations to Palmdale.

PC00076-4

Comment:

The current MAP is the maximum.

Response:

There are two alternatives that have a capacity constraint of approximately 78 MAP at LAX: No Action/No Project Alternative as described in the Draft EIS/EIR, and Alternative D as described in the Supplement to the Draft EIS/EIR.

PC00077 Johnston, Rachel OSAGE Neighbors Association 4/4/2001

PC00077-1

Comment:

I have been a resident of Westchester (LAX) for over twenty years. I am concerned about the proposed expansion of LAX.

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.

PC00077-2

Comment:

I feel our community has had its fair share of noise, pollution & traffic. There are other alternatives; Ontario, Palmdale.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, air quality impacts in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendices D and G and Technical Reports 2, 3 and 4 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR. 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. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00077-3

Comment:

The airplane noise at night has noticeably increased as well as the early evenings.

Response:

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 in Appendix D of the Draft EIS/EIR and Appendix SC and Technical Report S-1 of the Supplement to the Draft EIS/EIR. For information regarding night and evening noise increases, please see Topical Response TR-N-5 and Topical Response TR-N-6.

PC00077-4

Comment:

We don't need anymore pollution noise or traffic. NO to LAX EXPANSION

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; 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.

PC00078

Kapp, Carol

None Provided

4/4/2001

PC00078-1

Comment:

"Me thinks there is something rotten in the state of Denmark (Los Angeles)

Isn't odd that we should have to pay to see 21 volumes of the draft EIR - There must be alot of secret hidden land encrouching burried in there.

I'm not willing to do a research project of this magnitude so get this straight my position is to support "No Action/No Project".

Response:

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. It should be noted that Alternative D, Enhanced Safety and Security Plan, was addressed in the Supplement to the Draft EIS/EIR 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.

PC00078-2

Comment:

Seek the wide open space of Palmdale or The Marine Base or Ontario.

3. Comments and Responses

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. 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-5 regarding transferring LAX operations to Palmdale.

PC00079 Weir, Jr., Ph.D., None Provided
Alexander

PC00079-1

Comment:

My name is Dr. Alexander Weir, Jr. and I have lived on Billowvista Drive in Playa del Rey since 1957. I served two terms as President of the Civic Union of Playa del Rey. When I bought my house, the Airport was East of Sepulveda Blvd which at that time was not a tunnel. Since that time, the Airport has moved next door to me. They have extended the South Runway West over Sepulveda Blvd and then built a North Runway and then a North-North Runway. They built a new tower West of Sepulveda and then a newer tower as far West as Lincoln Blvd. Now they want to build another terminal on the West side of the Airport and move the smog-producing car rental agencies to Pershing Drive. Enough is enough.

Response:

Comment noted. 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.

PC00079-2

Comment:

The South Coast Air Quality Management District collected air samples at the International Terminal and Terminal 7 at LAX in May 1998. (Report SM98001)The value of PM10(Particulate Matter larger than 10 microns in diameter) at Hawthorne was 27 micrograms per cubic meter while at LAX it was 84. SQAQMD states(p9) that the PM10 concentrations exceeded the State of California standard of 50 micrograms/cubic meter in 5 out of 9 cases. This was at the curb in the terminal buildings which shield somewhat the aircraft exhaust on takeoff. In Playa del Rey, I am sure the concentration of particulate matter, both submicron size as well as over 10 microns in diameter, is greater. These small particles collect in the lungs and are said by many to cause cancer and other illnesses.

Response:

There is no indication that PM10 levels are higher in Playa Del Rey than at the Hawthorne air monitoring site or the airport terminal. Please also see Response to Comment PC00070-1 regarding existing air quality, Topical Response TR-AQ-1 regarding air pollutant deposition, and Topical Response TR-AQ-2 regarding toxic air pollutants.

PC00079-3

Comment:

I have measured (and published in the scientific literature) the concentration of the Oxides of Nitrogen as well as particulate matter in jet engine exhaust. The NOx combines with hydrocarbons(the unburned jet fuel is one source) to form photochemical smog. It doesn't take a Ph.D. to determine that more takeoffs and landings at LAX will increase the amount of smog and particulate matter in Playa del Rey and have a major adverse impact on the environment in Playa del Rey.

Response:

Comment noted. Please see Topical Response TR-AQ-3 regarding air pollution increase.

PC00080 Medina, Linda None Provided 4/4/2001

PC00080-1

Comment:

Children are our future:

How will increase of noise, toxic pollutants and traffic affect the health, quality of life, and safety of the children living and/or attending schools in the Inglewood, Playa del Rey and Westchester areas?

Also, what are the present noise, toxic pollutants and traffic and what will be the increase of noise, toxic pollutants and traffic with the LAX expansion?

Response:

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, schools in Section 4.27, Schools, traffic in Section 4.3, Surface Transportation, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. These sections considered adults as well as children living and attending school in the area, and addressed existing conditions as well as increases associated with the LAX Master Plan. In addition, please see Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-LU-1 regarding quality of life impacts, and Topical Response TR-AQ-2 regarding toxic air pollutants

PC00081 Evans, Lynne None Provided 4/4/2001

PC00081-1

Comment:

1. With 34,000,000 of all departures from LAX being Orange County residents, how can anyone make any logical case for not utilizing El Toro? We will never have as well-located and suitable piece of land available ever again! This is a REGIONAL issue.

Response:

Comment noted. The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale, and Van Nuys airports. The decision to develop an airport is the responsibility of local government. Subsequent to the publication of the Draft EIS/EIR for LAX, Orange County as the Local Redevelopment Authority for the former Marine Corps Air Station El Toro discontinued pursuit of a civilian aviation reuse of the former installation. The Department of the Navy has decided to dispose of the base for non-aviation reuses. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

PC00081-2

Comment:

2. I understand it is inevitable that we will have more traffic in and out of LAX...

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. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways.

3. Comments and Responses

PC00081-3

Comment:

Palmdale wants and needs the increased revenue represented by commercial air traffic = send it there!!

Response:

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00081-4

Comment:

but it must fit within the parameters of existing infrastructure!

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. 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 regarding airport area traffic concerns.

PC00081-5

Comment:

3. The airline industry is clearly trending toward fragmentation, "point-to-point" service, rather than the old-fashioned "hub and spoke" system. Therefore, it makes more sense to have smaller planes out of a greater number of area airports. - Ontario! - Palmdale! - El Toro! - Long Beach!

4. Why can't the new super-jumbos come into and out of Palmdale or El Toro? They go into service in 2006 and LAX is a "target" according to Airbus (555 pax + crew)

5. How on earth can LAX handle more cargo, with our congested roads? Get real!!! Send it to the desert where there's space!

Response:

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale, for information regarding Airline Economics ("Point-to-Point" versus "The Hub Concept"), and regarding relocating some airline operations to Palmdale Airport. The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale and Van Nuys Airports. Subsequent to the publication of the LAX Draft EIS/EIR, Orange County (as the Local Redevelopment Authority for the former Marine Corps Air Station [MCAS] El Toro) discontinued pursuit of a civilian aviation reuse of the former installation. 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 of the Draft EIS/EIR and Appendix S-C of the Supplement to the Draft EIS/EIR. 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. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

PC00082 Tanji, Ken None Provided 6/10/2001

PC00082-1

Comment:

Whatever happens, the ground transportation must be improved!
Especially access from freeway and from light rail!

Response:

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 regarding airport area traffic concerns. Regarding improved mass transit options from light rail, the new Enhanced Safety and Security Plan, Alternative D, which is analyzed in detail in the Supplement to the Draft EIS/EIR, incorporates remote passenger parking with people mover systems (light rail) to shuttle passengers to/from the terminals. Alternative D would eliminate the need for a "Ring Road" and a western passenger entrance from Pershing Drive. In addition, the Green Line is proposed to be extended north to provide access to LAX. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

PC00083 Buchalter, Julie None Provided 6/6/2001

PC00083-1

Comment:

This is to communicate to you a great concern I have about the plans I have been reading about concerning the expansion of the Los Angeles Airport. I have lived in the Westchester area for the past ten years. I have enjoyed the community as it has been these last few years. I knew that the airport was there when I moved here, but I felt I could live with the status of that facility as it was then. I'm not sure that I could live with the proposed changes that are being discussed currently.

I have two young children for whom I want the best environment possible. If the proposed configuration that I have seen of the airport is built, I am sure we will have more pollution and certainly more traffic congestion in this area. The increase in noise factor is another thing that concerns me. I just cannot conceive of this airport with an increase in ridership in the area of 90 million passengers who would come through our area.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality; traffic impacts in Section 4.3, Surface Transportation; 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. In addition, please see Topical Response TR-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester. 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.

PC00083-2

Comment:

I am also concerned of added congestion in my immediate area if an interchange is built from the 405 Freeway onto Arbor Vitae Street. I see this as a part and parcel of the proposed airport expansion. It will impact my home very negatively. In short, I am satisfied with the airport the way it is.

3. Comments and Responses

Response:

This comment is similar to comment AL00008-8. Please see Response to Comment AL00008-8. In addition, please see Topical Response TR-ST-2 regarding surface transportation analysis methodology.

PC00083-3

Comment:

I would hope that you or the powers that be would pursue a regional policy whereby the people of Orange County and other surrounding areas would be asked to absorb some of the traffic that comes into LAX. There are also areas in San Bernardino County that should be encouraged to take up some of the air traffic that is anticipated to grow into LAX. I ask that you take these ideas into consideration before you decide to spend billions of dollars to expand LAX. Thank you for your consideration.

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.

PC00084

Marx, Michelle

None Provided

6/11/2001

PC00084-1

Comment:

I am writing to say I am thoroughly opposed to any airport expansion for so many reasons. Maybe the most important is that I have just discovered there are two small nodules on my lungs. I am a non-smoker. Hopefully, they will turn out to be nothing serious upon further inspection. It froze me in my tracks when I realized I am already breathing so many toxic airplane fumes by living in this area that I thought was safe and beautiful and, until recently, somewhat rural. Airport expansion will put the nails in a lot of coffins. Do you want that on your hands? Do you want the lawsuits that would likely follow?

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-2 regarding toxic air pollutants and Response to Comment PC00045-4 regarding fumes. 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.

PC00084-2

Comment:

And the traffic!! What insanity. There is less and less quality of life in this area. Adding the thousands upon thousands more trips here is just a horrendous thought. As it is one can barely move around town from here. And the pollution/the accidents that will heighten from expansion are, as well, daunting.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality, noise in Section 4.1, Noise, and 4.2, Land Use, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

PC00084-3**Comment:**

I heard the mayor of Irvine saying they did not want El Toro to be expanded because his area needs a large park! Oh sure, we'll carry the burden for all other areas of the surrounding landscape so they can have their parks and their real estate values and their life quality. NO! Other areas need to share this burden.

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. 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. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

PC00084-4**Comment:**

Stand up for your citizens here. Help us put a stop to the degradation of neighborhoods, life-quality, air-quality, traffic congestion and so many other ill side effects of destroying the little we have left. This is not a boost to Los Angeles, this is a shame, a blight on any quality this city can offer. We are becoming an over-crowded, under "open-spaced" area. Our environmental reputation is going downhill.

Help us, please. Think this out fully.

Response:

Please see Topical Response TR-LU-1 regarding impacts on quality of life. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed 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 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.

PC00085**Tena, Arnold****None Provided****6/10/2001****PC00085-1****Comment:**

This is to communicate to you my ardent opposition to the proposal to expand the Los Angeles Airport. I have been a resident of Westchester for the past 32 years and I have thoroughly enjoyed most of those years living in a very congenial community. I have noted over the years a gradual increase in traffic congestion and noise pollution. Recent changes in this area have prompted me to think more seriously of moving out of the area to a more tranquil area. However, I am not a young man anymore and my family is established in the Southern California area and moving would not be a very pleasing option. Having decided to stay here, I must vigorously oppose this proposed plan to expand the airport because I believe it will very much erode even more the pleasure of living here in Westchester.

3. Comments and Responses

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts to quality of life and Topical Response TR-LU-2 regarding impacts to the community of Westchester. 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.

PC00085-2

Comment:

I have read portions of the EIR and I find it very disturbing. I believe that many of the estimates that are made concerning added noise and pollution are grossly underestimated. If accommodations are made to accept some 20 million more passengers at LAX, I cannot believe that this will not very seriously impact my community in a very negative way. I can picture the major arteries in this area to be clogged with traffic, with all the problems that will bring.

Response:

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.

PC00085-3

Comment:

I am aware of the NIMBY syndrome and I am sure that some people would say that we fit into that syndrome. I would say, however, that those of us who oppose expansion of the airport are not doing so for trivial reasons. Our comfort would be impacted, yes, but so would our livelihood and our very lives, what with the increased pollution that would accompany this expansion. I don't believe that anyone would want to get in the way of progress, but as I read this EIR report, this is not progress. It is detrimental to our well being in more ways than one.

Response:

Please see Topical Response TR-LU-1 regarding impacts on quality of life. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses 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.

PC00085-4

Comment:

Another factor that needs to be addressed is the cost of this expansion. In the final analysis, per usual, we the taxpayers will foot the major part of this expansion. TWELVE BILLION DOLLARS is indeed a lot of money. Again, per usual, I am sure that there will be major cost overruns. Examples abound throughout the country where this has happened. Are there assurances that this will not happen here?

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 will be used to pay for any of the proposed on-airport improvements.

PC00085-5

Comment:

I would think that if there is to be increased air activity in this area, that the surrounding communities are asked to share the load. As you know, there are possibilities at El Toro in Orange County, in Ontario, in San Bernardino and elsewhere. These communities should share the added traffic that is anticipated at LAX. Let us see them accept some of that share before we commit to a horrendous expansion that will negatively impact thousands of lives in our community.

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.

In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

PC00085-6

Comment:

I honestly hope that my input will not have been in vain. You tell us that each of our opinions will be considered. I do hope this is correct. I firmly believe that if all the options are fully considered, my view will prevail because it is sensible and compassionate. Thank you for your consideration.

Response:

Comment noted. Responses to individual comments included in this comment letter are provided above.

PC00086

Sochar, Karen

None Provided

6/8/2001

PC00086-1

Comment:

Please note that I vote "NO" on the LAX airport expansion. This will create more noise, pollution, poorer air quality than we already suffer with and filth in my home and on my property that is impossible to maintain.

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, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-1 regarding air pollutant deposition. 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

PC00086-2

Comment:

LAX already has so much NOISE that I often am awakened by outgoing and incoming flights. The airplanes need to be serviced so that they fly in more quietly.

Response:

Unlike automobiles, which become noisier if not serviced properly, turbojet aircraft do not become noticeably noisier as they age. For information on night noise at LAX, please see Topical Response TR-N-5 regarding nighttime aircraft operations, Topical Response TR-N-6 regarding noise increase, and Topical Response TR-N-7 regarding noise abatement measures/enforcement. Also please see the nighttime single event noise analyses that was provided in the Supplement to the Draft EIS/EIR in Section 4.1, Noise, and Section 4.2, Land Use, with supporting information in Appendix SC.

PC00086-3

Comment:

Please DO NOT let LAX expand as our neighborhood will only deteriorate with such. Thank you.

Response:

Comment noted. 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-LU-1 regarding impacts to quality of life.

PC00087

**Woodling, Bill and
Marlene**

None Provided

6/10/2001

PC00087-1

Comment:

We purchased a home on Waterview St. in Playa del Rey in 1963. LAX was located East of Sepulveda. It was a wonderful neighborhood. Then LAX expanded West. The quality of our life became miserable. Noise night & day, unable to talk outside or hear inside. The Airport bought homes to prevent lawsuits. They took 1/2 of Waterview St. We were left for over 30 years with noise, vandals, rubble - every home on our street was burglarized. Then we were promised a "golf course and less noise". Never happened. The airport replaced our windows & put in some "sound proofing". We heard about 25% less noise inside if we kept all doors & windows closed & didn't go outside. We were forced to sell our home at a greatly reduced price 4 years ago. It took over 1 year to sell. We purchased another home in Playa del Rey on Rees St. as far from the noise as possible.

Response:

Comment noted.

PC00087-2

Comment:

Now they want to expand again! We don't believe anything they say! Haven't we had enough? We already notice the noise level getting worse. We will now fight any and all LAX expansion legally united with surrounding communities!

Response:

Comment noted. Noise impacts are addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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. In addition, please see Topical Response TR-N-6 regarding noise increase. 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.

PC00088 Jorgensen, M.D., N. None Provided 6/9/2001

PC00088-1

Comment:

LAX is becoming a Public Nuisance! 150,000 visits daily, #405 Highway JAMMED 3x daily,

Response:

Comment noted. 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.

PC00088-2

Comment:

jet-fuel exhaust pollution adding to smog, which adversely afflicts my patients in the area, which used to be a "haven" from smog for victims of pollution!

Response:

Air pollution from jet fuel exhaust was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. While emissions from jet aircraft do contain compounds (volatile organic compounds, VOC, and oxides of nitrogen, NOx) known to be involved in the formation of ozone (smog), studies conducted by SCAQMD to support the 2003 AQMP indicate that the South Coast Air Basin will attain the ambient air quality standards for ozone by 2010. Because of the operational improvements to LAX proposed in the Master Plan, in general, air pollutant concentrations will be lower in the future under any of the Master Plan build alternatives than would exist under the No Action/No Project Alternative.

PC00088-3

Comment:

A Major Disaster, at LAX, is waiting to happen.

Response:

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

PC00088-4

Comment:

Bigger aircraft require longer runways & more expense (15-17 billion \$!!)

Response:

Comment noted.

3. Comments and Responses

PC00088-5

Comment:

Extending Metrolink Greenline is not a solution, it will worsen over utilization. Same goes for extra "off ramp" also at more cost to taxpayers.

Response:

Comment noted.

PC00088-6

Comment:

Even New York City has 2 major airports, so do likewise HERE; expand Burbank Airport, Ontario Airport, Palmdale, & other candidate areas.

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. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00089 No Author Identified, Westchester Residents

6/11/2001

PC00089-1

Comment:

NO ON LAX EXPANSION

ENVIRONMENTAL POLLUTION

TRAFFIC / GRID LOCK

CRIME

DECLINING REAL ESTATE VALUES

LACK OF SPACE

ETC.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, traffic impacts in Section 4.3, Surface Transportation, public services and law enforcement impacts in Section 4.26.2, Law Enforcement, and land use impacts in Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix G and Technical Reports 1, 2, 3, 4, and 16b. In addition, please see Topical Response TR-ES-1 regarding impacts to residential property values. 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.

PC00089-2**Comment:**

WE WILL PERSONALLY FUND AN INVESTIGATION ON EVERY LAX COMMITTEE MEMBER WHO CONTINUES TO PURSUE THIS PLAN. WE HAVE THE MONEY AND THE THE RESOURCES TO SMEAR YOU IN PUBLIC!!!!

Response:

This is not a comment on the contents of the Draft EIS/EIR.

PC00089-3**Comment:**

GO TO PALMDALE AND LANCASTER WHERE YOU BELONG.

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. 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-5 regarding transferring LAX operations to Palmdale.

PC00090**Mueller, Ingrid****None Provided****6/9/2001****PC00090-1****Comment:**

For years, but especially since this new Millenium dawned upon us, have we stressed and talked and fought about our Los Angeles' Westside's impacts under federal aviation administration law and mayor Riordan's pro-growth at any cost appointees. You both know that your 'piecemealing' has caused major impacts on LAX's surrounding neighborhood already.

Response:

Comment noted. Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding opportunities to alleviate impacts associated with past or present airport activities at LAX.

PC00090-2**Comment:**

How additional space for cargo hangars and more jets in the landing patterns, i.e. your mega expansion proposals WILL impact our neighborhoods TODAY/TOMORROW is infinitely more real than a mythical 'growth anyways, with no mitigation' plan.

This is not about crunching numbers down.
This is about respect for Los Angeles' residents.

Response:

Comment noted. 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. Proposed mitigation for project impacts was included in Chapter 5, Environmental Action Plan, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

3. Comments and Responses

PC00090-3

Comment:

There ARE other air travel and transport alternatives in Southern California that WON'T impact this economy.

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. 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-3 regarding high-speed rail as a solution to airport capacity and demand.

PC00090-4

Comment:

And I find myself repeating myself: once the skies of LA are darkened with smog, once residents can't hear themselves speak anymore, once the frequency of air traffic accidents scares the world away from LAX, you will have learned one important life lesson...too late.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed 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 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety.

PC00091

Kelly, Coleman

None Provided

6/8/2001

PC00091-1

Comment:

I am a homeowner in Westchester and do not want the LAX Expansion to happen. I love my home and neighborhood and do not want it ruined. It will create increased noise, pollution, traffic and will adversely effect my community. I worry about the negative impact on my property value. Please don't let the LAX Expansion happen!!

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-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester, and Topical Response TR-ES-1 regarding residential property values. 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.

PC00092 Kelly, Cindy None Provided 6/8/2001

PC00092-1

Comment:

I love my neighborhood and do not support the LAX Expansion!! Please do not allow the LAX Expansion to happen. We do not want increased noise, pollution, traffic or removal of our neighbor's homes. I do not want to lose the value of the equity on my home either!!!

Don't support the LAX Expansion!

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise and Land Use 4.2, air quality impacts in Section 4.6, Air Quality, traffic impacts in Section 4.3, Surface Transportation, and relocation impacts in Section 4.4.2, Relocation of Residences or Businesses. Supporting technical data and analyses are provided in Appendices D and G, and Technical Reports 2, 3, 4, and 5 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-2, S-3, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-ES-1 regarding impacts to residential property values.

PC00093 Michetti, Jo Ann None Provided 6/10/2001

PC00093-1

Comment:

Last night, Sunday night, I drove from my home in Rancho Palos Verdes to LAX to pick up my husband from a United flight from San Francisco. It took me 20 minutes to get there and 20 minutes to go around the airport to get to United Shuttle. The airport was packedbusses, taxis, cars were darting in front of each other, horns were honking and because my husband wasn't standing on the curb in front of the Baggage Claim area, I had to fight my way into the extreme left lane from the extreme right lane, to the ire of the other four lanes of traffic, in order to circle around again.

Circling around again took another 15 minutes and a lot of my good nature. I cannot believe that any rational human being could even, for a nanosecond, entertain the idea that LAX can be expanded to take care of 30 million more people a year. Obviously the powers that be either fly in their own private planes, ride in limousines or never travel. For the rest of us poor souls, we are doomed to circle LAX forever. It is my firm belief that anybody with power to vote on this plan should be required to drive his/her own car to LAX on a Friday or Sunday night and try to pick up an incoming passenger. I doubt that they would think expanding LAX is a good idea. And whose moronic decision stopped the Metro a mile from the airport? Where is the common sense here?

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 see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways and Topical Response TR-ST-4 regarding airport area traffic concerns. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

3. Comments and Responses

PC00094

Ross, William

Law Offices of William D. Ross

6/8/2001

PC00094-1

Comment:

This comment letter is submitted on behalf of the County of Los Angeles ("County") concerning the scheduling of three (3) concurrent public hearings by the United States Department of Transportation - Federal Aviation Administration ("FAA") and the City of Los Angeles, Los Angeles World Airports ("LAWA") regarding environmental studies addressing proposed improvements at Los Angeles International Airport ("LAX"). For the following reasons, the County strenuously objects to the timing and location of the hearings and demands either that these hearings be postponed and rescheduled or that additional hearings be scheduled prior to the close of the public comment period on July 25, 2001. These proposed alterations in the scheduled public hearings are necessary to insure that a diligent effort to involve the public in the entire Los Angeles region in preparing and implementing the National Environmental Policy Act of 1969 (42 U.S.C.S. §4321, "NEPA") and California Environmental Quality Act (Pub. Res. Code & 21000 et seq. "CEQA") is achieved and public participation requirements and procedures are fulfilled.

First, 49 U.S.C. § 47106(c)(1)(A)(i), which governs public hearing requirements for applications under 49 U.S.C.S. §§ 47101 et seq. for airport development projects involving the location of an airport or runway or a major runway extension, mandates that public hearings be conducted. These statutory requirements have been ignored. The statute provides that the Secretary may approve such applications,

(A) only if the sponsor certifies to the Secretary that - - (i) an opportunity for a public hearing was given to consider the economic, social, and environmental effects of the location and the location's consistency with the objectives of any planning that the community has carried out . . .

The FAA's obligations in this regard are elucidated in the procedural rules governing public hearings. The FAA is mandated to establish "a reasonable date, time, and place for the hearing.... Due regard shall be given to the convenience of the parties with respect to the place of the hearing." 14 CFR § 13.55 (emphasis added). This section is applicable to the statute governing the public hearings at issue.

Nevertheless, as a consequence of the truncated scoping process and public hearing format, the "opportunity for a public hearing" has not occurred. This project, as described in the EIS/EIR, has a regional impact on the greater Los Angeles area for a variety of reasons including, without limitation, that other airports in the Los Angeles County region will take up existing and anticipated aviation demand that the proposed project will not handle. Based solely on the locations of the Draft EIS/EIR for public review, the impact of the project is anticipated to encompass, among other places, the San Fernando Valley, Ontario, Lancaster, and Costa Mesa in addition to the greater Los Angeles area. Yet the only public hearings scheduled are three simultaneous hearings on Saturday, June 9, 2001 from 12:00 p.m. to 7:00 p.m. at three specified locations - Los Angeles, Inglewood, and Manhattan Beach - all within several miles of each other in the vicinity of the Los Angeles International Airport. Moreover, the scoping process did not include a single agency within San Bernardino, Orange, Riverside and Ventura Counties yet the EIS/EIR identifies the importance of LAX in the region as a whole. Under the established hearing schedule, if individuals have a personal conflict with the limited Saturday only hearing schedule, they are precluded from personally participating in the hearing process by providing live comment. Individuals in the Los Angeles region impacted by the project will be foreclosed from the opportunity to comment during truncated public forums considering the economic, social and environmental effects of the location of the airport's improvements and the location's consistency with the objectives of planning efforts being carried out in the excluded counties. Cf. Ecology Center, Inc. v. United States Forest Service, 192 F.3d 922, 926 (1999). This circumscribed public hearing schedule does not fulfill the public participation the FAA is obligated to provide.

Finally, the FAA and LAWA have ignored the required level of "public involvement" mandated by NEPA. Specifically, the Council on Environmental Quality has provided that agencies shall, inter alia "(a) make diligent efforts to involve the public in preparing and implementing their NEPA procedures," "(c) hold or sponsor public hearings or public meetings whenever appropriate or in accordance with statutory requirements applicable to the agency "and "(d) solicit appropriate information from the public." See 40

Code of Federal Regulations ("C.F.R.") § 1506.6.1 § Given the complex NEPA issues concerning this project, which imposes a regional impact on the greater Los Angeles area, a diligent effort required by NEPA regulations should require more than three simultaneous hearings on Saturday, June 9, 2001 all within several miles of each other near LAX. The NEPA scoping process likewise did not include a single agency within San Bernardino, Orange, Riverside and Ventura Counties despite the fact the EIS/EIR identifies the importance of LAX in the region as a whole. Similar to the EIS/EIR scoping process, the public hearing format turns deaf ears to the public impacted in these ignored counties in violation of NEPA and CEQA. The public hearing format further undercuts the "public involvement" sought by NEPA and the required diligent efforts to involve the public in implementing NEPA procedures. See 40 C.F.R. § 1506.6. Especially given the size and complexity of the EIS/EIR and the County's request for additional hearings to ensure the broadest possible participation in the process, the limited public hearings fail to comply with NEPA and CEQA.

In conclusion, the currently scheduled public hearings are insufficient to fulfill the FAA's obligations under either 49 U.S.C. § 47106(c)(1)(A)(i) or NEPA and CEQA. Accordingly, County respectfully renews its request that the public hearings currently scheduled for June 9, 2001 either be rescheduled for different times and a variety of locations, or that additional public hearings be scheduled prior to the close of the public comment period.

1 See CEQA & 15202 (public hearing on environmental impact of project should usually be held when lead agency determines it would facilitate purposes and goals of CEQA). See also *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal.3d 553, 564 (1990) (CEQA process protects . . . informed self - - government." See also 14 C.F.R. § 13.55 ("The Hearing Officer shall set a reasonable date, time, and place for the hearing, and shall give the parties adequate notice thereof and of the nature of the hearing. Due regard shall be given to the convenience of the parties with respect to the place of the hearing.") [emphasis added].

Response:

Comments noted. Please see Topical Response TR-PO-1 regarding the public hearing process, and also Response to Comment AL00035-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Response to Comment SPHGH00002-4 provides additional discussion regarding noticing requirements applicable to the proposed project. The extensive number of public hearings exceeds the required level of public involvement required for this project.

PC00095	Hill, Roger	None Provided	6/6/2001
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PC00095-1

Comment:

Just want to let you know I'm apposed to any expansion of LAX. I have lived in Westchester off and on since 1953 and have seen how LAX expansion has degraded the life around it. It is not healthy or pleasant to live here anymore. The air and noise pollution coming from LAX, 405 and the 105 freeways has made it unhealthy.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality, noise in Section 4.1, Noise, and 4.2, Land Use, traffic in Section 4.3, Surface Transportation human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-HRA-3 regarding human health impacts. 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

PC00095-2

Comment:

The local residential streets now support traffic that supports the airport.

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 see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways, Topical Response TR-ST-4 regarding airport area traffic concerns, and Topical Response TR-ST-6 regarding neighborhood traffic impacts.

PC00095-3

Comment:

Expanding this airport and the highways around it will only decrease the value of life around the airport.

Response:

Please see Topical Response TR-LU-1 regarding impacts on quality of life. 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.

PC00095-4

Comment:

Do not help us by improving the streets because that will only allow the airport to expand more and make it less healthy.

Response:

Comment noted.

PC00095-5

Comment:

I live in Manchester Square for many years and felt it was not unhealthy, until the LAX expanded by adding the north runway. Now you want to the runways closer to homes and get rid of other homes. You say you will soundproof homes. Well my home extends to my yard and garage. People have to yell to each other when planes fly over there. You have offered to soundproof the homes of people who live in Manchester Square and other areas around LAX. You have ruined those neighborhoods and I don't want to see LAX do anymore harm to the neighborhood.

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 the Supplement to the Draft EIS/EIR. Note that under LAWA Staff's new preferred alternative, Alternative D, no residential acquisition is proposed. As described in Section 4.2, Land Use (subsection 4.2.3), of the Draft EIS/EIR, under a separate program from the LAX Master Plan homes are being acquired in Manchester Square under LAWA's Voluntary Acquisition/Relocation Program based on interest from homeowners and residents who requested that LAWA purchase their property instead of soundproofing. Under this program, acquired properties are fenced, landscaped, and maintained by LAWA. It is not clear from the comment how neighborhoods have been ruined. Please see Topical Response TR-LU-3 for a description of soundproofing under the Aircraft Noise Mitigation Program, Topical Response TR-MP-3 regarding residential acquisition in Manchester Square, and Topical Response TR-LU-4 regarding outdoor noise levels.

PC00095-6

Comment:

Also you have those same people sign an agreement that they will not sue the city as long as the noise doesn't get over some many DB louder. The noise may not get above that limit, but what about it just being more constant noise. The more planes that land the more noise.

Response:

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. 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.

In addition, please see Topical Response TR-N-6 regarding noise increases and Subtopical Response TR-LU-3.13 regarding aviation easements.

PC00095-7

Comment:

Most people spend a lot of time outside their homes in their yards and have to put up with more and more planes every year.

Response:

Please see Topical Response TR-LU-4 regarding outdoor noise levels and Topical Response TR-N-6 regarding noise increases, in particular Subtopical Response TR-N-6.1 regarding existing and future noise levels.

PC00095-8

Comment:

Let others in this wonderful part of Southern CA do there share. The density of the area is already too dense. Others areas use LAX, but do not share in the sacrifices. What needs to be done is to invest in other airport so they can have the benefits and the sacrifices in there areas.

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. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand for a discussion of the roles and responsibilities of LAWA, the City of Los Angeles, SCAG, and SCRAA in meeting regional demand.

PC00095-9

Comment:

The LAX area has had many benefits and sacrifices but the sacrifice that goes along with any more changes it is not worth it any more. The new bridge on Sepulveda was an LAX expansion. The people were not informed about the changes that would affect their quality of life.

Response:

Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding opportunities to alleviate impacts associated with past or present airport activities at LAX. Please also see Topical Response TR-LU-1 regarding impacts on quality of life.

The comment is unclear as to what "new bridge on Sepulveda" is being referred. There have been no new bridges constructed over Sepulveda Boulevard in the past several years. In the early 1990's the

3. Comments and Responses

96th Street Bridge over Sepulveda Boulevard was completed; however, the bridge was constructed to address traffic problems at the at-grade intersection of 96th Street and Sepulveda Boulevard and had nothing to do with any expansion of LAX. More recently, various improvements were made to the Sepulveda Boulevard tunnel beneath the LAX south runway complex; however, those improvements were made relative to seismic safety and had no relation to the operations or capacity (e.g., expansion) of LAX.

PC00096 Moxley, Tom Ironworkers Local 433 6/5/2001

PC00096-1

Comment:

The Ironworkers Local #433 strongly supports the Los Angeles International Airport Recommended Master Plan. The rebuilding of the airport will bring tremendous economic benefits to our region. It is clear that the airport is a major source of jobs and economic activity. But in order to compete for business in the Asian Pacific Rim, we need to upgrade and modernize this major asset.

Our members will be working under a project labor agreement, which means that their wages and benefits will be based on a union standard. When our members go to work, our communities thrive. Our 4,300 members live all over this region and invest their time and money in their communities. If the Master Plan is adopted by the Los Angeles City Council, our cities will benefit, our economy will grow and the flying public will be better off. We need an airport we can all be proud of. Moving forward on LAX modernization will take us a step closer to that goal.

Response:

Comment noted.

PC00097 Holt, Jack Ironworkers Local 433 6/5/2001

PC00097-1

Comment:

The Ironworkers Local #433 fully supports the Los Angeles International Airport Recommended Master Plan. Our members will be the ones who help build the airport and we will do so under wage and benefit conditions that are a standard for our industry.

It is clear to anyone who uses the airport that the current infrastructure is inadequate. In an increasingly competitive and global economy, this major public asset needs to be of the highest quality and restructured for efficiency. The Master Plan will allow our regional economy to remain competitive and will increase jobs throughout the region.

We cannot just listen to the voices of the nay-sayers and opponents of progress. We need to invest in our transportation infrastructure to prepare for the future. If we stand still, the jobs and wealth will go to other major cities on the West Coast. We strongly support the Recommended Master Plan and urge the Los Angeles City Council to endorse this critically needed project.

Response:

Comment noted.

PC00098 Wong, Aida None Provided 6/8/2001

PC00098-1

Comment:

LAWA had created a terrible place for us to live in Monterey Park. Everyday airplanes constantly fly over my house. I see no benefit for my town in LAX plan. I think no one in your organization cares about the citizens of my area.

Response:

Comment noted. Please see Topical Response TR-LU-1 regarding impacts to quality of life. 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.

PC00099 Dawson, Lee Ann None Provided 6/9/2001

PC00099-1

Comment:

I have spent a considerable amount of time reviewing the Draft EIS/EIR. Throughout the documents, I have observed a uniform disregard for the quality of life of those residents living in the communities surrounding LAX.

Response:

Please see Topical Response TR-LU-1 regarding impacts on quality of life.

PC00099-2

Comment:

Opposition to LAX, and evidence supporting such opposition, is overwhelming. The DEIS/EIR tries to put the right spin on the issues, but the degradation of communities, destruction of the environment, and massive noise and air pollution that expansion would bring (and has already brought) cannot be ignored.

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, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life. 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 are disclosure documents that provide the public and the decision makers with information relative to the potential impacts of the various alternatives.

PC00099-3

Comment:

Expanding LAX is not the answer. The LAWA wants to provide sound proofing programs to affected residential areas. Are residents expected then to not enjoy their yards or walk or bike through their neighborhood?

3. Comments and Responses

Response:

Please see Topical Response TR-LU-4 regarding outdoor noise levels, Topical Response TR-LU-5 for a discussion of thresholds used to identify significant noise levels, Topical Response TR-LU-3 for a description of the residential soundproofing program, and Topical Response TR-N-6 regarding noise increase, particularly Subtopical Response TR-N-6.1.

PC00099-4

Comment:

The air pollution that LAX generates, and the disrupting noise of screaming jets, negatively impact the quality of community life and reduce property values.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed 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 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-ES-1 regarding impacts to residential property values.

PC00099-5

Comment:

Please listen to the communities. Do not expand LAX. Rather, reduce the amount of air traffic at LAX by distributing air traffic across the 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.

PC00100

Bissell, Chip

None Provided

6/9/2001

PC00100-1

Comment:

The Draft EIS/EIR contains well over 500 pages of public comments. The overwhelming majority of those comments voice strong opposition to the expansion of LAX, and legitimately question the motive behind the proponents of expansion. Apparently though, the collective voice of the DEIS/EIR believes that "mitigation" is a magical wand which can be waved to make all problems and opponents disappear. Well, it's not.

Response:

Comment noted. 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.

PC00100-2**Comment:**

Expanding LAX is not the answer. Providing sound proofing programs to affected residential areas turns residents into prisoners of their own homes. Residents become unable to enjoy their yards and neighborhoods, or even open their windows to enjoy the afternoon ocean breeze, because to do so would require them to face the onslaught of noisy, roaring jet engines and helicopters.

Response:

Please see Topical Response TR-LU-4 regarding outdoor noise levels, TR-LU-5 for a discussion of thresholds used to identify significant noise levels and Topical Response TR-LU-3 for a description of the residential soundproofing program.

PC00100-3**Comment:**

Enough is enough. Divide evenly the burden of air transport across the region.
Do not expand LAX!

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.

PC00101	Ramos, Gloria	None Provided	6/6/2001
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PC00101-1**Comment:**

I am opposed to the LAX Expansion Project route. It makes no sense to me that the airport expansion should need to destroy an historic landmark, the Centinela Adobe. Do we care so little for our heritage that we would take away our oldest standing structure in the entire Centinela Valley? I certainly hope not!

Response:

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

PC00102	Di Domenico, Mr. & Mrs. Thomas	None Provided	6/5/2001
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PC00102-1**Comment:**

I have lived in Westchester with my family for forty five years. My wif and I are very concerned about the expansion of L.A.X.

3. Comments and Responses

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.

PC00102-2

Comment:

We have noticed an increase in air traffic over our area and also in the number of cars, busses and cabs using La Tijera and Sepulveda to the air port;

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. 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 regarding airport area traffic concerns. Please see Topical Response TR-ST-6 regarding neighborhood traffic impacts.

PC00102-3

Comment:

The noise and air pollution has caused me and my family increased problems with our respiratory and eye irritations.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, Section 4.2, Land Use and in Section 4.24.2, Health Effects of Noise, air quality 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 D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-1 regarding air pollutant deposition and Topical Response TR-LU-5 regarding land use and noise mitigation.

PC00102-4

Comment:

Please, Please consider other alternatives.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed alternatives to the proposed project in Chapter 3, Alternatives. 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.

PC00103 Baca, Tracey None Provided 6/6/2001

PC00103-1

Comment:

Our neighborhood is an established and stable one, and we hope to keep it that way. There are many seniors, young children, and pets in our community who deserve a clean and quiet place to live and enjoy. LAX expansion will bring noise, traffic, pollution, and take away community homes/businesses. Please help us protect our stable neighborhood and peaceful community.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, noise impacts in Section 4.1, Noise, and Section 4.2, Land use, traffic impacts in Section 4.3, Surface Transportation, and relocation impacts in Section 4.4.2, Relocation of Residences or Businesses, with supporting technical data and analyses provided in Appendices D and G, and Technical Reports 2, 3, 4 and 5 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-2, S-3, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts to quality of life, and Topical Response TR-RBR-1 regarding residential acquisition and relocation.

PC00104 Adkins, Kathii None Provided 6/6/2001

PC00104-1

Comment:

I want to go on record that I am opposed to the LAX Expansion Project if it in any way harms our oldest historic site, the Centinela Adobe. I am 57 years old and if we do not preserve and protect our heritage for our children and ourselves then we have not done our job. Please reconsider the route that this expansion will travel and run it through an area that does not harm our wonderful historic site.

Response:

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

PC00105 Ragus, Nicholas None Provided 6/6/2001

PC00105-1

Comment:

Your regional solution embodied in the Draft Master Plan & Draft EIS/EIR has further doomed my community. While your organization has protected "neighborhoods by minimizing impacts" it has maximized the impact on Monterey Park. LAX and the FAA has sacrificed the peace and quiet of my diverse and middle-class community in order to "maintain its prominence" & grow the economy of LA. Enclosed please find a copy of our letter that begs for relief from your expansion past and present and future.

Response:

Please see Responses to Comments below. In addition, 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

PC00105-2

Comment:

As stated in our letter of October 7, 2000, since 1995 LAX has increased the rate of commercial air traffic over our "bedroom community" to an alarming level. Monterey Park is a middle-class suburb located on hills in the west San Gabriel Valley approximately 20 miles northeast of LAX. On a normal day the parade of low and slow-flying aircraft on approach to LAX begins at 6:30 AM and doesn't end until mid-night. On many occasions I have been awakened as early as 4:00 AM and as late as 1:00 AM. These aircraft, with landing gears down and slats/flaps deployed, lumber noisily overhead every two minutes. Frequently the rate increases to one every thirty seconds - SEVEN DAYS A WEEK.

Response:

The commentor is affected by the base leg (perpendicular) segment of the westerly approaches to the airport. This approach is used by all traffic arriving from west coast, Pacific and European origins. Under heavy traffic conditions, the base leg moves eastward over Monterey Park to better increase the separations between arriving aircraft and to safely sequence them into the arrival flows coming directly from the east. This eastward extension of the base leg approach results in the conditions described by the commentor. Air Traffic Control management has evaluated modifications of the approaches to the north and south runway complexes to increase aircraft altitude over Monterey Park, resulting in noise level decreases of several decibels. It is not likely that the procedures can be changed to remove the traffic entirely from over the area. Any modifications to the base leg approach to reduce the impacts of flights over communities under them beyond the 65 CNEL contour would 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 and the effects of elevation on noise, Topical Response TR-N-6 regarding noise increase, and Topical Response TR-N-5 regarding nighttime aircraft operations.

PC00105-3

Comment:

This particular problem for our community is not news to your administration. The handling of the problem on a local level has not worked. Here we are spending another "relaxing" Sunday under the noise and exhaust of commercial aircraft on approach to LAX. Whatever mitigating plan the FAA and LAX developed and agreed upon in 1998 has either never been implemented or is so ineffectual that it is not noticeable to the untrained ears and eyes of us citizens.

Response:

Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding opportunities to alleviate impacts associated with past or present airport activities at LAX.

PC00105-4

Comment:

The simplest solution would be to route the traffic south of here over the industrially zoned areas and railroad yards.

Response:

Comment noted.

PC00105-5

Comment:

The noise levels we experience are equivalent to the levels "enjoyed" by communities adjacent to LAX. The level of noise varies from that which impedes outdoor conversations to one that rattles windows, knocks out TV signals and drowns out indoor conversations. Spend some time in a classroom at Brightwood Elementary School or at the St. Thomas Aquinas Catholic Church on Atlantic Blvd; you will

see this is true. Now I am not a walking "decibel-meter" but having to shout in order to be heard over the sound of passing aircraft tells me the noise level is

Response:

This is not a comment on the contents of the Draft EIS/EIR. However, 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.

Regarding increases in noise levels at the referenced properties (located at 1701 Brightwood Street and 1501 South Atlantic Boulevard, respectively, in Monterey Park), to qualify for soundproofing, properties must be exposed to 65 CNEL or greater noise levels. As shown on Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, and Figure S4.2-2 in the Supplement to the Draft EIS/EIR, these properties are located outside the 1992 fourth quarter, 1996 baseline, and Year 2000 65 CNEL contour. As presented in Section 4.2.3 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, within the 75 CNEL noise contour, outdoor areas associated with schools are considered to be incompatible with airport uses. Although exposure of noise-sensitive uses to outdoor noise levels in the 65 to 75 CNEL range are considered to be compatible, areas exposed to these noise levels would still have some impact on outdoor speech and the quality of outdoor activities. Therefore, based these noise thresholds no significant noise levels from LAX operations were identified for Brightwood Elementary School or St. Thomas Aquinas Catholic Church. See also Topical Responses TR-LU-3 regarding the Aircraft Noise Mitigation Program (ANMP), TR-N-8 regarding noise-based vibration, and TR-LU-4 regarding outdoor noise levels.

PC00105-6

Comment:

It is the position of LAX and the local FAA that Monterey Park does not qualify for the required noise impact study and compensation because our city is not geographically close to the airport.

This interpretation is an example of narrow-minded, bureaucratic thinking. No other corridor in the Class B airspace of Los Angeles County or Orange County has a lower allowable operating altitude. The distance between the aircraft and our homes is further reduced because our homes are atop hills 300+ feet above MSL. Given the amount of commercial air traffic we experience and the fact that it is increasing every year (despite our complaints) should qualify our community. It is a cold-hearted bureaucrat that would argue in favor of the LAX and FAA interpretation.

Response:

As stated by the commentor and shown on Figure 4.2-5 of the Draft EIS/EIR, the City of Monterey Park is outside the current ANMP boundaries that define areas exposed to high noise levels (based on the 1992 fourth quarter 65 CNEL or greater noise contours). As also shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the area within the 65 CNEL noise contour has decreased from 1992 conditions. As shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the City of Monterey Park is also outside of areas exposed to high single event noise levels (as defined by the 94 dBA SEL noise contour). Therefore, based on the thresholds presented in Section 4.1, Noise (subsection 4.1.4), no significant noise impact from aircraft noise has been identified for the City of Monterey Park. Please see Topical Response TR-N-3 regarding the effect of elevation on noise contours and TR-N-6 for a discussion of the correlation between increased number of flights and increased noise levels.

PC00105-7

Comment:

Perhaps the cultural and ethnic diversity of our once quiet Eastside bedroom community makes us expendable in order to "grow" the economy of Los Angeles? For an experiment let us shift commercial air traffic slightly north over another suburb called San Marino. This is still within Los Angeles Class B airspace. For one year fly commercial aircraft through that corridor at the same frequency and altitude as the corridor over Monterey Park. It would be a safe bet for me to claim that within a week from the start of the experiment commercial air traffic over San Marino would be re-routed.

3. Comments and Responses

Response:

Comment noted. Please see Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR regarding disproportionately high or adverse impacts on minority and low-income communities.

PC00105-8

Comment:

The expansion of LAX directly impacts the quality of life and the economy of the homeowners of Monterey Park. It is a fact that residences in a major flight path of a commercial airport decrease in market value from 15 to 43 percent. According to local real estate agents a seller in Monterey Park must presently "voluntarily disclose" the existence of this commercial aircraft flight pattern. How long until we are legally bound to disclose in all real estate contracts that we are in a major flight path and our land values are substantially impacted? How desirable will our community of \$300,000 to \$600,000 homes be when it is considered to be equivalent to living under a railroad trestle?

Response:

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values and Topical Response TR-LU-1 regarding impacts on quality of life.

PC00105-9

Comment:

Our community is presently at the mercy of the organization called Los Angeles World Airports, the City of Los Angeles, the Board of Airports and the FAA. None have yet to show any mercy for the citizens of Monterey Park. What this group has shown us is their callousness toward the deterioration of the quality of life in our community.

Response:

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

PC00105-10

Comment:

It is my request that the air traffic be moved south or the citizens of Monterey Park be compensated and our homes retrofitted with soundproofing.

Response:

Section 4.1, Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts from aircraft and, where significant impacts were identified, mitigation, including soundproofing, was provided. As indicated in Section 4.1, and illustrated in figures provided in Section 4.2, Land Use, significant impacts do not extend easterly as far as Monterey Park.

PC00106

Galanter, Ruth

City of Los Angeles

6/5/2001

PC00106-1

Comment:

I am forwarding comments provided by my constituents in response to the Environmental Impact Report and Statement prepared for the proposed LAX Master Plan. Please ensure that the enclosed comments become part of the official public record on this project.

Response:

Responses to the referenced attachments are provided in Comment Letters PC00061 through PC00081.

**PC00107 Slawson, Richard Los Angeles Building &
Construction Trades Council**

PC00107-1**Comment:**

My name is Richard Slawson and I'm the Executive Secretary of the Los Angeles/Orange Counties Building Trades Council. I'm here today to provide a very simple message for an issue that I acknowledge is very complex. It is clear to me, and to the tens of thousands of men and women in the construction trades, that LAX needs to be modernized. It needs to be modernized for a number of reasons. This airport is a critical economic engine for our city, our region, our state and for the country. Over 400,000 jobs in our region are attributable to the economic impact of LAX. Los Angeles County benefits from \$50 billion in economic output related to the airport. The airport is a fundamental part of our public infrastructure that has been left to deteriorate, has been surpassed by growth in population and is no longer capable of adequately dealing with the advances in transportation technology that have taken place over the last decade.

Thousands of construction related jobs will be created by the modernization program. Those jobs will provide livelihoods for families, will help send children to college and will bring consumer dollars into every city in this region. But the modernization of LAX is not a jobs program. The modernization of LAX is critical because it will make our airport safer. It will preserve its role as the gateway to Asia and make it a critical gateway to growing economies in South America, Central America and Mexico. And it will serve as a test-case for how a complex society deals with the long term infrastructure planning that is essential to prepare for the demographic and social changes that are part of the future of this whole region.

The people of Los Angeles have a choice to make about LAX. If we do nothing, delays will increase, the runways will become less safe, airline traffic will continue to increase and we will lose jobs to other regions who are more willing and ready to act. These are indisputable facts of our situation and these facts will not be altered by fantasizing about quick-fix solutions or pie in the sky ideas about how we will unilaterally demand that air carriers fly to other airports.

We can't control all of the economic decisions of our airline industry. But, we can control our planning, our creativity in solving problems and our vision as to what LAX can be. It can become a top level airport for this new century. Right now it is not. We can have a "regional" solution to increasing demand for air travel and cargo. But that solution will not occur without LAX taking its fair share of that increase.

Response:

Comment noted.

PC00108 Harman, Jane U.S. House of Representatives 6/9/2001

PC00108-1**Comment:**

As the Member of Congress representing California's 36th Congressional District - which includes the communities adjacent to Los Angeles International Airport (LAX) - I appreciate the opportunity to present my views. These views reflect the many e-mails, letters, phone calls and conversations with the District residents who are passionately concerned about what LAX expansion will do to their communities.

3. Comments and Responses

The decisions we make about the development of LAX and other Southern California airports will cost billions of dollars, affect millions of residents and travelers and be a part of the urban environment for generations. They will have an impact on the vitality of our economy, the health of our children and the quality of our lives. These goals are not easy to balance. Therefore, it is critical not only that we make the right decisions, but also that the process by which those decisions are reached be thoughtful, inclusive, fair and comprehensive.

Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed economic impacts in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement). In addition, please see Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-LU-1 regarding impacts on quality of life.

PC00108-2

Comment:

The Draft Environmental Impact Report makes clear that 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."¹ However, the Master Plan prepared by the Federal Aviation Administration (FAA) and Los Angeles World Airports (LAWA) only addresses development at LAX. As such, this Plan is inherently inadequate to meeting the stated Purpose and Objectives.

1 Page 2-1. The Los Angeles region is defined as encompassing Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties - an area of over 35,000 square miles and with a population of more than 15 million people.

Response:

As was described in Chapters 1, 2 and 3 of the Draft EIS/EIR and was further discussed in Chapter 3 of the Supplement to the Draft EIS/EIR, the proposed Master Plan provides for improvements to LAX, based on the role of LAX within the regional context of southern California. It is not within the jurisdiction of LAWA or the scope of the EIS/EIR to plan and provide for improvements to commercial aviation facilities throughout the region. It should be noted, however, that the Southern California Association of Governments (SCAG) Regional Transportation Plan within the 2001 Regional Transportation Plan (RTP) provides an overall long-term plan for commercial aviation airports throughout the region. Alternative D, the LAWA staff-preferred alternative for the Master Plan, is consistent with the policy framework of the 2001 RTP.

PC00108-3

Comment:

In contrast, how Southern California can best meet future demand for air transportation was summed up in a Statement of Principles signed by 13 Members of Congress from across Southern California and the political spectrum. In that statement, we urged development and implementation of a plan that:

- Was made by consensus across the region and resulted in fair allocation of benefits and burdens of air transportation across the region;
- Gives priority to expanding facilities and operations at airports with under-utilized capacity, including Ontario, Palmdale, and elsewhere;
- Recognizes the negative impact airports can have on surrounding communities and does not force growth at already over-burdened airports; and
- Includes appropriate transportation that facilitates use of all the region's airport resources.

Our statement also makes clear that, "We will use the means at our disposal...to facilitate this process, including: seeking appropriate funding, communicating our position to other Members of Congress and the relevant Committees of Congress, and expressing our concerns to Federal entities with jurisdiction over airport and aviation issues such as the Federal Aviation Administration and the Department of Transportation."

The full text of that statement and the cover letter by which it was transmitted to Secretary of Transportation Norman Mineta are attached to this testimony.

The Master Plan being considered is not consistent with these principles.

1. The Master Plan does not reflect a regional consensus. It does not appear that any efforts were made to ascertain the needs and interests of the communities with airports in Ontario, Palmdale, and sites in San Bernardino, Riverside, Ventura and Orange Counties. No hearings on airport development were held in any of these locations. State and local officials and community leaders in those areas were inadequately contacted and consulted.

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.

PC00108-4

Comment:

2. The Master Plan states that "airlines, not government, make the decision about which airports they will serve."² However, there are a number of means that have been used to make airports more attractive destinations for airlines. Examples include explicit and implicit subsidies and marketing programs. More important are improvements in facilities and improvements in ground access, as well as proximity and convenience to population centers. No active measures that could change the distribution of passenger and/or cargo traffic to under-utilized airports were examined and included in the Master Plan. Indeed, a regional approach that meets future transportation needs is entirely ignored in favor of expansion of one already difficult-to-reach airport - LAX.

3. In other large American cities with significant air transportation demand, regional or "reliever" airports play a significant role play important complementary roles in meeting air passenger and cargo demand, including Minneapolis/St. Paul, New York/New Jersey, Washington D.C./Baltimore and the Boston/Massport complex. The Master Plan did not make any explicit comparisons between its proposed expansion at LAX and the approaches that adopted in other U.S. cities and regions. The plan does not appear to reflect in-depth discussions and analyses with relevant officials and administrators at those airports.

2 Page 1-14

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.

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.

An update of the master plan for Ontario is currently underway. The Ontario master plan will recommend the needed improvements to meet the projected demand of 17.6 MAP in 2015. The local community supports the airport's growth, and Ontario has the potential to capture a much larger share

3. Comments and Responses

of total regional demand. Space is available for terminal development between and adjacent to the existing terminals.

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-1 regarding the LAX Master Plan role in regional approach to meeting demand, that discusses the roles and responsibilities of LAWA, the City, SCAG, and SCRAA in meeting regional demand and the forecasts and capacities of the other regional airports. Please also see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale, that discusses airline economics and airport choice.

PC00108-5

Comment:

4. Rather than take a comprehensive approach that will address projected demand of 150 million air passengers (MAP) in the region, the Master Plan takes a piecemeal approach that will be quickly overwhelmed. In the absence of viable alternatives, airlines will concentrate flights and resources at LAX.

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.

PC00108-6

Comment:

The Master Plan projects 89 MAP at LAX, but fails to provide any evidence that LAX will not be forced to handle much more capacity.

Response:

The 89.6 million annual passengers (MAP) level of activity projected for Alternative C was defined based on the capacity of the limited airside facilities associated with Alternative C and the expected response of the airlines to the resulting congestion and delays. Please see Response to Comment AL00022-102 regarding the ability of the proposed terminal in Alternative C to serve more passengers. 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.

PC00108-7

Comment:

5. The Master Plan states that one of its goals is to "ensure that new investments in airport capacity are efficient and cost-effective, maximizing the return on existing investment."³ However, the Master Plan does not take into consideration public investment at military bases in Palmdale and elsewhere in the

region. Nor does the Master Plan appear to make any effort to include estimates for the cost of building new and engaging in programs to attract air traffic at airports other than LAX. Without those estimates the Master Plan cannot offer planners and policymakers the necessary comprehensive and meaningful comparison of the costs and benefits of differing approaches to meeting the region's aviation needs.

3 Page 2-1

Response:

A master plan is intended to present the land use and facility plans for a specific airport, in this case LAX. LAWA is attempting to meet a portion of the regional demand, especially for international service. However, LAWA is not attempting to meet all of the regional demand not met by other airports in the region. As described in Topical Response TR-MP-2, LAWA developed Alternative D to be consistent with the SCAG's Regional Transportation Plan. Required investments at the other regional airports to construct facilities to meet certain passenger and cargo activity levels are beyond the scope of the LAX Master Plan and the associated Draft EIS/EIR. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in regional approach to meeting demand, that discusses the roles and responsibilities of LAWA, the City, SCAG, and SCRAA in meeting regional demand and the forecasts and capacities of the other regional airports. Please also see Response to Comment PC00108-4 regarding the limited ability of subsidies and marketing programs to influence airline choices.

PC00108-8

Comment:

6. LAWA's ability to implement the Master Plan will be affected by the Southern California Association of Governments recent decisions to base its Regional Transportation Plan - which has significant influence over the allocation of federal transportation funding - on a scenario which does not include new facilities at LAX, does not include many of the ground transportation improvements that are a part of the Master Plan and assumes that capacity at LAX will not exceed 78 MAP. Those decisions have consequences for how the region will meet demand for air transportation and they must be evaluated.

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, 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 has 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.

PC00108-9

Comment:

7. The Southern California Regional Airport Authority, which has been largely dormant since it was chartered in 1983, was re-constituted and re-vitalized this year. The SCRAA is a Joint Powers Agreement (JPA) whose duties are to "develop, construct, acquire, operate, contract for, repair, transfer, maintain, manage, lease and administer general aviation and commercial air carrier airports and heliports and related facilities, improvements and services."⁴ The role and potential contributions of the SCRAA in designing and implementing a plan to meet the region's demand for air transportation must be included.

4 <http://bos.co.la.ca.us/Categories/Commissions/FactSheets/chii-2.htm>

Response:

Comment noted. Please see Topical Response TR-RC-1 for information on the role of Southern California Regional Airport Authority and the Southern California Association of Government 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 Southern California Regional Airport Authority (SCRAA) back to inactivity. Riverside County voted in July 2002 to withdraw

3. Comments and Responses

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 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.

PC00108-10

Comment:

I look forward to your responses to these concerns and those raised by the residents of the 36th Congressional District and across Southern California who would be affected by proposed expansion and its failure to adopt an approach that truly meets the region's aviation needs.

Response:

Please see Responses to Comments PC00108-1 through PC00108-9 above.

PC00109 Antonovich, Michael County of Los Angeles 6/9/2001

PC00109-1

Comment:

I am Michael D. Antonovich, Mayor of the County of Los Angeles. I appreciate the opportunity to offer preliminary comments on the DRAFT EIS/EIR for Los Angeles World Airport's (LAWA) Proposed LAX Master Plan, however, I must again register my opposition to the decision by the FAA and LAWA to schedule only a single public hearing, conducted concurrently at three separate locations.

Response:

The three referenced hearings on one date were purposefully scheduled to permit easier access and opportunity for public input. Please see Topical Response TR-PO-1 regarding the public hearing process.

PC00109-2

Comment:

Our review indicates the report is seriously compromised by ERRORS, OMISSIONS, & BIASES. We believe the problems are so pervasive and systemic that the only practical remedy is to start the process over. We strongly encourage LAWA to take this step. Despite our concerns, the Los Angeles Board of Supervisors fully understands the importance of LAX to the Los Angeles region, and the need for regional airports which will serve our county's 10 million residents and the millions more who reside in neighboring counties. We offer our comments in this context.

Response:

Comment noted. Alternative D, Enhanced Safety and Security Plan, has been 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. 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.

PC00109-3

Comment:

ALTERNATIVES

Mandate for Alternatives Review

The EIS/EIR FAILS to comply with the cornerstone element of CEQA and NEPA: that an EIR shall describe a reasonable range of alternatives TO AVOID OR LESSEN the SIGNIFICANT ADVERSE EFFECTS of the project. Instead, in this EIS/EIR:

- Of the 25 SIGNIFICANT IMPACTS identified in the Summary Comparison of Environmental Impacts from Alternatives A, B and C (pages ES-40 through ES-59) as significant and unavoidable for any one of the project alternatives:

- 22 are significant & unavoidable for ALL 3 ALTERNATIVES;
- One is unknown for ALL 3 ALTERNATIVES; and
- Only two impacts show ANY variation among alternatives in terms of Severity.

In fact, the preferred 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) and yet fails to meet the full demand scenario (as do the other 2 alternatives, with marginally fewer impacts):

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. We request that the EIR provide an adequate assessment of alternatives.

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 AL00022-43 regarding Alternative C's fulfillment of the project objectives. 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.

PC00109-4

Comment:

Need for Regional Alternative

The EIS/EIR often cites the regional significance of LAX and the Master Plan process -- not only in discussions found throughout the text, but more significantly in the Project Purpose and Objectives. The EIS/EIR also makes frequent mention of its conclusion that "development of other regional airports is not a reasonable alternative to increasing the capacity of LAX" and even goes so far as to tell readers that "23% of the unconstrained potential increases in international air service will be lost to the region" under the No Project Alternative. None of these statements are supported by evidence in the EIS/EIR

Had the 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 EIR cannot be validated.

As you know, I have long been a strong supporter of efforts to develop the role of Palmdale, Air Force Plant 42, and Ontario Airports as key links in the regional airport system. These facilities - all currently underutilized - are located in the heart of the fastest-growing areas of California and offer convenient access to more than 6.5 million people. The Tri-Star Marketing Company's conclusion that Antelope Valley can support a regional airport shows that there is at least the potential for Palmdale to play a key role. THIS POSSIBILITY SHOULD HAVE BEEN EVALUATED IN THE EIS/EIR CUMULATIVE ASSESSMENT OF THE 5-COUNTY STUDY AREA. We request that the EIS/EIR be revised to include a thorough and unbiased evaluation of the REGIONAL AIRPORT ALTERNATIVES.

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Response:

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Response to Comment AF00001-56 regarding the Draft EIS/EIR assumptions pertaining to Ontario International and Palmdale Regional airports. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

PC00109-5

Comment:

NOISE ANALYSIS

Obviously, noise has been one of the critical impacts associated with the expansion of LAX over the years. And it is important to note that this EIS/EIR includes yet another finding of significant noise impact that cannot be mitigated. We do not dispute this finding of significance. But we strongly question whether the EIS/EIR adequately discloses the extent and magnitude of the impact and whether it adequately addresses mitigation.

Extent and Magnitude of Impact: There is a significant discrepancy between the EIS/EIR and data published by LAWA in the magnitude of the noise-impacted population. The EIS/EIR indicates that 49,000 people would live within the 65 CNEL, whereas LAWA's 1996 4th quarter report indicates a population just under 86,000! The difference - almost 37,000 people - is not even presented in the EIS/EIR, let alone explained or reconciled. This discrepancy, which appears due to the failure to reconcile noise computer model results with actual noise monitoring data, must be remedied. It's an incredible oversight.

In the same vein, this EIS/EIR relies on the noise model to identify relative changes between baseline and future alternative conditions - implying that the increased number of impacted people will be the same whether the noise contours are or are not adjusted to reflect noise-monitoring results. In fact, the number of people residing inside the 65 CNEL contour WILL CHANGE - and will be MUCH LARGER than reported in the EIS/EIR.

Response:

Significant noise impacts can be mitigated and are identified in Section 7, Noise Mitigation, of Appendix D, Aircraft Noise Technical Report, Section 7, Noise Mitigation, of the Draft EIS/EIR, and Section 3.1.6, Alternative D Mitigation, of Appendix S-C1 of the Supplement to the Draft EIS/EIR. Additionally, Section 6.1.3, Mitigation of Awakenings, and Section 6.2.3, Mitigation of Single Event Effects on Schools, of Appendix S-C1 of the Supplement to the Draft EIS/EIR address single event impacts. Topical Response TR-N-4 regarding noise mitigation also provides additional information on noise mitigation.

There is a difference in the number of people impacted between the contours identified in the Draft EIS/EIR and the 1996 monitored contours. According to the 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 difference is acknowledged and described in Topical Response TR-N-1 regarding the noise modeling approach and in detail in Section 2.2, Comparison of Environmental Baseline Noise to Quarterly Noise Report, and Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR.

Depending on alternative, Population Newly Exposed to 65 CNEL Compared to No Action/No Project (2015) does show increases ranging from 1,950 to 23,360 people. However, mitigation is not based on these forecasts but based on LAWA's Fourth Quarter 1992 Aircraft Noise Mitigation Program. For more information on noise impacts please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C1 and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

PC00109-6

Comment:

Use of 1996 as Base Year: There will be substantial criticism of using 1996 as the baseline year. And rightfully so -- use of 1996 as the baseline underestimates the impact of the project - even ignoring the contour adjustment issue I mentioned a moment ago. In fact, the LAWA quarterly Noise Reports show that the population inside the 65 CNEL in 1996 was almost 5,000 people higher than in 2000. Use of the 1996 baseline in the EIR results in a smaller impact conclusion than would result with the monitoring data, and fails to account for the reduction in noise resulting from the use of quieter aircraft since 1996.

Response:

Please see Response to Comment AL00033-87.

PC00109-7

Comment:

Project Description and Operational Assumptions: The future operational assumptions presented in this EIS/EIR are in many cases counterintuitive and lack justification - which weakens the reliability of the noise analysis. The following are just a few examples, taken from the Executive Summary:

- Passengers Per Departure: The baseline indicates 91 passengers per departure, while Alternative C assumes 145. How does this increase occur? Does the EIS/EIR assume a relocation of short haul operations to some other airport? Does it assume an increase in average aircraft size? The EIS/EIR never explains this transition, even though it results in nearly a 60% increase in passengers per departure, and greatly reduces the estimated impact for a number of topical issues.

Response:

All Master Plan alternatives assume an increase in passengers per departure from the environmental baseline level. Passengers per departure increase from 90.76 in the environmental baseline to 145.09 in Alternative C due to an increase in the size of the aircraft and subsequently an increase in the number of passengers. The Master Plan alternatives are considered constrained alternatives because none have the runway capacity needed to meet the forecast demand in 2015 without changes in the activity profiles. The alternatives were designed to maximize the amount of traffic that could be served in the limited space available. Increasing the size of the aircraft allowed each alternative to maximize its passenger capacity with little effect to the constrained airfield system. For further discussion of the Master Plan alternatives' activity profiles please see Chapter V, Section 3.3.2 of the Draft Master Plan.

PC00109-8

Comment:

- Cargo Activity/Cargo Building Space: The baseline cargo activity shows 1.9 million tons of cargo using 1.9 million square feet of space. The preferred project alternative (C) assumes about the same ratio -- 4.1 million tons of cargo using 5 million square feet of space. In other words, the future ratio assumes that new cargo facilities are no more efficient than the old LAX facilities - even though modern facilities can handle twice the amount of cargo per square foot. Again, the net effect of this assumption is to greatly understate potential impacts: a doubling of actual cargo handling translates to a lot more traffic, and a lot more pollutant emissions, and a lot more noise, than what the EIS/EIR assumes.

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. For the No Action/No Project Alternative, the cargo tonnage forecast is constrained to 3.1

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MAT, the current capacity of the cargo facilities. The new Enhanced Safety and Security Plan, 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 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 were 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. Please also see Topical Response TR-AQ-3 regarding air pollution issues.

PC00109-9

Comment:

- Maximum Airside Capacity: The 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. What if improved technology results in increases in airside capacity? Given the increase in terminal space, how much air traffic could those terminals handle?

Response:

Most technology enhancements that are applicable at LAX have the potential to increase efficiency and safety, reduce controller workload, and/or reduce delays but typically do not significantly improve sustainable hourly throughput. Please see Response to Comment AL00036-30 for further discussion on the impact of technology improvements on capacity.

PC00109-10

Comment:

- Terminal Space/Number of Gates: Alternative C would nearly double terminal space (from 4 million square feet to 7.3 million), but would only increase the number of gates from 165 to 172. Even accounting for larger craft, this projection suggests that the project may have a larger gate capacity than is being reported. Is this so? If the answer is yes, why is it not accounted for in the noise analysis?

Response:

Please see Response to Comment AL00022-102 regarding the ability of the proposed terminal in Alternative C to serve more passengers. Alternative D, the new LAWA staff-preferred alternative, reduces the total number of gates at LAX from 163 to 153, as indicated in Table S3-2 of the Supplement to the Draft EIS/EIR.

PC00109-11

Comment:

- Health Effects of Noise Technical Report: The Noise Technical Report contains a generalized discussion of the effects of noise on people, concluding 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 it fails to acknowledge that LAX is not in compliance with the compatibility criteria. Nevertheless, no further analysis is provided! Can it be concluded that noise levels associated with aircraft operations at LAX have adverse health effects on people?

Response:

Please see the Draft EIS/EIR and Supplement to the Draft EIS/EIR Section 4.24.2.4.1, CEQA Thresholds of Significance, in Section 4.24.2, Health Effects of Noise (CEQA), which addressed the degree of significance necessary to cause health effects. Secondly, Section 4.24.2.9, Level of Significance After Mitigation, discusses the proposed mitigation measures that would reduce noise impacts in both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

PC00109-12

Comment:

Mitigation of Noise Impacts: The project includes no noise mitigation recommendations for the proposed project. We understand that LAWA has an ongoing noise mitigation program that has periodically introduced new programs. What is not clear is why the proposed project does not address any new noise mitigation programs. Ironically, several measures are discussed but not recommended, including several that we strongly believe should be given further consideration:

- Shorten the downwind leg approach to reduce the number of flights over communities well east of the airport
- Eliminate early turns over El Segundo.
- Reevaluate the benefit of restricting outboard runways to arrivals only; and
- Consider expanding the sound insulation program to homes in 60 CNEL contour.

We ask that the EIS/EIR discussion at least consider these mitigation options and, if they are rejected, provide the reasoning for our review and comment.

Response:

Efforts to eliminate early turns over El Segundo and Playa del Rey are incorporated into the recommended mitigation actions for each project alternative. The restriction of the outboard runways to arrivals only was evaluated and rejected because it would significantly increase delays at the airport (see Sub-Section 7.2.2, Alternative C, which is located in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR). Modifications to the downwind approach to reduce the number of flights over communities beyond the 65 CNEL contour were undertaken independent of the Draft EIS/EIR process, for more information, please see Subtopical Response TR-N-3.5. Expansion of the sound insulation program to all homes within the 60 CNEL contour is rejected as ineffective in meeting the required interior noise level reduction set forth by the FAA for funding and support of sound insulation programs. However, based on recent Court of Appeal ruling in the "Berkeley Jets" case at Oakland International Airport, additional sound insulation is recommended for areas exposed to single event Sound Exposure Levels (SEL) in excess of 94 decibels, if a recommended restriction on easterly departures during the night hours fails the required tests under FAR Part 161. Please see the noise mitigation program, mitigation measures MM-LU-1 and MM-LU-2 in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR. Additionally, please see Response to Comment AL00022-106 regarding shortening the downwind leg, elimination of early turns over El Segundo and the benefit of using outboard runways for arrivals only.

PC00109-13

Comment:

AIR QUALITY

The Air Quality Assessment suffers from similar flaws, including misleading assumptions and incomplete quantitative data. I'll touch on just a few of these:

Failure to Compare Monitoring with Modeling: Once again, the analyses were based on modeling that WAS NOT COMPARED with the available monitoring data: there is no way for the reviewer to determine whether the models do a reasonable job of predicting impacts, and thereby develop confidence in the model predictions. Moreover, the lack of a benchmark analysis for existing conditions makes it difficult to have confidence in the model predictions for the future alternatives.

Response:

The air quality analyses for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR were performed using dispersion models listed as "preferred" in Appendix W to 40 C.F.R. Part 51, the "Guideline on Air Quality Models". These models represent the state of the science when used in the appropriate applications.

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PC00109-14

Comment:

Errors in predicted pollutant concentrations: Our review suggests that the predicted carbon monoxide and nitrogen dioxide concentrations from on-airport sources for future scenarios may be too high when compared to the Environmental Baseline, while the predicted carbon monoxide concentrations at off-airport locations appear to be too low. Moreover, LAWA did not analyze the mitigated carbon monoxide concentrations at off-airport intersections. All of these errors would tend to understate project impacts, and in some cases by a large factor.

Response:

The Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix G and Technical Report 4. Updates to this analysis and methodologies were addressed in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix S-E and Technical Report S-4. Since publication of the Draft EIS/EIR, the air quality impact analysis has been updated to incorporate a more detailed methodology for estimating 1-hour NO₂ concentrations. A detailed discussion of the NO to NO₂ concentration estimation was provided in Section 4.6.2.3, Air Dispersion Modeling, of Section 4.6, with supporting data contained in Technical Report S-4. Off-airport, on road emissions, were originally analyzed using EMFAC2000 emission factors, and since publication of the Draft EIS/EIR, have been reanalyzed using the more recently available, EPA approved, EMFAC2002. As pre-mitigation CO concentrations at off-airport intersections were all calculated to be below significance thresholds, no additional analysis of mitigation measures is required.

PC00109-15

Comment:

Ineffective mitigation measures for addressing NO_x emissions at LAX. The EIS/EIR concludes that NO_x is the only parameter that would have significant impacts from on-airport sources, yet the EIS/EIR finds that NO_x emissions will be reduced least by proposed mitigation measures. If so, the proposed mitigation measures do not successfully address this issue, and require further work.

Response:

The Supplement to the Draft EIS/EIR included a revised air quality mitigation measure with many components, that describes in greater detail those efforts being carried forward and their associated control efficiencies. LAWA intends to adopt and implement all feasible mitigation measures. It is important to note the mitigation measures for some types and sources of pollutants are more readily available than others. There are very few available and feasible mitigation measures to reduce NO_x. Those measures which are currently available are insufficient to mitigate the NO_x-related impacts of the project to below a level of significance.

PC00109-16

Comment:

INADEQUATE SCOPING

I noted earlier that the EIS/EIR makes frequent mention of the regional significance of the Master Plan process, both in the analyses and in the Statement of Purpose and Objectives. Nevertheless, the scoping outreach effort did not include a single agency within the county governments of San Bernardino County, Kern County, Orange County, Riverside County, or Ventura County. Nor did the scoping outreach include any municipal agencies, or airport officials, or businesses or services within any of these 5 counties -- many of whom would surely have a strong interest in the regional issues raised by this project. This is a serious omission that requires remedy.

Response:

Comment noted. Please see Response to Comment AL00007-1 regarding the scoping undertaken for the LAX Master Plan.

PC00109-17**Comment:****CLOSING COMMENTS**

We strongly encourage LAWA to start this project over, beginning with a scoping process that acknowledges the regional nature of the undertaking, and followed by a fresh look at alternatives that includes at least one regional option among them. If LAWA is willing to take the step of reevaluating its options through a strengthened EIS/EIR, we will lend our assistance and support to the effort. The LAX Master Plan is an important undertaking with significant ramifications for the Los Angeles region. Clearly, this effort will require broad leadership to bring it to reality. We hope that LAWA will reach out to the County and other agencies in the region in support of this goal.

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. 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.

PC00110**Ichien, Joanne****None Provided****6/9/2001****PC00110-1****Comment:**

I am a resident of a neighborhood that will be negatively impacted by the plans to expand LAX. While I understand that there may be a need to accommodate more air traffic into the Los Angeles area, I do not understand why this need has to be completely accommodated by LAX. I understand that any of the variations under the LAX Master Plan will expand the size and capacity of LAX thus addressing the demand for increased access. However, I do not understand why LAX is the only airport being considered for expansion. At least some of the burden of increased air traffic to the Los Angeles area should be borne by the existing Ontario and Burbank airports. How about a study of developing another airport in the Inland Empire or any other area not currently being served by an area airport?

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.

PC00110-2**Comment:**

This community has been plagued by a great deal of development of late. With the never-ending development of Playa Vista and the Howard Hughes Center the residents here have been incredibly

3. Comments and Responses

patient while being subjected to what seems like ever-present building and road construction. It seems foolish and incredibly shortsighted to consider further development in an area where it is still unknown what actual environmental, economic and quality of life impact the current development will have.

Response:

Comment noted. Please see Response to Comment AL00018-19 regarding the evaluation of cumulative impacts in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

PC00111 Wyant, Leslie None Provided 6/9/2001

PC00111-1

Comment:

During the last eight years golfers at Westchester golf course have been told not to worry about the three holes removed from the course to build what is now being called the Ring Road. And that the holes would be replaced on land next to the course. We all know that the property used for the golf course belongs to the airport, but the community, in my opinion, needs the golf course much more than the airport needs the property. People from a radius of five or more miles are always on the course, and for the airport commission and city not to provide for replacement of these holes is at best irresponsible.

Response:

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed parks and recreation impacts in Section 4.26.3, Parks and Recreation. As discussed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, Westchester Golf Course would be expanded by six acres under Alternatives A, B, C, and D. This additional acreage would replace the three holes of golf that were lost when Westchester Parkway was constructed.

PC00111-2

Comment:

Local activists and government representatives seem to be more concerned about butterflies and bugs than the needs of people in the community. No useable open or recreational space has been created for humans since I moved here more than thirty years ago.

Response:

Comment noted.

PC00112 No Author Identified, Hillside Memorial Park & Mortuary 6/11/2001

The content of this comment letter is identical to an attachment contained in comment letter AL00018; please refer to Responses to Comments AL00018-121 through AL00018-130.

PC00113 Christensen, V. Lorene None Provided 6/11/2001

PC00113-1

Comment:

Please listen to our Congressional & County Representatives Jane Harman & Don Knabe. They are proposing sane & fair solutions to the issue of airport expansion. Other large cities such as New York, Chicago & Minneapolis are not limiting themselves and endangering their people by having only one huge airport in their area. We must consider all eventualities so that terrorists attacks, earthquake

disruptions or large plane collisions do not shut down the entire community. A regional plan would serve to protect all people and allow sharing of all responsibilities.

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.

PC00114 Greer, Andrew None Provided 6/8/2001

PC00114-1

Comment:

As a resident of Santa Monica who lives close to the flight path of the Santa Monica Airport, the problem with small corporate jets taking off continues to be a significant problem.

- 1). These small jets do not appear to have any noise abatement design as they are extremely noisy and disruptive.
- 2). The take off pattern of these jets contributes to significant noise levels, well above what should be endured by residents.
- 3). Diverting small private jets to the Santa Monica Airport as one means of improving air traffic at LAX is a bad idea. I will oppose any plan or effort to do so as it will have serious negative impact on the quality of my life, the environment (noise and pollution) and traffic.
- 4). The area surrounding Santa Monica Airport is strictly residential and there is limited traffic access to the airport area. Any additional traffic would only further burden a congested area.
- 5). Increasing jet traffic through Santa Monica Airport to benefit LAX is putting private interests against those of individuals. Any increase in air traffic here would negative affect property values, quality of life, air quality and noise pollution.

Both my wife and I are against any plan to expand, divert or otherwise attempt to utilize Santa Monica Airport as an alternative in the LAX Master Plan.

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.

**PC00115 Sidney-Fryer,
Donald None Provided 6/9/2001**

PC00115-1

Comment:

Altho' the immediate area (North Kentwood) where I live (Westchester) is only minimally impacted in a negative way by LAX in terms of its everyday operations, nonetheless I fail to see how further

3. Comments and Responses

expansion of the existing facilities & services will improve or benefit anyone's life in and around LAX, anyone who does not work for the airlines or at the airport.

Response:

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-LU-2 regarding impacts to the community of Westchester. 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.

PC00115-2

Comment:

Is it not now the time to revive & put into effect the So. Cal. Regional Airport Authority as originally planned,

Response:

Comment noted. 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 Southern California Regional Airport Authority (SCRAA) back to inactivity. 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 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.

PC00115-3

Comment:

and "fairly distribute both the benefits and burdens of aviation needs" across all or more of So. Cal. - ? Let us "give priority to airports eager for more growth like Palmdale & Ontario," as advocated by Congresswoman Jane Harman!

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. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

PC00116 Acker, Sandy None Provided 6/8/2001

PC00116-1

Comment:

I love Westchester and do not support the LAX Expansion! Please do not allow the LAX Expansion to happen! If it is approved, the quality of life will decrease here; with an increase of noise, pollution, traffic, & the value of our homes will be greatly reduced!

Please do not support LAX Expansion!

Response:

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-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester and Topical Response TR-ES-1 regarding residential property values. 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.

PC00117 Topek, Bob & Mary None Provided 6/11/2001
Jane

PC00117-1

Comment:

Sorry it's not how would, the expansion affect us it is how it already has affected us. -

First, we have lived in Hermosa for 35 years, except for 1978, there was a problem with planes flying the Dagget loop. Settled by a judge in Inglewood. -

- The last 5yrs. since LAX decided to expand the airport, it has been very unpleasant living with the constant noise. - The original reason given for the change in flight pattern was the cost of fuel to the airlines. Well, the airlines have put a surcharge on every ticket sold for gas or fuel. So why hasn't the flight pattern changed, so they're not flying over our homes?

- The planes use to (5 yrs ago) fly straight over ocean, 3-5 miles gaining altitude before turning over land. We very seldom heard the planes over our home. Now the planes barely clear the breaking surf before turning and flying (low) over our homes.

Response:

Please see Topical Response TR-N-3 regarding aircraft flight procedures, particularly Subtopical Response TR-N-3.1 which describes the changes that have occurred in flight patterns during recent years. These have been implemented independently of the Master Plan and are not a part of the Master Plan impacts. In addition, please see Appendix D, Aircraft Noise Technical Appendix, of the Draft EIS/EIR for more information and Appendix S-C1 of the Supplement to the Draft EIS/EIR. .

PC00117-2

Comment:

The noise is constant and unbelievable. We have noise from jets flying the Dagget loop, private planes, helicopters, blimp and in the summer the banner planes, plus LAX this year, has been doing something with take offs, that we can hear 4 miles away!!

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Response:

Please see Topical Response TR-N-3 regarding aircraft flight procedures, particularly Subtopical Response TR-N-3.1 regarding flight routes relative to areas of the South Bay being overflown by new routes and Subtopical Response TR-N-3.2 regarding early turns over areas north and south of LAX.

PC00117-3

Comment:

- I went to the scam of a LAX meeting on June 9. Not 1 of the maps presented had Hermosa or Manhattan included. Why? We're not being affected by the noise? When I spoke to the agent from LAX (on the noise problem) all he wanted to talk about was the plane noise on the ground. When I asked about noise over homes - he went back to mantra about noise on ground. No one I questioned had an answer as to why our area wasn't on the area maps.

Response:

As was shown on Figure 4.2-5 of the Draft EIS/EIR, the cities of Hermosa Beach and Manhattan Beach are outside the current ANMP boundaries that define areas exposed to high noise levels (based on the 1992 fourth quarter 65 CNEL or greater noise contours). As was also shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the area within the 65 CNEL noise contour has decreased from 1992 conditions. As was presented in Section 4.2.6, Environmental Consequences, of the Draft EIS/EIR, these cities would not be exposed to high noise levels under Alternatives A, B, and C. As shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the cities of Hermosa Beach and Manhattan Beach are outside of areas exposed to high single event noise levels (as defined by the 94 dBA SEL noise contour) and would not be newly exposed to high single event noise levels under Alternatives A, B, C, and D. In addition, Section 4.2.6 of the Supplement to the Draft EIS/EIR concluded that development of Alternative D would not exposed the cities of Hermosa Beach or Manhattan Beach to the 65 CNEL contour. Therefore, based on the thresholds that were presented in Section 4.1.4, Thresholds of Significance, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, no significant impact from aircraft noise has been identified for the cities of Hermosa Beach or Manhattan Beach. In addition, please see Topical Response TR-N-3 regarding South Bay overflights.

PC00117-4

Comment:

We'd like to be able to open our windows or be outside & not hear the constant roar of planes.

Response:

Please see Topical Response TR-LU-4 for a discussion of outdoor noise levels and Topical Response TR-LU-5 regarding thresholds used to identify significant noise levels.

PC00117-5

Comment:

The year 2001 has been the worst in the so called proposed expansion of LAX. They've already done it, and they don't care about the effects on the citizens.

Response:

LAWA has not undertaken any activities to implement the Master Plan. Moreover, the Master Plan will not be implemented until the Final EIS/EIR is certified by the City of Los Angeles; the City Council approves implementation of one of the alternatives, makes written findings, and adopts a Statement of Overriding Considerations, if needed; and the Federal Aviation Administration publishes a Record of Decision.

PC00117-6**Comment:**

Here is a partial list of a day noise. These days are happening a least once a month. The last day was Wednesday June 6. I didn't begin recording until late afternoon, but it began at 7:04 am.

3:06 pm	10:31	12:04 AM
3:11	10:38	12:06
3:14	10:40	called FAA
3:19	10:55	12:32
3:25	11:02	12:34
left home	11:05	1:05
6:53	11:07	1:14
6:55	11:12	1:21
called FAA		
10:08	11:19	1:24
10:16	11:23	1:35
	11:43	2:09
	11:45	2:18
		2:23
		3:00 finally went to bed
		7:12 AM & begins again every 5-6 min. . -

I think you'll agree this is a bit excessive! We are not speaking about an occasional fly over, but about a constant assault of noise. Was there an environmental study done on the effects of LAX expansion plan?-

Response:

Comment noted. Please see Response to Comment PC03011-7 which was received from the same commentor and contains a list of aircraft events similar to the comment above. Relative to an environmental study of the effects of the LAX expansion plan, in the year 2000, LAWA completed a combined Draft Environmental Impact Statement/Environmental Impact Report for the four selected alternatives identified in the LAX Master Plan. The comment period was initiated in January 2001 and extended twice through the month of November 2001. This comment takes advantage of the opportunity for the public to comment on the contents of the environmental analysis document. In addition, a Supplement to the Draft EIS/EIR providing additional analysis related to the LAX Master Plan, including evaluation of a fifth alternative, was completed in July 2003.

PC00118**Smalley, Mary****None Provided****6/10/2001****PC00118-1****Comment:**

Expanding LAX is wrong. Los Angeles County is too spread out on its own, without taking on the surrounding counties for transportation, whether people or cargo. Other counties should have their own airports, then there would be less commuting back & forth. There is plenty of room around Palmdale and El Toro. There is no more room around LAX.

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

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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.

Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

PC00119 Smalley, John None Provided 6/10/2001

PC00119-1

Comment:

DO NOT EXPAND LAX MAKE IT SMALLER AND MORE EFFICIENT.

Bigger does not mean better!

Response:

Comment noted. 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.

PC00120 Wood, None Provided 6/10/2001

PC00120-1

Comment:

No LAX expansion.

Please put people of Westchester, Inglewood, and El Segundo first, foremost and primary before selfish motives -- the almighty dollar.

When do you reach the point of satisfaction?

Response:

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. 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.